



April 6, 2018

Eric L. Lohrenz  
Chief Counsel  
Illinois Department of Natural Resources  
1 Natural Resources Way  
Springfield, Illinois 62702-1271

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**Francine Washington**  
*Board of Commissioners*

**Eugene Jones, Jr.**  
*Chief Executive Officer*

**José R. Alvarez**  
*Chief of Staff and*  
*Chief Operating Officer*

Re: New Construction of Chicago Public Library Branch and  
Daycare Facility, Altgeld Gardens – 951 E. 132<sup>nd</sup> Pl., SE Corner  
131<sup>st</sup> Street and Ingleside Avenue, Chicago, IL. – SHPO  
Log#006030917

Dear Mr. Lohrenz:

Enclosed, please find an original executed Chicago Housing Authority (“CHA”) signature page evidencing the CHA’s concurrence with the Illinois Department of Natural Resources’ “No Adverse Effect with Conditions” Letter.

Should you require anything further from CHA in connection with this matter, please contact me directly at (312) 913-7134.

Sincerely,

  
LaRue Little  
Deputy General Counsel

Chicago Housing Authority  
60 E. Van Buren  
12th Floor  
Chicago, IL 60605

o 312-742-8500

[www.thecha.org](http://www.thecha.org)



# Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271  
www.dnr.illinois.gov

Bruce Rauner, Governor  
Wayne A. Rosenthal, Director

FAX (217) 524-7525

Cook County  
Chicago

New Construction of Chicago Public Library Branch and Daycare Facility, Altgeld Gardens  
951 E. 132nd Pl., SE Corner 131st St. and Ingleside Ave.  
SHPO Log #006030917

March 29, 2018

Lynn A. Crivello  
Chicago Housing Authority  
60 E. VanBuren St., 8th Floor  
Chicago, IL 60605

Dear Ms. Crivello:

This letter revises the Illinois State Historic Preservation Office (SHPO) determination of effects for the undertaking submitted by the Chicago Housing Authority (CHA) on February 26, 2018. Based upon recent conversations and further consideration of effects, we are now making a determination of No Adverse Effect with Conditions for the proposed library and community Center in the National Register-eligible historic district of Altgeld Gardens.

Our review is required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, "Protection of Historic Properties" (36 CFR 800). Altgeld Gardens was previously determined eligible for listing in the National Register of Historic Places, under Criterion A for Community Planning and Development and under Criterion C for Architecture, on October 22, 1992 (IHPA Log # 01092192). The Stores Building, designed by the renowned architecture firm of Keck and Keck, was determined to be individually eligible for listing in the National Register of Historic Places on May 20, 2015 (IHPA Log # 001082213). Prior to that, in a letter written on January 17, 2014, our office had concurred with the Chicago Housing Authority (CHA)'s determination of eligibility of that same building (also called the Retail Building or Building 7).

In our first comment letter on this undertaking, dated March 23, 2017, for which we reviewed only a block diagram, we made an initial determination of no adverse effect, with conditions, stating that our office expected that the CHA and the City of Chicago's Fleet and Facility Management (2FM) would submit schematic design drawings and design development plans as they progressed. Then, in our letter of February 26, 2018, we wrote that the design and location of the new public library and community center constituted an adverse effect to Altgeld Gardens, in accordance with 36 CFR 800.5, as the fully developed and finalized plans for the project were for a building and landscape that were not compatible with the historic district and did not meet the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties (Standards).

Further, we advised CHA to notify the Advisory Council on Historic Preservation (ACHP) of this finding to determine if they wished to join the consultation process. Lastly, we proposed mitigation measures to be considered for inclusion in a Memorandum of Agreement document that our office would prepare with other consulting parties.

