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CRAIG A. POTTS
EXECUTIVE DIRECTOR
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PRESERVATION OFFICER

February 16, 2018

Cynthia Johnson Elmore
Planning & Design Services
Department of Develop Louisville
LOUISVILLE FORWARD
444 South Fifth Street, Suite 300
Louisville, KY 40202

Re: General Consultation on Indirect Effects of Proposed New Construction at Beecher Terrace

Dear Ms. Elmore:

At the request of the Advisory Council for Historic Preservation, our office is supplying additional information to the City to supplement our previous consultation on the assessment of indirect effects for the proposed new mixed-income housing and commercial space on the site of the former Beecher Terrace public housing complex. For reference, under 36CFR800.5(a)(1): "Adverse effects occur when an undertaking may directly or *indirectly* alter characteristics of a historic property that qualify it for inclusion in the Register" and under 36CFR800.5(a)(2):

Examples of adverse effects include physical destruction or damage; alteration not consistent with the Secretary of the Interior's Standards; relocation of a property; *change of use or physical features of a property's setting; visual, atmospheric, or audible intrusions*; neglect resulting in deterioration; or transfer, lease, or sale of a property out of Federal ownership or control without adequate protections.

Based on our review, the proposed new construction on the site of the NRHP-eligible Beecher Terrace public housing complex has the potential to diminish the integrity of setting and feeling of adjacent NRHP-listed and NRHP-eligible historic resources. As a result, Gretchen Milliken (Louisville Metro) and our office have begun a productive conversation on ways indirect effects can be minimized/avoided through design; indirect effect concerns primarily include encroachment of new buildings on NRHP-listed and NRHP-eligible historic resources as well as concerns about proposed scale/proportion, setbacks, color/material choice, ornamentation, and fenestration/rhythm of openings in the new construction. As with other projects, our office will need final plans in order to evaluate whether the proposed design has successfully minimized/avoided adverse effects to these buildings. We understand, based on a conversation on 2-15-18, that the Lifelong Wellness building elevations are still in draft form and we will be consulted before they are final; these elevations can be submitted along with the description of Phase I of the undertaking for our formal comment. We look forward to this same type of coordination for later Phases of the project. If you have any questions, 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 #50915