



Preserving America's Heritage

July 13, 2017

Mr. Ross Black  
Director  
Community Development Department  
City Hall, Room 300  
419 Fulton Street  
Peoria, IL 61602

Ref: *Request for ACHP Comment on Disputed No Adverse Effect Finding for North Valley Community Housing Development Organization Proposal  
City of Peoria, Illinois*

Dear Mr. Black:

On June 29, 2017, the City of Peoria, Illinois (City), informed the Advisory Council on Historic Preservation (ACHP) of a disputed effect finding for the proposed undertaking with a consulting party. The City is acting as the Responsible Entity in accordance with the U.S. Department of Housing and Urban Development's environmental regulations at 24 CFR Part 58. The City has requested that the ACHP provide its advisory comments on this dispute in accordance with Section 106 of the National Historic Preservation Act (NHPA; 54 U.S.C. 306108) and 36 CFR Part 800.5(c)(2)(i) of our regulations, "Protection of Historic Properties."

Based upon the information provided, we understand that the City proposes to provide HOME funds to the North Valley Community Housing Development Organization for its proposal to construct four new single-family homes on non-contiguous vacant residential lots. These homes will be located within the North Side Historic District, which is listed on the National Register of Historic Places. The City will follow the Secretary of the Interior's *Standards for Rehabilitation* (SOI's) Standards for the new construction. Accordingly, the City determined that the undertaking would have "no adverse effect" on historic properties. The Illinois State Historic Preservation Officer (SHPO) concurred with the finding. However, a consulting party, Ms. Karrie Alms, disagrees with the City's finding. Specifically, she opines that the construction of a 1.5 story property at 912 NE Monroe Street is incompatible with the scale of the historic district, and that a two-story construction would be more appropriate.

The City appears to have carefully considered the properties that are within the district and that contribute to its integrity. The City also has provided multiple examples of other properties within the surrounding area that are one or two stories. As such, it appears that the construction of a 1.5 story property which will conform to the SOI's Standards is unlikely to alter any of the characteristics of the district that qualify it for inclusion in the National Register of Historic Places. Accordingly, the ACHP believes that the City has appropriately applied the criteria of adverse effect to this undertaking, and the finding of "no adverse effect" is correct.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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In accordance with 36 CFR Section 800.5(c)(3)(ii)(A-B), the City shall take into account the ACHP's opinion before reaching a final decision on the finding. The City should prepare a summary of its rationale for the decision, and provide it to the ACHP and all consulting parties.

We appreciate the opportunity to provide our comments on this disputed finding. If you have any questions regarding our comments, please contact Ms. Jaime Loichinger at (202) 517-0219 or via email at [jloichinger@achp.gov](mailto:jloichinger@achp.gov).

Sincerely,

A handwritten signature in cursive script that reads "Charlene Dwin Vaughn".

Charlene Dwin Vaughn, AICP  
Assistant Director  
Office of Federal Agency Programs  
Federal Permitting, Licensing and Assistance Section