



ILLINOIS DEPARTMENT OF NATURAL RESOURCES • NATIONAL PARK SERVICE



JOINT GENERAL MANAGEMENT PLAN

Pullman National Historical Park

Pullman State Historic Site



DECEMBER 2023

Final Joint General Management Plan

for

Pullman National Historical Park

and

Pullman State Historic Site

For the Illinois Department of Natural Resources:



Natalie Phelps Finnie, Director

Illinois Department of Natural Resources

APPROVED FOR LEGAL SUFFICIENCY

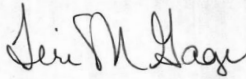
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EXECUTIVE SUMMARY

Introduction

The National Park Service (NPS) and Illinois Department of Natural Resources (IDNR) have prepared a Joint General Management Plan (JGMP) for Pullman National Historical Park (NHP) and Pullman State Historic Site (SHS) to define values, desired conditions, and actions for resource protection and improving the visitor experience. This plan proposes management actions that present a spectrum of resource treatments, visitor experiences, and opportunities to increase access.

Joint General Management Plan Structure

This JGMP is a unique planning document that incorporates the planning requirements of two distinct agencies. While it will address the federal legal requirements for general management plans, it may be organized and written in a manner different from a traditional, single agency management plan.

Chapter 1: Introduction sets the framework for the entire document. It describes why the plan is being prepared and the purpose and need for taking action. It forms the foundation for the management strategy found in chapters 2 and 3, based on legislation, purpose, the significance of resources, special mandates and administrative commitments, and laws and policies. The chapter also details the joint management relationship between the NPS and IDNR, identifies the role of partnerships, and explains jurisdictional authorities.

Chapter 2: Vision, Desired Conditions, and Management Areas describes the NPS and IDNR vision, desired conditions, and designated management areas.

Chapter 3: Management Strategy presents the proposed action that outlines management actions and guides decisions through the life of the plan. The proposed action represents reasonable management directions consistent with NPS and IDNR policy, applicable laws, and best practices.

Chapter 4: Public Engagement describes the public involvement during the preparation of the JGMP.

Final Revision

Following the public comment period, the NPS and IDNR revised the JGMP with in-text changes based on consultation with Illinois State Historic Preservation Office (SHPO) and public feedback, in addition to other corrections. The changes related to the SHPO consultation update and clarify Illinois law and policy. The remainder of changes are primarily typographical corrections. The edits do not impact the management strategies in the JGMP or environmental analysis in the EA. Specific text changes can be found in the Finding of No Significant Impact (FONSI) Errata.

Implementation of the Plan

Approval of this plan does not guarantee that funding and staffing needed to implement the plan would be forthcoming. Implementation of the approved plan would depend on future funding and could also be affected by factors such as changes in staffing, visitor use patterns, and unanticipated environmental factors. Full implementation could be many years in the future. Once the plan has been approved, more detailed planning may be needed before certain components of the selected alternative could be carried out.

PULLMAN NATIONAL
HISTORICAL PARK
&
PULLMAN STATE HISTORIC SITE

SECTION ONE – JOINT GENERAL
MANAGEMENT PLAN

December 2023

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ABBREVIATIONS

AIA – American Institute of Architects Chicago

CDOT – Chicago Department of Transportation

CEQ – Council on Environmental Quality

CERP – Comprehensive Environmental Review Process

CFR – Code of Federal Regulations

CMAP – Chicago Metropolitan Agency of Planning

EA – Environmental Assessment

FONSI – Finding of No Significant Impact

IDNR – Illinois Department of Natural Resources

ILCS – Illinois Compiled Statutes

JGMP – Joint General Management Plan

LRIP – Long Range Interpretive Plan

NEPA – National Environmental Policy Act

NHL – National Historic Landmark

NHP – National Historical Park

NHPA – National Historic Preservation Act

NPCA – National Parks Conservation Association

NPS – National Park Service

SHS – State Historic Site

USC – United States Code



Section One: Joint General Management Plan

Section One is the Joint General Management Plan (JGMP). This section introduces Pullman National Historical Park and Pullman State Historic Site (“the Sites”) and outlines the requirements and need for creating a JGMP. Section One also lists desired conditions for the Sites and provides management actions to accomplish those conditions. Section One is a joint effort between the NPS and IDNR to help streamline and improve management throughout the Sites.

JGMP Chapter | 1

Introduction

National Park Service General Management Planning/ Illinois Department of Natural Resources General Management Planning

NPS Rationale for General Management Planning

The National Parks and Recreation Act of 1978 and National Park Service (NPS) *Management Policies 2006* require each unit of the national park system to have a general management plan (GMP). Director’s Order 2: *Park Planning* (NPS 2021) specifies that a general management plan refers to (1) a stand-alone general management plan or (2) the planning documents in a park’s planning portfolio that collectively meet the statutory requirements for a general management plan. These statutory requirements, as described in the National Parks and Recreation Act, include the following:

- measures for resource preservation
- indications of the types and general intensities of development (visitor circulation and transportation patterns, systems, and modes), including general locations, timing of implementation, and anticipated costs
- identification and implementation of commitments for visitor carrying capacities
- indications of potential boundary modifications and the reasons for the modifications

The purpose of general management planning is to ensure that a national park system unit has a clearly defined direction for resource preservation and visitor use to best achieve the NPS mandate to preserve resources unimpaired for the enjoyment, education, and inspiration of future generations. In addition, general management planning makes the NPS more effective, collaborative, and accountable by:

- providing a balance between continuity and adaptability in decision making by defining the desired conditions to be

achieved and maintained in a park unit and providing a touchstone that allows NPS managers and staff to adapt their actions to changing situations, while staying focused on what is most important about the park unit.

- analyzing the park unit in relation to the surrounding ecosystem, cultural setting, and community, which helps NPS managers and staff understand how the park unit can interrelate with neighbors and others in ways that are ecologically, socially, and economically sustainable. Decisions made within such a larger context are more likely to be successful over time.
- affording everyone who has a stake in decisions affecting a park unit an opportunity to be involved in the planning process and to understand the decisions that are made. Park units are often the focus of intense public interest and public involvement throughout the planning process. Involving all interested parties in GMP development provides opportunities for NPS managers and staff to interact with the public to learn about their concerns, expectations, and values and to share information about the park unit's purpose and significance and the opportunities and constraints for management of park lands.

General management plans are intended to be long-term documents that establish and articulate a management philosophy and framework for decision making and problem solving in national park system units. An outcome of general management planning for park units is an agreement among the NPS, its partners, and the public on why each area is managed as part of the national park system, what resource conditions and visitor experiences should exist, and how those conditions can best be achieved and maintained over time.

Pullman National Monument was established by presidential proclamation in 2015 and redesignated Pullman National Historical Park by Congress in 2022 (appendix A) to help preserve, protect, and interpret nationally significant resources that exemplify the evolution of American industry, the rise of unions and the labor movement, the lasting strengths of good urban design, and the remarkable journey of the Pullman porters toward the civil rights movement of the 20th century. This document, along with the previously published foundation document and other plans, collectively comprise the park's planning portfolio meeting the statutory requirements for general management planning.

IDNR Rationale for General Management Planning

IDNR is enabled to develop comprehensive plans under the Outdoor Recreation Resources Act (20 ILCS 860). The IDNR Policy and Procedure Manual (Chapter 5, Subchapter E, Section 5E2) describes management policy for land management:





Policy: “The management of any and all Department properties shall be done to protect the resources at the site and provide safety and security of the site visitor. Site development and program concepts shall be in keeping with an approved plan prepared by a selected task force of Department representatives appointed by the Director and in accordance with the procedures found in the Procedures Section of this policy.”

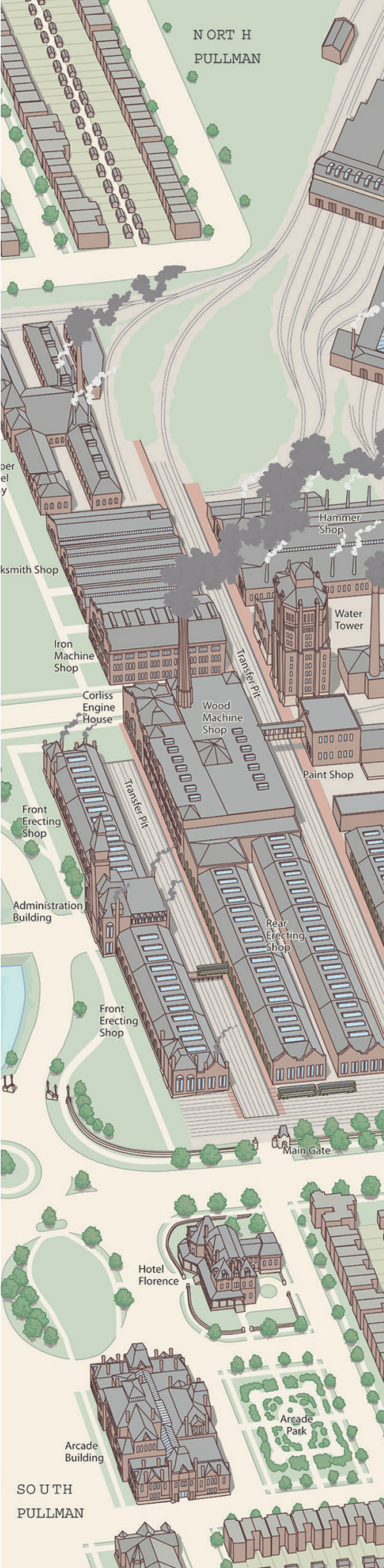
Procedure: “A site management plan shall be prepared as soon as practicable for all Department-owned or managed properties. Any revision to this plan shall be approved by the applicable Management Plan Task Force appointed by the Director. Any substantive changes will require approval of the Director.”

Other Laws and Policies Related to NPS Management and IDNR Management

NPS Laws and Policies

This section discusses some of the most pertinent NPS service wide laws and policies related to planning and managing the National Historical Park (NHP). The NHP must comply with these laws and policies regardless of this joint general management planning effort.

The NPS is required by law and policy to protect environmental and cultural resources, preserve environmental quality, and provide public services. Applicable laws and policies related to resource management include, but are not limited to, the Clean Water Act of 1972; the Endangered Species Act of 1973; the National Historic Preservation Act of 1966, as amended; and the Native American Graves Protection and Repatriation Act of 1990. Laws, policies, and guidance documents related to public services and access include but are not limited to the Americans with Disabilities Act of 1990, the



Architectural Barriers Act Accessibility Act Standards, the Final Outdoor Developed Area Guidelines, the Rehabilitation Act of 1973, and the Fair Housing Act.

Some laws and policies are applicable solely or primarily to units of the national park system, including the 1916 Organic Act that created the National Park Service; the General Authorities Act of 1970; the Redwood Act of 1978; and the National Parks Omnibus Management Act of 1998. The NPS Organic Act (16 United States Code [USC] 1) provides the central management direction for all units of the national park system:

“

[P]romote and regulate the use of the Federal areas known as national parks, monuments, and reservations. . .by such means and measure as to conform to the fundamental purpose of said parks, monuments and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

The General Authorities Act (54 U.S.C. 100101) affirms that while all national park system units remain “distinct in character,” they are “united through their inter-related purposes and resources into one national park system as cumulative expressions of a single national heritage.” The act makes it clear that the NPS Organic Act and other protective mandates apply equally to all units of the system. Further, amendments state that NPS management of park units should not “derogate. . .the purposes and values for which these various areas have been established.”

The National Park Service also has established policies for all units under its stewardship which are identified and explained in NPS Management Policies 2006. This general management plan incorporates and complies with the provisions of these mandates and policies.

IDNR Laws and Policies

This section discusses some of the most pertinent IDNR laws and policies related to planning and managing the SHS. The SHS must comply with these laws along with all applicable federal, state, and local laws regardless of this joint general management planning effort.

Section 6 of the Historic Preservation Act (20 ILCS 3405/6) designated the Pullman Car Works and Hotel Florence (and Annex) as a State Historic Site. Section 3.1 of the Historic Preservation Act (20 ILCS 3405/3.1) abolished the Historic Preservation Agency and transferred, effective August 3, 2018, all powers, duties, rights, and responsibilities of the Historic Preservation Agency, except those functions relating to the Abraham Lincoln Presidential Library and Museum, to IDNR.

The Illinois Department of Natural Resources is authorized by state statute # 20 ILCS 3405 to protect and promote the Pullman SHS under the following:

Sec. 6. Jurisdiction. The Department shall have jurisdiction over the following described areas which are hereby designated as State Historic Sites, State Memorials, and Miscellaneous Properties. These sites have been deemed to have a State, national, or international level of historical significance and the stewardship and caretaking responsibilities to protect and promote are hereby bestowed upon the Department

Additionally, jurisdiction over the Pullman SHS to IDNR, and Sections 16.b and 16.u give IDNR the power “to take all measures necessary to erect, maintain, preserve, restore, and conserve all State Historic Sites and State Memorials...” and “to engage in marketing activities designed to promote the sites and programs administered by the Department... All income from marketing activities shall be deposited into the Illinois Historic Sites Fund.

The Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420) establishes a mandatory review and consultation process by the Illinois State Historic Preservation Office of work proposed for state-owned historic property, including the Pullman SHS.

Applicable laws and policies related to IDNR resource management include 20 ILCS 3435, Archaeological and Paleontological Resources Protection Act; Human Remains Protection Act, signed August 4, 2023, and not yet codified; 20 ILCS 860, Outdoor Recreation Resources Act; 520 ILCS 10, Illinois Endangered Species Protection Act; 525 ILCS 30, Illinois Natural Areas Preservation Act; and 20 ILCS 830, Interagency Wetland Policy Act of 1989.

Some state laws and policies are applicable to IDNR management of state historic sites. These laws include 20 ILCS860/5a (Outdoor Recreation Resources Act), which states the IDNR may enter into and administer agreements with the United States or any appropriate agency thereof for survey, planning, acquisition,



development and preservation projects involving participating Federal-aid funds on behalf of any county, city, other governmental unit or qualified participant provided such county, city, other local governmental unit or qualified participant gives necessary assurances to the Department of Natural Resources that it has available sufficient funds to meet its share of the cost of the project and that the surveyed, acquired or developed historic properties and interests will be operated and maintained at its expense for historic preservation purposes.

Other applicable law and policy directing IDNR management of state historic sites includes 20 ILCS 3405/16 (Historic Preservation Act) and 20 ILCS 3420/15.1b (Illinois State Agency Historic Resources Preservation Act).

IDNR Comprehensive Environmental Review Process

The Comprehensive Environmental Review Process (CERP) coordinates internal reviews of actions funded or performed by IDNR to ensure that they comply with relevant state and federal environmental and cultural resource statutes. The CERP is utilized for actions on state property only. Planning documents such as a JGMP do not require CERP review, however individual actions within the JGMP will be subject to CERP when they are implemented and if they disturb the land, water, or air.

Background and Overview

NPS Pullman National Historical Park Purpose and Significance

The park purpose statement conveys the reasons that the area was set aside as a national park. Grounded in an analysis of park legislation and legislative history, purpose statements also provide primary criteria against which the appropriateness of plan recommendations, operational decisions, and actions are tested. The purpose and significance were identified in Pullman National Monument Foundation Document (2017).





The purpose of Pullman NHP is as follows:

Pullman National Historical Park fulfills the following purposes for the benefit of present and future generations: to preserve the historic resources; to interpret the industrial history and labor struggles and achievements associated with the Pullman Company, including the rise of and the role of the Brotherhood of Sleeping Car Porters; and to interpret the history of urban planning and design of which the planned company town of Pullman is a nationally significant example.

Significance statements capture the essence of the national park system unit's importance to the nation's natural and cultural heritage. They describe the unit's distinctiveness and describe why an area is important within regional, national, and global contexts. These statements help managers focus their efforts and limited funding on protection and enjoyment of attributes that are directly related to the purpose of the park unit.

- The Pullman Company transformed passenger rail travel in America. The comfortable facilities and consistently exceptional level of service of the Pullman Company was unprecedented; it became an international model for luxury. Pullman was a brand name equated with opulence and consistency and is still recognized worldwide.
- What is today the Pullman neighborhood was the first completely planned major industrial model community in America. The community was recognized by some as "the perfect town," and influenced later planned communities. The architecture (by Solon Spencer Beman), landscape architecture (by Nathan Franklin Barrett), and sanitation (by Benezette Williams) of the development were thoughtfully designed to provide good living conditions for workers, a significant departure from previous worker housing models and an improvement on what was generally available to workers in the free market in American cities at the time.
- George Pullman's factory town is a powerful example of the concept of corporate paternalism. Amenities provided to employees to encourage loyalty and workforce retention were meant to



be both good for workers and profitable for the company. The Pullman workers' experiences were a mix of benefits and limitations. Employees in the community, comprised of European immigrants and migrants from the South and other parts of America, had to conform to the company's expectations. The Pullman Company town influenced later similar efforts by other industrialists.

- The Pullman Company and its employees played a pivotal role in the American labor movement. The 1894 strike was national in scope and highlighted the emerging strength of unions in America. Clarence Darrow and Eugene V. Debs, major figures in U.S. labor history, played roles in the Pullman strike. President Cleveland used the Sherman Anti-Trust Act to end the strike, the first time it was ever used against a union. Though already adopted by nearly half of the states, the enactment of the national Labor Day holiday was spurred by the Pullman Strike.
- The Pullman porter job was pivotal for the growth of the black middle class in America, and porters played a large role in the civil rights movement. By 1937 the Pullman Company had been the nation's largest employer of African Americans for more than 20 years, and Pullman porters composed 44% of the Pullman Company workforce. The jobs at Pullman contributed to the Great Migration of African Americans.
- Formed by A. Philip Randolph, the Brotherhood of Sleeping Car Porters (BSCP) was the first black union to be recognized by the American Federation of Labor and to achieve a bargaining agreement with a major corporation. The BSCP union had a major influence on the American civil rights movement. The Pullman neighborhood is home to the National A. Phillip Randolph Pullman Porter Museum.
- The business economy of Pullman's industries allowed the company to be successful for a long period, despite legal and labor challenges. The Pullman Company was vertically integrated for maximum profit. It controlled the manufacturing process and staffing for its products and services. It leased its products and tightly controlled the consistency of the experience it provided.

IDNR Pullman State Historic Site Purpose and Significance

As identified in the Prospectus, Pullman State Historic Site preserves for public interpretation buildings significant for their architecture and historical associations. The site serves the general public and the local community through its educational program.

Significance statements capture the essence of the state historic site's importance to natural and cultural heritage. They describe the site's distinctiveness and describe why an area is important within regional, national, and global contexts. These statements help managers focus their efforts and limited funding on protection and enjoyment of attributes that are directly related to the purpose of the park unit.

The State Historic Site and its buildings possess both historical and architectural significance. Architecturally, the Car Works represent important advances in the design of industrial buildings. Architect Solon S. Beman's designs integrated aesthetic and utilitarian considerations to realize George Pullman's economic and social goals.

State Historic Site derives its historical significance from several related factors:

- State Historic Site is significant because it preserves buildings that date from and exemplify the era in which large, complex industrial corporations emerged to shape America's economy, helping to create the world in which we now live.
- State Historic Site is significant because it preserves the industrial remnants of a famous late-19th-century experiment in social and economic planning.
- State Historic Site derives significance from its association with the railroad strike of 1894, often known simply as the "Pullman strike."

Park Description

The National Historical Park and State Historic Site are located on the South Side of Chicago in the historic Pullman neighborhood (see 1.3.4 Historic Context). The Pullman National Historical Park boundary encompasses 206 acres of the neighborhood including privately-owned properties, public infrastructure, and Pullman SHS. The National Park Service owns one resource, the Administration Clock Tower Building, located in the heart of Pullman SHS, which contains several key historic resources (see 1.3.5 Designations and Jurisdictions). Pullman NHP and Pullman SHS are known in this document as "the Sites".

Historic Context

George Mortimer Pullman founded the Pullman Palace Car Company (Pullman Company) in 1867. The company quickly became successful through its business structure and high-quality products. In less than a decade, George Pullman sought to consolidate and expand his business operations while improving the living conditions of his workers. He was convinced that better living conditions would produce better workers.

The Pullman Company purchased 4,000 acres of vacant land south of Chicago and in the spring of 1880 broke ground on an innovative planned manufacturing complex integrated with worker homes and amenities. The town included the manufacturing buildings, church, theater, market, water tower, hotel,



and more than 1,300 housing units. In addition to believing that good living conditions could prevent misery and vice, Pullman believed that good design and beauty were ennobling and thus desired buildings and a landscape that would be both practical and aesthetically pleasing. The innovative business model of the Pullman Company included manufacturing, renting rail cars and providing on-board staff, and managing the Town of Pullman with its residential housing.

When an economic downturn led to flagging revenues, the Pullman Company lowered wages, but not the rents on company housing, angering workers. This spark ignited the Pullman Strike of 1894, in which Pullman factory workers walked off the job and American Railway Union members nationwide boycotted Pullman cars, disrupting rail traffic. This major labor action was defeated, with national reverberation and though public sentiment had been against the boycott, George Pullman was roundly criticized for the policies that led to the strike and his refusal to enter into arbitration with his workers.

Following the strike, the situation for residents in Pullman remained dire, and while little effort was made to evict residents or collect rent in arrears, hardship was widespread. If George Pullman entertained any doubts about the wisdom of continuing the company town experiment, they were not reflected in his actions; company ownership and concern with the town's appearance continued under Pullman's direction until his death in 1897.

In 1898 the Illinois Supreme Court ordered the Pullman Company to sell all nonindustrial land holdings because of violations of the original company charter. By 1907, the company-owned housing and non-manufacturing buildings were sold to private owners with residents given the first option of buying their homes. Without the company care and maintenance over the property, the community of Pullman started to deteriorate. In 1960, when developers planned to demolish much of the Pullman neighborhood to expand the Calumet Harbor, residents banded together in protest and formed the Pullman Civic Organization to preserve the historic neighborhood and promote the general welfare of the community. In 1970 the district became a national historic landmark and in 1972 portions of the Pullman Community were designated as a City of Chicago landmark district.

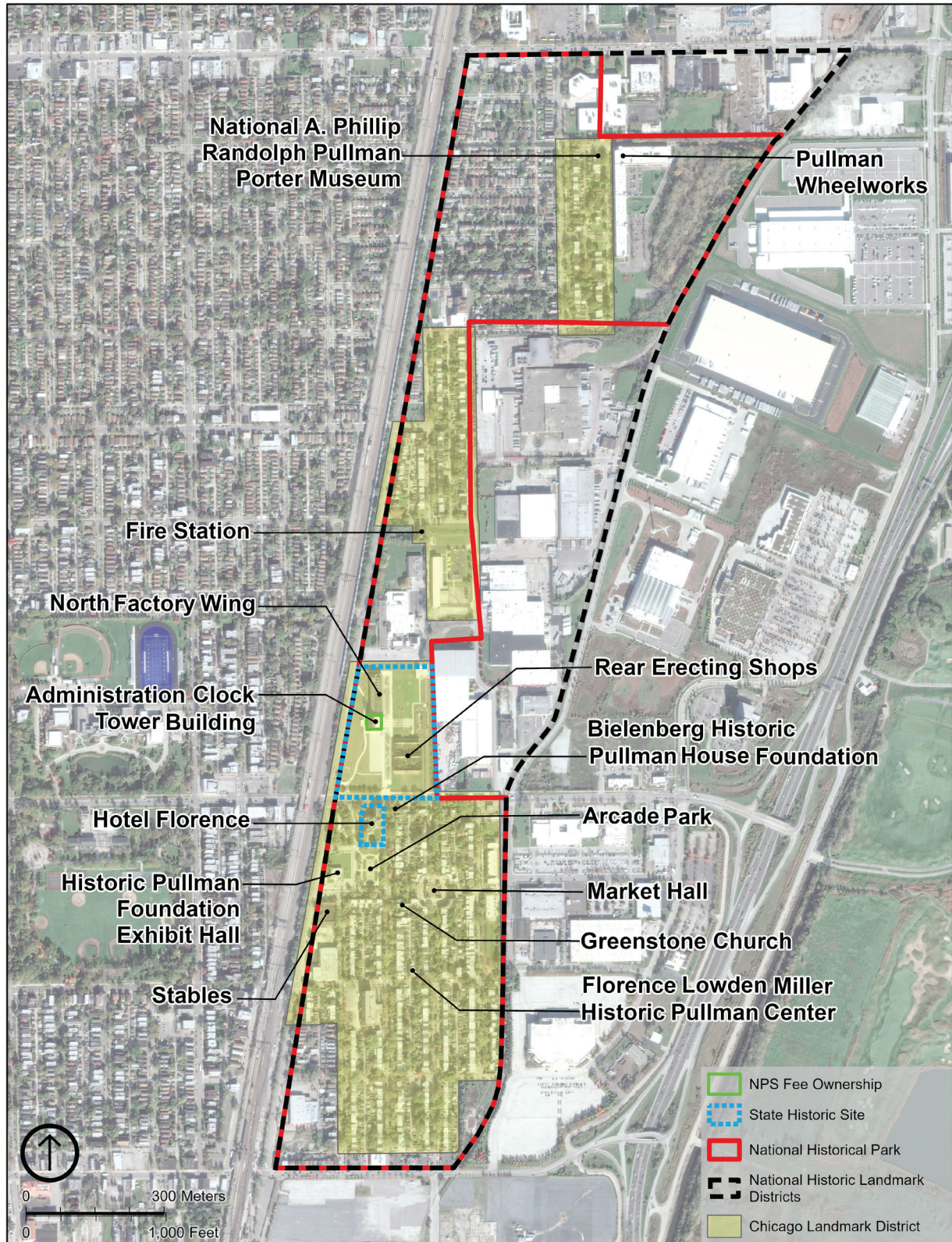
In 1991 the State of Illinois acquired the original Pullman Car Works and the Hotel Florence which was subsequently established as the Pullman State Historic Site. Under the former Illinois Historic Preservation Agency, plans were set to rehabilitate the site and open it as a historical site for public access. Many of the plans were stalled in 1998, one week before rehabilitation was to begin, when an arson fire did major damage to the Rear Erecting Shops and the Administration Clock Tower Building. Since 1999, the State of Illinois has invested in stabilizing and preserving the Administration Clock Tower Building, the surviving Front Erecting Shops – North Factory Wing, the Rear Erecting Shops, and the Hotel Florence. Meanwhile, residents and stakeholders worked steadfastly to promote the idea of Pullman as a unit of the national park system.

