PULLMAN HISTORIC DISTRICT
RECONNAISSANCE SURVEY

Chicago, Illinois

July 2013
Study Team
Natalie Franz, Planner, Midwest Region, National Park Service
Sändra Washington, Associate Regional Director, Cultural Resources,
Strategic Investments, and Planning, Midwest Region,
National Park Service

Acknowledgements
This report would not have been possible without the time and expertise of:
Julia Bachrach, Historian, Chicago Park District and Trustee, Illinois
Historic Preservation Agency
Pat Brannon, Vice President, Pullman Civic Organization
Lorraine Brochu, President, Pullman Civic Organization
Linda Bullen, Curator, Pullman State Historic Site
David Doig, President, Chicago Neighborhood Initiatives
Phyllis Ellin, Chicago Liaison, Midwest Region, National Park Service
Sunny Fischer, Board Chair, Illinois Historic Preservation Agency
Charles Gregerson
Eleanor Gorski, Assistant Commissioner, Department of Housing
and Economic Development, City of Chicago
Dr. Lyn Hughes, Director, Black Labor History and Cultural Studies
Research Center
Holly Ludlam, Interpreter, Pullman State Historic Site
Lynn McClure, Midwest Region Director, National Parks
Conservation Association
Arthur Pearson, Pullman Civic Organization
David Peterson, President, A. Philip Randolph Pullman Porter Museum
Catherine Shannon, Deputy Director, Illinois Historic Preservation
Agency
Mike Shymanski, President, Historic Pullman Foundation
Mike Wagenbach, Director, Pullman State Historic Site
Sherry Williams, Bronzeville Historical Society
Antoinette Wright, Independent Cultural Management Consultant

This study has been prepared to explore specific resources and advise on
whether these resources merit further consideration as a potential addition to
the National Park System. Publication or transmittal of this report should not
be considered an endorsement or a commitment by the National Park Service
to seek or support specific legislative authorization for the project or its imple-
mentation. This report was prepared by the United States Department of the
Interior, National Park Service, Midwest Region. For more information contact:

Natalie Franz
Midwest Regional Office
National Park Service
601 Riverfront Drive
Omaha, NE 68102-4226
(402) 661-1856
This reconnaissance survey is a preliminary resource assessment of the Pullman Historic District based on National Park Service (NPS) criteria for inclusion in the National Park System: significance, suitability, feasibility, and need for direct NPS management. The conclusions are not final or definitive – the survey provides a cursory review and analysis of available information to determine whether a special resource study is warranted.

Historic Context
The model factory town of Pullman was created from scratch in the 1880s by the Pullman Palace Car Company to manufacture railroad passenger cars and house workers and their families. Company founder George Pullman saw the positive incentives of good housing, parks, and amenities as a way to build a happy, reliable workforce. He engaged architect Solon Spencer Beman and landscape architect Nathan F. Barrett to plan the town and design the buildings and public spaces therein, all of which were owned by the Pullman Company. 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 reverberations. The Pullman Company would again be the focus of a nationally important labor event when, in 1937, the Brotherhood of Sleeping Car Porters, an influential African-American union, sought and won recognition from the company.

Existing Conditions
The Pullman Historic District covers approximately 300 acres of the Pullman neighborhood in southeast Chicago, Illinois. The district retains the strong integrity it had at the time of designation as a National Historic Landmark (NHL) in 1970. Most houses are privately owned and maintained. The Illinois Historic Preservation Agency manages the Administration and Factory Complex and Hotel Florence as a historic site. The Historic Pullman Foundation operates a visitor center and owns several properties in the district. Other organizations work toward the interpretation and improvement of the Pullman Historic District. The historic resources of the district, especially the Administration and Factory Complex, have been the subject of many previous studies.

Significance
For a historic site to meet national significance criteria for addition to the National Park System, it must meet the criteria for NHLs. The Pullman Historic District was designated an NHL District in 1970 for its importance in social history, architecture, and urban planning, therefore, it meets criteria for national significance.

Suitability
The suitability criterion for addition to the National Park System is met when a determination is made that the cultural resources and historical themes of a study area are not preserved and interpreted for public enjoyment elsewhere by the NPS or comparably by another entity. Though other sites preserve and interpret labor stories and sites where some corporate planning of worker housing took place, none match the scale, intensity, and national impact of the Pullman Historic District. As a result, it is likely that a full special resource study would have a positive finding for suitability.

Feasibility
To be considered feasible for inclusion in the National Park System, NPS must be capable of ensuring resource protection and public enjoyment at a reasonable cost. Preliminary feasibility of the Pullman Historic District cannot be determined considering the many possible responsibilities and management structures of a unit within the district. Should a special resource study be authorized, a finding of feasibility would rely heavily on the existence of a strong partnership with a consortium of private and public organizations. Evaluation of that complexity is outside the scope of a reconnaissance survey.

Need for Direct NPS Management
A site meets the need for NPS management criterion if management by NPS is both required and the clearly superior alternative. Many resources within the Pullman Historic District are cared for by owners and protected by City of Chicago historic preservation ordinances. Existing community groups, nonprofits, and the state are all working at capacity in Pullman, yet there are unmet needs for resource protection and comprehensive interpretation. A full study may determine that there is a need for NPS management, or that existing management is adequate if supported by targeted NPS programmatic assistance. Because of the strength of existing organizations, it seems that if NPS were to have
a role in Pullman, it would be more effective as part of that system, rather than wholly relieving any current group of their responsibilities.

**Conclusion**

In a preliminary evaluation, the Pullman Historic District appears likely to meet the national significance and suitability criteria if evaluated in a special resource study. However, determinations about feasibility and need for NPS management are complex due to the range of potential resource responsibilities, high potential costs, and the need to examine potential partnership models to make NPS involvement viable. Such complex evaluations are beyond the scope of the reconnaissance survey. Therefore the NPS recommends that a special resource study be authorized to fully analyze the criteria for inclusion in the National Park System, invite public involvement, and develop potential management scenarios. The NPS also recommends an update to the NHL documentation for the Pullman Historic District.
CONTENTS

Introduction 6

Part I: Historic Context and Existing Conditions
Historic Context 10
Recent History 21
Existing Conditions 22
Government & Community Organizations 27
Previous Study 32

Part II: Preliminary Application of the Criteria for Inclusion
Significance 36
Suitability 38
Feasibility 42
Need for Direct NPS Management 44
Conclusion & Recommendations 45

Bibliography 47

Appendix A: Criteria for Inclusion 49
Appendix B: National Historic Landmark Criteria 51
INTRODUCTION

This reconnaissance survey is a preliminary resource assessment of the Pullman Historic District based on National Park Service (NPS) criteria for inclusion in the National Park System. The survey was requested in a letter to National Park Service Director Jonathan B. Jarvis in May of 2012 by Illinois 2nd Congressional District Representative Jesse L. Jackson, Jr. and Illinois Senators Richard J. Durbin and Mark Kirk. It provides a cursory review and analysis of available information to determine whether a special resource study is warranted.

