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October 25, 2021

Colonel Paul Culberson
Commander and District Engineer
U.S. Army Corps of Engineers, Chicago District
231 South LaSalle Street, Suite 1500
Chicago, Illinois 60604

Dear Colonel Culberson:

I write to express my support of a true preservation approach for repairs of the historic limestone, step-stone revetment at Promontory Point, in accordance Secretary of Interior Standards for the Treatment of Historic Properties. The Point's 2018 listing on the National Register of Historic Places mandates this approach and protects it as the only remaining stretch of the WPA historic limestone revetment that once extended the entire Chicago lakefront. I am aware that the City of Chicago and Chicago Park District have been advocating in advance for demolition and new construction. However, that approach has been rejected before and has no factual, legal or community support – while preservation will allow for rehabilitation of the historic revetment at comparable cost and maximum public benefit.

This is completion of a long-standing project and commitment

Federal funding under the Chicago Shoreline Reevaluation Report (GRR) offers a welcome opportunity to finally complete the long awaited Promontory Point project. Initial discussions of the work led to the 1993 Memorandum of Agreement (executed by the Corps, the City, the Park District and others). Since that time, a preservation solution for Promontory Point has been viewed as necessary and appropriate.

In 2006, as efforts for preservation resumed after delays, then-Senator Obama convened the governmental partners, elected officials and community representatives to resolve conflicts, reach agreement and move the project forward. Discussion of steel and concrete were raised and rejected. The result was a Scope of Work (SOW) that instructed the Corps' Technical Center of Expertise in Seattle, under the direction of the Buffalo Corps office, to do initial engineering and design work for preserving, repairing and rehabilitating the limestone revetment. Unfortunately, Congress never funded this work. With the new GRR funding, the Obama SOW can now be implemented without need to start over, under Corps leadership.

A legal framework in place for preservation

Because the GRR completes unfinished work at Promontory Point, it appears that the 1993 MOA, 2002 State Historic Preservation Office (SHPO) Letter of Adverse Effect, and the 2006 Obama SOW are relevant and require rehabilitation of the limestone revetment. These documents spell out the design and engineering planning, the construction process and the community engagement, under the GRR. Along with the National Register listing, these documents call for a thorough Section 106 Review and NEPA Review for a preservation plan.

There's no emergency to support a demolition solution

Although there was erosion and high water levels at nearby Morgan Shoal, South Shore and other places on the South Side lakefront, there is no such imminent danger at Promontory Point. Since the limestone revetment still functions at 83 years old, there is no proper or justifiable reason to rush emergency work or otherwise dismiss a preservation approach.

Cheaper, stronger, better looking: something we all want

In 2002-2004, the community funded its own design engineering studies (2002 Galvin Report, 2003 Shabica-Tjaden-Heiztman Preservation Plan and Cost Estimate, 2004 Kalven Mediator's Report with Bruxnell) that showed that a preservation approach with adaptation for ADA compliance was feasible and cost effective:

- Repair and rehabilitation in place is cheaper than demolition and new construction of steel and concrete by a 1:2 ratio
- The limestone revetment is more durable with a lifespan of 85 years versus 35 years for concrete and requires less maintenance costs over a longer lifespan (the limestone blocks have already weathered 40 million years)
- Three-quarters of the limestone blocks can be repurposed and reset rather than using all new materials
- Preservation work can be completed more quickly as sections can be repaired in place rather than demolition and new construction
- Preservation is the community's preferred plan because the limestone revetment is aesthetically more pleasing and provides continuous access to the water
- Creative adaptation of a preservation approach for ADA compliance is doable and embraced by the community

Conversely, demolition of the limestone revetment and new construction with steel and concrete would use excessive amounts of energy, generate air and sound pollution, take longer, and cost more.

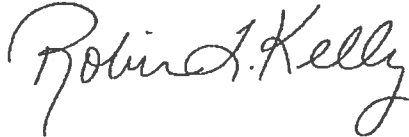
As demonstrated by the National Park Service's preservation work on stone revetments and seawalls at Ellis Island and other historic sites, we have the design knowledge, engineering expertise, initiative and funding to do proper preservation of historic stone revetments.

I appreciate the Corps' long-standing commitment to work with communities and to foster the stewardship of natural and cultural resources. Preservation of the original limestone revetment

will not only conform to the highest ideals of the National Historic Preservation Act, it will also create a legacy that the Corps can share with Chicagoans who value and love Promontory Point.

Accordingly, a preservation plan is doable, worthwhile, legal, and mandated – and beneficial to all parties. Thus, I urge the Corps to undertake a preservation approach that maximizes repair-in-place and use of existing materials. Thanks for your consideration in this important matter and please keep me updated on developments as the design plans progress.

Sincerely,

A handwritten signature in black ink that reads "Robin L. Kelly". The signature is written in a cursive, flowing style.

Robin L. Kelly
Member of Congress

cc:

Secretary Deb Haaland, U.S. Secretary of the Interior
U.S. Senator Dick Durbin
U.S. Senator Tammy Duckworth
Toni Preckwinkle, Cook County Board President
Bill Lowry, Cook County Commissioner, 3rd District
Lori Lightfoot, Chicago Mayor
Leslie Hairston, Alderman, 5th Ward
Heather Gleason, Chicago Park District