In February 2015, President Barack Obama signed a presidential proclamation designating Pullman National Monument. In December 2022, the site was redesignated as Pullman National Historical Park.

Designations and Jurisdictions

Pullman is a complex system of overlaying jurisdictions with various authorities and influences. Below is a list of the major jurisdictions and a summary of how they relate to Pullman. The National Historic Landmark District (black dotted line), Chicago Landmark District (yellow shading), Illinois State Historic Site (small blue dotted line), National Historical Park (red solid line), NPS fee ownership (green solid line) are all represented in Figure 1. Local Government, private property and streets are not called out in Figure 1 but are important for understanding the different jurisdiction in the area and managing the Sites.

National Historic Landmark Districts : In 1970, the Pullman Historic District was designated as a National Historic Landmark (NHL). NHLs are determined by the Secretary of the Interior to be nationally significant in American history and culture. NHL designation encourages all property owners to preserve and maintain the site, but only regulates federal agencies on restrictions. Specific buildings



[Figure 1: Pullman Historic District Overview]



within the NHL but not encompassed by the State Historic Site named in the NHL nomination include the Union Foundry, the Pullman Fire Station, the Hammer Shop (Industrial structures between 108th and 111th Streets), the Stables, and the Greenstone Church. The National Park Service, who manages NHL program, may recommend to owners various preservation actions but owners are not obligated to carry out these recommendations.

Chicago Landmark District: Through a process of nomination, collaboration and local legislation, the south portion of the Pullman neighborhood and the state-owned portions were designated a Chicago City Landmark District in 1972, The north portion of the Pullman neighborhood was designated a Chicago City Landmark District in 1993. The two districts were administratively joined and renamed the Pullman District by the city in 1999. The Commission on Chicago Landmarks reviews any proposed alteration, demolition, or new construction for properties in landmark districts as part of the permit review process. The Commission determines whether the proposed work will impact the “significant historical and architectural features” of the district. For most landmark districts, these are the exterior building elevations visible from the public right-of-way. The Commission reviews any work involving demolition. The Commission’s purpose is “To identify, preserve, protect, enhance, and encourage the continued utilization and the rehabilitation of such areas, districts, places, buildings, structures, works of art, and other objects having a special historical, community, architectural, or aesthetic interest or value to the City of Chicago and its citizen”.

Illinois State Historic Site : In 1991 the state designated the Pullman Factory and Hotel Florence as a State Historic Site. The State of Illinois owns and manages the Front Erecting Shops - North Factory Wing, Front Erecting Shop – South Factory Wing (Ruin), Transfer Pit, Arrival Plaza, Worker’s Gate Reconstruction, Rear Erecting Shops, Service Building, and surrounding grounds – these are all part of the Car Works. In addition, the State of Illinois owns and manages the Hotel Florence and Hotel Florence Annex. Pullman State Historic Site was managed by the Illinois Historic Preservation Agency until 2018 when all powers, duties, rights, and responsibilities of the agency, except those related to the Abraham Lincoln Presidential Library and Museum, were transferred to IDNR in 2018. The mission of the IDNR Historic Preservation Division is to “Protect the state’s historic resources and promote them so that the public enjoys them and learns from them” (20 ILCS 3405).

National Historical Park : Pullman was established as a National Monument in 2015 under Presidential Proclamation Number 9233 and congressionally redesignated as a National Historic Park (NHP) in December of 2022 under P.L. 117-328: Consolidated Appropriations Act, 2023. The NHP boundary encompasses 206 acres of the Pullman neighborhood. The Administration Clock Tower Building is the only NPS fee ownership within the boundary.

Local Government: The City of Chicago operates under a Mayor-Council form of government, which is divided into 50 wards. An alderman is elected from each ward to represent constituents in the

City Council, the legislative body of the city. The council maintains legislative powers granted by the state legislature and home rule provisions of the Illinois constitution and passes laws and ordinances. One major ordinance maintained by the council is zoning, the city's mechanism for protecting property rights, limiting nuisances, and promoting health and safety. Zoning ordinances dictate acceptable development types and densities. Pullman is a combination of high-density residential, community commercial, and light industrial zones. The City of Chicago owns several properties and owns and operates city parks within the NHP boundary.

Private Property: Within the NHP boundary are many private residential properties as well as commercial properties and those owned by nonprofit organizations. Their property rights are protected by the US and State Constitutions. The NPS and IDNR do not have jurisdiction over these properties. The NPS and IDNR are not actively acquiring any private residences and hope to support private landowners in preserving the Pullman community.

Streets: The streets within and surrounding the Pullman community are owned and maintained by Cook County Division of Highways and Chicago Department of Transportation (CDOT). The streets provide circulation throughout the NHP and connection to the rest of the city. In 2017, the city published the Pullman Transportation Plan to facilitate the specific transportation needs of the community and CDOT is actively changing the streetscape to improve the Pullman experience.

Demographics and Socioeconomic Context

The community of Pullman has two designated Census Tracts (American Community Survey, 2021) with a total population of 3,839. The tracts run from Doty Avenue and Cottage Grove Avenue on the east and west and 103rd St. To 115th St. on the north and south. 111th Street is the dividing line between the two tracts. The largest racial group in Pullman is Black/African American at 61%, followed by White at 26%. The City of Chicago's overall demographic makeup is a Black/African American population of 29% and White population of 45%. The population in Pullman is 14% Hispanic, who are primarily located in Tract 5003 (south), which is less than the overall Hispanic population in Chicago at 28%. Approximately 84%

Table1. Demographic Table for Pullman Historic District					
	Pullman Community	Tract 5002 North Portion	Tract 5003 South Portion	Chicago	Illinois
Population					
	3,839	1,963	1,876	2,742,119	12,821,813
Race					
White	26%	2%	51%	45%	68%
Black/African American	61%	93%	28%	29%	14%
Other	13%	5%	21%	26%	18%
Hispanic Origin					
Hispanic or Latino	14%	0%	14%	29%	18%
Income and Poverty					
Median Household Income	\$39,787	\$32,888	\$46,685	\$66,576	\$72,205
(American Community Survey 2021)					

of Pullman residents make under the median annual income of Chicago at \$66,576 per year, with 41% making less than \$25,000 a year.

Scope of the Joint General Management Plan

Joint Management

Since its designation as a national park system unit in 2015, the NPS and IDNR have worked closely together to provide a unified and fluid visitor experience and preserve the historical nature of the site. Because of the similar park purposes, it was determined that cooperation could improve visitor experience and resource preservation while also providing greater efficiency and cost savings.

Pullman National Historical Park, originally established as Pullman National Monument in 2015, encompasses within its legislative boundary 206 acres of the historic Pullman neighborhood, including the entirety of Pullman SHS. The NPS owns the Administration Clock Tower Building at the center of the Car Works, a complex of industrial buildings covering approximately 12 acres. Pullman State Historic Site, established in 1991, includes the remaining Car Works resources, surrounding landscape, and the Hotel Florence, all owned by the IDNR.

Given that the NPS and IDNR will attract and serve the same visitor base and share common purposes to preserve and interpret Pullman history and resources, the NPS and IDNR entered a cooperative management agreement. The Cooperative Management Agreement (appendix D) outlines the intentions of NPS and IDNR to cooperatively manage lands and structures within the boundaries of the Sites, including the need to “collaborate on various planning and management initiatives, including the general management plan, long range interpretive plan, scope of collections, collections management plans, resource management plans, and development strategies for the sites.” The efforts made in this document support the agreement between the two agencies.

Purpose and Need for Joint General Management

The National Park Service has prepared this joint general management plan to address the requirements of the National Parks and Recreation Act of 1978, and *NPS Management Policies 2006*, and P.L. 117-328, which enabled the establishment of Pullman National Historical Park (NHP). The JGMP builds on



legislation, established resolutions, laws and policies, and on the Pullman's foundation document (NPS, 2017) to develop a management vision for the Pullman NHP and Pullman SHS.

The State of Illinois approaches planning for each site individually following best practices established by the managing agency (see JGMP Chapter 1 Pg 2 IDNR Rationale for General Management Planning).

The IDNR and NPS committed to collaborating on a general management plan in a cooperative management agreement (appendix C). The joint purpose for the JGMP is as follows:

- Provide a joint management vision and decision-making framework for managers to ensure future resource protection, access, and tools to manage visitor use
- Define desired resource conditions and visitor uses and experiences to be achieved.
- Develop long-term strategies for preserving resources, providing access, connecting visitors to key experiences, and managing use
- Identify partnerships with public and nonprofit entities, and other interested parties, for the preservation of non-federal or state lands and
- Evaluate properties and resources within the NHP's legislative boundary for opportunities for protection by the NPS and/or others

Planning Issues and Opportunities

NPS and IDNR staff, representatives from county, state, and city agencies, stakeholder groups, and the public helped to identify issues, opportunities, and concerns during internal scoping and civic engagement. Comments were solicited at public meetings, through planning newsletters, and at meetings with agencies and community stakeholders. An issue is defined as a conflict or problem regarding the use or management of public lands. The JGMP provides high level strategies for addressing these issues and opportunities within the context of the Sites' purpose, significance, and special mandates. The following





is a synopsis of the issues, opportunities and concerns from the solicited comments received during the JGMP planning process.

Experiencing the Sites

Boundary Sign Opportunities: The boundary of the NHP could be utilized to better identify entrance into the Sites. Signage may create a desired sense of arrival for visitors and residents alike. Gateway locations at the north and south boundaries along Cottage Grove Avenue were analyzed for their potential to be utilized as entrance plazas. The full analysis of these locations can be found in Chapter 3.

Collections and Research Space Opportunities: Partners and collection holders have noted the potential for a collections and research space to be located at the Car Works. Such a space would be beneficial in the central point of interest for scholars, and it could support original research related to Historic Pullman and Pullman Stories, particularly on labor history, Black history, capitalism, immigration, and urban planning. There is not a current recommendation for when or how this could be executed. The North Factory Wing is identified in the IDNR Visioning Document (appendix D) as a potential location for this space.

Wayfinding Opportunities: Identified in the Pullman Transportation Plan (2017) is a need for clear wayfinding to the park and within the park as well as a desire for uniform branding and continuity of information delivery throughout the Sites. The JGMP does not address specific wayfinding management actions as previous planning efforts from the NPS and CDOT have provided clear direction.

Green Space Opportunities: An opportunity exists to utilize space for public access and recreation throughout the NHP boundary. Many blighted areas within the NHP boundary could serve as accessible green space in the urban landscape, providing outdoor recreation opportunities for residents and visitors alike. The JGMP does not address green space in the management actions.

Visitor Safety Opportunities: A safety plan is needed to ensure human safety throughout the Sites. Safety issues include infrastructure challenges such as crosswalk size and placement, which is addressed in the CDOT transportation improvements and physical safety of visitors and residents. The JGMP does not address specific visitor safety management actions.

Food Access Opportunities: Currently, few food options exist within the NHP boundary. This issue could be addressed with food trucks throughout the community, the development of new restaurants and food venues, and implementation of IDNR plans to incorporate dining services in the Hotel Florence. The actions required to fulfil this opportunity are already stated in IDNR plans or would be through City of Chicago development and permitting.

Preserving Cultural Resources

The Sites' physical resources include the historic structures and artifacts located within or associated with the Pullman Car Company. Several threats to the resources within the NHP and SHS have been identified, including vandalism, theft by relic hunters and looters, litter, potential impacts of recreational use, deferred maintenance/neglect, and potential development and redevelopment that is not in character with original architectural styles.

Partnerships

For NPS administered sites, units known as partnership parks are often found in urban or suburban population centers, where a park coexists with many other public and private land uses. In such areas, the NPS has stated that “managing through agreements and partnerships is a matter of both practical necessity and philosophy” (CRI 2016). With their diverse ownership and management arrangements, some of these parks have served as sites for innovative management techniques within the NPS .

Partnerships are essential to the success of the Sites. Today the Sites have numerous partners who support a variety of park activities and operations, several with formal agreements and many that are collaborative with less formal arrangements. These partnerships benefit the Sites and the community. In years to come, existing partnerships, both formal and informal, would continue and new partnerships would emerge as the NPS, IDNR, and current partners build relationships with others to address the desired conditions and implement management actions in the approved JGMP. Park managers should seek to maintain and foster relationships with current partners and pursue opportunities for additional partnerships. Agreements will be maintained and updated as necessary, and the Sites will continue to engage partners on planning elements and implementation moving forward. The NPS and IDNR have outlined this commitment in the current Cooperative Management Agreement (appendix C) between the agencies. Law, regulation, and policy guiding partnerships for both the NPS and IDNR are applicable to any future work with partners.

Areas of Interest

Within the NHP boundary, there are many sites that have been identified as significant to the Pullman community and story. In most cases NPS and IDNR seek to support current owners and partners in managing historic properties. Some significant sites or parcels with the potential to further develop the visitor experience are identified as “areas of interest”. All of the sites identified as an area of interest have been addressed in previous planning work by the NPS, IDNR, or other groups or agencies. This document aims to update information and provide a broader explanation actions to be taken by the NPS and IDNR. A thorough analysis in Chapter 3 : Areas of Interest page 34 of the JGMP assesses if an identified area of interest meets NPS or IDNR criteria for potential acquisition, easement, or other interest.



Relationship with Other Planning Efforts

The JGMP for the Sites is heavily informed by and prepared in coordination with other plans and by special mandates and administrative commitments with other federal agencies, state and local governments, utility companies, partnering organizations, and other entities. As appropriate, relevant recommendations from these plans are carried forward for integration in this JGMP.

NPS and IDNR Plans

NPS Pullman Factory Site Conceptual Design / Environmental Assessment (2017): NPS and IDNR facilities and grounds are impacted by the conceptual design plan. The Administration Clock Tower Building exterior and first floor visitor center rehabilitations are consistent with this design plan. Further work to the 2nd and 3rd floors of the Clock Tower is ongoing. The factory site grounds rehabilitation followed these plans. Desired conditions and management actions in Chapters 2 and 3, related to the clock tower, have incorporated the preferred alternative in this plan.

NPS Long Range Interpretive Plan (2021): The long-range interpretive plan (LRIP) identifies the NPS interpretive themes for Pullman NHP, describes visitor experience goals and recommends a wide variety of both personal and non-personal services and outreach activities that will best communicate the NHP's purpose, significance and themes. This document was created with partners including the IDNR and includes guidance on working with IDNR and other stakeholder to tell the Pullman story. This serves as a guide for working with our partner organizations and looking for potential new partnerships.

IDNR Vision – Pullman Car Works/Hotel Florence (2020): This document (appendix D) outlines a clear vision for the future of the SHS. This vision document was released to the public during the JGMP process and was integrated into all facets of the JGMP.

NPS Signage and Wayfinding Plan (2021): This plan was created by the U.S. Department of Transportation Volpe Center to guide signage within the NHP boundary and to guide wayfinding to the Sites. The proposed action is aligned with this plan with the goal of creating a consistent signage style throughout the NHP.



NPS and IDNR Cooperative Management Agreement (2021): The cooperative management agreement (Appendix C) is a 10-year agreement between the NPS and IDNR for the cooperative management of the Sites. It defines the roles and responsibilities of each agency to fulfill the missions of both sites more effectively.

NPS Scope of Collection Statement (2020): This document outlines the NPS collections. The NPS museum collection will consist of cultural collections. There is no expectation for the NPS to acquire a natural history collection.

NPS Archeological Overview and Assessment (2017): This report is a review of archaeological resources of the Pullman NHP, incorporates work previously completed including, the 2000 Pullman Water Tower excavation, 2004 Factory excavations, 2005-2008 Pullman Town excavations, and the 2016 Archaeological study. This document includes recommendations for future research and management that has informed the JGMP.

Other Related Plans

Positioning Pullman (NPCA & AIA, 2015): This visioning document is a collaborative work led by the National Parks Conservation Association (NPCA) and American Institute of Architects Chicago (AIA) that included NPS and State of Illinois staff. The work done here accounts for regional interests along with Pullman community interests. Areas of interest to the Pullman story that were analyzed in Positioning Pullman and analyzed in this JGMP include: the Pullman Fire Station, the Salem Baptist Church, the Hammer Shop, the Stables, Market Square, and the Southwest corner of the National Historical Park (See Chapter 3: Areas of Interest, Pg 34). The work of Positioning Pullman was considered during the JGMP process. The execution of this vision was revisited through Positioning Pullman 2.0 in 2019.

Pullman Transportation Plan (CMAP, 2017): Positioning Pullman inspired the need for the Pullman Transportation Plan. This was a joint effort of the CMAP and NPCA. The US Department of Transportation Volpe Center was included on the project team, and NPS was consulted and provided input. This plan identified several sites discussed in this JGMP for potential future use and development including the Northwest and Southwest corners of the NHP boundary, the Pullman Fire Station, and the Salem Baptist Church property. This planning effort was utilized by the Volpe Center to create the





NPS Signage and Wayfinding Plan (2021) which is being executed through the NPS Five-Year Transportation Implementation Plan (2022). Transit based design concept plans for 111th St from IDNR have also incorporated this plan. CDOT, CTA, Metro, and Chicago Parks planning is considered in this document. NPCA and Chicago Metropolitan Agency for Planning host the Pullman Transportation Committee quarterly to help implement this plan. The NPS and IDNR participate as part of the Pullman Transportation Committee. JGMP planning has integrated this plan for compatibility.

1978 National Parks and Recreation Act Requirements

As described in the JGMP chapter 1: NPS Rationale for General Management Planning, the over arching vision of this document addresses the 1978 National Parks and Recreation Act at a programmatic level. The JGMP serves as a component of the park's planning portfolio. The park's planning portfolio is the collection of planning documents that guides decision making and satisfies law and policy. The planning portfolio enables the use of planning documents (such as this one) to meet the four general management plan statutory requirements identified in 54 USC 100502 and a broad range of park planning needs. This section outlines how the JGMP addresses those requirements. Given the dynamic nature of park operations and issues, the descriptions for each requirement include reference to subsequent planning needs that are programmatic, strategic, or implementation plans. Subsequent plans, which will be consistent with the approved JGMP and the Pullman National Monument Foundation Document (NPS 2017), will require additional analysis and compliance when implementation becomes feasible.

Resource Preservation

This JGMP identifies desired conditions for natural and cultural resources within the Sites' management areas and identifies management strategies and actions for natural and cultural resources. Using the portfolio approach, the following documents are currently used for the management direction in preserving resources: the Scope of Collections Statement (NPS 2020) provides measures for resource preservation; and the Archeological Overview and Assessment (NPS 2017) reviews archeological resources and provides recommendations for management. The Pullman Factory Site Conceptual Design Environmental Assessment (NPS 2017) provides measures for the preservation of the Administration Clock Tower Building and the Car Works grounds. Subsequent plans, such as a cultural landscape report, NHL update, and an archeological management plan, would include additional preservation guidance for the NHP's resources.

Types and General Intensities of Development

The JGMP outlines the desired conditions and proposed management strategy for the types and general intensities of development throughout the Sites. The proposed action seeks to increase public enjoyment and use of the Sites and provides strategies and actions for facility management. As needed, subsequent site-specific plans

would be developed that include specific measures to address collections management, administrative, maintenance, and storage needs in appropriate relationship with resource protection measures.

Visitor Carrying Capacity

This JGMP identifies desired conditions for visitor use and experience within the NHP's management areas and identifies strategies and actions to achieve desired conditions. The JGMP through the desired conditions identifies general intensities of use and activities associated with public enjoyment and use of the NHP and potential management strategies that would respond to changes in visitation. As needed, subsequent site-specific planning such as a transportation and circulation plan would be developed that include more extensive management strategies to address the amounts and types of visitor use as additional information becomes available.

External Boundary Modifications

National Park Service policies require park managers to evaluate the adequacy of boundaries for protecting resources and providing visitor opportunities in general management planning. The criteria state that potential boundary adjustments may be recommended for the following purposes:

- Protect significant resources and values or enhance opportunities for public enjoyment related to park purposes.
- Address operational and management issues, such as the need for access or the need for boundaries, to correspond to logical boundary delineations (e.g., topographic or other natural features or roads).
- Otherwise protect park resources that are critical to fulfilling park purposes.

The National Historical Park's current legal boundaries were established in the 2015 presidential proclamation creating the Pullman National Monument and reconfirmed by the legislation redesignating Pullman National Monument as Pullman National Historical Park in 2022. As such, no specific boundary adjustments were identified in this JGMP. This plan does not preclude future consideration of boundary adjustments should needs or conditions change. As needed, potential boundary adjustments would be evaluated in a boundary study or similar planning document.

Next Steps and Implementation

Approval of this plan does not guarantee that the funding and staffing needed will be forthcoming or that direction would not change due to future legislation. Actions directed by the JGMP would be accomplished over the years following the plan with updates as needed. The NPS and IDNR will continue to look for creative and diverse funding opportunities to complete the described actions. The plan will be used by site, district, and regional staff to guide management decisions through the life of the plan and will be used to develop more immediate strategic goals and action plans.

The implementation of the approved plan could be affected by factors, such as changes in staffing levels, visitor use patterns, and unanticipated environmental or legislative changes. As actions in the approved JGMP are implemented, additional feasibility studies and more detailed planning, environmental documentation, and consultation would be completed, as appropriate, before certain actions could be carried out.



JGMP Chapter | 2

Vision, Desired Conditions, and Management Areas

Introduction

General management plans provide a framework for management by aspirational desired conditions for each management area within the site. This chapter outlines the site-wide general management planning framework for the Sites followed by desired conditions for each management area.

Desired conditions are the cornerstone of general management planning. Desired conditions statements provide a basis for future decision making by defining end-state goals that support the management vision for the Sites — “what” should be achieved, rather than “how” it should be achieved. They are defined as statements of aspiration that describe resource conditions, visitor experiences and opportunities, and facilities and services that an agency strives to achieve and maintain in a particular area. Desired conditions describe what outcomes, opportunities and end-state goals are to be achieved and maintained in the future, not necessarily what exists today.

Desired conditions can apply to an entire park unit or specific areas or resources. Typically, desired conditions statements are not changed in future planning processes, unless new management directives are introduced (e.g., legislation) or circumstances at the park greatly change and a new management approach is needed to effectively protect resources and provide for visitor experiences.

Desired Conditions and Management Areas for the Sites

The overarching guidance for desired conditions is the management vision statement that summarizes the desired outcomes of the JGMP. It articulates parkwide desired conditions and guides management action decision

making. The following vision statement was developed by the JGMP team and inspired and guided the JGMP process:

“Pullman serves as an inclusive and collaborative model for historic preservation and public lands management in a living community”.

