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CRAIG A. POTTS
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October 19, 2017

Anne T. Bader
Corn Island Archaeology
P.O. Box 991259
Louisville, KY 40269

Re: ABOVEGROUND RESPONSE ONLY: Revised *Cultural Historic Survey for the Proposed Demolition of Beecher Terrace, Louisville, Jefferson County, Kentucky* by Mathia Scherer May 25, 2017

Dear Anne:

Thank you for your letter and copies of the above revised report submitted to our office for review and comment. Based on previous communication with our office about the original cultural historic report, we understand that this report has been revised to include a recommendation of eligibility and assessment of effects for Baxter Square Park, a historic resource within the APE for this project. We understand, based on the revised report, that Louisville Metro Housing Authority proposes the demolition of the 1940 Beecher Terrace Housing Project and the construction of mixed-income housing and commercial space on the former site of Beecher Terrace. We understand that the APE, established in consultation with our office, includes the Beecher Terrace public housing complex as well as the surrounding historic resources with direct visibility of the housing complex (and, in turn, the proposed new construction).

We understand that, as part of this survey, Corn Island documented 11 sites (68 total historic resources) including Baxter Square Park. We understand that the author recommends that the Fire Department Headquarters (JFWR-1748), St. Peter's German Evangelical Church (JFWR-1749), and Church of our Merciful Savior (JFWR-1752) retain the qualities for which they were listed on the National Register of Historic Places (NRHP) and should remain Listed. We understand that Corn Island recommended that Beecher Terrace (JFL-01), Baxter Square Park (JFL-485), and the Baxter Community Center (JFWR-3796) are all Eligible for listing on the NRHP. Beecher Terrace is recommended individually Eligible for listing on the NRHP under Criterion A and the author recommends that the Baxter Community Center is recommended Eligible for listing on the NRHP as part of a group including Beecher Terrace. Baxter Square Park is also recommended Eligible for listing on the NRHP as part of a group – the Olmsted Park System of Louisville. The author recommends that the Louisville Central Community Centers (JFL-318) and Mini-Versity Child Development Center/Louisville Central Community Center (JFL-319), the Warehouse (JFWR-3830), Porter Paint Factory (JFWR-3831), and a second Warehouse (JFWR-3833) are Not Eligible for listing on the NRHP.

Based on our review, we concur with the author's recommendation that JFL-318, JFL-319, JFWR-3830, JFWR-3831, and JFWR-3833 do not retain sufficient significance or integrity to be eligible for listing on the NRHP and, as such, they are recommended Not Eligible. We also concur that JFWR-1748, JFWR-1749, and JFWR-1752 retain the qualities for which they were listed and should remain Listed on the NRHP. We concur that Beecher Terrace (JFL-01) appears to be individually Eligible for listing on the National Register under Criterion A for its association with public housing development from just after World War II in 1946 to Urban Renewal in the 1970s. We also recommend that it appears to be Eligible as a contributing element within a proposed NRHP district.

(Continued on Next Page)

Section 106 Review
Re: Proposed Demolition of Beecher Terrace

October 19, 2017

The author acknowledges this district as a “group” when discussing the eligibility of the Community Center (p.69; “JFWR-3796 [Community Center] was previously surveyed in 2009 and recommended eligible as a member of a group.”) but does not propose a NRHP boundary for this group; as such, we recommend that this group is a Beecher Terrace NRHP district and would include Beecher Terrace itself (JFL-01), the Baxter/Beecher Terrace Community Center (JFWR-3796), as well as Baxter Square Park (JFL-485). As such, we concur with the author’s recommendation that the Baxter/Beecher Terrace Community Center (JFWR-3796), which included a gymnasium space to host Beecher Terrace dances and other events as well as a clinic for Beecher Terrace residents, appears to be eligible as a contributing element to this proposed Beecher Terrace NRHP district. As it relates to Baxter Square Park, although the author recommends it is eligible as a contributing element within the Olmstead Parks System of Louisville, and we acknowledge and are supportive of its significance within that historic theme as well, our office recommends that it is perhaps more appropriately included within the proposed Beecher Terrace NRHP district. The reason behind this is that the park was segregated – restricted to only African American residents - during the period of significance for Beecher Terrace and was used as a play area for Beecher Terrace children; Baxter Square Park also includes on its parcel the Baxter/Beecher Terrace Community Center, developed at approximately the same time and built to host Beecher Terrace residents. As with Beecher Terrace itself, we recommend that Baxter Square Park may be individually eligible (in addition to eligible as a contributing element to a group) under Criterion A for the development of the Public Park system in Louisville. Baxter Square Park was developed as the first public park (dedicated 1880) in Louisville and was only redesigned by Frederick Law Olmsted after it was damaged irreparably by a tornado in 1890. Additionally, Baxter Square Park is significant for the fact that it was built on a portion of the site of a 1786 pioneer cemetery.

As it relates to the effects of the project, the author recommends that the proposed demolition of the Beecher Terrace Public Housing Project would have a direct Adverse Effect on the integrity of the proposed NRHP-eligible Beecher Terrace NRHP district including NRHP-eligible contributing elements: Beecher Terrace Public Housing project, Baxter/Beecher Terrace Community Center, and Baxter Square Park. Additionally, the author recommends that the proposed demolition of the Beecher Terrace Public Housing Project and the construction of the new mixed-income housing and commercial space would have an indirect Adverse Effect on the integrity of two NRHP-Listed churches – St. Peter’s German Evangelical Church (JFWR-1749) and Church of Our Merciful Savior (JFWR-1752). The author is also clear that if construction activities occur in Baxter Square Park, a direct Adverse Effect would likely be recommended there, too.

Although we feel we will ultimately concur with the author’s Adverse Effect recommendation for the aboveground portion of project due to negative impacts to the integrity (specifically the design, setting, materials, workmanship, setting, and feeling) of the proposed Beecher Terrace NRHP district, we are currently requesting additional information in the form of final construction plans and elevations for the proposed mixed-income housing/commercial space (once they are available). The requested construction plans will help us confirm whether Baxter Square Park, St. Peter’s German Evangelical Church, and Church of Our Merciful Savior will be negatively impacted (individually; either directly or indirectly) by the proposed mixed-income housing/commercial space and will help us make a formal recommendation of effect for this project. We look forward to continued consultation with Louisville Housing Authority and consulting parties on this project and recommend that consulting parties be provided this documentation for review at least 30 days prior to a proposed consulting parties meeting. If you have any questions, or if project plans should change, please contact Jennifer Ryall of my staff at 502-564-7005 ext. 4565.

Sincerely,



Craig A. Potts,
Executive Director and State Historic Preservation Officer

CP: jr, KHC#50011
Cc: Cynthia Johnson, LOUISVILLE FORWARD