Studies for potential new units of the National Park System, called special resource studies, are conducted by the NPS only when authorized by Congress and signed into law by the President. The special resource study (SRS) process is designed to provide definitive findings of a site’s significance, suitability, feasibility, and the need for direct NPS management; and, if those criteria are met, identify and evaluate potential resource protection strategies, boundaries, and management alternatives.

Reconnaissance Survey Process

While specific authorization from Congress would be necessary to conduct a SRS, the NPS is authorized to conduct preliminary resource assessments and gather data on potential study areas or sites. The term “reconnaissance survey” is used to describe this type of assessment. Its conclusions are not considered final or definitive. A reconnaissance survey examines the natural and cultural resources in a study area to provide a preliminary evaluation of their significance, and the suitability and feasibility of protecting those resources as a park unit. If a study area appears potentially eligible for inclusion in the NPS system, then NPS may recommend that a special resource study be authorized by Congress.

The Pullman Historic District Reconnaissance Survey is divided into two parts. Part I first summarizes the historic context of the district and its national importance in labor history, transportation history, architecture, and urban planning. Second, it describes existing conditions in the district, identifying major landowners and existing preservation and interpretation efforts. Third, because the Pullman District has been evaluated several times in the last two decades by the National Park Service and others, a section describes the previous studies and their scope and findings. In Part II of the survey, the criteria for inclusion in the National Park System is preliminarily assessed. The survey concludes with recommendations for further study.

Criteria for Inclusion in the National Park System

The following are the criteria a site must meet to be recommended for inclusion in the National Park System (Appendix A):

1. Significance: Determinations of an area’s national significance are made by NPS professionals in consultation with scholars, experts, and scientists following specific criteria. The National Park Service has adopted four criteria to evaluate the national significance of proposed areas. These criteria, listed in the NPS Management Policies 2006, state that a resource is nationally significant if it meets all of the following conditions:

   • It is an outstanding example of a particular type of resource.
   • It possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation’s heritage.
   • It offers superlative opportunities for public enjoyment or for scientific study.
   • It retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource.

National significance for cultural resources will be evaluated by applying the National Historic Landmark (NHL) criteria contained in 36 CFR Part 65.4 (Code of Federal Regulations).

2. Suitability: A property is considered suitable if it represents a resource type that is not currently represented in the park system or is not comparably represented and protected for public enjoyment by another agency or entity. Adequacy of representation is determined on a case-by-case basis by comparing the type, quality, quantity, combination of resources present, and opportunities for public enjoyment.

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1 This criteria is outlined in NPS Management Policies 2006 Section 1.3 (Appendix A), and draws its legal basis from Public Law 91-383 §8 as amended by §303 of the National Parks Omnibus Management Act (Public Law 105-391).
In addition to resource conservation, the fundamental purpose of all parks is to provide for the enjoyment of park resources and values by the people of the United States. Public enjoyment of national park units are preferably those forms of enjoyment that are “uniquely suited to the superlative natural and cultural resources found in the parks and that (1) foster an understanding of and appreciation for park resources and values, or (2) promote enjoyment through a direct association with, interaction with, or relation to park resources.”

3. Feasibility: To be considered feasible, an area must be of sufficient size and appropriate configuration to ensure long-term protection of the resources and to accommodate public use. The area must have potential for efficient administration at a reasonable cost. Other important feasibility factors include land ownership, acquisition costs, current and potential use, access, level of local and general public support, and staff or development requirements.

4. Necessity of Direct NPS Management: Even if a resource meets the criteria of national significance, suitability, and feasibility, it will not always be recommended that the resource be added to the National Park System. There are many excellent examples of important natural and cultural resources managed by other federal agencies, other levels of government, and private entities. A proposed addition must require direct NPS management instead of protection by other public agencies or the private section, and the evaluation of management options must show NPS management is the clearly superior alternative. Because a reconnaissance survey does not propose management alternatives, there will be only a cursory discussion of need for direct NPS management.

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2 NPS Management Policies 2006 Section 8.1.1.
PART I
Historic Context and Existing Conditions
The Pullman Historic District covers approximately 300 acres of the Pullman neighborhood in southeast Chicago, Illinois. Once its own town, Pullman was created from scratch by the Pullman Palace Car Company, which manufactured railroad passenger cars. Pullman’s rich history in manufacturing, labor history, architecture, and urban planning is of national importance.

George Mortimer Pullman grew up in New York State near the major engineering feat of the early nineteenth century, the Erie Canal. Pullman’s father had a business moving buildings, and with that knowledge and a knack for business, Pullman sought opportunities in the booming city of Chicago. In the mid-1850s, the growing city needed better drainage and young Pullman devised a way to raise entire buildings to the new grade level, thus making his early fortune. He then turned his attention to the railroads expanding across the nation with the goal of providing comfortable and elegant sleeping cars for overnight travelers.

George Pullman founded the Pullman Palace Car Company in 1867, and it quickly gained a large share of the market, buying up smaller competitors. Pullman’s factories employed a mostly white workforce of laborers, cabinetmakers, upholsterers, and other workers in constructing the lavish railroad cars. The cars transformed the experience of passenger railroad travel for those able to afford it, setting a new standard. The luxurious sleeping cars, as well as hotel cars, parlor cars, reclining room cars, and dining cars the company produced were expensive for railroads to purchase outright. Pullman’s business model was to lease sleeping cars to the railroads and provide the employees necessary to serve passengers. Many of these employees were recently-freed former house slaves.