Table 2. Site Wide Desired Conditions

Visitor Experience	<ul style="list-style-type: none"> • Visitor experience is enhanced by collaborative relationships between NPS, IDNR, and key partners who work together to research and interpret Pullman stories, and to preserve and protect historic structures, cultural landscapes, and artifacts relevant to Pullman. • Accessible opportunities are provided to all visitors. • Night skies, soundscapes, and air quality will not detract from the visitor experience while still recognizing the location in an urban environment. • Visitors can connect to the historic resources and landscapes. • Sites within this area lend richness to a planned community. • The experience of traveling through this area provides an immersive experience. • Visitor participation is consistent with current land use and private property ownership. • There are opportunities for historical recreation. • Visitors are cognizant that this is still an active community. • There are visitor opportunities throughout the Sites that provide pedestrian connectivity. • Visitors can: <ul style="list-style-type: none"> o understand the significance of the Sites and are satisfied with the interpretive experience and resource conditions. o be awed by the vast scale and power of the Pullman manufacturing operation, compared to the “people power” and human scale of the neighborhood. o encounter levels of use throughout the Sites which are consistent with the historical use of the area. o understand the Town of Pullman as a pedestrian-focused urban village where people could easily walk to work, school, church, grocery stores, and other local businesses. o participate in living history programs that connect with different types of historic experiences. o experience opportunities to gain first-hand knowledge of Pullman’s historic preservation success stories, as well as its challenges. o experience opportunities to connect to Pullman as a walking environment where popular destinations can be easily reached without an automobile (LRIP NPS, 2021). o understand the story was ever growing and changing and that it still is taking place today. o understand and respect the NHP and the Pullman Historic District as a living, present-day neighborhood of residents and businesses. o enjoy a safe, welcoming, inclusive, and respectful experience at the Sites. o be provided safe access to the historic resources and landscapes and will be able to safely navigate the grounds, street crossing, and sidewalks. o feel welcomed, included, and safe.
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Table 2. Site Wide Desired Conditions

Cultural/ Natural Resources	<ul style="list-style-type: none"> • Historic structures and cultural landscapes are preserved and protected in accordance with the Secretary of Interior's Standards for Historic Preservation. • The historic character and atmosphere of the Pullman Community is maintained while allowing for appropriate rehabilitation, reuse, and redevelopment.
Community and Partnership Engagement	<ul style="list-style-type: none"> • Residents and stakeholders benefit from technical assistance provided by NPS, often with the support of IDNR and key partners. • Residents and youth are engaged in the active preservation, interpretation, and stewardship of the Sites. • Formal and informal cooperation toward community revitalization and preservation of cultural and natural resources is supported by the NPS, IDNR, and local government agencies. • Formal and informal partnerships will improve the community atmosphere, the visitor experience, and cultural and natural resource preservation.

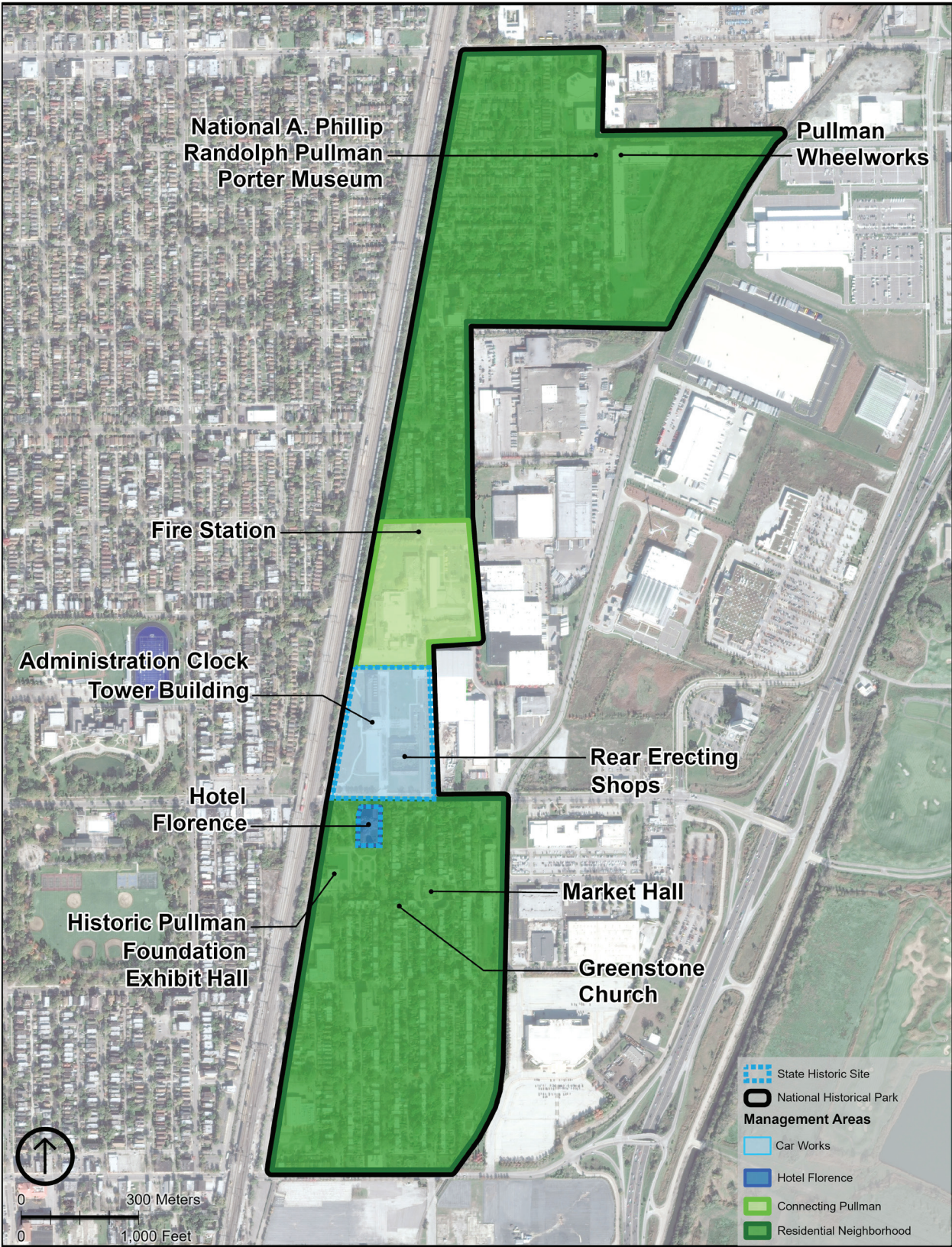
Desired conditions were developed during the planning process for the JGMP and includes input from the public gathered through public outreach. This section identifies desired conditions that apply to the entirety of the National Historical Park boundary (including the State Historic Site), organized around specific topics or resource areas. Since the NPS and IDNR do not have direct management authority over the entirety of the NHP, these desired conditions statements serve to meet the zoning requirement for the NHP, providing a similar level of guidance and meeting the intent of NPS management zoning policy.

Management Areas

The National Park Service uses the concept of management zoning to identify and describe the variety of resource conditions and visitor experiences to be achieved and maintained in different areas of a park unit. *NPS Management Policies 2006* notes that each park's approved general management plan will include a map that delineates management zones or districts that correspond to a description of the desired resource and visitor experience conditions for each area of the park. Zoning outlines appropriate uses and facilities necessary to support desired conditions. Some desired conditions may apply site-wide, but the delineation of management zones will illustrate where there are differences in intended resource conditions, visitor experiences, and management activities (NPS, 2006).

For the purposes of this guidance, zoning and desired conditions often fulfill the same major planning goals for a park unit or area. In most cases, zoning can be considered the spatial application of statements





[Figure 2: Management Areas Map]

of desired condition—where they describe the conditions, outcomes, and opportunities for specific areas of a park. Therefore, appropriately detailed desired conditions statements can essentially serve as management zoning for a unit if they provide guidance across all park areas. In this plan, the zones are referred to as management areas.

All lands within the Site’s legislated boundaries are assigned to an area regardless of whether the lands are currently owned by the NPS or IDNR. In partnership parks—such as Pullman National Historical Park—where the National Park Service and its partners are making management decisions, this shared understanding provides the basis for general coordination of plans and activities.

This JGMP identified four management areas for the Sites. Each management area applies to different geographic locations (see figure 2 and descriptions below), and is associated with a general level of management guidance or direction, including the types of activities and facilities that are appropriate in that area. The management areas are consistent with, and help achieve the specific purpose, significance, and special mandates for the Sites.

The site-wide desired conditions as described in the previous section are applicable to all four areas of the Sites. The following overview and desired conditions are applicable to each individually outlined area.

Car Works Area

The Car Works (commonly referred to as the historic factory site) consists of the NPS-owned Administration Clock Tower Building and visitor center and the surrounding IDNR-owned properties, including the North Factory Wing and the Rear Erecting Shops. The Car Works serves as the main visitor hub and provides local information for a visit to the entire Pullman area. Visitors will often start their experience at Pullman in the Car Works where they will learn about other opportunities within the NHP boundary and connected experiences outside of the park. The Car Works Area is characterized by State and Federal ownership and is the area where IDNR and NPS have control of the future conditions and actions that take place.

Table 3. Car Works Desired Conditions	
Visitor Experience	<ul style="list-style-type: none"> • The Car Works Area focuses on interpretation, education, and historic representation of the site, as well as being the central location for visitors to be informed of appropriate opportunities throughout Pullman Community. • The Car Works is a gateway where visitors can feel they have entered something different, a transformational space that they have not experienced before. • Visitors can: <ul style="list-style-type: none"> o immerse themselves in history, connect with different types of experiences, and understand the relationship between Pullman’s history and the present day. o encounter higher levels of use in this area, which is consistent with the historical use of the area. o explore the buildings and grounds including the Administration Clock Tower Building, manufacturing workspaces, and other commercial and recreational spaces with and without formal guides. o experience a Pullman Railcar.

Cultural/ Natural Resources	<ul style="list-style-type: none">• The cultural resources enhance the experience and expand interpretation opportunities while maintaining their integrity.• Current and future use is reflective of historic use patterns.• Historic resources are emphasized as the prominent basis for experiences.• Landscape is managed to depict the most accurate historic knowledge of the area, while incorporating where appropriate sustainable practices that include climate friendly and native plant landscaping.• The west side of the Administration Clock Tower Building will be more manicured and landscaped to keep with the theme of interpreting the boundary of Lake Vista.• A Pullman Railcar can be found in this area.
Community and Partnership Engagement	<ul style="list-style-type: none">• Actions will primarily be led by NPS and IDNR staff or long-term volunteers.• Volunteers will participate in a range of actions from periodic maintenance to supporting the visitor experience.

Hotel Florence Area

The Hotel Florence, Hotel Annex and surrounding grounds (the Hotel) will be an immersive experience where the visitor can connect with the prestige and ornate character of the Hotel. Visitors will learn about and understand the business and marketing strategies of George Pullman. The Hotel Florence and adjacent Car Works Area will complement each other with connected historical landscapes and connected viewsheds. The Hotel Florence Area is characterized by State ownership and is the area where IDNR has control of the future conditions and actions that take place.

Table 4. Hotel Florence Desired Conditions	
Visitor Experience	<ul style="list-style-type: none">• Visitors can experience the historic character of the Hotel with appropriate interpretive and education opportunities.• Visitors can learn about the role the Hotel Florence played in marketing the Pullman Company.• Visitors can enjoy amenities that were historically provided at the hotel.
Cultural/Natural Resources	<ul style="list-style-type: none">• The Hotel Florence grounds feature plants that are reminiscent of plantings that surrounded the hotel during the period of significance.• The Hotel's grounds complement the historical representation of the Car Works' landscape features.



Community and Partnership Engagement	<ul style="list-style-type: none"> • Actions will primarily be led by IDNR and NPS staff, with assistance from volunteers, or other identified partners as applicable law allows. • Volunteers may participate in a range of actions from periodic maintenance to supporting the visitor experience as applicable law allows. • Neighbors and their residential views and soundscapes shall be respected with any new installations and amenity operations.
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Residential Neighborhood Area

The Residential Neighborhood Area consists mainly of privately owned residences that are the living community within the boundary of Pullman National Historical Park. Visitors will gain a sense of the life and living conditions in Pullman, both past and present. This area serves to research, document, and interpret the lives of residents who lived in the Town of Pullman during the period of significance and to recognize and strengthen the role of present-day residents in community based historic preservation. While NPS and IDNR do not have fee ownership within this area, their influence and technical support are available to meet the desired future conditions and to help preserve the historic fabric of the community.

Table 5. Residential Neighborhood Desired Conditions	
Visitor Experience	<ul style="list-style-type: none"> • This area includes community space that are connected to the features of a thriving community that Pullman designed and that enhance the experience of understanding the historical setting. • Visiting this area offers opportunities to connect to history in a vibrant, living community • Resources in this zone help people to experience the Sites and are important to the functioning of the neighborhood. • Visitors to these areas respect the Sites and the Pullman Historic District as a living, present-day neighborhood of residents and businesses • Visitors can explore and see different kinds and sizes of planned housing for different levels of employees.
Cultural/Natural Resources	<ul style="list-style-type: none"> • Spaces that are integral to the design of the community will connect visitors to the historic fabric of the neighborhood and the Pullman story. • Residents understand the historical importance of the Pullman Neighborhood and are aware of the Secretary of Interior Guidelines for historic preservation. • Residents understand that the condition of the historic structures affect the historical significance and visitor experience. • Cultural resources are managed and maintained in accordance with city, county, and state laws, regulations, and policies, including local land-use zoning.



Community and Partnership Engagement

Actions in the Residential Neighborhood Area will primarily be led by community groups, partners, or private individuals. The NPS and IDNR will support, where feasible, activities and actions that align with organization missions and desired conditions outlined for this area. Additionally, the NPS can assist public and private landowners with design and implementation of interpretive media and programs that enhance public understanding of the cultural and natural resources of the NHL district. Assistance may also be available for design and implementation of appropriate treatments for historic properties such as preservation (stabilization), rehabilitation (with or without adaptive reuse) and restoration. As budget and staffing allow, technical assistance would generally include professional staff time, research, and assistance with obtaining funding for projects. All direction given by the NPS will follow Secretary of Interior Guidelines for Historic Preservation. Additional information can be found at the National Historic Landmarks Program webpage.

Connecting Pullman Area

The Connecting Pullman Area serves additional opportunities for visitors to learn about and understand the scale of manufacturing that occurred in Pullman. This area also links the Car Works with the upper portions of the Residential Neighborhood. In collaboration with partners, this area can provide community and open spaces. Currently the Connecting Pullman Area stands out from the other areas because of its limited visitor access and few remaining historic structures. While the NPS and IDNR do not have fee ownership within this area, their influence and technical support are available to meet the desired future conditions.

Table 6. Connecting Pullman Desired Conditions

Visitor Experience	<ul style="list-style-type: none"> • Visitors can seek out this location as a connection to the Pullman landscape and story. • Visitors can connect to the history of the Pullman area. • Resources in this area help people to experience the Sites and are important to the functioning of the neighborhood. • Visitors can view the historic Pullman Fire Station and Hammer Shop • Community business-oriented visitor services locations are appropriate in this area
Cultural/Natural Resources	<ul style="list-style-type: none"> • Property owners understand the significance of their historic structures and are aware of the Secretary of the Interior's Guidelines for Historic Preservation. • There are opportunities for external interpretive features such as waysides. • Green space is available for the community and visitors • Cultural resources are managed and maintained in accordance with city, county, and state laws; regulations; and policies, including local land-use zoning.

Community and Partnership Engagement

Actions in the Connecting Pullman Area will primarily be led by community groups, partners, or private individuals. The NPS and IDNR will support, where feasible, activities and actions that align with organization missions and desired conditions outlined for this area. Additionally, the NPS can assist public and private landowners with design and implementation of interpretive media and programs that enhance public understanding of the cultural and natural resources of the NHL district. Assistance may also be available for design and implementation of appropriate treatments for historic properties such as preservation (stabilization), rehabilitation (with or without adaptive reuse) and restoration. As budget and staffing allow, technical assistance would generally include professional staff time, research, and assistance with obtaining funding for projects. All direction given by the NPS will follow Secretary of Interior guidelines for historic preservation. Additional information can be found at the National Historic Landmarks Program webpage.



JGMP Chapter | 3

Management Strategy

Management Actions

Management actions are specific actions that site management intends to implement to achieve the desired conditions over the life of the plan. Because the Sites are managed collaboratively between the NPS and IDNR, there is a clear indication of the responsible party throughout the management actions. In most cases when only one party is identified the other party will support the action where possible and within the terms of the Cooperative Management Agreement (appendix C). This delineation of roles is particularly important because various sites and structures are owned and operated by different parties.

It is important to note, while a JGMP may identify a range of actions to be taken outside the direct authority of park management, the NPS and IDNR are only directly responsible for actions on federal or state-owned property. All other actions express the interests of site management and a willingness to support partners through a combination of technical and financial assistance, where feasible, to implement identified management actions for non-owned areas within the park boundary.

Proposed Action: Experience History

In the proposed action visitors would actively explore the entire park and enjoy the cultural resources while learning about the national significance and impact of Pullman. This proposal incorporates the continuation of current management and builds upon them to increase visitor experience and resource preservation. Management actions would be taken to provide technical support to the community where resources and funding allow. There are two categories of actions listed below: 1) general actions that are applicable site wide and 2) actions specific to management areas.

Table 7. General Actions

Partnerships	<ul style="list-style-type: none"> • NPS and IDNR would seek out partnerships that promote and benefit the historic character of the Sites. • NPS would hire a dedicated person to develop partner relationships through communicating, organizing, convening, hosting interpretive programming, and developing connections in the community. • NPS and IDNR would develop effective relationships and communication protocols with local elected officials and city staff.
External Outreach	<ul style="list-style-type: none"> • NPS would identify sites outside the NHP boundary with connections to the Pullman story and explore interpretation programming and opportunities for identified sites. • NPS would develop improved visitor information for additional NPS and IDNR related sites in the Chicago metropolitan area and actively collaborate with external partners to support programming, public events, and natural/cultural resource interpretation activities beyond the NHP boundary.
Circulation	<ul style="list-style-type: none"> • NPS would support efforts to determine the need and feasibility of shuttle services around the NHP and SHS to encourage sitewide visitation. • NPS and IDNR would support Chicago Department of Transportation's efforts to improve bike and pedestrian infrastructure, provide traffic calming within the NHP, and improve safety to pedestrian crossings.
Opportunity Areas	<ul style="list-style-type: none"> • NPS and IDNR would, if future property accession should happen, explore opportunities for additional visitor experiences by extending and preserving the transfer pit north of the car works over to the Service Master Building and add an additional replica worker's gate at 108 and Langley.
Community Interaction	<ul style="list-style-type: none"> • NPS would convene workshops about historic preservation and IDNR would support the NPS in this action.

Table 8. Car Works

Visitor Experience	<ul style="list-style-type: none"> • IDNR and NPS would collaborate with partners to provide a Pullman car experience. • NPS and IDNR would work with partners to identify options for research space.
Viewscales	<ul style="list-style-type: none"> • NPS and IDNR would preserve sight lines to historic buildings and other landscape features from adjacent areas.
Historic Preservation	<ul style="list-style-type: none"> • IDNR plans to repair and restore the Rear Erecting Shops to safely allow visitor access for guided tours and viewing of the historic structure. • IDNR plans to repair and restore the North Factory Wing to allow enhanced manufacturing interpretation and event uses. • NPS would seek to develop the second and third floors of the Administration Clocktower Building to the highest and best use for the National Historical Park.

Table 9. Hotel Florence

Visitor Experience	<ul style="list-style-type: none"> • NPS and IDNR would work together to support public access and an immersive and multifaceted visitor experience provided by NPS & IDNR staff, with assistance from volunteers, and docents. • IDNR would allow visitor access for guided tours and provide food and drink options.
Viewscapes	<ul style="list-style-type: none"> • NPS and IDNR would work together to preserve sight lines of the hotel from adjacent areas
Partnerships	<ul style="list-style-type: none"> • NPS and IDNR would work with the Chicago Park District to coordinate programming, events, infrastructure and amenities at Pullman Park and Arcade Park.
Historic Preservation	<ul style="list-style-type: none"> • IDNR would facilitate repair and rehabilitation of selected portions of the hotel for future use.

Table 10. Residential Neighborhood

Historic Preservation	<ul style="list-style-type: none"> • NPS and IDNR would support adaptive reuse in historic buildings, consistent with historic use and utilize community assistance services • NPS would be a convener for discussions on best practices in historic preservation and support research on historic preservation that preserves the stories and histories in the Pullman community. • NPS would develop a homeowners guide to support historic façade preservation that is applicable to the entire NHP boundary
Communication	<ul style="list-style-type: none"> • NPS and IDNR would collaborate with city officials on a process to be notified of development proposals for zoning changes within the landmark district.
Visitor Experience	<ul style="list-style-type: none"> • NPS would expand the scope of Park Ranger led programming to include destinations throughout the community.
Opportunity Areas	<ul style="list-style-type: none"> • NPS would explore opportunities with partners to create welcome plazas or gateway plazas to improve the visitor sense of arrival at 103 and cottage grove; 115 and cottage grove; 111 and doty; and 103 and Corliss. • NPS and IDNR would (if future property accession should happen), explore opportunities for additional visitor experiences.

Table 11. Connecting Pullman

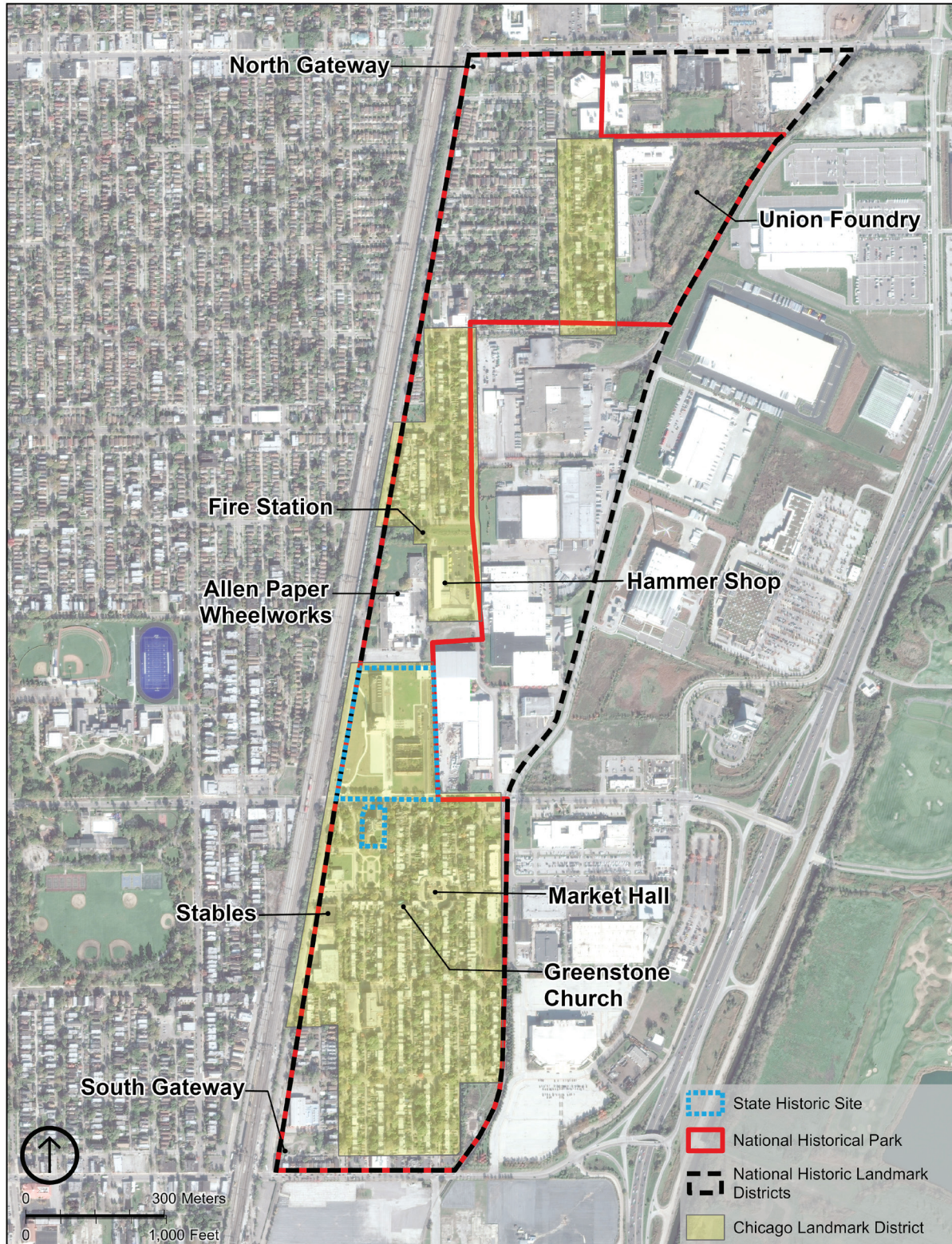
Partnerships	<ul style="list-style-type: none"> • NPS and IDNR would support partners in creating a visitor experience at the Pullman Fire Station • NPS and IDNR would support the creation of a cultural trail and corresponding visitor opportunities along the trail.
Opportunity Areas	<ul style="list-style-type: none"> • NPS and IDNR would, where appropriate, obtain easements to further connect the Car Works Area and the Residential Neighborhood Area.
Visitor Experience	<ul style="list-style-type: none"> • NPS and IDNR would partner with City of Chicago to develop interpretive signage on the Fire Station building.

