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July 20, 2023

Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

To the Advisory Council on Historic Preservation:

Landmarks Illinois appreciates the opportunity to respond to the Advisory Council for Historic Preservation's call for comments on the application and interpretation of the Secretary of the Interior's Standards for Historic Properties (Secretary's Standards). Through our work across Illinois, our staff has the opportunity to observe the current application of the Secretary's Standards in a variety of real-world scenarios, and we welcome this chance to share the perspective of our experience.

The Secretary's Standards are a framework to preserve history, design and craftwork. They are based on the presumption that materials encapsulate and express a place's historic value and significance. If enough material is altered, significance is viewed as compromised. This presumption overlooks that there are multiple ways to convey importance, and that the story and value of a place is not limited to its materials. It also leaves little room for flexibility or creative solutions. Many of the changes that enable historic buildings to respond to equity, housing-supply, energy-efficiency, renewable energy and climate change-related concerns are made in opposition to the Secretary's Standards, not because of, or in harmony with, them. When assessed as part of the Section 106 process under the National Historic Preservation Act, it is common for these changes to be labelled adverse effects and to be allowed to go forward only with accompanying mitigation. These processes set historic preservation up as an impediment rather than as part of the solution to many of the most pressing concerns currently facing people and the built environment. Preservation can be a solution only when we don't get in the way.

In its pending policy statement on climate change and historic preservation, the ACHP calls attention to the need to reuse older and historic buildings and to encourage the thoughtful retrofit of those buildings to be more energy efficient. But the ability of historic buildings to be part of climate change solutions is limited by the common interpretation of the Secretary's Standards that interventions that are visible to the public constitute an adverse effect. At the Dearborn Homes, a Chicago Housing Authority

(CHA) property in Chicago, the CHA installed rooftop solar panels on a one-story building. This action was taken without proper review, and the Illinois State Historic Preservation Office (ILSHPO) later gave the CHA the opportunity to remove the solar panels to avoid an adverse effect finding. When CHA declined, ILSHPO found that the solar panel installation did not meet the Secretary of the Interior's Standards for Rehabilitation, and would require mitigation. The mitigation requested—a historic inventory process for Dearborn Homes and other CHA properties—will be beneficial, but casting solar panel installation as an adverse effect and requiring mitigation discourages the implementation of renewable energy solutions.

The Secretary's Standards similarly discourage equity in the form of accessibility by deterring interventions that make historic places ADA-compliant. As part of plans to rehabilitate the Van Buren Metra station in downtown Chicago, alterations are proposed to the adjacent Van Buren Street Pedestrian Bridge to add an ADA accessibility ramp at the west end. During Section 106 consultation, which is still ongoing, the ramp has been framed as an adverse impact to the historic bridge, and potentially grounds to consider it no longer a contributing resource to the Grant Park National Register Historic District. This raises the question: If preservation is a public benefit, how can it be an adverse effect to make access to a historic resource more broadly available to the public? As with renewable energy solutions, framing accessibility as an adverse effect discourages its implementation.

Affordable housing conversions for historic buildings are hindered by the higher costs associated with adhering to the Secretary's Standards. Affordable housing developers pair the federal Low-Income Housing Tax Credit (LIHTC) with the Federal Historic Rehabilitation Tax Credit to finance projects, but meeting the standards is reported to increase the per-unit cost. The Illinois Housing and Development Authority (IHDA) administers the LIHTC program in Illinois. Several years ago, IHDA removed the extra point that projects received for reusing a historic building. In our discussions with the agency, it cited the high cost of certified historic rehabilitation projects versus new construction. The IHDA board sees new construction, not historic building rehabilitation, as the best way to build more housing units. By leaving little room for flexibility in the interpretation of the Secretary's Standards, historic rehabilitation projects are no longer seen as a solution for affordable housing.

The aim of our comments is not to cast blame on the preservation practitioners who interpret the Secretary's Standards in the ways described in this letter and who are following accepted approaches. Rather, it is to call for a reconsideration. The Secretary's Standards were published in 1979, and despite their utility to guide our thinking, a strategic conversation about their contents and applicability is warranted. Has the need for, and purpose of, the standards changed? What would we design today that is a more relevant, responsive and flexible tool? Who would be involved in the process? How could the standards support preservation that is more equitable, more responsive to climate change and energy needs and friendlier to housing reuse? In considering its position toward interpretation of the Secretary's Standards and the opportunity for new educational

approaches, we ask the ACHP to engage in a strategic review of the Secretary's Standards and discourage a blanket interpretation that is applicable to all buildings and undertakings. Landmarks Illinois believes that more flexibility and case-by-case consideration can better position preservation to address the most pressing needs of our society, and allow it to serve more people.

Sincerely,



Bonnie McDonald
President & CEO