George Pullman championed the education and betterment of workers, out of concern for the welfare of low-skilled migrants from rural areas and abroad, and out of concern for the quality of the workforce from which his factories drew. Though he and the growing ranks of industrialist peers were ensconced in their Prairie Avenue mansions, they could not fail to see the attendant rise in slums which brought with them poor sanitary conditions and the “social ills” of the time. The widening gulf between management and workers contributed to labor unrest, which Chicago experienced every year between 1870 and 1880. Pullman, convinced that capital and labor should cooperate for mutual benefit, sought to address the needs of his workers using business efficiency. And, as it happened, he needed a new factory.1

The need for a new manufacturing center for sleeping cars gave Pullman the opportunity to apply his ideas about the role of the employer in the living conditions and betterment of his workers. Rising land prices in the City of Chicago drew manufacturing to the outer areas, and a clean slate south of the city was chosen for a new, meticulously-planned company town. The Pullman Palace Car Company purchased 4,000 acres for its town and factory between Lake Calumet and the Illinois Central rail line south of Chicago. All but 500 acres were transferred to the Pullman Land Association, the entity which would control all non-manufacturing real estate.

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though the division between the Car Company and the Land Association was merely a legal fiction.  

The task of constructing an entire company town at once was a unique endeavor. Pullman hired three professionals to oversee the work. Architect Solon Spencer Beeman was commissioned to design the many buildings of the town including the factory buildings, church, theater, market, water tower, hotel, and over 1,300 housing units. Landscape architect Nathaniel Franklin Barrett’s charge was the layout of the town, design of the streets and parks, and even an artificial lake. Benzette Williams, Chicago’s former superintendent of sewage, took on water, sewer, and gas lines, and site drainage.

Groundbreaking occurred in spring of 1880, and work proceeded at a furious pace, with over 100 railroad cars of supplies per week unloaded at Pullman over the summer. By fall, factory buildings were taking shape and work began on the first non-industrial building in town: the Hotel Florence. The first factory shops completed were those that would refine the building materials as they came in. A brickyard was built south of the site to supply materials needed for the “first all-brick city.”

Housing for workers was separated from the industrial areas, and took shape primarily as row houses with red granite macadam streets in front and alleys in the rear for the daily trash collection. Indoor plumbing and relative spaciousness put Pullman’s accommodations well above the standards of the day, and were a marked improvement over the overcrowded and unsanitary tenements where many industrial workers made their homes in the late nineteenth century.

In addition to believing that good living conditions could prevent misery and vice, Pullman believed that good design and beauty was ennobling, and thus desired buildings that would be both practical and aesthetically pleasing. Beman designed housing in simple yet elegant Queen Anne style, and included Romanesque arches for buildings that housed shops and services. Though he strove to avoid monotony, Beman imbued the town with visual continuity. The scale, detailing and architectural sophistication of the community was unprecedented.

“Capital will not invest in sentiment, nor for sentimental considerations for the laboring class. But let it once be proved that enterprises of this kind are safe and profitable and we shall see great manufacturing companies develop similar enterprises, and thus a new era will be introduced in the history of labor.”

George Pullman, to the Hour Week Journal of New York, August 5, 1882

Barrett, for his part, broke up the monotony of the grid of streets with the curvilinear Arcade Park and Lake Vista, in front of the Administration building, which held the spent water from the massive Corliss engine that powered the factory. Street trees and street lights enlivened the streetscape.

For all the beauty, sanitation, and order he wanted to provide to his workers and their families, George Pullman did not give them away, believing people did not value the things they did not pay for. His workers would benefit from their superior surroundings while paying a rent that was to ensure a six percent return on the company’s investment in building the town.

The meticulousness with which George Pullman provided for his workers went beyond social uplift; it amounted to social control. A system of control and hierarchy was inscribed in the architecture and layout of the community. Larger, more ornate, and finely-finished houses on Arcade Row were intended for company officers; smaller, simpler rowhouses for junior workers and their families; and rooms without kitchens in tenement blocks for single men. The only religious building in Pullman, Greenstone Church, was intended to be shared by various denominations, since no one group could afford its high rent. Saloons were not allowed.

George Pullman wanted other companies to locate in his model town, but the only ones that did were those in which he had a direct interest or that were suppliers to the Pullman Palace Car Company. When additional housing was needed for the Allen Paper Car

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2 Ibid., 49-50.
3 Ibid., 49-52.
4 Ibid., 43.
Wheel Company and the Union Foundry, additional housing was constructed north of the industrial area. The foundry and wheelworks tended to employ lower-paid, unskilled labor, so simpler, cheaper row houses designed by Beman were constructed there. Aside from a firehouse and school, no public facilities were constructed in the northern section of Pullman.

The factories at Pullman attracted thousands of people, the majority of which were skilled workers, commanding a higher salary than semi or unskilled workers. Pullman had intended his town to attract and retain these employees, most of whom were young, skilled, and overwhelmingly male. The company made efforts to employ women in jobs such as sewing, considered appropriate because they stemmed from household tasks. By fall of 1883, the population of Pullman topped 8,000. African Americans were not permitted to live in Pullman; the population was ethnically diverse but racially monochromatic. Less than half of Pullman residents in 1885 were native-born, a percentage that fell steadily. Scandinavians, Germans, Dutch, British and Irish origins were well represented among immigrant groups.

Not all workers at the Pullman factories lived in Pullman proper. Out of necessity or choice, many moved out to the surrounding neighborhoods that developed, providing places for single-denomination houses of worship, saloons, and property ownership that were not possible in Pullman. Pullman was annexed by Chicago in 1889, but since the Pullman Land Association continued to own the properties, management and maintenance of the town by the company continued.

Beyond the profit on the company’s investment and the effect of the surroundings on the workers the Pullman Company was able to attract and retain, George Pullman had an eponymous showplace to exhibit the living proof of his philosophy. The town attracted visitors, and during the 1893 World’s Columbian Exposition in Chicago, visitors from near and far came to marvel at the town. Pullman did, however, have its detractors; labor leaders were mistrustful of the decidedly capitalist scheme, while other capitalists saw it as inviting trouble and doubted it could possibly be as profitable as George Pullman intended. And, in fact, it wasn’t. Returns on the town never reached the six percent threshold. When one of the partners in Procter & Gamble approached George Pullman for advice on building a model town for a Cincinnati soap factory, he advised against the idea.