Areas of Interest

Introduction:

As noted in Chapter 1, no boundary change to the Pullman NHP is being proposed as a result of this Joint General Management Plan. As part of this planning process, properties within the boundary of Pullman NHP were evaluated for the appropriateness of potential direct management by the NPS or IDNR. These properties were chosen for evaluation based on the historical significance of the properties (as outlined in the NHL or other planning documents) and based on their potential importance to visitor experience. The sites evaluated are labeled as “areas of interest” because acquisition is not the only possible management action. Currently, ownership of these areas of interest varies but is not currently with the NPS or IDNR. The nine areas of interest evaluated as part of this planning process are outlined in figure 3.



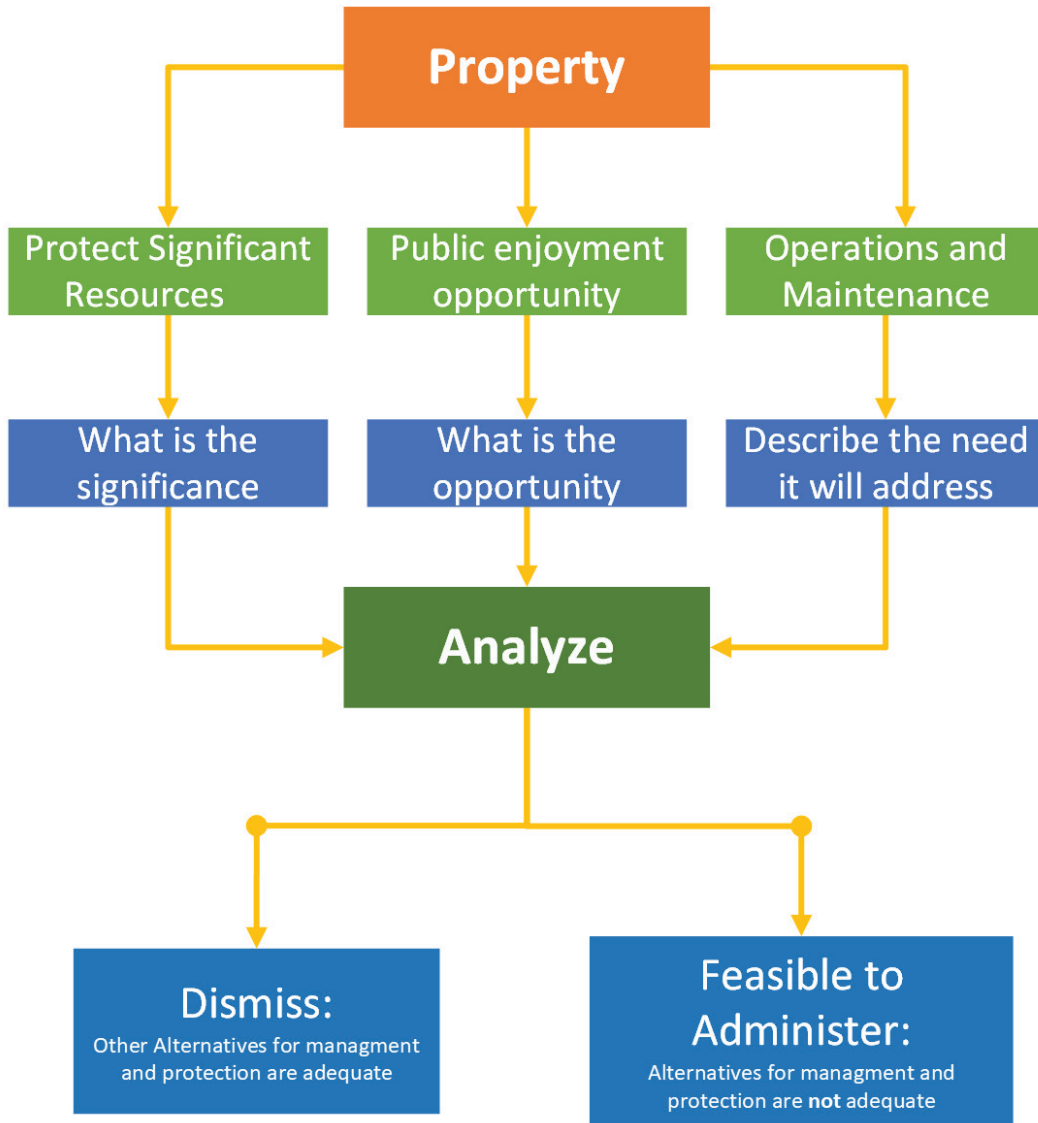


[Figure 3: Areas of Interest Map]

The Areas of Interest Property Analysis Matrix (figure 4) illustrates the evaluation process undertaken for each area of interest. Each area of interest was analyzed for historical significance, potential to meet visitor needs (public enjoyment), and operational and maintenance needs for the Sites. Current conditions, ownership, and legal protections were outlined along with applicable management and preservation guidelines. The proposed management area and desired conditions for that management area (see JGMP Chapter 2) were considered for each area of interest.

Potential pathways for future use and management actions for each of the properties was part of the evaluation. The discussions included an evaluation of the potential for the NPS to acquire properties. As areas of interest were analyzed, they were divided into two categories: 1) dismissed and 2) not dismissed. Two properties were determined to be unsuitable for acquisition and dismissed. Although none of the other seven areas of interest analyzed were recommended for acquisition as a current management action, they were not dismissed from potential future acquisition. The feasibility to administer these areas of interest was not evaluated given current management and protection was deemed sufficient. If ownership or other circumstances for these areas of interest change, they should potentially be reevaluated. The current management action for all evaluated properties is NPS and IDNR would support management by partners and offer support and technical as time and funding allowed.





[Figure 4: Areas of Interest Property Analysis Matrix]

The following is a summary of the analysis for each of the nine properties evaluated during the planning process:

Dismissed

North Gateway

Current Status: The corner of 103rd and Cottage Grove Avenue lies within the Residential Neighborhood management area of the NHP. This area consists of empty space in the form of an abandoned auto repair shop and empty parking lot as well as several adjoining vacant lots all held in private ownership. The area is within the NHL.

Analysis: Although this area is within the NHL, no structures remain that provide a significant connection to the Pullman story. The 2017 City of Chicago Pullman Transportation Plan outlines this location as a potential community park space and identifies the location as suitable for wayfinding associated with the Sites. This is a transportation hub with access to the Metra, CTA bus routes, and bike lanes. There is an opportunity to provide wayfinding and signage to signal the arrival at the Sites.



The NPS and IDNR seek to partner with the current owner or community groups to activate the space to add park signage and increase park visibility.

South Gateway

Current Status: The corner of 115th and Cottage Grove Avenue lies within the Residential Neighborhood management area of the National Historical Park. This area consists of vacant storefronts and a vacant lot all held in private ownership. The area is within the NHL.

Analysis: Although this area is within the NHL, no structures remain that provide a significant connection to the Pullman story. The 2017 City of Chicago Pullman Transportation Plan outlines this location as a potential community park space and identifies the location as suitable for wayfinding associated with the Sites. Several other planning efforts over the past four decades have identified this area for revitalization. This is a transportation hub with access to both the Metra, CTA bus routes, and bike lanes. There is an opportunity to provide wayfinding and signage to signal the arrival to the Pullman National Historical Park and State Historic Site. The NPS and IDNR seek to partner with the current owners or community groups to activate the space with a welcome plaza and park signage to increase park visibility.

Analysis Conclusion - Support partners (not suitable for acquisition):

These areas are within the NHL boundary and the NHP boundary, but historic significance is lacking. They provide key connections to the Car Works and Hotel Florence areas and could be revitalized through current or future owners or partnership groups. Partnerships are a fundamental resource and value of the NPS and the desired future conditions for this area of the NHP support efforts within the community as the best means to revitalization in this area. Future transportation development efforts by other government entities in these areas also support revitalization by owners or park partners. The NPS may be able to offer technical support towards future efforts. These properties are not suitable for future NPS or IDNR acquisition.

Not Dismissed

Union Foundry

Current Status: The Union Foundry lies within the Residential Neighborhood management area of the National Historical Park. This area is comprised of vacant land that is overgrown and minimally maintained. The area is held in private ownership and is fenced off and inaccessible to the public. The site likely includes environmental contamination from historic manufacturing, but no known testing has been conducted for contaminants. This area is within the NHL and NHP boundaries.

Analysis: This was the site of the Union Foundry and archeological resources likely exist throughout. No current NPS or IDNR operational or maintenance need has been identified that this area

would address. There is an opportunity to create usable space for the community and visitors by activating this green space to improve connectivity and access. Interpretive opportunities could exist in telling the Pullman story in relation to the Union Foundry. NPS and IDNR support the rehabilitation, remediation and activation of this site.

Pullman Fire Station

Current Status: The Pullman Fire Station (Fire Station) lies within the Connecting Pullman management area of the NHP at 601 East 108th Place. The Fire Station is currently vacant and owned by the City of Chicago. The building has a 2011 Condition Assessment and Stabilization report that includes priorities of stabilization, mothballing, and repair and maintenance. The City of Chicago does not have record of any work taking place toward these priorities. The building is boarded and inaccessible. The green space to the west of the Fire Station, also owned by the City of Chicago, is fenced off and is also currently inaccessible. The City of Chicago built the Pullman Fire Station in 1894 and later sold the space to Sherwin Williams after being decommissioned in 1951. Sherwin Williams owned the building until selling it to nonprofit Historic North Pullman in 1998. In 1999, North Pullman Development Corporation acquired the Pullman Fire Station. The City of Chicago took ownership of the building from the North Pullman Development Corporation through court order in 2006. The City of Chicago has maintained ownership since 2006. The Fire Station is within the NHL, NHP, and the City of Chicago's Pullman Landmark District.

Analysis: The Fire Station is the original building from 1894 and is named in the NHL nomination. It is potentially the last remaining hose drying watchtower in the City of Chicago. The adjoining properties also contains the foundation for the Pullman Company Medical Clinic. No NPS or IDNR operational or maintenance needs have been identified for the building. The 2017 City of Chicago Pullman Transportation Plan and Positioning Pullman both highlight the desire to activate the green space at the Fire Station toward improving access and connection within the National Historical Park boundaries. There is an opportunity to eliminate blight and increase connectivity between the IDNR-owned properties and North Pullman Community through the activation of the green space. Use of the green space, opportunities to provide technical support, and visitors seeking out this location as a connection to the Pullman landscape and story are desired conditions that would be supported with the activation of this space. As the Fire Station is protected through inclusion in the City of Chicago's Pullman Landmark District, the NPS and IDNR seek to support the City of Chicago in rehabilitation and activation of the Pullman Fire Station and adjacent open space or support another organization that will maintain the historic building and open the space for a community purpose.

Allen Paper Wheelworks

Current Status: The site of the Allen Paper Wheelworks lies within the Connecting Pullman management area of the National Historical



Park. The property is owned by the Salem Baptist Church and serves as their administrative offices, and houses Chicago Collegiate High School and Hope Center Foundation. The entire property is fenced off and inaccessible to the general public including green space and parking. It is within the NHL and NHP boundaries.

Analysis: The Allen Paper Car Wheel Company was the only non-Pullman business partner at the Pullman Factory site. The original building was built in 1880 and torn down in 1950. The existing building was used by the Pullman company, Sherwin Williams Paint, and is now used by the Salem Baptist Church for administrative offices. Positioning Pullman identified this property as a connection point between the Car Works and Northern Pullman residential area and outlined a vision of connection through this property. No operational need for the NPS or IDNR is identified for this area, although in the future, parking and access may be desired. There is an opportunity to expand the physical connectivity and access between North Pullman and the Car Works Area while further connecting the Pullman manufacturing story.

Hammer Shop

Current Status: The Hammer Shop lies within the Connecting Pullman management area of the National Historical Park. ServiceMaster DSI operates a commercial and residential rehabilitation company out of the Hammer Shop building and surrounding property. It is fenced off and inaccessible to the public. The Hammer Shop is contained within the NHL and NHP boundaries as well as the City of Chicago's Pullman Landmark District

Analysis: The space was originally owned by the Pullman company and was built by the Pullman company to house the hammer shop. No NPS or IDNR operational or maintenance needs have been identified for the building. Connectivity and access are outlined as needs for achieving the future desired conditions of this area as outlined in this document. This area currently causes a physical barrier to connectivity between the Car Works Area and the Pullman neighborhood. Preservation and activation of the space in the future would better support desired conditions for the management area.



Market Hall

Current Status: Market Hall lies within the Residential Neighborhood management area of the National Historical Park. Market Hall is closed to any use for safety concerns as the floor is structurally compromised. It is fenced off and inaccessible. Currently, a Pullman National Historical Park partner, the Historic Pullman Foundation, owns the Market Hall. Market Hall is within the NHL and NHP boundaries, as well as the City of Chicago landmark district.

Analysis: Originally laid out in the form of a square, the center of this area was occupied by a two-story brick Market Hall that had vegetable and meat stalls on the first floor and a public meeting hall above. The first Market Hall was destroyed by fire in 1892 and in the following year the architect Solon Beman redesigned the original square into its present circular format and prepared the plans for the second Market Hall. As rebuilt in 1893, the “Square” is treated as a unified and coherent whole and is designed in the classical and Italianate manner. The second Market Hall was two-stories high, with a central third story; first-story entrance ways and windows were arched. The first story was constructed of limestone and the upper floors of yellow brick (NPS, 1971). The 1893 structure burned in 1931, and another Market Hall was built. The current structure burned in 1973, closing the space because of safety concerns. No NPS or IDNR needs are identified for this space. The NPS and IDNR seek to support the Historic Pullman Foundation in rehabilitation and activation of Market Hall.

Stables

Current Status: The Stables lie within the Residential Neighborhood management area of the National Historical Park. This privately owned space is currently occupied by a local nonprofit that utilizes it as a headquarters. The McLaughlin Brothers contractors were the first owners of the Stables after the State of Illinois forced the Pullman Company to sell all the “non-industrial buildings” in the original town. The building served as a mortuary, barbershop, Illinois Bell Telephone Company, and a gas station and auto repair shop. The Stables lie within the NHL and NHP boundaries and the City of Chicago’s Pullman Landmark District.

Analysis: The Pullman Company originally built and owned the Solon Beman-designed Stables in 1880. The Stables primary purpose was to house all horses in the Pullman Community. The building was also used as fire department and telegraph office. The structure itself has seen extensive modifications over



the years but is one of the most charismatic remaining Pullman-era structures. No currently identified NPS or IDNR needs for operations or maintenance could be addressed here. The NPS and IDNR seek to support the current owner in rehabilitation and maintenance of the property.

Greenstone Church

Current Status: The Greenstone Church (Church) lies within the Residential Neighborhood management area of the National Historical Park. The Church is owned by the United Methodist Church and is in use serving an active congregation and several community organizations. The building is undergoing renovations on the roof and exterior. The NPS has previously provided technical assistance on rehabilitation projects for this building. The Church is within the NHL and NHP boundaries and protected by the City of Chicago's landmark district.

Analysis: The Church is an original Pullman building designed by Solon Beman and completed in the 1880's. The 1971 NHL nomination describes the Church as constructed of limestone in 1880-1884, "this fine Gothic Church is in excellent condition and has been little altered inside or out" (NPS, 1971). The church was for rent to any Pullman-based congregation. No needs of NPS or IDNR for operations or maintenance have been identified for this space. There is an opportunity for further rehabilitation and preservation of the Church. The NPS and IDNR seek to support the Greenstone United Methodist Church in rehabilitation and interpretive use of the church.

Analysis Conclusion - Support Partners (potentially suitable for future NPS acquisition):

All the considered properties are within the NHL and NHP boundary and all have historically significant resources. Excluding the Allen Paper Wheelworks and Union Foundry, the properties are also within the City of Chicago's Pullman Landmark District, providing the properties the protection of the Standards for Rehabilitation set forth by the United States Secretary of the Interior at 36 C.F.R. 67 through the City's permit review process. The properties provide key connections to the National Historical Park and State Historic Site properties and could be revitalized by current or future owners or through partnerships. Partnerships are a fundamental resource and value of the NHP and the desired future conditions for the Sites is to support efforts within the community as the best means for resource protection, rehabilitation, and interpretation. The NPS, where feasible, may offer technical support towards future efforts. If current ownership situations change, these properties should be reevaluated for future management strategies to preserve these resources.



JGMP Chapter | 4

Public Engagement

Public Scoping and Participation

Public participation and scoping are essential components of the JGMP planning process. Public scoping was conducted in the winter of 2022 to inform stakeholders about the need to develop a comprehensive JGMP at the Sites. Public scoping included a project scoping newsletter, that provided an overview of the project, described the planning process and the path forward, and included the 50-day public scoping period notice and comment period. The NPS solicited feedback on a series of questions included within the newsletter to assist with planning for the Sites' future and identifying preferred interpretive and educational experiences. During the public scoping process, the NPS held two in-person meetings on November 15 and 16, 2022 and one virtual meeting on November 17, 2022.

In conjunction with the JGMP, there was work completed through a third-party contractor to complete a Stakeholder Situation Assessment. "The purpose of the dialogue was to gain a better understanding of the issues, needs, and concerns of a broad range of stakeholders and to determine the most relevant and effective ways to reach and involve community members and partners in the JGMP process" (Situation Assessment, 2022). Several listening sessions and focus groups held in the fall of 2022 helped outline current barriers, opportunities and needs. The recommendations from this assessment have been considered for the JGMP and will continue to be used in future planning and public engagement efforts in the future.

Future Consultation

As actions from the JGMP are implemented, the NPS and IDNR will continue to consult with agencies, tribes, partners, stakeholders, and the public as actions advance toward more detailed design development and implementation stages and where such consultation would be beneficial, required, or be considered a best practice.

Appendix | A

Contributors & References

Contributors

National Park Service

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George Sisk – Senior Counsel & Ethics Compliance officer, Illinois Department of Natural Resources

Levi Bray – Site Superintendent, Pullman State Historic Site

Martin Tuohy – Site Services Specialist, Pullman State Historic Site

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Appendix | B

Pullman National Historical Park Enabling Legislation

P.L. 117-328 Consolidated Appropriations Act of 2023

SEC. 619. DESIGNATION OF PULLMAN NATIONAL HISTORICAL PARK.

(a) **DEFINITIONS.**—In this section:

- (1) **HISTORICAL PARK.**—The term “historical park” means the Pullman National Historical Park.
- (2) **MAP.**—The term “map” means the map entitled “Pullman National Historical Park Boundary”, numbered 590/125,485, and dated November 18, 2021.

(b) **REDESIGNATION OF PULLMAN NATIONAL MONUMENT.**—

- (1) **IN GENERAL.**—The Pullman National Monument, established by Proclamation Number 9233, dated February 19, 2015, is redesignated as the “Pullman National Historical Park”.
- (2) **AVAILABILITY OF FUNDS.**—Any funds available for purposes of the Pullman National Monument shall be available for purposes of the historical park.
- (3) **REFERENCES.**—Any references in a law, regulation, document, record, map, or other paper of the United States to the Pullman National Monument shall be considered to be a reference to the historical park.
- (4) **PROCLAMATION.**—Proclamation Number 9233, dated February 19, 2015, shall have no force or effect.

(c) **PURPOSES.**—The purposes of the historical park are to preserve, protect, and interpret Pullman’s nationally significant cultural and historical resources associated with—

- (1) the labor history of the United States and creation of a national Labor Day holiday;
- (2) the first planned industrial community in the United States;
- (3) the architecture and landscape design of the planned community;
- (4) the pivotal role of the Pullman porter in the rise of the African-American middle class; and
- (5) the entirety of history, culture, and historic figures embodied in Presidential Proclamation Number 9233.

(d) **ADMINISTRATION.**—The Secretary shall administer the land within the boundary of the historical park in accordance with—

- (1) this section; and
- (2) the laws generally applicable to units of the National Park System, including—
 - (A) section 100101(a), chapter 1003, and sections 100751(a), 100752, 100753 and 102101 of title 54, United States Code; and
 - (B) chapter 3201 of title 54, United States Code.

(e) **COOPERATIVE AGREEMENTS.**—

- (1) **IN GENERAL.**—To further the purposes of this section and notwithstanding chapter 63 of title 31, United States Code, the Secretary may enter into cooperative agreements with the State of Illinois, other public and nonprofit entities, and other interested parties, subject to paragraph (2)—
 - (A) to support collaborative interpretive and educational programs at non-Federal historic properties within the boundaries of the historical park; and

(B) to identify, interpret, and provide assistance for the preservation of non-Federal land within the boundaries of the historical park and at sites in close proximity to the historical park, but located outside the boundaries of the historical park, including providing for placement of directional and interpretive signage, exhibits, and technology-based interpretive devices.

(2) PUBLIC ACCESS.—A cooperative agreement entered under this subsection shall provide for reasonable public access.

(f) USE OF FUNDS.—

(1) IN GENERAL.—The Secretary may use appropriated funds to mark, interpret, improve, restore, and provide technical assistance with respect to the preservation and interpretation of the properties.

(2) INCONSISTENT PURPOSES.—Any payment made by the Secretary under this subsection shall be subject to an agreement that the conversion, use, or disposal of the project for purposes that are inconsistent with the purposes of this section, as determined by the Secretary, shall result in a right of the United States to reimbursement of the greater of—

(A) the amount provided by the Secretary to the project; and

(B) an amount equal to the increase in the value of the project that is attributable to the funds, as determined by the Secretary at the time of the conversion, use, or disposal.

(g) ACQUISITION OF LAND.—The Secretary may acquire for inclusion in the historical park any land (including interests in land), buildings, or structures owned by the State of Illinois, or any other political, private, or nonprofit entity by donation, transfer, exchange, or purchase from a willing seller.

(h) MANAGEMENT PLAN.—Not later than 3 fiscal years after the date on which funds are first made available to carry out this section, the Secretary shall complete a management plan for the historical park.

Appendix | C

Cooperative Management Agreement

COOPERATIVE MANAGEMENT AGREEMENT
between the
NATIONAL PARK SERVICE
and
ILLINOIS DEPARTMENT OF NATURAL RESOURCES
for
THE COOPERATIVE MANAGEMENT
of
Pullman National Monument and
Pullman State Historic Site

This Cooperative Management Agreement (Agreement) is made and entered into by and between the Illinois Department of Natural Resources, (IDNR) and the National Park Service (NPS). The IDNR and the NPS may hereinafter be referred to as a “Party,” or collectively as “the Parties.” Pullman National Monument and Pullman State Historic Site may hereinafter be referred to collectively as “the Sites.”

Article I - Background and Objectives

WHEREAS, Pullman National Monument (PULL) was established by Presidential Proclamation on February 19, 2015 for the purposes of: preserving the historic resources; interpreting the industrial history and labor struggles and achievements associated with the Pullman Company, including the rise and role of the Brotherhood of Sleeping Car Porters; and interpreting the history of urban planning and design of which the planned company town of Pullman is a nationally significant example.

WHEREAS, the single NPS-owned property is the Administration Clock Tower Building, located at 11001 S. Cottage Grove Avenue, Chicago, Illinois 60628; surrounded by the 12-acre Factory Grounds owned by IDNR.

WHEREAS, IDNR-owned properties are located adjacent to the Administration Clock Tower Building in the area of 111th Street and Cottage Grove Avenue in south Chicago. The main buildings/areas are: 1) North Factory Wing; 2) Rear Erecting Shops; 3) Maintenance Building; 4) the 12-acre Factory Grounds; and 5) Hotel Florence. These properties are collectively referred to as Pullman State Historic Site;

WHEREAS, the Pullman State Historic Site is located entirely within the boundaries of PULL and PULL is located entirely within the boundaries of the Pullman National Historic Landmark District (See Attachment A - PULL Boundary Map);

WHEREAS, the boundary of PULL encompasses much of the historic Pullman neighborhood, including active and historic residences and businesses, and the IDNR-owned Pullman State Historic Site. There are several overlapping designations and authorities in the Pullman neighborhood. The way PULL will thrive is through active collaboration efforts with IDNR, Pullman residents, and partners.