After reconsidering the proposed design—including Koo Architecture’s explanation of the design precedents in the curved façade of the Stores Building, which were intended for reference within the design of the new library, and changes to the landscape plan that will preserve more historic landscape features—the SHPO is revising its determination of this undertaking to No Adverse Effect to Altgeld Gardens, provided that the conditions listed below are accepted and met. Our office recognizes the significant community value of this project and wishes to help the CHA meet the impending deadline by which the general contractor must begin construction of the new building. Considering this urgency and after consultation with staff at the CHA, 2FM, the ACHP, the U.S. Department of Housing and Urban Development (HUD), and the Office of Governor Bruce Rauner, we recommend that we complete our Section 106 review of this undertaking by your concurrence with the determination that there is No Adverse Effect with the following conditions:

1. CHA will retain a qualified architectural historian to work with the community and with the SHPO staff, as needed, to prepare a nomination and list Altgeld Gardens in the National Register of Historic Places. The nomination should be completed and submitted to the SHPO for review by the Illinois Historic Sites Advisory Council (IHSAC) within twenty-four (24) months of this letter. The complex will be nominated as a historic district, with the Stores Building as a contributing resource therein, under the following criteria:
  - a. Criterion A, considered at the local and national levels of significance, in the three areas of Community Planning and Development, Politics/Government, and Social History. As a complex designed and constructed by the federal government to provide housing for African-American veterans of World War II and their families, the roles of both local and federal government in its successful completion should be explored and documented within the nomination. The statement of significance should place Altgeld Gardens within the context of planning and design of that era’s public housing. Further, the nomination will document Altgeld Gardens’ role in the evolution of the environmental justice movement nationwide beginning in the late 1960s and early 1970s, which directly resulted in Environmental Justice Executive Order 12898, which President Bill Clinton signed on February 11, 1994, with Hazel Johnson attending at the White House in recognition of her achievements in forwarding the national discussion of environmental justice.
  - b. Criterion B, considered at the local level of significance, for Altgeld Gardens’ association with resident Hazel Johnson, widely recognized as a founder of the environmental justice movement of the mid- to late-twentieth century. Ms. Johnson and her organization, People for Community Recovery, worked to elevate awareness of the environmental and health hazards of asbestos and the need for its removal, which was bolstered with assistance from future senator and President Barack Obama, and their efforts received coverage in newspapers and magazines with nationwide distribution.

- c. Criterion C, considered at the local level of significance, for Architecture. The statement of significance will place Altgeld Gardens within a national context for town planning, public housing, and modern architecture, but emphasize its comparison to designs within the City of Chicago.

Generally, the period of significance for the nomination will be 1944 through 1994, when the Executive Order 12898 was signed. The period of significance for Architecture will be 1944 through 1948, which reflects the date of design or construction through the Stores Building's appearance in the June 1948 issue of *Progressive Architecture*, a magazine with professional readership nationwide. The statement of significance that describes Hazel Johnson's work and Altgeld Gardens' role in the national movement for environmental justice will be prepared such that it will be clearly demonstrated that Altgeld Gardens easily meets Criterion Consideration G for resources that have achieved historic significance less than 50 years ago.

2. The revised landscape plan, Option 2, that was emailed to this office on March 8, 2018, by Kevin Parzych of Koo Architecture will be constructed as part of the undertaking. Our reply on March 19, 2018 to Koo and CHA staff stated our preference for Option 2, which preserves the greatest amount of significant features of the historic central plaza.

In addition, we request that CHA conduct training on the Section 106 process, within twelve (12) months of this letter, for relevant CHA and HUD staff and staff from other pertinent City and State agencies, including 2FM, the Illinois Housing Development Authority (IHDA), and the Illinois SHPO. We trust that you will make scheduling this training a priority, and we will be pleased to participate.

Please indicate your concurrence with this No Adverse Effect determination and stated conditions by signing on the lines below, and return the signed letter to our office. If you have questions, please contact me at (217) 785-5031, or at [rachel.leibowitz@illinois.gov](mailto:rachel.leibowitz@illinois.gov).


Sincerely,



Rachel Leibowitz, Ph.D.  
Deputy State Historic  
Preservation Officer

- c: Eleny Ladas, U.S. Dept. of Housing & Urban Development  
Kevin Laberge, City of Chicago, Illinois  
John D. Gerut, Chicago Housing Authority  
Erik Sandstedt, U.S. Department of Housing and Urban Development  
Angela Brooks, Chicago Housing Authority  
Diana Liu, Chicago Housing Authority

CONCUR



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Eugene E. Jones, Jr.  
Chief Executive Officer  
Chicago Housing Authority

4/2/18  
\_\_\_\_\_  
Date

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David J. Reynolds  
Commissioner  
Chicago Fleet and Facility Management

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Date