As Chicago was on display in 1893 for the World’s Columbian Exposition, the grip of financial panic was closing around the country in general and the railroad industry in particular. Despite the stimulus provided

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6 Ibid., 78-79
8 Ibid., 89-90.
9 Ibid., 132-133. Procter & Gamble did build a factory complex, Ivorydale, but not worker housing. Ivorydale was designed by Solon Spencer Beman.
View of Lake Vista, with the Administration Building, Hotel Florence, and Arcade Building, c.1885. Courtesy of Pullman State Historic Site.
Pullman Historic District Reconnaissance Survey

by travelers from around the nation flocking to the fair itself, railroads had become mismanaged and overbuilt, and in 1893 were reaching a tipping point. Pullman exhibits in the Transportation Building at the World’s Columbian Exposition helped spur fairgoers to visit the Pullman neighborhood, and most found cause to praise George Pullman’s grand experiment. They did not see the annoyance of Pullman workers and residents at company paternalism and red tape that festered under the surface. As 1893 wore on, orders at the factory declined, and decreases in wages came without corresponding decreases in rents. Since rents were deducted from paychecks, workers were left with what amounted to starvation wages. Meanwhile, the corporate dividends were undisturbed. Discontent and grievance could remain silent no longer.

The American Railway Union (ARU) had formed in June 1893 in Chicago, with membership open to all white railroad employees of any profession. While other unions, such as the Brotherhood of Locomotive Firemen, focused on specific professions, the ARU embraced all related professions, even coal miners, longshoremen, and car-builders, if they were in the employ of a railroad. Pullman Company employees were eligible since the company owned and operated a few miles of railroad to access its factories. The structure of the union was one that encouraged democracy and settlement of grievances by mediation, recognizing that strikes were destructive for both employers and employees and to be avoided. Under the leadership of President Eugene V. Debs, the union won some early victories and ranks swelled to 150,000 members.

Pullman workers, who had formed a grievance committee to negotiate with the company, were getting nowhere, and, though ARU leadership advised against it, a strike broke out at the Pullman factories on May 11, 1894. The timing was unfortunate, since the company could afford to withstand a work stoppage financially by relying on existing leases. Against the might of the Pullman Company, the cause of the workers seemed hopeless. The Pullman Company continued to resist any concessions in negotiations with the strikers, trying to wait them out. So the ARU decided to take a truly injurious action against the Pullman Company on a national scale: a boycott of the handling of Pullman cars by all ARU workers.

Because Pullman cars were in such wide use, the boycott crippled rail traffic nationwide. Workers across the country had also seen wage reductions and had cause to take action. The size and scope of the ARU was threatening to railroads. In response, the General Managers’ Association, an industry group representing 24 railroads with terminals in Chicago, organized measures against the boycott. Those who walked off the job were replaced with strikebreakers, and the association tried to sway

Left: The Alexander, a lavish made-to-order private car, 1892. Right: Interior of the Machine Bay, Pullman.
public opinion against the boycott through methods such as encouraging Pullman cars to be hitched to mail cars to disrupt delivery.\textsuperscript{16}

It was through disruption of the United States mail that the federal government was given an opening for intervention into the boycott and strike. The government was uncomfortable with the labor actions in general, part of a growing apprehension about the laboring classes by those in the propertied class during a period of economic hardship.\textsuperscript{17} An injunction against the boycott was secured on the grounds of the violent nature of the strike and the threat to interstate commerce, citing the Sherman Anti-Trust Law of 1890, which ironically had been adopted to combat monopoly by big business.

Going over the head of the Illinois Governor, thousands of U.S. marshals and U.S. Army troops were deployed in what seemed an outsized response to the disturbance. In Chicago, mob activity increased with the military presence, with members from Pullman, but many more from other south side neighborhoods.\textsuperscript{18} Back in Pullman, the Pullman Company strikers’ plight had been overshadowed on the national stage by the boycott. Fighting between the military and workers at rail yards in the Chicago area left dozens dead and more wounded. The injunction led to the jailing of key leaders, weakening the ARU and the strike.\textsuperscript{19}

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“There are variety and freedom on the outside. There are monotony and surveillance on the inside. None of the “superior,” or “scientific” advantages of the model city will compensate for the restrictions on the freedom of the workmen, the denial of opportunities of ownership, the heedless and vexatious parade of authority, and the sense of injustice arising from the well founded belief that the charges of the company for rent, heat, gas, water, etc. are excessive – if not extortionate… Pullman may appear all glitter and glow, all gladness and glory to the casual visitor, but there is the deep, dark background of discontent which it would be idle to deny.”
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\textit{The Chicago Tribune, September 21, 1888}

\textsuperscript{16} Ibid., 132-144.
\textsuperscript{17} Ibid., 147-150.
\textsuperscript{18} Buder, 191-192.
\textsuperscript{19} National Park Service, U.S. Department of the Interior, “National Register of Historic Places, Multiple Property Documentation
National Guard troops encamped at the Hotel Florence, 1894. Courtesy of the Industrial Heritage Archives at Pullman State Historic Site.
With the government working to the General Managers’ Association’s ends, Debs felt the only way to force the Pullman Company into arbitration was reaching out to other labor groups to join in a general strike, but his efforts did not succeed. The boycott dissolved in mid-July, and the ARU was defeated; some of the workers who quit the union were reemployed. For refusal to obey the injunction, Debs and others in the ARU were indicted for contempt. In late July, President Grover Cleveland appointed a commission to investigate the strike and boycott.

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. The situation for those in Pullman remained dire, and while little effort was made to evict residents or collect rent in arrears, destitution was widespread. In his testimony before the investigative commission, however, George Pullman defended his model town and his decisions, though they had led to a strike which ultimately damaged the company and the strikers, and tarnished his image irreparably.

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. Tons of steel and concrete were placed over his casket to prevent labor radicals from desecrating the grave.

The impacts of the Pullman Strike, as the strike and boycott have come to be known collectively, were national in scope. As a massive and truly national strike, it demonstrated the power of national labor and forced consideration about labor action and corporate paternalism. Legally, the injunction against the strike, later upheld by the U.S. Supreme Court, *In re Debs*, 158 U.S. 564 (1985), affirmed a broad power of the federal government to ensure the free flow of interstate commerce, essentially making national strikes illegal.