WHEREAS, the NPS and IDNR will attract and serve the same visitor base and share common purposes to preserve and interpret Pullman history and resources;

WHEREAS, the commitment of both NPS and IDNR resources within the boundary of PULL can enhance the common protection of all park visitors and resources, as well as the appropriate enjoyment and appreciation of the same by the public. The Parties will benefit by greater efficiency and cost savings derived from cooperative and consistent operating procedures and practices, as well as standardization of public facing signage, wayfinding, exhibits, and publications.

NOW THEREFORE, in consideration of the foregoing, NPS and IDNR desire to enter into this Agreement to provide for cooperative management of all NPS and IDNR lands and structures within the boundary of PULL.

Article II - Legal Authority

A. The NPS enters into this Agreement pursuant to the following authorities:

1. Authority to Use Agreements for Cooperative Management Where Park System Lands are Near State or Local Parks (54 U.S.C. § 101703): Authorizes the Secretary to enter into an agreement with a State or local government agency to provide for the cooperative management of Federal and State or local park areas.
2. General Authority to Take Actions That Promote and Regulate Units of the National Park System (54 U.S.C. § 100101 et seq.): The NPS Organic Act directs the Secretary to promote and regulate National Park System lands by such means and measures as to conform to the fundamental purpose of such lands, namely, conservation of the scenery and the natural and historic objects and wildlife therein, and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.
3. Authority to Use Cost-Share Arrangements with Partners (54 U.S.C. § 101701): Authorizes the Secretary to enter into an agreement with a cooperator for the purpose of sharing costs or services in carrying out authorized functions and responsibilities with respect to the National Park System, any NPS program, any affiliated area, or any designated National Scenic or Historic Trail. The Secretary is authorized to provide the federal funding share from any funds available to the NPS.
4. Authority to Use Federal Lands Recreation Enhancement (FLREA) Funds (16 U.S.C. § 6807(a)(3)(a)). Authorizes the NPS to spend fee dollars for the repair, maintenance, and facility enhancement related directly to visitor enjoyment, visitor access, and health and safety.

B. The IDNR enters into this Agreement pursuant to the following authorities:

1. Intergovernmental Cooperation Act (5 ILCS 220/3): Authorizes cooperation between Illinois Historic Preservation Agency (which is now a part of IDNR), as a public agency of the State, and any agency of the United States.
2. Historic Preservation Agency Act (20 ILCS 3405/16 (b) and (g)): Authorizes IDNR to enter into contracts and take all other measures necessary to maintain, preserve, restore, and conserve all State Historic Sites, and to cooperate with cultural organizations to advance agency goals.

Article III- Statement of Work

A. Joint Responsibilities of the NPS and the IDNR. Subject to their respective capabilities, NPS and IDNR agree to:

1. Establish an operations team for PULL and Pullman State Historic Site with representatives of both NPS and IDNR who will meet at least quarterly to collaborate on day-to-day operations and to address operational needs and issues.
2. Collaborate to enhance visitor understanding, research, and preservation of historic resources.

3. Collaborate to encourage community engagement in shared stewardship of the Sites and encourage volunteer activities by students, neighbors, and others.
4. Collaborate on various planning and management initiatives, including General Management Plan, Long Range Interpretive Plan, Scope of Collections, Collections Management Plans, resource management plans, and development strategies for the Sites.
5. Expedite decisions and agreements considered vital to the Parties' mutual goals and to this Agreement and expeditiously resolve any issues that arise at the lowest appropriate management level.
6. Meet annually to (1) develop an Annual Operations Plan to delineate responsibilities, activities, and commitments for both Parties annually, and (2) review the Cooperative Management Agreement and make any necessary amendments or modifications.
7. Provide orientation training opportunities for NPS and IDNR employees to better understand each Party's operational policies and procedures and to develop cooperative processes and procedures.
8. Collaborate on shared visitor services for the Sites including hours of operation and shared interpretive and educational programming for each site.
9. Cooperatively utilize existing IDNR permitting process as appropriate for public uses within the Sites, such as: special events, first amendment activities, and other special public uses of the Sites. This is necessary because the IDNR-owned land (Factory Grounds) surrounds the NPS-owned Administration Clock Tower Building and must be crossed in order to enter the Administration Clock Tower Building.
10. Provide mutual access agreement and protocol between the NPS and IDNR lands and facilities to allow each Party to carry out the provisions of this Agreement.
11. Develop and implement a joint communications strategy for the Sites. This strategy will address the use of digital media and will help guide the development and use of printed and digital interpretive, educational, and promotional materials for the Sites. As part of this strategy, the Parties will incorporate cross promotional opportunities on existing and developed communications platforms.
12. Develop a joint graphic identity for the sites to include signage, exhibits, and publications.
13. Develop and implement a joint partnership and community engagement strategy to help strengthen existing partnerships and establish new partnerships with local agencies, organizations, businesses, and other stakeholders.
14. Cooperatively convene a working group to explore feasibility of a shared archive and library space for multiple Pullman cultural heritage collections.
15. Seek opportunities to leverage both Parties' financial commitments to the Sites via cost-sharing and resource-sharing opportunities.

B. Responsibilities of the NPS. The NPS agrees to:

1. Provide appropriate staffing to manage and conduct interpretive and educational programming for the Sites.
2. Provide building maintenance and preservation for the NPS-owned structure (Administration Clock Tower Building.)
3. Manage a volunteer program to expand interpretive, educational, communications, outreach, and collections management capabilities for the Sites.
4. Own, repair, and replace the security system in the Administration Clock Tower Building.
5. Provide alarm monitoring services and annual testing and inspection of the devices for the Administration Clock Tower Building and North Factory Wing.

6. Provide routine operational trash removal service for the Factory Grounds and IDNR-owned structures on the Factory Grounds. This does not include trash removal for any construction/renovation projects executed by IDNR.
7. With the exception of water and sewage, be responsible for the provision of needed utilities (electricity, phone, internet, gas, etc.) at NPS-owned structure(s).
8. Subject to staffing requirements and capabilities and funding, hire/assign one seasonal maintenance worker (mid-April to mid-October) to assist with grounds maintenance on the Factory Grounds and Hotel Florence.
9. Invite IDNR employees duty stationed at Pullman State Historic Site to participate in regular NPS staff meetings, planning sessions, and training events.

C. Responsibilities of the IDNR. The IDNR agrees to:

1. Subject to staffing requirements and capabilities, provide appropriate staffing to manage and conduct grounds maintenance, including snow removal, for the Factory Grounds and Hotel Florence.
2. Subject to staffing requirements and capabilities, provide appropriate staffing to participate in interpretive and educational planning meetings, workshops, charettes.
3. Subject to staffing requirements and capabilities, provide appropriate staffing to provide advice and guidance on collections/archives management.
4. Provide building maintenance and preservation for the IDNR-owned structures (North Factory Wing, Rear Erecting Shops, Hotel Florence, and Maintenance Building.)
5. Provide water and sewage services for all structures located on the Factory Grounds to include the North Factory Wing, Rear Erecting Shops, Maintenance Building, and the Administration Clock Tower Building.
6. Be responsible for the provision of other needed utilities (electricity, phone, internet, gas, etc.) at IDNR-owned structures.
7. Maintain security system equipment in the North Factory Wing in good working condition.

Article IV - Term of Agreement

This Agreement shall remain in effect for a period of ten (10) years, unless terminated earlier per Article IX. The period from the Effective Date to the Expiration Date is the period of performance for the Agreement (Agreement Term). This Agreement can be extended for another ten (10) years with the written concurrence of both Parties.

Article V - Key Officials

- A. Key officials are essential to ensure maximum coordination and communication between the Parties. The Key Officials are:

For the NPS:

Name: Teri Gage

Title: Superintendent, Pullman National Monument

Address: 11001 S. Cottage Grove Avenue, Chicago, IL 60628 Email: teri_gage@nps.gov

Phone Number: (773) 468-3284

For the IDNR:

Name: Michael Norris

Title: Historic Preservation Sites Manager

Address: 1 Natural Resources Way Springfield, IL. 62702 Email: Michael.Norris@illinois.gov

Phone Number: 217 785 9383 (O) 217 720 2420 (C)

- B. Notices from either Party with respect to this Agreement must be in writing and delivered by mail, personal delivery, electronic delivery, or other appropriate means to the Key Officials of the other Party at the addresses or contact information indicated above.

- C. Any permanent change in personnel designated as a Key Official requires written notice to the other Party reasonably in advance of the proposed change. The notice will include the reason(s) for the change with sufficient detail to permit evaluation of the impact of such change on Article III of this Agreement. Any permanent change in Key Officials will be reflected in a written modification to this Agreement.

Article VI - Expenditure of Funds

This Agreement does not obligate NPS or IDNR to expend any funds in excess of appropriations authorized by law.

This Agreement is contingent upon and subject to the availability of funds. IDNR, at its sole option, may terminate or suspend this Agreement in whole or in part, without penalty or further payment being required, if (1) the Illinois General Assembly or the federal funding source fails to make an appropriation sufficient to pay such obligation, or if funds needed are insufficient for any reason (30 ILCS 500/20- 60), (2) the Governor decreases IDNR's funding by reserving some or all of the IDNR's appropriation(s) pursuant to power delegated to the

Governor by the Illinois General Assembly, or (3) IDNR determines, in its sole discretion or as directed by the Office of the Governor, that a reduction is necessary or advisable based upon actual or projected budgetary considerations. NPS will be notified in writing of the failure of appropriation or of a reduction or decrease.

Article VII - Liability

Each Party to this Agreement will be liable for the acts or omissions of its respective officers, employees, agents, representatives, and contractors to the extent authorized by applicable Federal, State or local law. Unless otherwise agreed to in writing by the Parties, no officer or employee of one Party will be deemed to be an officer, employee, agent, representative or borrowed servant of the other Party. The provisions of this Article VII herein shall survive the expiration or early termination of this Agreement. Neither

Party to this Agreement shall be liable for any negligent or wrongful acts of the other party, either of commission or omission, unless such liability is imposed by law

Any claim against IDNR or the NPS arising out of this Agreement must be filed in the Federal Court of Claims or other appropriate forum with Federal Jurisdiction. The NPS, IDNR and the State of Illinois shall not enter into binding arbitration to resolve any dispute arising out of this agreement. Neither the NPS, IDNR nor the State of Illinois waive sovereign immunity.

Article VIII - Property Utilization

All tools, equipment, materials or other business property furnished by the NPS shall remain the property of the NPS. Similarly, any tools, equipment, materials or other business property furnished by the IDNR shall remain the property of the IDNR.

Article IX - Modification and Termination

This Agreement may be modified only by a written instrument executed by the Parties. Either Party may terminate its participation in this Agreement with cause by providing sixty (60) days written notice to the other Party following the expiration of any notice and cure period applicable to the alleged default by the non-terminating Party.

In the event of a breach of this Agreement by one of the Parties, the non-breaching Party may provide the breaching Party with an opportunity to cure the breach by a date specified in a Cure Letter. If the breach is not cured to the satisfaction of the non-breaching Party by the specified date, this Agreement will terminate upon the breaching Party's receipt of a Notice of Termination for Breach.

Article X - Standard and Required Clauses

1. **Compliance with Applicable Laws:** This Agreement and performance hereunder is subject to all applicable laws, regulations and government policies, whether now in force or hereafter enacted or promulgated. Nothing in this Agreement shall be construed as in any way imparting the general powers of the NPS to supervise, regulate, and control its property under such applicable laws, regulations, and management policies. Nothing in this Agreement shall be construed to be inconsistent with or contrary to the purpose or intent of any Act of Congress.
2. **Compliance with Additional Laws:** In addition to other laws, regulations and policies referenced in this Agreement, the IDNR is on notice that, where applicable, it must comply with, and assist NPS in complying with additional laws, regulations, Executive Orders and policies including, but not limited to the Americans with Disabilities Act (42 U.S.C. § 12101), Architectural Barriers Act (42 U.S.C. § 4151 et seq.), the Rehabilitation Act (29 U.S.C. § 701 et seq. as amended), the Resource Conservation and Recovery Act (42 U.S.C. § 6901 et seq.), the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. § 4821, et seq.), the National Environmental Policy Act (42 U.S.C. § 4321 et seq.), the Clean Air Act (42 U.S.C. § 7401, et seq.), The National Historic Preservation Act (54 U.S.C. § 100100), the Archaeological Resources Protection Act of 1979 (16 U.S.C. § 470aa), Providing For Administration Of The Clean Air Act And The Federal Water Pollution Control Act With Respect To Federal Contracts, Grants, Or Loans (Exec. Order No. 11738), Wetlands Protection (Exec. Order No. 11990) and Flood Hazards in Floodplains (Exec. Order No. 11988), Planning for Federal Sustainability in the Next Decade (Exec. Order No. 13693).
3. **Non-Discrimination:** All activities pursuant to this Agreement shall be in compliance with the requirements of Executive Order 11246, as amended; Title VI of the Civil Rights Act of 1964, as amended, (78 Stat. 252; 42 U.S.C. §§ 2000d et seq.); Title V, Section 504 of the Rehabilitation Act of 1973, as amended, (87 Stat. 394; 29 U.S.C. § 794); the Age Discrimination

Act of 1975 (89 Stat. 728; 42 U.S.C. §§ 6101 et seq.); and with all other Federal laws and regulations prohibiting discrimination on grounds of race, color, sexual orientation, national origin, disabilities, religion, age, or sex.

4. **Lobbying Prohibition:** 18 U.S.C. § 1913, Lobbying with Appropriated Moneys, as amended by Public Law 107-273, Nov. 2, 2002 - No part of the money appropriated by any enactment of Congress shall, in the absence of express authorization by Congress, be used directly or indirectly to pay for any personal service, advertisement, telegram, telephone, letter, printed or written matter, or other device, intended or designed to influence in any manner a Member of Congress, a jurisdiction, or an official of any government, to favor, adopt, or oppose, by vote or otherwise, any legislation, law, ratification, policy, or appropriation, whether before or after the introduction of any bill, measure, or resolution proposing such legislation, law, ratification, policy, or appropriation; but this shall not prevent officers or employees of the United States or of its departments or agencies from communicating to any such Members or official, at his request, or to Congress or such official, through the proper official channels, requests for legislation, law, ratification, policy, or appropriations which they deem necessary for the efficient conduct of the public business, or from making any communication whose prohibition by this section might, in the opinion of the Attorney General, violate the Constitution or interfere with the conduct of foreign policy, counter-intelligence, intelligence, or national security activities. Violations of this section shall constitute violations of 31 U.S.C. § 1352 section 1352 (a) of title 31. In addition to the above, the related restrictions on the use of appropriated funds found in Div. F, § 402 of the Omnibus Appropriations Act of 2008 (P.L. 110-161) also apply.
5. **Anti-Deficiency Act:** Pursuant to 31 U.S.C. § 1341 nothing contained in this Agreement shall be construed as binding the NPS to expend in any one fiscal year any sum in excess of appropriations made by Congress, for the purposes of this Agreement for that fiscal year, or other obligation for the further expenditure of money in excess of such appropriations.
6. **Assignment:** No part of this Agreement shall be assigned to any other party without prior written approval of the NPS and the IDNR.
7. **Member of Congress:** Pursuant to 41 U.S.C. § 22, no Member of Congress shall be admitted to any share or part of any contract or agreement made, entered into, or adopted by or on behalf of the United States, or to any benefit to arise thereupon.
8. **Agency:** The IDNR is not an agent or representative of the United States, the Department of the Interior, NPS, or Pullman National Monument, nor will the IDNR represent itself as such to third parties. NPS employees are not agents of the IDNR and will not act on behalf of the IDNR.
9. **Non-Exclusive Agreement:** This Agreement in no way restricts the IDNR or NPS from entering into similar agreements, or participating in similar activities or arrangements, with other public or private agencies, organizations, or individuals.
10. **Survival:** Any and all provisions which, by themselves or their nature, are reasonably expected to be performed after the expiration or termination of this Agreement shall survive and be enforceable after the expiration or termination of this Agreement. Any and all liabilities, actual or contingent, which have arisen during the term of and in connection with this Agreement shall survive expiration or termination of this Agreement. Reference Articles VI (Expenditure of Funds) and VII (Liability).
11. **Partial Invalidity:** If any provision of this Agreement or the application thereof to any party or circumstance shall, to any extent, be held invalid or unenforceable, the remainder of this Agreement or the application of such provision to the parties or circumstances other than those to which it is held invalid or unenforceable, shall not be affected thereby and each provision of this Agreement shall be valid and be enforced to the fullest extent permitted by law.
12. **Captions and Headings:** The captions, headings, article numbers, section letters, and paragraph numbers appearing in this Agreement are inserted only as a matter of convenience

and in no way shall be construed as defining or limiting the scope or intent of the provision of this Agreement nor in any way affecting this Agreement.

13. **No Employment Relationship:** This Agreement is not intended to and shall not be construed to create an employment relationship between NPS and the IDNR or its representatives. No representative of the IDNR shall perform any function or make any decision properly reserved by law or policy to the Federal government.
14. **No Third-Party Rights:** This Agreement creates enforceable obligations between only NPS and IDNR. Except as expressly provided herein, this Agreement shall not be construed to create any right of enforcement by or any duties or obligation in favor of persons or entities not a party to this Agreement.
15. **Disputes:** The Parties agree that in the event of a dispute between them, NPS and the IDNR shall promptly use their best efforts to resolve the dispute in an informal fashion through communication and consultation or other forms of non-binding alternative dispute resolution practices that are mutually acceptable to the Parties.
16. **Merger:** This Agreement, including any attachments hereto and documents incorporated by reference herein, contains the sole and entire Agreement of the Parties with respect to the subject matter of this Agreement.
17. **Waiver:** If a Party fails to exercise any rights or to insist that the other Party comply with any obligations, no such failure or instance shall be a waiver of a right of a Party to demand strict compliance with each duty or obligation. No custom or practice of the Parties which varies from the terms of this Agreement shall constitute a waiver of the right of a Party to demand exact compliance. Waiver by one Party of any particular default by the other Party shall not affect or impair a Party's rights in connection with any subsequent default of the same or of a different nature, nor shall any delay or omission of a Party to exercise any rights arising from such a default affect or impair the rights of that Party as to such default or any subsequent default. All waivers of any duty or obligation by a Party must be express and evidenced in writing.
18. **Counterparts:** This Agreement may be executed in counterparts, each of which shall be deemed an original (including copies sent to a party by facsimile transmission) as against the party signing such counterpart, but which together shall constitute one and the same instrument.
19. **No Third-Party Beneficiaries:** Unless expressly stated herein, nothing in this Agreement is intended to grant any rights or provide any benefits to any third party.
20. **Force Majeure:** Neither party shall be liable for failure to perform its obligations under this Agreement due to events beyond its reasonable control, including, but not limited to, strikes, riots, wars, fires, acts of God, and acts in compliance with or required by any applicable law or regulation.
21. **Public Information and Endorsements:**
 - a. The IDNR shall not publicize or otherwise circulate promotional material (such as advertisements, brochures, press releases, speeches, still and motion pictures, articles, manuscripts or other publications) which states or implies NPS endorsement of a business, product, service, or position which the IDNR represents. No release of information may state or imply that the NPS approves of the IDNR's work products or considers the IDNR's work product to be superior to other products or services.
 - b. The NPS shall not publicize or otherwise circulate promotional material (such as advertisements, brochures, press releases, speeches, still and motion pictures, articles, manuscripts or other publications) which states or implies IDNR endorsement of a business, product, service, or position which the NPS represents. No release of information may state or imply that the IDNR approves of the NPS's work products or considers the NPS's work product to be superior to other products or services.

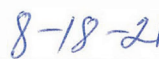
- c. All information submitted for publication or other public releases of information regarding the Pullman sites shall carry the following disclaimer: “The views and conclusions contained in this document are those of the authors and should not be interpreted as representing the opinions or policies of the U.S. Government. Mention of trade names or commercial products does not constitute their endorsement by the U.S. Government.”
 - d. Unless disclosure is required by law, or pursuant to a court order, subpoena, or other validly issued order or notice of a court or administrative body of competent jurisdiction, the IDNR must obtain prior Government approval for any public information releases concerning this Cooperative Management Agreement which refer to the Department of the Interior or any bureau or employee (by name or title). The specific text, layout photographs, etc. of the proposed release must be submitted with the request for approval.
- 22. Publications of Results of Studies:** No party will unilaterally publish a joint publication without consulting the other party. This restriction does not apply to popular publications of previously published technical matter. Publications pursuant to this Agreement may be produced independently or in collaboration with others; however, in all cases proper credit will be given to the efforts of those parties contributing to the publication. In the event no agreement is reached concerning the manner of publication or interpretation of results, either party may publish data after due notice and submission of the proposed manuscripts to the other. In such instances, the party publishing the data will give due credit to the cooperation but assume full responsibility for any statements on which there is a difference of opinion.
- 23. Freedom of Information Act:** Any information provided to the NPS under this Agreement is subject to the Freedom of Information Act, 5 U.S.C. § 552.

Article XI – Signatures

IN WITNESS WHEREOF, the parties hereto have executed this Agreement on the date(s) set forth below.

For the Illinois Department of Natural Resources:

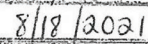

Colleen Callahan, Director
Illinois Department of Natural Resources

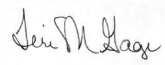


Date

APPROVED FOR EXECUTION

Date: 

Legal Counsel: 

For the National Park Service:


Digitally signed by TERI GAGE
Date: 2021.08.24 15:03:46
-05'00'

Teri Gage, Superintendent
Pullman National Monument

8/24/2021

Date

HERBERT FROST

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FROST
Date: 2021.09.01 16:35:15 -05'00'

Herbert C. Frost, Ph.D., Regional Director
Interior Regions 3,4,5

01 September 2021

Date

COOPERATIVE MANAGEMENT AGREEMENT between the NATIONAL PARK SERVICE and ILLINOIS DEPARTMENT OF NATURAL RESOURCES for THE COOPERATIVE MANAGEMENT of Pullman National Monument and Pullman State Historic Site

Appendix | D

IDNR Pullman Vision

Pullman State Historic Site

Central to the Pullman National Historic Landmark district – designated in 1970 and includes approximately three hundred (300) acres in Chicago, Cook County, Illinois – is the State of Illinois Department of Natural Resources' Pullman State Historic Site (PSHS). The PSHS is comprised of surviving portions of the industrial complex built by industrialist George Mortimer Pullman (1831-1897) in the early 1880s to build luxury railroad passenger cars. Once one of the most beautiful industrial landscapes in America, only a portion remains to demonstrate Pullman's pivotal role in the nation's history. The Pullman Palace Car Works was the centerpiece of a company-owned town planned under Pullman's direction, complete with worker's residences, church, market, and recreational facilities.

By the 1930s, however, the combined economic effects of the Great Depression and automobile travel caused the Pullman Company to begin a slow retrenchment and decline. In 1940, the U.S. Government sued Pullman to force the company to separate its train operations from its car-building operations. The Car Works converted erecting and repair shop space to offices, materials storage, and U.S. Army ordnance production during World War II. Between 1952 and 1957, original 1881 Buildings 5, 6, 7, and 8 were demolished in the northeast quadrant of the current PSHS. The demolition of the Boiler House chimney accidentally set the 1881 Water Tower on fire and destroyed many company records stored inside. In 1959, Kastle Steel Company purchased the other remaining Pullman Car Works buildings and operated a steel company in them until the early 1980s.

Meanwhile, the Pullman neighborhood won city, state, then national recognition beginning in 1969 as a National Historic Landmark. In 1991, the State of Illinois purchased the remnant property of the 1881 Pullman Car Works and separately purchased the 1881 Hotel Florence to create Pullman State Historic Site. In December 1998, one week before rehabilitation was to begin, a homeless mentally ill arsonist burned down the massive 1907 Steel Car Erecting Shop building at the corner of 111th Street and Cottage Grove Avenue. The fire severely damaged the Administration Building and two of four bays of the Rear Erecting Shops. The Front Erecting Shops – North Factory Wing survived the fire. Outcry about the fire and the importance of the PSHS resounded across the United States and internationally. The former Illinois Historic Preservation Agency was able to rebuild the ruins of the Administration Building, but two of the four bays of the Rear Erecting Shops were beyond salvage and had to be demolished. The other two bays had the roof removed and the northern wall buttressed.

Since 1999, the State of Illinois has invested in stabilizing and preserving the Pullman Administration Building, the surviving Front Erecting Shops – North Factory Wing, the Rear Erecting Shops, and the Hotel Florence. Over time, National Park Service officials became interested in the Pullman State Historic Site's surviving urban industrial structures and the strong community support for Pullman historic preservation. In December 2015, the State of Illinois transferred the Administration Building to National Park Service ownership, while retaining the surrounding grounds and the two car-building shops (as well as the Hotel Florence). On February 19, 2015, President Barack Obama declared Pullman National Monument as an honorary designation of the entire Pullman neighborhood, but also to authorize the National Park Service to operate from the Administration Building.

