

**Casa Durango Section 106 Consultation**  
**2008-12 S. Ashland Ave.**  
**Response to Consulting Party Comments – May 26, 2021**

The Chicago Department of Assets, Information and Services (AIS) contacted potentially interested members of the public, organizations, and tribes on April 13, 2021 to request participation as a consulting party and to solicit comments to the proposed undertaking. AIS included a summary fact sheet which described the project, discussed the Illinois State Historic Preservation Office (SHPO) determination of an adverse effect, provided the proposed Area of Potential Effect (APE), and detailed a proposed mitigation strategy. AIS established a 30-day comment period which ended on May 14, 2021. Comments and questions from the consulting parties are presented below in order of receipt. This document has been developed to meet documentation requirements under 36 CFR 800.4 and is intended to provide a response to the comments received.

### **Consulting Party Comments Received**

1. **Consulting Party:** Preservation Chicago

**Date:** April 14, 2021

**Comments:** Noting that the building at 2012 S. Ashland is a fine quality building, which appears from both interior and exterior photos to be in good condition (as viewed from your attachments submitted to us), would there be the opportunity to preserve and integrate this structure into the proposed new development? The proposed development spans several adjacent mostly vacant parcels and we could see this historic structure as a component of that larger development site and plan.

It would appear reasonable that this building could be nicely integrated into the new proposed residential development, save a historic resource and address in a profound way, the adverse effects on this particular structure and the overall project.

In addition, it would keep a contributing historic building standing, fronting Ashland Avenue and the historic streetwall, which is so very important in Pilsen and along this stretch of Ashland Avenue. Another positive outcome is it would keep another fine building from being demolished and added to landfill---a total waste of a historic building.

**Response:** The Resurrection Project's (TRP) goal is to bring new units of affordable housing to Pilsen, a community facing the pressures of gentrification and desperately in need of affordable housing resources.

TRP values the historic resources in our community and we try to save and restore them where it is feasible. Throughout our history, we have successfully adapted and reused a number of historic buildings for affordable housing and economic development projects. For example, TRP

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has completed three historic preservation projects in Pilsen and saved these historic buildings for future generations. In 1997, TRP completed the renovation of Casa Guerrero at 963 W. Cullerton St. This project involved the restoration of a historic warehouse building and we successfully converted it into 25 units of multifamily affordable rental housing. In 2002, TRP completed the renovation of Casa Puebla at 2014 S. Racine Ave. This project involved the restoration of a historic building and converted it into 52 units of multifamily affordable rental housing. In 2019, TRP completed the renovation of Casa del Sol at 2008 S. Blue Island Ave. The building at 2008 S. Blue Island Ave. was originally built in 1889, and this project involved restoring the building's historic features and preserving it as a 53-unit single room occupancy with rents maintained as affordable to extremely low-income individuals. Most recently, as part of our Casa Veracruz portfolio renovation, we have renovated and preserved the historic features of several contributing structures in the Pilsen Historic District, including 967 W. 19th St., 1313 W. 19th St., 1714 W. 19th St., 1712 W. 17th St., 1427 W. Cullerton St., and 1646 S. Throop St.

At the outset, TRP did evaluate the possibility of reusing the existing building at 2012 S. Ashland Ave. as part of this new affordable housing development. However, in this case, reuse proved economically and logistically challenging for a number of reasons. The existing building is commercial and has never been used as residential. The adaptation to residential use is difficult and costly. If the building were kept, TRP would only have been able to achieve 2-4 units at a per square foot cost that greatly exceeds the cost of new construction. Additionally, due to the existing configuration of the building entrance, it would have been very challenging to make those units accessible or visitable for persons with disabilities. Finally, the building has significant structural, environmental, and life safety challenges that increase the cost of preservation especially considering its relatively small size and the number of units it can accommodate. Removing the building will make it feasible to create more units of affordable housing.

Affordable housing projects are developed and supported through a variety of public funding resources, and those resources are scarce. In the end, the project simply does not have the resources to pursue a preservation route. In addition, TRP believes in the value of maximizing those public resources to house as many families as possible, and the new construction allows us to bring 16 new units of affordable housing to this site. We strongly believe that these 16 affordable units will be a valuable and welcomed addition to the community.

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2. **Consulting Party:** Forest County Potawatomi Community of Wisconsin

**Date:** April 19, 2021

**Comments:** We have consulted our cultural resources database and archival materials. The Tribal Historic Preservation Office on behalf of Forest County Potawatomi Community would like to offer the finding of NO HISTORIC PROPERTIES AFFECTED. Should the SHPOs comment differ, the Tribe reserves the right to revisit the finding offered. In the case of inadvertent discovery of human remains and/or archaeological materials, the Tribe requests to be notified of discovery and to participate in consultation regarding treatment and recovery protocols, prior to removal, with appropriate state and federal agencies.

**Response:** AIS replied to the Forest County Potawatomi Community on April 26, 2021 to clarify that SHPO did find an adverse effect and to invite further comments if that changed their finding. AIS received a response from the Forest County Potawatomi Community on April 27, 2021 indicating their determination does not alter the SHPO determination.

AIS acknowledges the importance of historic, cultural, and archaeological materials of significance. The proposed mitigation will include a Memorandum of Agreement with a provision for post-review discoveries, including the unanticipated discovery of human remains or burials. In addition to immediately stopping work within the area of discovery, such provision will also require notification and consultation with representative Tribal Historic Preservation Officers (THPO) in addition to SHPO.

3. **Consulting Party:** Advisory Council on Historic Preservation (ACHP)

**Date:** April 29, 2021

**Summary of Comments:** AIS received a letter from ACHP declining to participate as a consulting party for this project. ACHP concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of their regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. ACHP reserved its right to reconsider its decision in the event it received a request for participation from the SHPO, THPO, affected Indian tribe, a consulting party, or other party. ACHP advised, pursuant to Section 800.6(b)(1)(iv), that AIS will need to file the final Section 106 agreement document (Agreement), developed in consultation with the SHPO and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process.

**Response:** AIS acknowledges ACHP's comments. No additional response required at this time.

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4. **Consulting Party:** Fr. Charles W. Dahm, O.P. (Archdiocese of Chicago Domestic Violence Outreach)  
**Date:** May 9, 2021

**Summary of Comments:** Supporting the construction of 16 affordable units at 2008 -2012 S. Ashland and removal of the building at 2012 S. Ashland to accommodate this new construction.

**Response:** AIS acknowledges support for the project. No additional response required at this time.

5. **Consulting Party:** Miami Tribe of Oklahoma  
**Date:** May 14, 2021

**Comments:** The Miami Tribe offers no objection to the above-referenced project at this time, as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site. However, given the Miami Tribe's deep and enduring relationship to its historic lands and cultural property within present-day Illinois, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery.

**Response:** AIS acknowledges the importance of historic, cultural, and archaeological materials of significance. The proposed mitigation will include a Memorandum of Agreement with a provision for post-review discoveries, including the unanticipated discovery of human remains or burials. In addition to immediately stopping work within the area of discovery, such provision will also require notification and consultation with representative Tribal Historic Preservation Officers (THPO) in addition to SHPO.