In October 1898, the Illinois Supreme Court ordered

> “I believe a rich plunderer like Pullman is a greater felon than a poor thief, and it has become no small part of the duty of this organization to strip the mask of hypocrisy from the pretended philanthropist and show him to the world as an oppressor of labor...The paternalism of the Pullman is the same as the interest of a slaveholder in his human chattels. You are striking to avert slavery and degradation.”

Eugene V. Debs, President of ARU, speech of May 16, 1894

the Pullman Company to sell all non-industrial land holdings. Some holdings, such as the brickyard, sold quickly. The Illinois Central railroad had owned the right of way past the front of the factory; Lake Vista was filled and new track and a road installed. The company was granted a deferment on its deadline to sell most of the town, which mostly changed hands in 1907, with residents given the first option to buy.

The Pullman Company, no longer in the landlord business, returned to success under the leadership of its second president, Robert Todd Lincoln. Union activity returned to Pullman, and just ten years after the explosive strike, in 1904 the company locked out union workers, defeating them easily and without larger incident. In 1900, the company began using metal frames for its cars, and by 1908 the company had converted to all steel construction. Over $5 million was invested in remodeling and enlarging the shops. As the company succeeded in the 20th century, the town it once supported floundered. As the housing stock uniformly aged and other neighborhoods grew around it, Pullman lost population, and its community identity.

The 1894 Strike was not the last time the Pullman Company would be the epicenter of a contentious labor issue. In the early 20th century, the Brotherhood of Sleeping Car Porters (BSCP) strove for recognition of their union, a victory whose impact went beyond Pullman Porters to African-American society on the whole.

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20 Buder, 185.
21 Ibid., 199.
22 Ibid., 16.
23 Ibid., 210.
Operation of railroads across the country relied on different classes of workers: conductors and engineers in the “operating trades,” construction and laborers, and service positions like porters, dining car waiters, and station ushers. The classes of railway workers were segmented along racial and ethnic lines. Workers in the railroad trades began forming “brotherhoods” in the 1860s and 1870s as a response to health and safety issues. Many of these brotherhoods codified these racial divisions, barring non-whites from membership. In general, African-Americans were confined to the service positions.31

Thus it was in the service positions that black trade unionism on the railroads began. The Brotherhood of Sleeping Car Porters was founded in 1925 in New York City, and for four decades was led by A. Philip Randolph, who had never worked as a porter or even ridden in a sleeping car.32 From outside the Pullman Company, he was not susceptible to their reprisals, and his powerful public speaking and work editing the Harlem, New York monthly The Messenger helped prepare him for the task.33 Porters comprised 44 percent of the Pullman rail car operation workforce, and Pullman was the nation’s largest employer of African Americans.34 The porters, owing in part to their cosmopolitan experience, held positions of status and respect in the black community. The union faced tough opposition: from a traditionally racist industry, from an anti-union corporation, and initially from some in the black community as well who feared economic reprisals, since the Pullman Company offered jobs to African-Americans and advertised in the black press.35

In 1937, the Pullman Company signed a contract with the BSCP, leading to higher salaries, better job security, and increased protection for workers’ rights through

31 ALHTS 2003, 95-96. In the south, many African-Americans served in the operating trades as brakemen and firemen, but were barred from the top positions of conductor and engineer.
34 Tye, 99, 114.
35 ALHTS 2003, 102-103.
grievance procedures.\textsuperscript{36} It was the first major labor agreement between an African-American union and a corporation. The NAACP’s \textit{Crisis} credited the victory for broad influence, saying, “As important as is this lucrative contract as a labor victory to the Pullman porters, it is even more important to the Negro race as a whole, from the point of view of the Negro’s uphill climb for respect, recognition and influence, and economic advance.”\textsuperscript{37} The BSCP also functioned as a civil rights organization through the 1960s.

The Pullman Company factories consolidated and downsized through the 1940s, and the railroads discontinued sleeping car service in 1969.\textsuperscript{38} Cars and highway travel eclipsed passenger rail for short trips and commercial aviation eclipsed passenger rail for long distance travel. Although the company split apart and rail travel itself faded from prominence, the Pullman Company and the labor unrest it ignited remains prominent in the American memory of industrial and labor history. The causes of those developments and upheavals can still be seen in the architecture and landscape of Pullman’s model town.

\textbf{“As important as is this lucrative contract as a labor victory to the Pullman porters, it is even more important to the Negro race as a whole, from the point of view of the Negro’s uphill climb for respect, recognition and influence, and economic advance.”}  
G. James Fleming in the NAACP’s \textit{Crisis}, 1937

\textsuperscript{36} ALHTS 2003, 103.  
\textsuperscript{37} Quoted in ALHTS 2003, 103, from G. James Fleming, “Pullman Porters Win Pot of Gold,” \textit{Crisis} 44, No.11 (November 1937), 333.  
\textsuperscript{38} Tye, xii.
Historic American Engineering Record rendering of the Pullman Company factory complex in 1886.
The recent history of Pullman has been marked by strong preservation advocacy and action in the face of destruction or partial destruction. In 1960, when the neighborhood was slated to be turned into an industrial park, residents reactivated in the Pullman Civic Organization (PCO) to prevent destruction of the community and promote its history. The district became a National Historic Landmark District in 1970. The southern portion of the Pullman neighborhood was designated a Chicago city landmark district in 1972, and north district of Pullman 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.

From 1972-75, the non-profit Historic Pullman Foundation (HPF) purchased and safeguarded some of Pullman’s prominent historic assets. With guidance and some financial support of the PCO, many homeowners have preserved and restored their historic homes.

From 1972-75, the non-profit Historic Pullman Foundation (HPF) purchased and safeguarded some of Pullman’s prominent historic assets. With guidance and some financial support of the PCO, many homeowners have preserved and restored their historic homes.

39 The Pullman Civic Organization began during WWII as a civil defense organization.

The Administration Building and North Factory Wing were largely vacant and deteriorating following the factory closure, which was mostly complete by 1957. The now-destroyed south wing of the factory and Rear Erecting Shops were in use by various steel concerns. The Administration and Factory Complex and the Hotel Florence were acquired by the State of Illinois in 1991, after which they were established as a state historic site. Before the Administration and Factory Complex buildings could be utilized, a 1998 arson fire claimed the south factory wing and reduced much of the remainder to a shell. Funds were secured to rehabilitate the fire-ravaged structures and reconstruct the clocktower.