Improvements

The PSHS currently consists of the grounds and buildings surrounding the Administration Building (operated by the National Park Service) which includes Front Erecting Shops – North Factory Wing (NFW), Front Erecting Shops – South Factory Wing Ruins (South Slab), the extant structure of the Rear Erecting Shops (RES), and grounds of the Pullman Palace Car Works (Car Works). The PSHS also includes the historic Hotel Florence which was integral to the Car Works sales operations (the Hotel Florence also includes an attached, more modern, Annex). The PSHS is also a designated Chicago Landmark.

Hotel Florence & Annex - \$6M (UBR 262):

Designed by architect Solon Spencer Beman and named for George M. Pullman's oldest daughter, the Hotel Florence were constructed in 1881. The 50-room, Queen Anne-style brick and limestone building offered first-class accommodations to railroad CEOs who came to Pullman to do business; the hotel was critical to marketing Pullman train cars. In 1914, a major addition, the Annex, was added. The Illinois Department of Natural Resources took the title of the Hotel Florence in 1991.

The Hotel Florence main entrance is located on the west side of the structure and accessible via a large front veranda (and ADA ramp to the south). The first floor contained a lobby, women's parlor, men's reading and billiards room, saloon, dining rooms, and kitchen facilities. The second, third, and fourth floors including guest rooms and suites – with the more elite suites located on the lower floors. George M. Pullman's personal suite and office, located on the northwest corner of the hotel's second floor, has views of the Palace Car Work's main gate and Administration Building.

The hotel is currently not open to the public as the DNR works to replace the antiquated fire suppression system and update the hotel's air conditioning (required to obtain a building Occupancy permit). Once the structure can be reopened, the historic rooms are intended to be restored and utilized in similar ways to the original Beman design.

Hotel Lobby: The lobby is relatively unchanged from 1881 with original fireplace, check-in counters, and even original rocking chairs. The DNR intends to retain the lobby as an orientation space and for use in displaying revolving interpretive exhibits sharing stories about the hotel. The floors of the lobby are not compliant with ADA code and will have to be modified (lifted) to provide an Accessible Path of Travel.

Dining Rooms: The DNR intends to provide small dining services (so popular with the community until the hotel was closed) – coffee, sandwiches, "Sunday Brunch", etc. As part of developing small dining services, the preparation area will be improved, and the two hotel dining rooms will be renovated.

Lady's Parlor: This room has already been restored by the DNR and includes a restoration of the historic carpet (both the original and restoration were hand-crafted in Europe). This space will be limited to viewing except for small events.

Reading Room: The DNR envisions the Reading Room as a respite area that can still be utilized as named. This space will also be used in coordination with the PSHS curator as a space to view artifacts.

Billiards Room: DNR already owns a 1905 pool table (in storage on-site) and intends to install it in the Billiards Room prior to the Hotel Florence opening to the public.

Saloon/Bar Room: The original bar remains in the Bar Room and it is the intent of the DNR to restore the Bar Room for its intended purpose. Working with the same vendor who will be running the small dining services, the DNR would like to see the Bar utilized during small events.

2nd & 3rd Floors: The DNR would like to restore the hallways and a selection of rooms on the 2nd and 3rd floors with the selection of rooms highlighting variety of accommodations available at the Hotel Florence (with higher class suites on lower floors and less expensive rooms on the 3rd floor). George M. Pullman's office on the northwest corner of the 2nd floor would also be restored and available for viewing.

4th Floor: The DNR will not be making the 4th floor available to the public and it will be utilized for storage. While the ground, 2nd, and 3rd floors have been made ADA accessible by an elevator, the 4th floor does not have similar access.

Back of House: The Hotel Florence has a varied history of uses and the Back of House has a tremendous history. Unfortunately, these spaces are too tightly confined to be made accessible by the public. The DNR intends to develop exhibits (to be shared in the lobby) which may also include a video tour.

Basement: The basement of the Hotel Florence requires tuckpointing and air handling units are repaired.

Hotel Annex: The Hotel Annex is situated directly across from the Worker's Gate at St. Lawrence Avenue and will be adjacent to the primary access between the South Pullman Neighborhood and the Pullman Palace Car Works. Ultimately, the DNR would like to develop the ground level as a dining space with views of the Administration Building, Front Erecting Shop – South Factory Wing Ruining and Rear Erecting Shop. The DNR is also considering the upper levels of the Annex for boutique hotel and cultural tourism (but the upper levels is a lower priority for the Agency).

Hotel Florence Fire Alarm & Suppression System – \$250k (estimate):

Placeholder.

Hotel Florence Kitchen Roof – \$2.6M (UBR 155):

The current slate roofing over the east wing (including main floor kitchen and upper floor hotel) has reached the end of its usable life. Roof decking, dormers, trim and fascia, gutters, and downspouts require associated selective replacement to restore integrity to the intricate roofing details and the appropriate roof drainage away from the building.

The front-facing west façade (main entrance façade) includes a large stained-glass panel window sited within the main stairwell between the first and second floors above the main porch roof line. The stained-glass is missing panes and the frame is leaking necessitating repairs to the large window opening which has been boarded and tarped for the past 3 years while other interior restoration work occurs. Without replacement/repairs, the new interior restorations, including period carpeting imported from Europe, painting and varnished surfaces, will be damaged.

Kitchen Roof: Remove and replace roofing system, in kind, repairing roof decking as required. Associated repairs will include replacement of fascia and trim, special flashing, caulking, special gutters and downspouts, and connections to storm sewer. Repaint any impacted wood surfaces to match color and type of paint. Clean and seal masonry prior to installation of chimney flashing.

Stained Glass Window: Remove and replace in kind, and per documentation, stained glass panels, salvaging historic glass where practicable, rebuilding frames and roof with roofing system, reinstalling, painting, and finishing all impacted interior and exterior surfaces, to match existing. Masonry repair work, including salvage and tuckpointing of historic materials is anticipated.

Front Erecting Shops, North Factory Wing (NFW) – \$25M (UBR 252):

The Administration Building, hub of the Car Works often referred to as the Clock Tower Building, is centrally located on the State of Illinois' 12-acre site. The Administration Building has been developed as a new Visitor Center by the National Park Service which owns and operates the building. The Visitor Center, approximately 10,000 square feet on the ground floor of the Administration Building, accommodates functional areas including lobby, multi-purpose room, exhibit area, sales area, information desk, public restroom facilities, and storage area. The Illinois Department of Natural Resources will be working with the

National Park Service to further develop a connection to the Front Erecting Shops – North Factory Wing; this connection is in the Visitor Center exhibit area where a historic connection existed.

Directly north, and accessible from, the Administration Building, The Front Erecting Shops – North Factory Wing was one of the first buildings constructed at the Pullman Palace Car Works in the early 1880s. These Front Erecting Shops were originally utilized for the construction of Pullman wooden cars and remain the most intact structural representative of the initial construction of the Car Works. By 1900, the 20-year-old Pullman Car Works and its workers had to switch from wooden car-building to steel cars. Company officials built entirely new steel car erecting and repair shops east and north of the town. The original 1881 buildings were modified or expanded to hold longer, heavier 85-foot steel passenger cars and steel freight cars. However, the North Factory Wing remained intact as originally constructed and was still utilized for lighter manufacturing.

In December 1998, the NFW was damaged by arson. Subsequently, the DNR stabilized the structure, but the building currently does not have an Occupancy permit and is not open to the public. The NFW is comprised of three distinct areas which DNR has labeled the Orange Bay, Event Bay, and Boneyard:

Orange Bay: The Illinois Department of Natural Resources, working with the Capital Development Board, currently has a project underway to improve the building envelope and fenestration of the south bay (called the Orange Bay) of the NFW. This project will not be sufficient for Occupancy and other improvements are plans. The DNR plans to develop the Orange Bay as an interpretive exhibit space. This space will be primarily focused on “Industry” – the labor, craftsmanship, and marketing -- of Pullman passenger cars. Themes will include science and art, design and innovation, improvisation, and social science. “Industry” stories will include discussions about the Detroit Car Works (which inspired the Pullman Palace Car Works), exhibits showing materials and wheelworks, the famous Corliss Engine and line shafting that powered the Car Works, and the construction of passenger cars. Other exhibits will focus on the locations of historic rail, assemblies hanging from the bay rafters, banners from building trusses, and views into display cars – wooden cars that are a “living exhibit” and built over time right in the Orange Bay.

Event Bay: Located immediately north of the Orange Bay, the next bay is also intended as an exhibit space primarily focused on the “people” who worked at the Pullman Palace Car Works. Themes include social and urban planning, descriptions of the people who lived and worked in Pullman, and the building itself as a tribute to George M. Pullman and the people that worked at the Car Works. “People” stories will include discussions about lessons learned at Pullman, more details about the 1894 Worker’s Strike, the role of specialists at the Car Works, and the transition of the Car Works after its heyday. Mila walls will provide flexible exhibit spaces. In the recent past, this space contained a small stage for small venues. The DNR intends to reestablish this use by including a new stage, catering space, and a small kitchen. The DNR envisions that the stage will be used once again as a small music venue, live artisan event space, and small weddings. During non-event times, the Event Bay is also intended for use as a respite area with small tables and seating areas for resting. Located immediately north of the Orange Bay, the DNR is looking into concepts to develop a series of ADA restrooms that will service both the Event and Orange Bays.

The Boneyard: The northernmost bay currently contains remnants of the historic structures that, while damaged, did survive the 1998 fire. These ill-fated relics are all that remain of the destroyed buildings – lending the space its name “The Boneyard”. The Boneyard will be accessible by appointment only and will continue to be utilized to store artifacts, as a storage area for exhibits, and will contain a space for approved guests to study / research. The DNR intends that the space will be accessible by key card entry and will routinely schedule curator tours. The Boneyard will contain a conditioned archive space and the existing mechanical room that services the entire NFW will remain.

Rear Erecting Shops (RES) – \$20M (UBR 258):

The Rear Erecting Shops were reportedly constructed in the 1800s. The existing building is rectangular in plan and measures approximately 189 feet in the east-west direction and 198 feet in the north-south direction. The structure is divided into two separate areas approximately equal in length by an east-west masonry firewall. The extant structure consists of composite ferrous metal (likely wrought iron) and wood roof trusses supported by interior columns and exterior masonry walls. There is presently no roof on the structure after the building was damaged by fire.

The DNR has investigated the damaged RES and evaluated the general structural integrity of the existing masonry walls, roof trusses, and foundations and has determined that restoring the structure for use as an enclosed exhibit space is possible. Once restored, the DNR concepts include leaving the interior largely open as it was in the 1900s. The interior space of the RES was originally designed for the assembly of the Heavy Steel Cars that the Pullman Palace Car Works is famous for. The DNR intends to display multiple steel cars in this place including Advance! – a smaller corporate steel car used by Robert Todd Lincoln who became general counsel and, after George M. Pullman died in 1897, president of the Car Works. While several cars are envisioned for the large space, the DNR is particularly interested in displaying a Pullman Superliner Heavy Car. A Superliner Heavy Car would offer visitors to the PSHS a firsthand experience of the paramount version of the Pullman heavy sleeper car that has become iconic in transportation history.

The DNR also envisions that the original steel rails that permeated the building would be “shadowed” – shown through installing a paving pattern or the incorporation of reconstruction steel rail – on the floor of the RES. An exhibit space focused on the transformation and evolution (from wood to steel) of Pullman cars and gift shop is also considered for a small section of the space.

Appendix | E

Section Two: NPS Environmental Assessment

The Environmental Assessment (EA) analyzes the environmental impacts associated with management actions presented in Chapter 3 of the draft JGMP, subject to National Environmental Policy Act (NEPA) compliance. To implement the draft JGMP, the NPS must comply with NEPA and has prepared an EA. IDNR environmental compliance is separate from the NPS EA. Any actions in the draft JGMP that are undertaken by the IDNR will go through the state Comprehensive Environmental Review Process for environmental compliance and follow all applicable state laws and policies (see draft JGMP Chapter 1 pg 1-6).

EA Chapter | 1

Purpose and Need

Introduction

The National Park Service (NPS) and Illinois Department of Natural Resources (IDNR) are preparing a draft joint general management plan (JGMP) and environmental assessment (EA) (JGMP/EA) for Pullman National Historical Park (NHP) and Pullman State Historic Site (SHS).

Pullman is a complex system of overlaying jurisdictions with various authorities and influences in South Chicago, Illinois. Pullman National Monument was established by presidential proclamation in 2015 and redesignated Pullman National Historical Park by Congress in 2022 (Appendix B) to help preserve, protect, and interpret nationally significant resources that exemplify the evolution of American industry, the rise of unions and the labor movement, the lasting strengths of good urban design, and the remarkable journey of the Pullman Porters toward the civil rights movement of the 20th century (see draft JGMP Chapter 1).

Since its designation as a national park system unit in 2015, the NPS and IDNR have worked closely together to provide a unified and fluid visitor experience and preserve the historical nature of the site. Because of the similar park purposes, it was determined that cooperation on the draft JGMP/EA could improve visitor experience and resource preservation while also providing greater efficiency and cost savings.

The National Historical Park encompasses within its legislative boundary 206 acres of the historic Pullman neighborhood, including the entirety of the SHS. The NPS owns the Administration Clock Tower Building at the center of the Car Works, a complex of industrial buildings covering approximately 12 acres. The State Historic Site, established in 1991, includes the remaining Car Works resources, surrounding landscapes, and the Hotel Florence. The buildings and land within the boundary of the SHS are all owned by the IDNR, except for the Administration Clock Tower Building.

This EA evaluates the environmental impacts of the actions proposed in the draft JGMP. While general management plans are efforts that generally require an environmental impact statement, consistent with NPS NEPA Handbook, 2015, Section 1.5 E, an environmental assessment may be prepared if there is no potential for significant effects from implementing any of the proposed actions. The NPS has determined that there are minimal impacts associated with the proposed actions and there is no potential for significant effects, and therefore has prepared an environmental assessment. Following the EA comment period, the NPS will revise both the EA (through errata) and the draft plan as appropriate, before issuing a decision document and final JGMP.

Purpose and Need for Action

The purpose of the EA is to:

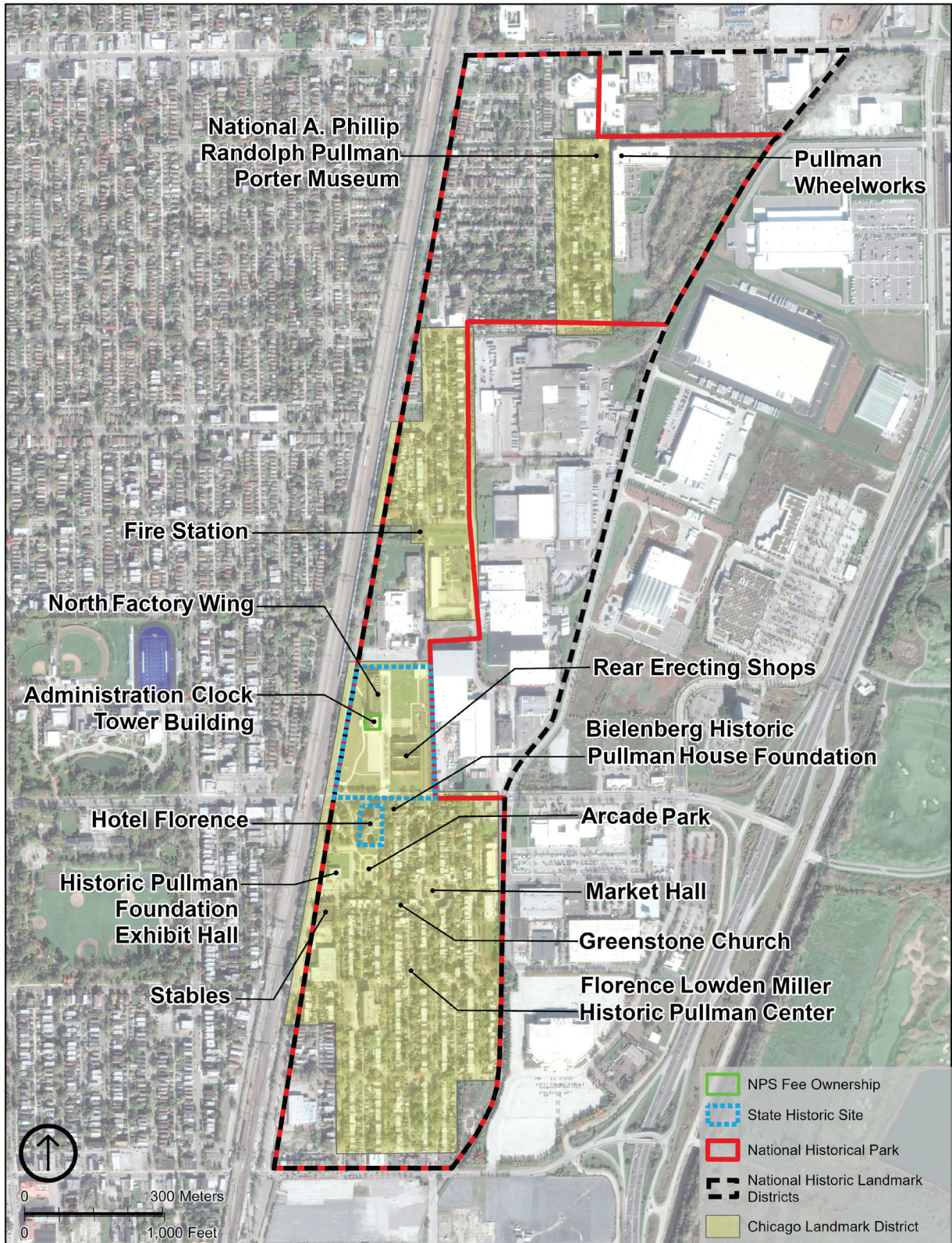
- Provide a joint management vision and decision-making framework for managers to ensure future resource protection, access, and tools to manage visitor use
- Define desired resource conditions and visitor uses and experiences to be achieved.
- Develop long-term strategies for preserving resources, providing access, connecting visitors to key experiences, and managing use
- Identify partnerships with public and nonprofit entities, and other interested parties, for the preservation of non-federal or state lands and
- Evaluate properties and resources within the NHP's legislative boundary for opportunities for protection by the NPS and/or others

A draft JGMP/EA is needed to meet the requirements of the National Parks and Recreation Act of 1978, and *NPS Management Policies 2006*, and P.L. 117-328, which enabled the establishment of Pullman National Historical Park.

Pullman is a complex system of overlaying jurisdictions with various authorities and influences. Below is a list of the major jurisdictions and a summary of how they relate to the Pullman Community's historic resources. The National Historic Landmark District (black dotted line), Chicago Landmark District (yellow shading), Illinois State Historic Site (small blue dotted line), National Historic Park (red solid line), and NPS fee ownership (green solid line) are all represented in Figure 1. Local Government, private property, and streets are not called out in Figure 1 but are important for understanding the different jurisdiction in the area and managing the Sites.

National Historic Landmark District: In 1970, the Pullman Historic District was designated as a National Historic Landmark (NHL). National Historic Landmarks are determined by the Secretary of the Interior to be nationally significant in American history and culture. National Historic Landmark designation encourages all property owners to preserve and maintain the site, but only regulates federal agencies on restrictions. Specific buildings within the NHL but not encompassed by the SHS named in the NHL nomination include the Union Foundry, the Pullman Fire Station, the Hammer Shop (Industrial structures between 108th and 111th Streets), the Stables, and the Greenstone Church. The NPS, who manages NHLs, may recommend to owners various preservation actions but owners are not obligated to carry out these recommendations.

City of Chicago Landmark District: Through a process of nomination, collaboration and local legislation, the south portion of the Pullman neighborhood and the state-owned portions were designated a Chicago city landmark district in 1972, The north portion of the Pullman neighborhood was designated a Chicago city landmark district in 1993. The two districts were administratively joined and renamed the Pullman District by the city in 1999. The Commission on Chicago Landmarks reviews any proposed alteration, demolition, or new construction for properties in landmark districts as part of the permit review process. The Commission determines whether the proposed work will impact the "significant



historical and architectural features” of the district. For most landmark districts, these are the exterior building elevations visible from the public right-of-way. The Commission reviews any work involving demolition. The Commission’s purpose is “To identify, preserve, protect, enhance, and encourage the continued utilization and the rehabilitation of such areas, districts, places, buildings, structures, works of art, and other objects having a special historical, community, architectural, or aesthetic interest or value to the City of Chicago and its citizen”.

Illinois State Historic Site: In 1991 the state designated the Pullman Factory and Hotel Florence as a State Historic Site. The State of Illinois owns and manages the Front Erecting Shops - North Factory Wing, Front Erecting Shop – South Factory Wing (Ruin), Transfer Pit, Arrival Plaza, Worker’s Gate Reconstruction, Rear Erecting Shops, Service Building, and surrounding grounds – these are all part of the Car Works. In addition, the State of Illinois owns and manages the Hotel Florence and Hotel Florence Annex. Pullman State Historic Site was managed by the Illinois Historic Preservation Agency until 2018 when all powers, duties, rights, and responsibilities of the agency, except those related to the Abraham Lincoln Presidential Library and Museum, were transferred to IDNR in 2018. The mission of the IDNR Historic Preservation Division is to “Protect the state’s historic resources and promote them so that the public enjoys them and learns from them” (20 ILCS 3405).

National Historical Park: The NHP boundary encompasses 206 acres of the Pullman neighborhood. The Administration Clock Tower Building is the only NPS fee ownership within the boundary.

Local Government: The City of Chicago operates under a Mayor-Council form of government, which is divided into 50 wards. An alderman is elected from each ward to represent constituents in the City Council, the legislative body of the city. The council maintains legislative powers granted by the state legislature and home rule provisions of the Illinois constitution and passes laws and ordinances. One major ordinance maintained by the council is zoning, the city’s mechanism for protecting property rights, limiting nuisances, and promoting health and safety. Zoning ordinances dictate acceptable development types and densities. The Pullman Community is a combination of high-density residential, community commercial, and light industrial zones. The City of Chicago owns several properties and owns and operates city parks within the NHP.

Private Property: Within the NHP boundary are many private residential properties as well as commercial properties and those owned by nonprofit organizations. Their property rights are protected by the US and State Constitutions. The NPS and IDNR do not have jurisdiction over these properties. The NPS and IDNR are not actively acquiring any private residences and hope to support private landowners in preserving the Pullman community.

Streets: The streets within and surrounding the Pullman community are owned and maintained by Cook County Division of Highways and Chicago Department of Transportation (CDOT). The streets provide circulation throughout the NHP and connection to the rest of the city.

Issues Carried Forward for Detailed Analysis

- Historic Structures and Cultural Landscapes
- Visitor Use and Experience
- Transit and Circulation

EA CHAPTER | 2

Proposed Action

This document includes all required content for an EA as according to 43 Code of Federal Regulations (CFR) 36.310(a) and 40 CFR 1501.5. Consistent with 43 CFR 46.310(b), the NPS has not included a no-action alternative because it would not be analytically useful here, and there are no unresolved conflicts about the proposed action with respect to alternative uses of available resources.

Proposed Action: Experience History

Under the proposed action, NPS and IDNR would continue to work together to preserve resources, engage visitors, and cooperatively manage park areas generally as they do today and as prescribed by the Cooperative Management Agreement (Appendix C).

The draft Joint General Management Plan identifies management areas and defines their desired conditions, which are the specific resource conditions and visitor experiences that the Sites strive to achieve and maintain. A detailed description of the desired conditions for each management area is included in the draft JGMP Chapter 2 and is incorporated by reference.

