

**Section 106 Consultation**  
**Humboldt Park United Methodist Church Adaptive Reuse**  
**2120-28 N. Mozart St., Chicago, IL**  
**Response to Consulting Party Comments – August 23, 2023**

The Chicago Department of Assets, Information and Services (AIS) contacted potentially interested members of the public, organizations, and tribes on July 3, 2023 to request participation as a consulting party and to solicit comments to the proposed undertaking. AIS included a letter and attachments which described the project, provided the proposed Area of Potential Effect (APE), discussed the undertaking's adverse effect on historic resources, referenced a proposed mitigation strategy, and included a web address for additional information. AIS established a comment period which ended on July 31, 2023. Comments and questions from the consulting parties and members of the public are summarized 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 and Public Comments Received**

1. **Consulting Party:** Preservation Chicago  
**Date:** July 6, 2023 and July 18, 2023

**Summary of Comments:** Preservation Chicago requested consulting party status and inquired as to when Section 106 consultation meetings will be scheduled. In a subsequent email, dated July 18, 2023, Preservation Chicago requested clarification to the type/nature of comments being sought by AIS and whether documentation related to historic assets and the area of potential effect have been prepared.

No further comments were received by AIS.

**Response:** AIS replied to Preservation Chicago on July 18, 2023, acknowledging Preservation Chicago's request for consulting party status. AIS indicated that it had not scheduled a Section 106 meeting for the proposed undertaking, and any future meeting(s), if warranted, would be dependent upon the nature and scale of comments received from consulting parties, agencies, and the public. For this initial round of consultation, AIS requested any comments Preservation Chicago may have related to the identification of historic properties and the assessment of effects, as well as any views to the minimization or mitigation of adverse effects. AIS sent a second reply to Preservation Chicago on July 21, 2023, referring to AIS' initial correspondence of July 3, 2023 for documentation related to historic assets and the area of potential effect, and a project website link. AIS also provided duplicate copies of reference materials.

2. **Consulting Party:** Illinois State Historic Preservation Office (SHPO)  
**Date:** July 10, 2023

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**Summary of Comments:** Illinois SHPO acknowledged receipt of the July 3 AIS notification. No further comments received.

**Response:** No additional response required at this time.

3. **Consulting Party:** Daniel La Spata, Alderman, 1<sup>st</sup> Ward  
**Date:** July 14, 2023

**Summary of Comments:** Alderman La Spata provided a letter of support for the proposed undertaking, citing the development’s intent to increase affordable housing in the 1<sup>st</sup> Ward and noting that it will be one of the most energy-efficient and carbon-zero developments in the City of Chicago. Alderman La Spata expressed concern that requiring new windows to match historic windows would impede the goal of decarbonization and disagreed with the adverse effect determination, noting that the location is not protected with Landmark status. The Alderman encourages AIS to reconsider the determination regarding historical preservation for the project.

**Response:** AIS thanks Alderman La Spata for his letter of support and his concerns related to historic preservation aspects of the project. Although the project does not have Landmark status, additional considerations were evaluated by Secretary of Interior (SOI) qualified personnel, under contract to AIS, in their recommendation for an adverse effect determination. SOI qualified personnel completed their evaluation in accordance with the 2022-2027 Programmatic Agreement between the City of Chicago and the Illinois State Historic Preservation Office.

The subject property is identified as “Orange” in the Chicago Historic Resources Survey (CHRS), a decade-long research effort completed by the City of Chicago in 1995 to analyze the historic and architectural importance of all buildings constructed in the city prior to 1940. CHRS uses a color-coded ranking system to identify historic and architectural significance relative to age, degree of external physical integrity, and level of possible significance. Properties designated as “Orange” possess some architectural feature or historical association that make them potentially significant in the context of the surrounding community.

The property is also listed as “undetermined” in the Illinois Historic and Architectural Resources Geographic Information System (HARGIS), the public portal to Illinois’ historic buildings, structures, sites, objects, and districts. HARGIS contains properties that have been listed in the

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National Register of Historic Places, determined eligible for listing, or surveyed without a determination. The proposed undertaking falls into the latter category.

SOI qualified personnel applied the “National Register Criteria for Evaluation” to assess the property’s integrity of location, design, setting, materials, workmanship, feeling, and association related to events, persons, architectural and/or artistic design, and ability to yield information important in history. In accordance with these criteria, SOI qualified personnel determined that the project site is potentially eligible for listing in the National Register of Historic Places (NRHP) under Criterion C for architectural design.

Based on their evaluation of historic resources, SOI qualified personnel determined the proposed modifications would diminish the historic property’s integrity of design, materials, and workmanship such that it’s potential eligibility for listing in the NRHP under Criterion C would be compromised. AIS shared this evaluation with SHPO, the Chicago Department of Housing, and the project developer, and initiated consultation under Section 106 of the National Historic Preservation Act. Section 106 consultation provides an opportunity for interested parties and the public to discuss these matters before a final decision is made. Through the Section 106 process, concerns are evaluated and addressed to reach a consensus for mitigating any adverse effects of the proposed undertaking.

4. **Consulting Party:** Latin United Community Housing Association (LUCHA)

**Date:** July 21, 2023

**Summary of Comments:** LUCHA requested consulting party status as the developer and future owner/manager of the property. LUCHA expressed its interest in activities, as a housing advocacy organization, to create and preserve affordable housing in its core community areas, including Logan Square.

**Response:** AIS acknowledges LUCHA’s consulting party status due to its key involvement as the project developer and future owner/manager.

5. **Consulting Party:** Miami Tribe of Oklahoma

**Date:** July 25, 2023

**Summary of Comments:** The Miami Tribe of Oklahoma accepted the City’s invitation to serve as a consulting party. The Miami Tribe offered no objection to the project; however, they

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requested immediate consultation 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 phases of the project.

**Response:** AIS acknowledges the Miami Tribe’s request for consulting party status due to their relationship with historic lands and cultural property in Illinois. AIS agrees to immediately consult with the Miami Tribe, other federally recognized Indian tribes with historic ties to Cook County, and SHPO in the event of an Inadvertent Discovery of human remains or Native American cultural items in accordance with NAGPRA.

6. **Consulting Party:** Palenque LSNA

**Date:** July 28, 2023

**Summary of Comments:** Palenque LSNA provided a letter of support for the proposed undertaking, noting that the proposed changes to the building will respect the historic character of the building, while meeting urgent community needs for affordable housing in a neighborhood that has experienced rising costs and displacement among long-term residents. Palenque LSNA believes that the proposed mitigation strategy of a Historic Illinois Building Survey (HIBS) documentation process adequately addresses the Adverse Effect determination, while enabling the preservation and productive reuse of a critical community asset.

**Response:** AIS acknowledges Palenque LSNA’s letter of support and notes that the proposed HIBS recordation is a baseline mitigation strategy for undertakings of this scope. A Memorandum of Agreement developed for the proposed undertaking will include mitigation strategies based on comments received and consensus obtained through consultation.

7. **Consulting Party:** Logan Square Preservation

**Date:** August 1, 2023

**Summary of Comments:** Logan Square Preservation requested consulting party status. No further comments were received by AIS.

**Response:** AIS acknowledges Logan Square Preservation’s request for consulting party status.