Development taking place at the time of this survey includes a renovation to the Hotel Florence, renovation of housing, and the replacement of the Chicago Family Health Center on 115th Street, which provides services for the uninsured and medically underserved in the community. To the east of the district, Pullman Park, a mixed use residential and commercial development, is under construction.

EXISTING CONDITIONS

The Pullman Historic District, the National Historic Landmark District stretching from 115th Street to 103rd Street between Cottage Grove Avenue and the railroad tracks, contains many contributing buildings with a range of current conditions, uses, and needs. This section will describe selected site-specific history and existing conditions.

Within the Pullman Historic District is a City of Chicago landmark district, called the Pullman District, that covers three discontiguous areas. Also within the Pullman Historic District, the Pullman State Historic Site covers 13.5 acres.

Administration and Factory Complex

The Administration and Factory Complex is one of the two areas in Pullman owned by the State of Illinois. The 12.5 acre site consists of the extant North Factory Wing, Administration Building, and Rear Erecting Shops, as well as archeological remains of other factory infrastructure. The complex is surrounded by a chain link fence, and while the buildings do not have any permanent occupants, the Complex serves a number of uses and community groups both in the buildings and on the property.

The buildings were left largely vacant after the factory closure in 1957. In 1991, the State of Illinois purchased the Administration and Factory Complex with the goal of converting the buildings into historic site and museum. Under the auspices of the Illinois Historic Preservation Agency (IHPA), the Administration and Factory Complex with Hotel Florence forms the Pullman State Historic Site. The Administration and Factory Complex received $890,000 in Transportation Enhancement funds to prepare a historic structures report and stabilize the Administration Building.40

In 1997, the Pullman State Historic Site was in the process of stabilization and projected to open as a historic site and museum run by the state in the early 2000s.41 Unfortunately, a destructive arson fire struck the Administration and Factory Complex in December 1998, destroying the south wing and damaging the Administration Building and North Factory Wing. The National Trust for Historic Preservation placed the Pullman Administration and Factory Complex on its list of most endangered historic properties in 1999, as did the Landmarks Preservation Council of Illinois.

The Administration Building and North Wing of the factory were stabilized and restored and the clock tower reconstructed between 1999 and 2007. The buildings are now unheated masonry shells with steel skeletons and concrete floors with over 53,000 square feet of space. Absent a planned use at the time of restoration, the floors were designed for high live loads. The North Factory wing is used for tours and special programs. The Rear Erecting shops are unroofed, and encompass 36,600 square feet. In 2001, the roof was deconstructed to save the walls from collapse. The measures taken to cap the walls and stabilize the existing structure are nearing the end of their lifespan. Without intervention, they could collapse or deteriorate to the point that they would no longer be salvageable.

Fire Station
The North Pullman Fire Station on 108th Street is owned by the City of Chicago, as is an adjacent empty lot. Tuck-pointing, masonry stabilization and roof repair was done in 2012. It is currently vacant and the City has advertised the property for sale and reuse.

Greenstone Church
Greenstone Church is owned by the United Methodist Church. It is actively used and in good condition.

Homes (General)
The majority of buildings in the district are housing, with over 1,000 units. In both the northern and southern portion of the Pullman Historic District, the historic workers housing individually is in a range of conditions from fully and accurately restored to vacant and deteriorating. Restoration efforts by individual homeowners and community development groups have improved the overall condition of the housing stock. Currently a major targeted effort by Chicago Neighborhood Initiatives and the City of Chicago in North Pullman continues to improve that segment of the neighborhood.

Hotel Florence
The Hotel Florence and Hotel Annex are owned by the IHPA. Previously owned and operated by the Historic Pullman Foundation, it had been a museum and restaurant. The Hotel Florence, constructed in 1881, is currently undergoing rehabilitation, primarily in the basement and on the ground floor, with new roofing and exterior wood restoration. Work began in late 2011 and is expected to be complete in 2013. The 1914 Hotel Annex, connected to the Hotel Florence, is not undergoing rehabilitation at this time and has been mothballed since stabilization and environmental abatement in 2006.

Market Square
At the center of Market Square is Market Hall, built to provide a venue for grocery vendors and a community meeting hall on the upper floors. Market Hall has been the scene of a series of destructive fires. The first Market Hall, a two-story building, was ravaged by fire in 1892. The second Market Hall, also designed by Beman, was built in 1893 as a grander three-story hall, flanked by four curved three-apartment buildings on each corner of the square. Market Hall again burned in 1931, and...
the upper floors of the building were removed. The ground floor was a grocery and a tavern until another fire in 1973 severely damaged what remained. In 1974, the shell was purchased by the Historic Pullman Foundation (HPF) to save it from demolition.

Renovation of Market Hall began in 1996, and the property has received grants from the City of Chicago and State of Illinois. In 2000, HPF received a $1.1 million Illinois First grant to rehabilitate the Market Hall. What remains of the building is stabilized and preserved, and though publicly visible, it is inaccessible and has no current use. Recently, streetscape improvements were made to the square.

Market Square is bordered on four corners by curved apartment blocks. The apartment in the southwest quadrant is owned by the Bielenberg Historic Pullman House Foundation and is intended for future operation as a museum.

Masonic Hall (Historic Pullman Center)
Formerly a block house of individual tenements, the building at 614 East 113th Street was converted into a Masonic Hall after the Pullman Land Association sold the Pullman Company’s residential property. A large auditorium was carved out of the upper floors. Owned by the Historic Pullman Foundation since 1973, the building is known as the Historic Pullman Center and hosts meetings and offices. The building also provides storage for the Historic Pullman Foundation collections. Exterior restoration work was completed in 2012.

Parks
Arcade Park and Pullman Park are the two publicly accessible open space areas within the Pullman Historic District and are managed by the Chicago Park District. When built in the 1880s, Arcade Park was a formal garden with dense plantings and the diagonally located Pullman Park was a pastoral green with a few trees. Both were razed and altered over the years. Arcade Park today echoes the layout of the original, but does not mimic it or include extensive plantings. Pullman Park today has a canopy of trees and curved pathways.
Location of Pullman buildings and landscapes.
Pullman Wheelworks

The Pullman Wheelworks at 901 East 104th Street was built in 1903. The building was converted into 210 units of housing in 1980, and is currently in the final phases of redevelopment by Mercy Housing Lakefront and National Housing Trust Enterprise. The rehabilitation was certified by IHPA and NPS for federal rehabilitation tax credits.