Zoning:

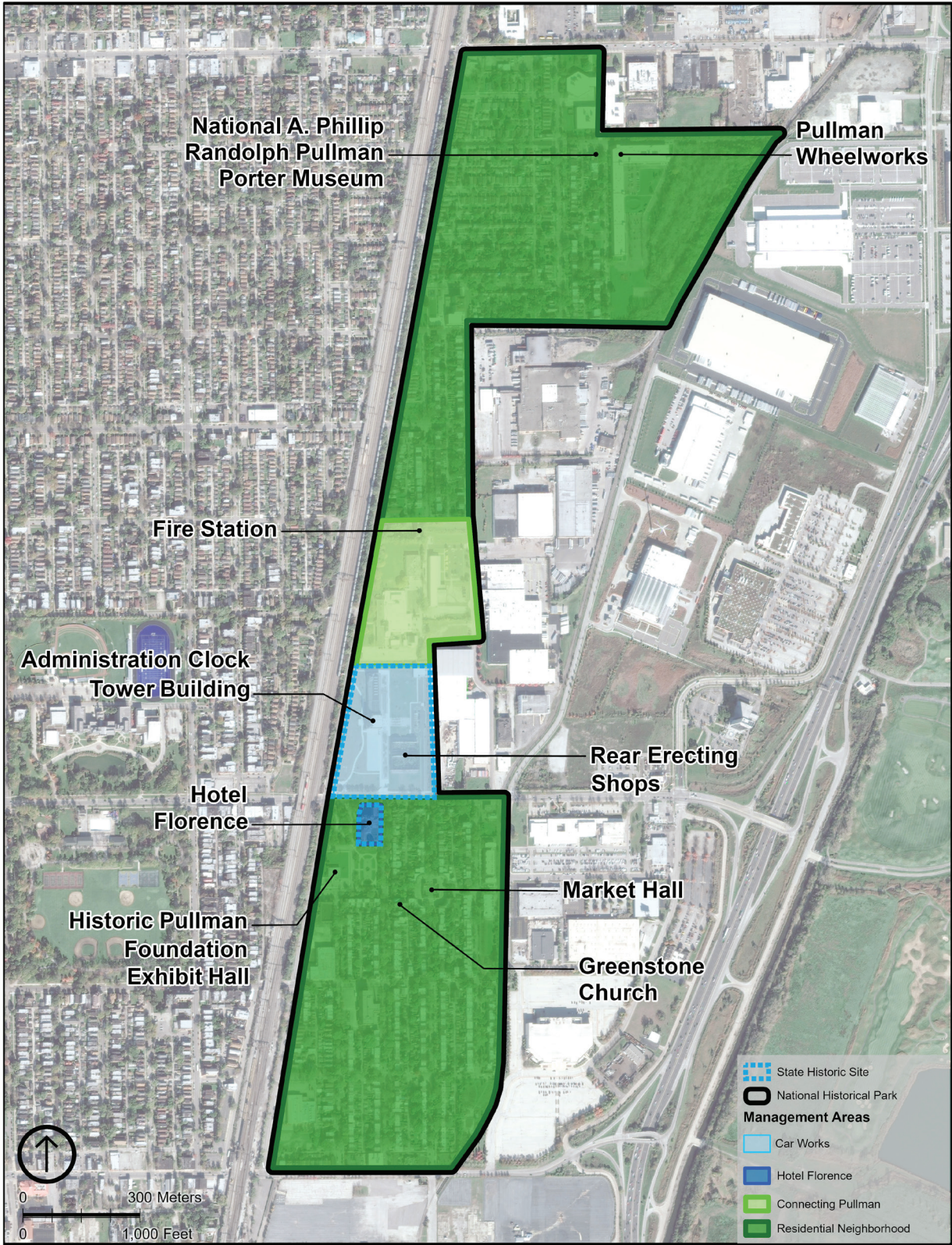
The NPS uses management zoning to identify and describe the variety of resource conditions and visitor experiences to be achieved and maintained in different areas of a park unit. The draft JGMP details the four proposed management zones under consideration and their desired conditions. All lands within the Site's legislated boundaries are assigned to an area regardless of whether the lands are currently owned by the NPS or IDNR. The four zones are detailed in the draft JGMP Chapter 2 and are:

Car Works Area: The Car Works (commonly referred to as the historic factory site) consists of the NPS-owned Administration Clock Tower Building and visitor center and the surrounding IDNR-owned properties, including the North Factory Wing and the Rear Erecting Shops. The Car Works Area is characterized by State and Federal ownership and is the area where IDNR and NPS have control of the future conditions and actions that take place.

Hotel Florence Area: The Hotel Florence Area consists of the Hotel Florence, Hotel Annex and surrounding grounds. The Hotel Florence Area is characterized by State ownership and is the area where IDNR has control of the future conditions and actions that take place.

Residential Neighborhood Area: The Residential Neighborhood Area consists mainly of privately owned residences that are the living community within the boundary of the NHP. The NPS and IDNR do not have fee ownership within this area, their influence and technical support are available to meet the desired future conditions and to help preserve the historic fabric of the community.

Connecting Pullman Area: The Connecting Pullman Area consists of the area north of the Car Works Area and contains limited visitor access and few remaining historic structures. While the NPS and IDNR do not have fee ownership within this area, their influence and technical support are available to meet the desired future conditions.



Management Actions

The NPS does not anticipate any actions would result in ground disturbing activities on NPS land. Some actions listed below may be realized at a later date when additional details and funding are specified. Many of the proposed actions seek to support partners, through technical support where resources and funding allow, in improving the Pullman Community and are not led by the NPS. For these actions, where there is no additional federal action or federal funding involved, additional compliance by the NPS would not be necessary. Local and state requirements for environmental protection would still need to be completed as required.

In the following tables is a list of the management actions grouped by management area that would be taken to achieve the desired conditions. A more detailed list of actions, including actions that do not require NEPA analysis and actions that would only be taken by IDNR are found in the draft JGMP Chapter 3.

Table 1. General Actions	
Partnerships	<ul style="list-style-type: none">• NPS and IDNR would support CDOT's efforts to improve bike and pedestrian infrastructure, provide traffic calming within the NHP, and improve safety of pedestrian crossings.• NPS and IDNR would seek out partnerships that promote and benefit the historic character of the Sites.• NPS would hire a dedicated person to develop partner relationships through communicating, organizing, convening, hosting interpretive programming, and developing connections in the community.• NPS and IDNR would develop effective relationships and communication protocols with local elected officials and city staff.
External Outreach	<ul style="list-style-type: none">• NPS and IDNR would identify sites outside the NHP boundary with connections to the Pullman story and explore interpretation programming and opportunities for identified sites.• NPS would develop improved visitor information for additional NPS and IDNR related sites in the Chicago metropolitan area and actively collaborate with external partners to support programming, public events, and natural/cultural resource interpretation activities beyond the NHP boundary.
Circulation	<ul style="list-style-type: none">• NPS would support efforts to determine the need and feasibility of shuttle services around the NHP and SHS to encourage sitewide visitation.
Opportunity Areas	<ul style="list-style-type: none">• NPS and IDNR would, if future property accession should happen, explore opportunities for additional visitor experiences by extending, preserving, or rehabilitating historic buildings, features, and landscapes.
Community Interaction	<ul style="list-style-type: none">• NPS would convene workshops about historic preservation and IDNR would support the NPS in this action.

Table 2. Car Works

Visitor Experience	<ul style="list-style-type: none"> • NPS and IDNR would collaborate with partners to provide a Pullman railcar experience. • NPS and IDNR would collaborate with partners to identify options for research space.
Viewscales	<ul style="list-style-type: none"> • NPS and IDNR would preserve sight lines of historic buildings from adjacent areas.
Historic Preservation	<ul style="list-style-type: none"> • NPS would seek to develop the second and third floors of the Administration Clock Tower Building to the highest and best use for the NHP, following the Pullman Factory Site Conceptual Design/Environmental Assessment (2017).

Table 3. Hotel Florence

Visitor Experience	<ul style="list-style-type: none"> • NPS and IDNR staff, with assistance from volunteers and docents, would work together to support public access and an immersive and multifaceted visitor experience.
Viewscales	<ul style="list-style-type: none"> • NPS and IDNR would work together to preserve sight lines of the hotel from adjacent areas
Partnerships	<ul style="list-style-type: none"> • NPS and IDNR would work with the Chicago Park District to coordinate programming, events, infrastructure and amenities at Pullman Park and Arcade Park.

Table 4. Residential Neighborhood

Historic Preservation	<ul style="list-style-type: none"> • NPS and IDNR would support adaptive reuse in historic buildings, consistent with historic use and utilize community assistance services. • NPS would be a convener for discussions on best practices in historic preservation and support research on historic preservation that preserves the stories and histories in the Pullman community. • NPS would develop a homeowners guide to support historic façade preservation that is applicable to the entire NHP boundary.
Communication	<ul style="list-style-type: none"> • NPS and IDNR would collaborate with city officials on a process to be notified of development proposals for zoning changes within the landmark district.
Visitor Experience	<ul style="list-style-type: none"> • NPS would expand the scope of Park Ranger led programming to include destinations throughout the community.
Opportunity Areas	<ul style="list-style-type: none"> • NPS would support partners to create welcome plazas or gateway plazas to improve the visitor sense of arrival at 103 and cottage grove; 115 and cottage grove; 111 and doty; and 103 and Corliss. • NPS and IDNR would (if future property accession should happen), explore opportunities for additional visitor experiences.

Table 5. Connecting Pullman	
Partnerships	<ul style="list-style-type: none"> • NPS and IDNR would support partners in creating a visitor experience at the Pullman Fire Station • NPS and IDNR would support the creation of a cultural trail and corresponding visitor opportunities along it.
Opportunity Areas	<ul style="list-style-type: none"> • NPS and IDNR would, where appropriate, obtain easements to further connect the Car Works Area and the Residential Neighborhood Area.
Visitor Experience	<ul style="list-style-type: none"> • NPS and IDNR would partner with City of Chicago to develop interpretive signage on the Fire Station building.

EA Chapter | 3

Impacts on Park Resources

Introduction

According to the Council on Environmental Quality (CEQ) regulations for implementing the National Environmental Policy Act, an EA should “briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact” (40 CFR 1501.5(c)(1)). To support this analysis, the NPS reviewed resources that may be present in the project area and identified those resources that may be impacted by the proposed action. Impact topics that were considered but dismissed from further analysis in this EA are listed below along with the reasons for dismissal. Following the dismissals, this chapter assesses effects to resources that are present and could be impacted by the proposed action.

Issues Considered but Dismissed

Environmental Justice

Presidential Executive Order 12898, *General Actions to Address Environmental Justice in Minority Populations*, requires all federal agencies to identify and address the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. According to the U.S. Environmental Protection Agency (USEPA), environmental justice is the

...fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies (USEPA 1998).

The proposed action would not disproportionately impact human health or the environment of low-income or minority groups. The proposed action does not include any construction or other impacts that could affect human health or the environment. For this reason, there is no anticipated effect on environmental justice and this impact topic was not carried forward for analysis.

Archeological Resources

The proposed action does not include any construction, ground-disturbing, or vegetation-clearing activities that could damage archeological resources. There would be no changes in the types or amounts of human activity in the project area as a result of the proposed action. Archeological resources would remain in situ, or undisturbed, as they have been, unless removal of artifacts or intervention into cultural material is justified by protection, research, stabilization, data recovery, interpretation, or development requirements. If artifacts are removed, the National Historic Preservation Act’s Section 106 process

would be initiated. For these reasons, there are no anticipated effects to archeological resources and this impact topic was not carried forward for analysis.

Greenhouse Gas Emission

The proposed action would not increase the carbon footprint or increase greenhouse gas emission associated with the site because the proposed action does not include any construction. Some administrative activities associated with the operation of the historic sites may emit a small amount of greenhouse gases, however, those are expected to be the same as current practices. Additionally, park visitors driving to the site may contribute greenhouse gas emissions. The NPS does not expect visitation numbers to change under the NPS proposed action. Some actions that are anticipated to be implemented by partners regardless of the JGMP (such as the addition of a railcar experience) could increase visitation; however, this increase is not likely to be substantial enough to result in measurable greenhouse gas emissions as a cumulative effect. Therefore, for all these reasons, greenhouse gas emission was not carried forward for analysis.

Indian Trust Resources

Indian Trust Resources are legal obligations of the U.S. Government to protect tribal lands, assets, resources, and/or treaty rights as granted under treaty or other legal instrument. The lands of the park are not held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians. Because these resources are not at the park, Indian trust resources was not carried forward for analysis.

Socioeconomics

The proposed action would have no anticipated effect on regional income and jobs would not be lost or shifted. Similarly, the proposed action is not expected to result in growth-inducing impacts for the region or in nearby communities. Because the proposed action is unlikely to impact the socioeconomic environment, visitor populations, and the regional economy, socioeconomics was not carried forward for analysis. A more detailed summary of the current socioeconomic condition for the Sites can be found in the draft JGMP Chapter 1: Demographic and Socioeconomic Context, Pg. 1-13.

Soils and Vegetation

The proposed action does not include any construction that would disturb soils or remove vegetation. New signs and waysides may be installed under the proposed action to enhance the visitor experience and to provide educational opportunities for the visitor. Installation of signs and waysides may require some vegetation removal and/or soil disturbance; however, all locations are in previously disturbed locations and would not impact soils or vegetation in a meaningful way. Therefore, soils and vegetation were not carried forward for analysis.

Threatened & Endangered Species

The NPS consulted with the U.S. Fish and Wildlife Service using the Information Planning and Consultation (IPaC) tool on July 17, 2023, in compliance with Section 7 with the Endangered Species Act of 1973 (ESA). The U.S. Fish and Wildlife Service replied on July 24, 2023, via email indicating “based on the project location and information that you provided in IPaC, you should make ‘no effect’ determinations for all the species listed in the county. The project location is in a highly developed area and there is not habitat (or records) for Federally listed species on your species list.”

Potentially Impacted Resources

The following resources are present and could be impacted by the proposed action:

- Historic Structures and Cultural Landscapes

- Visitor Use and Experience
- Transit and Circulation

The below section provides a brief description of the current condition of the resources and a brief discussion of how the actions proposed may change their condition.

Historic Structures and Cultural Landscapes

Affected Environment

The National Park Service owns only the historic Administration Clock Tower Building, which served as the hub of the former Pullman factory. The IDNR owns and operates the SHS within the boundaries of the NHP. Most of the land within the NHP is a City of Chicago Landmark, within the boundaries of which the city reviews proposed alterations, demolitions, and new construction as part of the permit review process using The Secretary of the Interior's Standards for the Treatment of Historic Properties. The city has zoning authority and the ability to enforce landmark and building code violations through administrative hearings or circuit court. The city's oversight has and will continue to play an important role in the preservation of the Pullman Community. There is also a national historic landmark district boundary overlaying the NHP. Designation as a national historic landmark helps recognize, preserve, and protect important locations in American history.

In 1998, an arson fire heavily damaged the Administration Clock Tower Building, following which it was partially reconstructed and restored. In 2021, the NPS completed rehabilitation of the Administration Clock Tower Building that created a small visitor center, classroom, and office space on the first floor. During the same timeline, IDNR completed the remediation and rehabilitation of its 12-acre Car Works grounds surrounding the NPS Administration Building Clock Tower Building. Currently, the IDNR has ongoing rehabilitation projects for the North Factory Wing, Rear Erecting Shops, and Hotel Florence.

The landscaping, plantings, lighting, and pathways that were designed as a part of the original 1880 plans for the Sites have been substantially altered, such that a cultural landscape true to that period no longer exists. Originally, Lake Vista was immediately west of the Administration Clock Tower Building and used to both beautify the principal entry way into the Pullman Company offices and to store water for the Corliss Engine which powered the factory's machinery. The construction of Cottage Grove Avenue reduced the size of the west landscape of the Car Works and Lake Vista by half. A reduced 'lake' footprint currently functions as a depressional area for stormwater overflow. Foundation fragments of the framing walls and entry were preserved or recreated in 2021.

Reasonably foreseeable future actions that have the potential to impact historic structures and/or cultural landscapes include the following:

Bielenberg Foundation House Restoration: The Bielenberg Foundation seeks to restore and interpret various houses throughout the southern Pullman neighborhood. The Bielenberg Foundation is a formal NPS partner. This action would restore some historic structures creating a benefit for the structure and would not adversely impact historic structures or cultural landscapes.

Market Hall Restoration: Restoration or adaptive reuse of Market Hall is being considered by the Historic Pullman Foundation. No timeline presently exists for this action. The stabilization, restoration, or activation of Market Hall would aid in maintaining the historic quality of the Pullman Community.

Pullman Cultural Trail: The 2022 National Parks Conservation Association proposed Pullman Cultural Trail would connect the north and south ends of the Pullman Community, within the NHP boundary. The cultural trail would primarily use existing infrastructure with the route potentially being completed with NPS support outside of NPS and IDNR owned property and would therefore not impact historic structures or cultural landscapes.

Impacts of Proposed Action

The establishment of four zones and associated desired conditions would provide direction for historic resource management with an emphasis on continued use and preservation of buildings and structures and the grounds immediately surrounding the historic structures. Under the proposed action, the NHP would develop partnerships, seek out funding opportunities, improve education and interpretation, and improve research, monitoring and inventorying. These actions would improve the park's ability to preserve historic structures and cultural landscapes in accordance with the *Secretary of Interior's Standards and Guidelines for Historic Preservation* and *Director's Order 28: Cultural Resource Management*. Under the proposed action, through the establishment of desired conditions, the historic character of the NHP would be maintained while allowing for appropriate rehabilitation, reuse and redevelopment which would benefit historic structures.

Therefore, implementation of the proposed action would improve the condition of historic structures and cultural landscapes through continued preservation and additional measures to ensure the presence of visitors does not damage historic resources.

When the impacts of the proposed action are combined with other past, present, and reasonably foreseeable future actions and trends, the overall cumulative impact on historic structures and cultural landscapes would be beneficial since the condition of these resources would improve.

Visitor Use and Experience

Affected Environment

The park boundary includes historic and active residences and businesses. There are several places for visitors to experience Pullman history and resources, including the Historic Pullman Foundation Visitor Information Center, Pullman State Historic Site at the Hotel Florence, the National A. Philip Randolph Pullman Porter Museum, and the Pullman neighborhood itself. The NPS does not own or manage these places. Visitors are encouraged to enjoy the historical park's architecture and public spaces while respecting the privacy of Pullman residents and private businesses. With professional guided tours by park staff or partners, and options for self-led experiences through the community, visitors can learn about the history and significance of the Pullman Company and Community.

According to an economic impact study, the 2015 designation as a National Monument was expected to grow annual visitation to 300,000 by 2020 (NPCA, 2013). The anticipated visitation was never reached because the visitor center and surround grounds were not reopened until 2021 after nearly three decades of rehabilitation work. Actual visitation data for the park is limited given the short period of operation, however, consistent with national trends, there is an anticipated increase of visitation year over year.

Broad factors not specific to the park may increase or decrease future visitation, including population changes, economic trends, travel costs, leisure time availability, future disposable income, climate change impacts, and changes in recreation preferences. Reasonably foreseeable future actions that have the potential to impact visitor use and experience include the following:

Bielenberg Foundation House Restoration: The restoration and interpretation of various houses throughout the southern Pullman neighborhood would create additional visitor learning experiences provided by partnering organizations.

Market Hall Restoration: The stabilization, restoration, or activation of Market Hall would aid in maintaining the historic quality of the Pullman Community and increase education and experience opportunities for visitors.

Metra Station Modernization: Metra stations adjacent to the NHP may draw visitors by mass transit rather than individual vehicles. Station modernization projects are planned for 111th Street and 103rd

Street. The improvements at these stations may include making the stations fully ADA-accessible as well as replacement and/or rehabilitation of station platforms, new lighting, gatehouse/head house rehabilitation, replacement of leaking roofs, installation of warming shelters, new platform amenities, and other related work. The project may also include wayfinding signage or other station identifiers. These stations are adjacent to the NHP boundary and would benefit the visitor experience through increased access and amenities for visitor use.

National A. Philip Randolph Pullman Porter Museum Expansion: The National A. Philip Randolph Pullman Porter Museum plans to expand its museum space in partnership with Chicago Neighborhood Initiative to provide additional space for showcasing black history and the civil rights movement. This expansion will include a hospitality district called “Randolph’s Way,” and establish a business corridor called Pullman Porters Row. The museum expansion will increase the education and interpretation opportunities of visitors visiting the NHP.

Onsite Pullman Railcar: In cooperation with many partners, IDNR and NPS are working to place a Pullman Railcar on the Car Works Grounds. This would meet the desired condition to have a railcar visitor experience at the Car Works. Details of this proposal are currently unknown, and impacts are thus difficult to anticipate but it is possible this would improve the visitor experience through increased interpretation and education.

Pullman Cultural Trail: This action would improve the visitor experience and park interpretive themes while also creating a pedestrian oriented circulation route throughout the NHP. The cultural trail would primarily use existing infrastructure with the route potentially being completed with NPS support outside of NPS and IDNR owned property. Use of this trail would be consistent with the current pedestrian use in the Pullman neighborhood, as such there are no anticipated adverse impacts to visitor use and experience.

Street Improvement Projects: Chicago Department of Transportation has planned a streetscape improvement project on 11th Street between Martin Luther King Drive and S. Doty Avenue and on Cottage Grove Avenue between 108th Street and 111th Street. The project would benefit the visitor experience at and near the NHP by providing safe, walkable, and attractive streets that foster community and economic growth through infrastructure and safety upgrades.

Impacts of Proposed Action

Establishing management areas, and management actions and strategies to achieve desired conditions, would improve the visitor experience within the NHP. Management actions such as improving education and interpretation, increasing pedestrian connectivity and access, and additional security measures in some locations, would improve the visitor experience. The NPS seeks to support partners with developing and improving visitor experience throughout the community and may offer technical assistance when appropriate. The following are some of the projects that are currently under consideration by local partners and how they may improve the visitor experience; Restoration of the Bielenberg Foundation House and Market Hall would provide additional visitor education opportunities, and expansion of the National A. Philip Randolph Pullman Porter Museum would further increase opportunities for visitor education. Metra station improvements and creation of the Pullman Cultural Trail would improve visitor access and opportunities to experience the park. Placing a Pullman Railcar on the Car Works Grounds would improve the visitor experience through increased interpretation and education. Planned street improvement projects would also benefit visitors by providing safe and attractive routes. Visitors would have the opportunity to experience the park in new ways, be provided with recreational and educational opportunities, and have easier and safer access to facilities. This would result in a long-term beneficial impact to visitor use and experience.

Over time, the NPS would use the visitor use management strategies outlined in the proposed action to strategically assess existing visitor opportunities and experiences and respond proactively to new

opportunities and trends. This would in turn enhance visitors' connection with and understanding of the significance and fundamental resources and values of the NHP.

When the impacts of the proposed action are combined with other past, present, and reasonably foreseeable future actions and trends, the overall cumulative impact on visitor use and experience would be beneficial through enhanced and expanded opportunities to recreate at the NHP and learn about and connect with NHP resources.

Transit and Circulation

Affected Environment

The park is located approximately 13 miles south of downtown Chicago and is situated adjacent to the Bishop Ford Expressway (I-94). The historic district itself is spread out physically: a mile and a half long north-south and a quarter mile east-west. This combination of distance and highway accessibility positions private vehicles as a highly attractive option for getting to and from the park. Although close to downtown, driving doesn't provide the most efficient access to Pullman Historic District at all times of day. The trip can take over an hour to reach by car during peak periods (CMAP, 2017). Currently, Metra is a convenient service to access Pullman National Historical Park and provides visitors a door-to-door connection between Millennium Park and Pullman. The journey between downtown and Pullman takes 26 minutes by Metra, which is comparable to car travel with minimal traffic (CMAP, 2017).

Visitors to Pullman National Historical Park primarily arrive in personal vehicles but can experience most of the park within walking distance of the main parking lot adjacent to the Administration Clock Tower Building. The community was originally designed as a walkable community which puts many points of interest within walking distance of the parking lot and visitor center. However, due to further distance and limited pedestrian focused access, the northern portion of the park is difficult to experience except by vehicle. Additional issues that affect transit and circulation at the site include lack of signage and wayfinding, aging amenities, and irregular service schedules for local transit. (CMAP, 2017)

In September 2017, the National Parks Conservation Association (NPCA) and CMAP released the *Pullman Transportation Plan*. The plan outlines recommendations for transit, bike and walking paths, and street and pedestrian improvements to be implemented. Implementation of this plan continues to improve transit and circulation at the park for both visitors and residents. Reasonably foreseeable future actions that have the potential to impact transit and circulation include the following:

Metra Station Modernization: The improvements at these stations may include making the stations fully ADA-accessible as well as replacement and/or rehabilitation of station platforms, new lighting, gatehouse/head house rehabilitation, replacement of leaking roofs, installation of warming shelters, new platform amenities, and other related work. The project may also include wayfinding signage or other station identifiers. These stations are adjacent to the NHP boundary and would benefit transit and circulation to the NHP.

Pullman Cultural Trail: This action would create, and thus improve, a pedestrian oriented circulation route throughout the NHP. The cultural trail would primarily use existing infrastructure with the route potentially being completed with NPS support outside of NPS and IDNR owned property. Use of this trail would be consistent with the current pedestrian use in the Pullman neighborhood, as such there are no adverse impacts to transit and circulation from implementation of this plan.

Street Improvement Projects: This project would benefit transit and circulation by providing safe, walkable, and attractive streets that would foster community and economic growth through infrastructure and safety upgrades.

