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30 N. Michigan Ave.
Suite 2020
Chicago, IL 60602

www.Landmarks.org

February 9, 2024

(VIA EMAIL)

Mr. Colin Smalley
U.S. Army Corps of Engineers, Chicago District
231 South La Salle Street, Suite 1500
Chicago, IL 60604-1437

**Re: Section 106 Public Meeting Seeking Information to Resolve
Adverse Effects on Historic Properties**

Mr. Smalley:

Thank you for the opportunity to provide comments regarding the resolution of adverse effects to historic properties at 2900 South Damen Avenue, Chicago, also known popularly as the Damen Silos. We support the USACE and IL SHPO's determination that demolition of the buildings currently on the site constitutes an adverse effect to the overall property.

The Damen Silos are one of the last remaining monuments to Chicago's historic dominance in the national grain industry. Built in 1906 by the Topeka & Santa Fe Railroad, today the silos are an iconic waterfront landmark visible from I-55, the Chicago Transit Authority's Orange Line train and the adjacent neighborhood of McKinley Park. In addition to the silos' historic and present-day significance, decisions about their future will be extraordinarily important for McKinley Park, a neighborhood in the midst of an ongoing struggle for environmental justice. That's why Landmarks Illinois chose to place them on our list of the Most Endangered Historic Places in Illinois in 2023, and why we continue to advocate for their preservation alongside community residents.

At this time, neither consulting parties nor the general public have adequate information about current conditions or future plans for the site to make informed proposals for avoidance, minimization, or mitigation through the Section 106 review process. We join the McKinley Park Development Council in calling for owner MAT Limited Partnership to allow a structural assessment of existing buildings and structures that can inform options for reuse or make the case that demolition is truly unavoidable. There are pro bono services available to provide this assessment at no cost to MAT Limited Partnership. It is important for the assessment to take place for consultation to meaningful and realistic.

Regarding resolution of adverse effects, given the environmental justice considerations of allowing work on this site to go forward, we would find a historical marker alone to be inadequate as resolution in this instance. While we defer to the surrounding community for what they would like as far as outcomes, we suggest the following for consideration:

- 1) Stabilize and retain all or a portion of the existing buildings and structures on the site while allowing new construction in currently undeveloped areas. Retained buildings and structures could be repurposed, incorporated into new development, or simply remain as a visual monument to the history of the site.
- 2) Include in a Memorandum of Agreement an ongoing commitment to community consultation and input for the future development and disposition of the site, should a sale occur in the future.
- 3) Guarantee public access in perpetuity to a portion of the site along the riverfront for interpretation and recreational access.

We appreciate MAT Limited Partnership's concern for safety given the difficulties they have shared in keeping the site secure from trespassers; however, we do not believe that to be a reason to truncate consultation or to dismiss the possibility of reuse without first giving it every consideration. Thank you for considering our comments.

Sincerely,



Kendra Parzen
Advocacy Manager

cc: IL SHPO
Ald. Julia Ramirez, 12th Ward
McKinley Park Development Council
Neighbors for Environmental Justice
Preservation Chicago
AIA Chicago
Openlands