Stables

The stables, on 112th between Cottage Grove and S. Forestville Avenue, retain much of their historic appearance and are currently in use as an auto repair shop. There are a number of government, non-profit, and other organizations that preserve, protect, or rehabilitate buildings within the Pullman Historic District. This section will describe the mission, protection mechanisms, and real estate holdings (if any) of major groups in the district.
Illinois Historic Preservation Agency (Pullman State Historic Site)

As the owners of the Administration and Factory Complex and the Hotel Florence, the State of Illinois has had a presence in the Pullman neighborhood through the Illinois Historic Preservation Agency (IHPA) since 1991. The state has put most of its effort into reconstructing, stabilizing, and restoring the buildings in its care. Interpretative tours and access to a developing research library are available by appointment, and site staff provides monthly walking tours of the factory site. There is a friends group in formation. The Illinois Department of Natural Resources planted a native species pilot plot on the site.

The Pullman State Historic Site has a strong community focus, hosting diverse local groups on the IHPA properties, including the Bronzeville/Black Chicagoan Historical Society Birding Group, Pullman Urban Gardeners, and the Pullman Beekeepers. The Administration and Factory Complex is also a venue for special activities, concerts, and other gatherings.

Over $25 million in state and federal funds have been expended on the state’s Pullman historic resources. This investment has stabilized and preserved these buildings for future use, though permanent use for the Administration and Factory Complex buildings has not yet been identified. Currently, the Hotel Florence is undergoing a multi-million dollar restoration that will culminate in a request for proposals for use of the hotel’s first floor.

City of Chicago

The City of Chicago has been the municipality of the Pullman neighborhood since annexation in 1889. Though the Pullman Historic District is a recognized landmark at the state and national level, it is the city Pullman District that provides legal protection for the privately owned buildings within it. The Department of Housing and Economic Development’s Historic Preservation Division administers and promotes the preservation of historic buildings through financial incentives, preservation planning, public outreach, and technical assistance. The Department of Housing and Economic Development is also staff to the Commission on Chicago Landmarks, which reviews proposed alterations, demolitions, or new construction in Chicago landmark districts as part of the permit review process, using the Secretary of the Interior’s Standards for Re-

Historic Pullman Foundation

The Historic Pullman Foundation (HPF) was formed in 1973 with the mission of expanding on existing preservation efforts and involving greater resources from outside the community.43 A non-profit organization operating with a small part time and volunteer staff, HPF runs a tour program for visitors and school groups. It has also developed self-guided tours and special event tours.

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43 HPF was initially an outgrowth of the Beman Committee of the Pullman Civic Organization.
A. Philip Randolph Pullman Porter Museum
A. Philip Randolph Pullman Porter Museum

Pullman State Historic Site
Administration Building
North Wing
Rear Erecting Shops
Hotel Florence
Hotel Annex

City of Chicago
Arcade Park
Pullman Park
North Pullman Fire Station
Houses (not shown)

Historic Pullman Foundation
Historic Pullman Visitor Center
Market Hall
Historic Pullman Center

Bielenberg Historic Pullman House Foundation
Southwest Market Square Building
641 East 111th Street
HPF owns and operates the Historic Pullman Visitor Center, open six days a week March through December, which houses exhibits and an auditorium space.\textsuperscript{44} Exhibits focus on community history and the history of the Pullman Company, with little emphasis on the strike or its national impacts. The foundation also owns the former Masonic Hall, now called the Historic Pullman Center, which is used for office and meeting space, as well as collections storage. The HPF collection includes thousands of photographs, organizational records, correspondence, furniture from the Hotel Florence, and architectural elements from George Pullman’s demolished Prairie Avenue mansion. HPF owned the Hotel Florence from 1975 until 1991, and operated the building until 2000.

**Bielenberg Historic Pullman House Foundation**

David Bielenberg, founding President of the Historic Pullman Foundation, created the Bielenberg Historic Pullman House Foundation (BHPHF) in his will to support the interpretation of Pullman by providing houses that would be available for tours, working closely with HPF. BHPHF was incorporated as a non-profit in 2008 and is run by a volunteer staff.

BHPHF received two buildings from the estate of David Bielenberg (Bielenberg Trust): an executive house at 641 East 111th Street and the apartment building in the southwest quadrant of Market Square. The BHPHF house museum concept is intended to show the mix of housing in the district, and is intended to include an executive house, a flat in the Market Square apartment building, and a typical apartment.

Remaining Bielenberg Trust real estate holdings are Block House C at 112th and Langley Avenue and a four flat building at 11208 South Langley Avenue, which are likely to be sold.

**A. Philip Randolph Pullman Porter Museum**

Founded in 1995, the mission of this museum named for the Brotherhood of Sleeping Car Porters (BSCP) union president is to “promote, honor and celebrate the legacy of A. Philip Randolph and contributions made by African-Americans to America’s labor movement; with a significant focus on the African American Railroad Employee.” Located at 10406 South Maryland Avenue in a Historic District row house, the museum’s exhibits and educational programs support the study, preservation, and understanding of African-American history and culture. In 2012, the museum launched the Black

\textsuperscript{44} The Pullman Visitor Center is a former American Legion Hall on the site of the Arcade Building, a shopping and social building demolished in 1926.
Labor History and Cultural Studies Research Center. The museum is outgrowing its original home, and is open to relocating to another neighborhood.45

Chicago Neighborhood Initiatives

Chicago Neighborhood Initiatives (CNI), a non-profit community development organization, was formed in 2010, but its roots stretch back a decade in the Pullman neighborhood, having grown out of the former Pullman Bank Initiatives. Now backed by U.S. Bank, CNI’s mission is to “focus on large scale commercial real estate development, residential neighborhood preservation, New Markets Tax Credits deployment and microlending” in low- and middle-income areas of Chicago’s far south and west sides.46

The major CNI project within the Pullman Historic District is rehabilitating houses in a North Pullman block (houses between 107th and 108th Streets on Cottage Grove and Champlain Avenues). Utilizing the Neighborhood Stabilization Program, a federally funded initiative, CNI rehabilitates homes and resells them to qualifying homeowners. In late fall of 2012, CNI had completed eight rehabilitations within its target block, with eleven slated as part of the first phase, and ten more identified for the future.