Impacts of Proposed Action

The proposed action supports local transportation groups to improve circulation throughout the community. Any action undertaken by the NPS would improve visitor's and resident's ability to navigate into and out of the community, travel to points of interest, and gain an immersive experience within the NHP.

When the impacts of the proposed action are combined with other past, present, and reasonably foreseeable future actions and trends, the overall cumulative impact on transit and circulation would be beneficial through increased connectivity through alternative transportation options in and out of to the site.

EA Chapter | 4

Agency and Tribal Consultation

Public Engagement and Participation

Public participation and scoping are essential components of the planning and NEPA process. Public scoping was completed in December 2022 and more detail can be found in the draft JGMP Chapter 4. After distribution of this draft JGMP/EA a 45-day public review will take place. In addition, stakeholder input will be requested during stakeholder meetings and public outreach events in Fall 2023.

Consultation

The National Park Service consulted with various agencies, tribes, organizations, and interested persons in preparing this document. The process of consultation and coordination is an important component of this plan. Below lists the agencies and tribes consulted, with a short summary of the actions taken and responses received.

Illinois State Historic Preservation Officer

Agencies that have direct or indirect jurisdiction over historic properties are required by Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended (16 USC 470, et seq.), to take into account the effect of any undertaking on properties listed in or eligible for listing in the National Register of Historic Places. To meet the requirements of 36 CFR 800, on August 7, 2023, NPS met with the Illinois SHPO to discuss the proposed project and solicit comment. These officials also received a copy of the EA for review and comment. The NPS will coordinate with the SHPO in the development of mitigation measures for historic and archeological resources through the use of a memorandum of agreement.

U.S. Fish and Wildlife Service

The NPS consulted with the U.S. Fish and Wildlife Service IPaC on July 17, 2023, in compliance with Section 7 with the Endangered Species Act of 1973. The U.S. Fish and Wildlife Service replied on July 24, 2023, via email indicating “based on the project location and information that you provided in IPaC, you should make ‘no effect’ determinations for all the species listed in the county. The project location is in a highly developed area and there is not habitat (or records) for Federally listed species on your species list.”

Associated Tribes

Letters inviting consultation to federally recognized tribes were sent on July 28 2023. NPS will continue to consult with traditionally associated tribes and groups during the public review period for this EA and throughout implementation of the final JGMP pursuant to requirements of 36 CFR 800, federal executive orders and agency management policies.

Future Consultation

The NPS will continue to consult with agencies, tribes, partners, stakeholders, and the public as actions identified in the draft JGMP advance toward more detailed design development and implementation stages. Pullman NHP staff will complete any additional compliance and permitting requirements, including compliance with Section 106 of the NHPA for project specific undertakings.

Appendix | F

FINDING OF NO SIGNIFICANT IMPACT

National Park Service
U.S. Department of the Interior
Pullman National Historical Park
Pullman Joint General Management Plan – Finding of No Significant Impact



November 10, 2023

FINDING OF NO SIGNIFICANT IMPACT Pullman Joint General Management Plan ENVIRONMENTAL ASSESSMENT Pullman National Historical Park, Illinois

BACKGROUND

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) has prepared an environmental assessment (EA) to examine the environmental impacts of the actions identified in the Pullman Joint General Management Plan (JGMP) for Pullman National Historical Park (PULL). The JGMP is needed to provide site-specific guidance for the management of resources and visitors and the development of infrastructure in the park. The plan provides management guidance and actions that will be carried out as staff and funding become available. The plan holistically presents future potential actions for the management of PULL, including actions proposed by Illinois Department of Natural Resources (IDNR) and other partners. The EA, consistent with NEPA and NPS policy, is focused on those actions the NPS is proposing while considering the cumulative impacts of other past and proposed future actions taken near PULL.

During preparation of the EA, the NPS consulted with federal and state agencies, Indigenous Nations, interested and affected parties, landowners with property in proximity or within PULL, and the general public. The EA was open for public comment from September 1, 2023, to October 15, 2023. A press release was issued on September 1, 2023, which announced that the EA was available for public review and invited comments online through the Planning, Environment, and Public Comment (PEPC) system or by U.S. mail. A summary of public comments and responses to all substantive comments are included in Attachment A.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the September 2023 EA and associated decision file. To the extent necessary, relevant sections of the plan and EA are incorporated by reference below. A non-impairment determination is included in Attachment B.

Selected Action and Rationale

The EA analyzed one alternative, the NPS proposed action. Based on the analysis, the NPS selected the proposed action as the alternative for implementation because it best meets the purpose and need for action, does not result in significant impacts on to park resources, and fulfills the requirements in the Cooperative Management Agreement (CMA). Under the selected action, NPS and IDNR would continue to work together to preserve resources, engage visitors, and cooperatively manage park areas as prescribed by the CMA. The JGMP identifies management areas, defines their desired conditions, and

outlines management strategies to achieve and maintain the desired conditions. A detailed description of the desired conditions and management strategy are included in Chapters 2 and 3 of the JGMP.

Consistent with 43 CFR 46.310(b), the NPS did not include a no-action alternative because it would not be analytically useful, and there are no unresolved conflicts about the selected action with respect to alternative uses of available resources.

MITIGATION MEASURES

The NPS strongly emphasizes avoiding, minimizing, and mitigating potentially adverse environmental impacts. Therefore, the NPS will require multiple mitigation measures and best management practices to protect environmental and cultural resources potentially affected by the selected action. Measures to minimize harm will be developed during detailed planning, compliance and permitting for individual components of the selected action.

Authority for these mitigations will come from the following laws and policies:

- NPS Organic Act (16 United States Code [U.S.C.] 1)
- National Park Service Management Policies (NPS 2006)
- National Historic Preservation Act (54 United States code [U.S.C.] 306108)

SIGNIFICANCE CRITERIA REVIEW

Consistent with CEQ regulations §1501.3(b), the NPS evaluates the significance of the selected action by evaluating the potentially affected environment and the degree of effect of the action, including both adverse and beneficial effects, effects on public health and safety and effects that would violate Federal, State, Tribal or local laws protecting the environment. The significance determination considers the effects of the selected action on the resources within the park.

Potentially Affected Environment

The plan provides management vision and strategies to improve resource conditions and visitor experiences. Potentially affected resources include historic structures and cultural landscapes, visitor use and experience, and transportation and circulation.

Historic Structures and Cultural Landscapes: The NPS owns only the historic Administration Clock Tower Building, which served as the hub of the former Pullman factory. Surrounding the Administration Clock Tower Building is the Pullman State Historic Site. The remainder of the land in the park boundary is owned by the City of Chicago or private owners. In 1998, an arson fire heavily damaged the Administration Clock Tower Building, following which it was partially reconstructed and restored. In 2021, the NPS completed rehabilitation of the Administration Clock Tower Building that created a small visitor center, classroom, and office space on the first floor. At the same time, IDNR completed the remediation and rehabilitation of its 12-acre Car Works grounds surrounding the NPS Administration Building Clock Tower Building. The landscaping, plantings, lighting, and pathways that were designed as a part of the original 1880 plans for the Sites have been substantially altered, such that a cultural landscape true to that period no longer exists.

Visitor Use and Experience: The park boundary includes historic and active residences and businesses. There are several places for visitors to experience Pullman history and resources, including the Historic Pullman Foundation Exhibit Hall, Pullman State Historic Site at the Hotel Florence, the National A. Philip Randolph Pullman Porter Museum, the Pullman House Project welcome center, the historic Greenstone Church, and the Pullman neighborhood itself. The NPS does not own or manage these places. Visitors are encouraged to enjoy PULL's architecture and public spaces while respecting the privacy of Pullman residents and private

businesses. With professional guided tours by park staff or partners, and options for self-led experiences through the community, visitors can learn about the history and significance of the Pullman Company and community.

Transportation and Circulation: The park is located approximately 13 miles south of downtown Chicago and is situated adjacent to the Bishop Ford Expressway (I-94). While public transportation is available via Chicago Metra train and Chicago Transit Authority bus, visitors to PULL primarily arrive by personal vehicle and can experience most of the park within walking distance of the main parking lot adjacent to the Administration Clock Tower Building. The community was originally designed as a walkable community which puts many points of interest within walking distance of the parking lot and visitor center. However, due to further distance and limited pedestrian focused access, the northern portion of the park is more frequently experienced by vehicle.

Degree of Effects of the Action

The National Park Service considered the following actual or potential project effects in evaluating the degree of the effects (40 CFR 1501.3(b)(2)) for the selected action.

a. Beneficial and adverse, and short- and long-term effects of the selected action.

Under the selected action, there would be permanent beneficial impacts to historic structures and cultural landscapes through the development of partnerships, growth of education and interpretation opportunities, and additional research, monitoring and inventorying at the park. These actions would improve the park's ability to preserve historic structures and cultural landscapes in accordance with the Secretary of Interior's Standards and Guidelines for Historic Preservation and Director's Order 28: Cultural Resource Management. Under the selected action, through the establishment of desired conditions, the historic character of PULL would be maintained while allowing for appropriate rehabilitation, reuse and redevelopment which would benefit historic structures. There are no anticipated adverse impacts on historic structures and cultural landscapes from the selected action.

The selected action also improves the visitor experience. Under the selected action, visitors would have the opportunity to experience the park in new ways, be provided with recreational and educational opportunities, and have easier and safer access to facilities. This would result in a long-term beneficial impact to visitor use and experience. The NPS would use the visitor use management strategies outlined in the selected action to strategically assess existing visitor opportunities and experiences and respond proactively to new opportunities and trends. This would in turn enhance visitors' connection with and understanding of the significance and fundamental resources and values of PULL.

The selected action also supports local transportation groups in their efforts to improve circulation throughout the community. Any action undertaken by the NPS would improve visitors' and residents' ability to navigate into and out of the community, travel to points of interest, and gain an immersive experience within PULL. There are no anticipated adverse impacts to visitor experience, transportation or circulation under the selected alternative.

As described above, the selected action will result in long-term beneficial effects to park resources over the life of the plan. The selected action will fulfill the park's purpose and support the park's fundamental resources and values. The NPS did not identify any significant adverse direct, indirect or cumulative effects from implementing the selected action.

b. Degree to which the selected action affects public health and safety.

The selected alternative will positively affect public health and safety by increasing the awareness and development of pedestrian oriented infrastructure including crosswalks at major streets. There are

no other anticipated impacts to health or safety and no adverse effects on health or safety from the selected action.

c. Effects that would violate federal, state, tribal, or local law protecting the environment.

The selected alternative does not threaten or violate applicable federal, state, tribal, or local environmental laws or requirements imposed for the protection of the environment. The park consulted with the U.S. Fish and Wildlife Service (USFWS), Illinois State Historic Preservation Office, and traditionally associated Tribal Nations during the analysis of the selected action. These consultation efforts are summarized below:

- **Government to Government Consultation:** Letters inviting federally recognized Indigenous Nations to consult on the JGMP were sent on July 28, 2023. NPS also consulted with traditionally associated Indigenous Nations on the EA and will continue to consult throughout implementation of the final JGMP pursuant to requirements of 36 CFR 800, executive orders and agency management policies.
- **U.S. Fish and Wildlife Service:** The NPS consulted with the USFWS using the Information Planning and Consultation (IPaC) tool on July 17, 2023, in compliance with Section 7 with the Endangered Species Act of 1973 (ESA). The USFWS replied on July 24, 2023, via email indicating “based on the project location and information that you provided in IPaC, you should make ‘no effect’ determinations for all the species listed in the county. The project location is in a highly developed area and there is not habitat (or records) for Federally listed species on your species list.”
- **State Historic Preservation Office:** The NPS is required by 36 CFR 800 and Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended (16 USC 470, et seq.), to consider the effect of any undertaking on properties listed in or eligible for listing in the National Register of Historic Places. On August 07, 2023, NPS sent a letter to the Illinois State Historic Preservation Office (SHPO) with a copy of the EA for review and comment. The NPS will coordinate with the SHPO in the development of mitigation measures for historic and archeological resources through the use of a memorandum of agreement.

The SHPO responded on September 5, 2023, stating that the JGMP and EA will not adversely affect any historic resource. Additionally, they provided corrections and updates regarding Illinois Law and Policy and the Illinois Comprehensive Environmental Review Process that do not affect the section 106 determination. These edits have been incorporated through errata (Attachment A).

FINDING OF NO SIGNIFICANT IMPACT

Based on the information contained in the EA, I have determined that the selected action does not constitute a major federal action having a significant effect on the human environment. Therefore, an environmental impact statement will not be required.

This finding is based on consideration of the Council on Environmental Quality criteria for significance (40 Code of Federal Regulations [CFR] 1501.3 [b] (2023)), regarding the potentially affected environment and degrees of effects of the impacts described in the EA (which is hereby incorporated by reference) and as summarized below.

Recommended:



Digitally signed by TERI GAGE
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Teri M. Gage
Superintendent
Pullman National Historical Park

Date

Approved:



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Date: 2023.11.24 13:02:11 -05'00'

Herbert C. Frost, Ph.D.
Regional Director
National Park Service DOI Regions 3, 4, and 5

Date

Attachment A: Public Comment Summary and Errata

On September 1, 2023, Pullman National Historical Park released the Pullman Joint General Management Plan Environmental Assessment (EA) for public review and comment. A press release was issued on September 1, 2023, announcing that the document was available for public comment for 45 days. The public was invited to provide comments online through the Planning, Environment, and Public Comment (PEPC) system at <https://parkplanning.nps.gov/pulljgmpea> or to mail comments to PULL.

The National Park Service received six correspondences through the NPS Planning, Environment and Public Comment website and one correspondence delivered to the superintendent's office.

RESPONSES TO PUBLIC COMMENTS

This section includes responses to all substantive and some non-substantive public comments on the EA. The comments do not change the outcome of the impact analysis, nor do they affect the final decision documented in the Finding of No Significant Impact. Minor typographical errors in the EA are corrected through the errata. Substantive comments are those that:

- question, with reasonable basis, the accuracy of the information in the NEPA document;
- question, with reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the NEPA document; or
- cause changes or revisions in the proposal.

EA Comments

COMMENT: One comment expressed concern that construction or preservation actions taken by partners could impact archeological resources.

NPS RESPONSE: The EA only address NPS impacts. Actions taken by partners will require compliance with appropriate laws and policies prior to implementation.

COMMENT: One commenter expressed that the socioeconomic analysis did not align with the rhetoric of local politicians, which indicates that the area should be experiencing economic growth.

NPS RESPONSE: The EA addresses the impacts of the JGMP. While there may be an increase in local economic growth, the JGMP will not have a direct impact on socioeconomics. As stated on page 2-11 there are no anticipated effects on regional income and jobs from the implementation of the JGMP. Many positive changes are occurring outside of the JGMP that may cause local economic growth.

COMMENT: One commenter expressed concern that the visitor use and experience impact analysis did not account for self-led tourists not respecting the privacy of Pullman residents and businesses.

NPS RESPONSE: Self-led experiences are not specifically prescribed through the management actions of the JGMP. Currently and in the future, it is anticipated that some visitors will participate in self-led experiences. As stated in the EA, visitors are encouraged to enjoy the park while respecting the privacy of residents and businesses.

COMMENT: One commenter asked about the impacts that road improvement projects will have on historic structures and features.

NPS RESPONSE: Street improvement projects are under the jurisdiction of the City and County and these agencies will be required to follow all applicable laws and policies prior to implementation.

JGMP Comments

COMMENT: Commenters expressed concerned about the preservation of historic buildings not owned by the NPS and requested NPS assistance and intervention.

NPS RESPONSE: The NPS offers technical assistance through the National Historical Landmarks Program and may also offer matching financial support to significant historic structures. The NPS works closely with the City of Chicago Landmarks Commission, the IL State Historic Preservation Office, and other government groups in adherence with the National Historic Landmark District designation.

COMMENT: One commenter supports specific inclusion of a cultural trail be included in the JGMP.

NPS RESPONSE: The JGMP supports the development of a cultural trail. Specific trail design is outside the scope of the plan.

COMMENT: Commenters expressed a desire to experience a Pullman Railcar and that a railcar should be placed on-site.

NPS RESPONSE: The JGMP specifically supports the placement of a railcar in the Carworks zone. The IDNR visioning document (Appendix D of the JGMP) provides some specifics on how this could be accomplished.

COMMENT: Commenters expressed that the park should connect visitors with similar stories and locations outside of the park boundaries.

NPS RESPONSE: Table 7 of the JGMP supports this idea. The Pullman Long Range Interpretive Plan includes guidance for working with partners toward promoting connected sites. Specifics are out of the scope of the JGMP.

COMMENT: Commenters expressed concern that the story of the Sleeping Car Porters was not fully addressed in the management actions section of the JGMP.

NPS RESPONSE: The NPS is mandated to tell the story of the Sleeping Car Porters and has engaged with the National A. Philip Randolph Pullman Porter Museum to tell this story. The Pullman Foundation Document identifies the Pullman Porter story in three of seven park significance statements. The Long-Range Interpretive Plan (LRIP) identifies the Pullman Porters as an interpretive theme and outlines the National A. Philip Randolph Pullman Porter Museum as a principal partner. The LRIP also includes guidance on telling the story of the Sleeping Car Porters through partnerships.

COMMENT: Commenters suggested a more active approach by NPS to acquire significant properties.

NPS RESPONSE: At this time the NPS is not actively acquiring any properties within the boundary of the park. The JGMP does not restrict future acquisition, and as situations change acquisition may be reassessed.

COMMENT: One commenter recommended a boundary modification to include the footings of the water tower and gas house.

NPS RESPONSE: The foundation of the Pullman Water Tower is within the Pullman National Historic Landmark Boundary and the National Historic Landmarks Program is available to support the owner of this property. The site itself does not fulfil any need or desired conditions identified in the plan.

The Pullman Gas House is outside the Pullman National Historical Park and National Historic Landmark boundaries. This area is not under consideration for inclusion in the park boundary. The site is a privately owned and development as a commercial area is currently underway.

COMMENT: Commenters expressed concerns about safety and that the plan primarily focuses on infrastructure safety not social safety.

NPS RESPONSE: On page 1-16, visitor safety issues are listed and the need for a safety plan is identified. However, the JGMP does not address safety plan specifics and further planning or coordination with partners and local law enforcements may still be required. This issue is carried forward from the Pullman Foundation Document which identifies the need to address safety for public spaces and services within the historical park boundary.

COMMENT: One commenter requested that the original landscape designed by Nathaniel Barrett should be restored throughout the park.

NPS RESPONSE: The decision to use landscaping reminiscent but not identical to the original plantings comes from NPS and IDNR mandates to maintain sustainable and locally friendly environments. The original plantings may not make sense in terms of water use, insect and other wildlife habitat, and maintenance costs.

ERRATA

This errata contains minor revisions to the JGMP and EA as a result of comments received during the public review process, as well as other corrections. These edits do not result in substantial modifications to the selected action, and do not change the environmental analysis. It has been determined that the revisions do not require additional environmental analysis. The page numbers referenced are from the September 2023 JGMP EA. Additions to text are underlined, and deleted text is shown by ~~strikeout~~.

Page 1-4

Section 6 of the Historic Preservation Act (20 ILCS 3405/6) designated the Pullman Car Works and Hotel Florence (and Annex) as a State Historic Site. Section 3.1 of the Historic Preservation Act (20 ILCS 3405/3.1) abolished the Historic Preservation Agency and transferred, effective August 3, 2018, all powers, duties, rights, and responsibilities of the Historic Preservation Agency, except those functions relating to the Abraham Lincoln Presidential Library and Museum, to IDNR.

The State Historic Site was created through 20 ILCS 3420/6 (Illinois State Agency Historic Resources Preservation Act) designating the Pullman Car Works and Hotel Florence (and Annex) as a State Historic Site. On August 3, 2018 (the effective date of Public Act 100-695), the Historic Preservation Agency was abolished and all powers, duties, rights, and responsibilities of the Historic Preservation Agency, except those functions relating to the Abraham Lincoln Presidential Library and Museum, were transferred to the Department of Natural Resources.—

The IDNR is authorized by state statute ~~statue~~ # 20 ILCS 3405 to protect and promote the Pullman SHS under the following:

Page 1-5

Additionally, jurisdiction over the Pullman SHS to IDNR, and Sections 16.b and 16.u give IDNR the power “to take all measures necessary to erect, maintain, preserve, restore, and conserve all State Historic Sites and State Memorials...” and “to engage in marketing activities designed to promote the sites and programs administered by the Department.... All income from marketing activities shall be deposited into the Illinois Historic Sites Fund.

The Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420) establishes a mandatory review and consultation process by the Illinois State Historic Preservation Office of work proposed for state-owned historic property, including the Pullman SHS.

Applicable laws and policies related to IDNR resource management include 20 ILCS 3435- Archaeological and Paleontological Resources Protection Act, 520 ILCS 10 Illinois Endangered Species Protection Act, 525 ILCS 30 Illinois Natural Areas Preservation Act, and 20 ILCS 830 Interagency- Wetland Policy Act of 1989.—

Applicable laws and policies related to IDNR resource management include 20 ILCS 3435, Archaeological and Paleontological Resources Protection Act; Human Remains Protection Act, signed August 4, 2023, and not yet codified; 20 ILCS 860, Outdoor Recreation Resources Act; 520 ILCS 10, Illinois Endangered Species Protection Act; 525 ILCS 30, Illinois Natural Areas Preservation Act; and 20 ILCS 830, Interagency Wetland Policy Act of 1989.

Page 1-18

IDNR Vision – Pullman Car Works/Hotel Florence (2020): This document (appendix D) outlines a clear vision for the future of the SHS. This vision document was released to the public during the JGMP process and was integrated into all facets of the JGMP.

NPS Signage and Wayfinding Plan (2021): This plan was created by the U.S. Department of Transportation Volpe Center to guide signage within the NHP boundary and to guide wayfinding to the Sites. ~~The proposed~~ Proposed action is aligned with this plan with the goal of creating a consistent signage style throughout the NHP.

NPS and IDNR Cooperative Management Agreement (2021): The cooperative management agreement (Appendix C) is a 10-year agreement between the NPS and the IDNR for the cooperative management of the Sites. It defines the roles and responsibilities of each agency to fulfill the missions of both sites more effectively.

Page 1-19

The execution of this vision was revisited through in Positioning Pullman 2.0 in 2019.

Page 1- 33

Table 11. Connecting Pullman

Page 1-35

The current management action for all evaluated properties is that NPS and IDNR would support management by partners and offer support and technical assistance as time and funding allowed.

Page 1-38

South Gateway

Current Status: The corner of 115th and Cottage Grove Avenue lies within the Residential Neighborhood management area of the National Historical Park.

Page 2-14

There are several places for visitors to experience Pullman history and resources, including the Historic Pullman Foundation Exhibit Hall ~~Visitor Information Center~~, Pullman State Historic Site at the Hotel Florence, the National A. Philip Randolph Pullman Porter Museum, and the Pullman neighborhood itself.



November 10, 2023

**Attachment B:
DETERMINATION OF NON-IMPAIRMENT
Pullman Joint General Management Plan
ENVIRONMENTAL ASSESSMENT
Pullman National Historical Park, Illinois**

National Park Service (NPS) *Management Policies 2006* (Section 1.4) requires analysis of potential effects to determine whether proposed actions will impair a national park's resources and values. NPS decision makers must always seek ways to avoid or to minimize, to the greatest degree practicable, adverse impacts on park resources and values. The NPS has the management discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of the park, although that discretion is limited by the statutory requirement that the NPS must leave resources and values unimpaired unless a particular law directly and specifically prescribes otherwise.

An impairment is an impact that, in the professional judgment of the responsible NPS decision maker, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values. An impact on any park resource or value may, but does not necessarily, constitute impairment. An impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact may be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values, and it cannot be further mitigated.

Impairment may result from visitor activities, NPS administrative activities, or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park. An impairment determination is not made for subject matters such as visitor experience, public health and safety, socioeconomic, environmental justice, land use, and park operations because impairment determinations only relate to resources and values that maintain the park's purpose and significance. Additionally, this determination applies only to NPS lands.

Historic and Cultural Resources

The selected action would maintain historic buildings in their current condition or improve them by appropriate restoration practices. The plan does not provide specific details and the actions would be taken by partners on non-NPS property. There would be no adverse effect to historic properties under Section 106 of the National Historic Preservation Act. Therefore, the selected action would not constitute an impairment to cultural resources.

Conclusion

As guided by the expected outcomes noted above, implementing the selected action does not constitute impairment of any resource or park value whose conservation is: (1) necessary to fulfill specific purposes identified in establishing legislation or proclamation of the park; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified as a goal in the Park's general management plan or other relevant NPS planning documents as being of significance. This conclusion is based on the consideration of the purpose and significance of PULL, a thorough analysis of the environmental impacts described in the environmental assessment, relevant scientific studies, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of NPS.