A major CNI project near the Pullman Historic District is the Pullman Park development, a phased $350 million mixed-use development on the site of an old steel plant to be completed over the next ten years. (The development has no relationship to the city park of the same name). The Pullman Park project includes new retail space, a neighborhood recreation center, and 1,100 housing units.47 The height of these buildings is not projected to be tall enough to have any visual impact on the NHL District.

Pullman Civic Organization

The Pullman Civic Organization (PCO) was formed as a civil defense organization during World War II and reactivated in 1960 in response to plans to turn the district into an industrial park. It has remained a strong and active presence in the southern part of the Pullman neighborhood. Today, PCO works with residents “toward building a better neighborhood through community outreach, community events, and community partnerships.”48 PCO publishes a neighborhood-wide free newsletter and organizes and disseminates information about neighborhood events. PCO also has several task-specific standing committees.

The Beman Committee of the PCO was created in 1968 to research and document the history of the Pullman neighborhood as part of efforts to receive national, state, and city landmark designations. The committee has continued as a resource for homeowners, particularly in South Pullman, for information about the history and architecture of their homes. In recent years the committee has published and distributed a homeowner’s manual, a continuously updated resource to assist homeowners in understanding landmark status and the restoration process.49 In 2004, the Beman Committee created a façade grant program, the Historic Pullman Homeowner’s Assistance Restoration Matching Fund. The fund reimburses up to $1000 for returning or restoring facade features based on original Beman designs; the program awards five to seven projects annually.

The ArtSpace Committee, working with CNI and ArtSpace (a national developer of affordable artist live-work spaces in rehabilitated buildings or new construction) began a survey of artists and audiences in 2011 to evaluate the demand in the district.

Millennium Reserve

The Pullman Historic District is within the core area of the Millennium Reserve, an initiative of the Illinois Department of Natural Resources (IDNR) backed by the federal America’s Great Outdoors (AGO) initiative to align federal programs with local conservation efforts. Announced in 2011, its goals are to improve the local environment, economy, and community by adding to and improving existing public spaces, honoring cultural and industrial past, and protecting and restoring natural ecosystems. Funding for the initiative has come from IDNR park and recreation facility construction grants, Coastal Zone program funding, the U.S. Fish and Wildlife Service, local and federal partners, and the private sector. To date, there have not been any Millennium Reserve efforts specific to Pullman.

46 Chicago Neighborhood Initiatives, “About Us” (http://www. cnigroup.org/aboutus.html)
49 The Beman Committee of the Pullman Civic Organization. “Homeowner Guide: Pullman Historic District.” Funding for the guide was provided in part by The National Park Service Challenge Cost Share Program.
Additional groups with a thematic (though not physical) presence in Pullman are the Illinois Labor History Society, which has a library, produces guides, and leads tours of Chicago’s labor history sites; the Bronzeville Historical Society, which has been involved in Pullman through its mission to preserve and recognize the stories of African Americans in Chicago; Preservation Chicago, an activist organization that advocates for the preservation of historic architecture, neighborhoods and urban spaces; and the National Parks Conservation Association, an independent organization devoted to advocacy on behalf of the National Park System which has been a vocal proponent of NPS involvement in the Pullman Historic District.

Top: Houses rehabilitated by CNI in North Pullman. Middle: An ongoing CNI Rehabilitation in North Pullman. Bottom: Detail of houses in South Pullman.
Over the last four decades, the historic resources of the Pullman neighborhood have been studied by government agencies and groups, resulting in a variety of recommendations. Many of them focus specifically on resources currently owned by the State of Illinois, others consider Pullman as a whole, or in a regional context.

**The Illinois Museum of Transport and Travel in Pullman, 1988**

This study of the Administration and Factory complex for the Illinois Historic Preservation Agency and the Illinois State Historical Society was prepared by Weese Hickey Weese Architects, Ltd. and Neil Harris, a professor of history at the University of Chicago. The study is a preliminary exploration of the concept of a regional museum devoted to all forms of travel and transportation in Northern Illinois. The Chicago location, size of the complex, and Pullman’s associations with transportation history were all considered advantageous.

**Pullman State Historic Site Prospectus, 1991**

The Historic Sites Division of the Illinois Historic Preservation Agency prepared the Pullman State Historic Site Prospectus in 1991 for the Administration and Factory complex. The prospectus describes the site’s significance, proposed use as a historic site and archive, and the economic and educational benefits it would confer on the area. The prospectus envisioned building and landscape restoration, museum exhibits, and a recreated car assembly area with costumed interpretation.

**The Pullman State Historic Site: Opportunities for the Future, 1993**

This study for the Illinois Historic Preservation Agency took a community-centered approach to identifying community revitalization and development opportunities that would be enhanced by the development of the Pullman State Historic Site as outlined in the 1991 Prospectus. Called the “Pullman Historic Site Community Planning Project,” the study makes recommendations for visitor circulation, landscaping, and connections with the Pullman and Roseland communities at large in aspirational language. The study was prepared by Camiros, Ltd.

**National Park Service American Labor History Theme Study, 1997 and 2003**

The National Park Service was directed in Public Law 102-101 to prepare a National Historic Landmark Theme Study to identify key sites nationwide in American labor history. The historic context component, completed in 2003, examined the history of workers and their work, of organizing unions and strikes, of the impacts of industrialization and technological change, and of the contributions of American labor to American history. It identifies major ideas and concepts in American labor history, and frequently cites Pullman as an example. The study recommended that the NHL documentation, prepared in 1970, be updated.

A component of the study completed in 1997 responded to the portion of the legislation requesting that the NPS prepare a list of the most appropriate “possible new park units” related to the theme. The Pullman Historic District was one of the 11 sites included. At the time, the state historic site and A. Philip Randolph Pullman Porter Museum were in development. NPS planners concluded that Pullman appeared not to be suitable as a new park unit because resources were adequately managed and protected by existing entities, with the exception of Market Hall, which the Historic Pullman Foundation owned at the time but had not yet stabilized. The potential high costs of stabilizing and developing Market Hall led the authors to conclude that a Pullman site was not likely to be feasible. The study ultimately concluded that the Pullman Historic District presented an excellent opportunity for partnership, and that it could be considered in a future locally-initiated study for a heritage area.

**Calumet Ecological Park Feasibility Study, 1998**

Prepared by the National Park Service, this special resource study examined the Calumet Region of northeast Illinois and northwest Indiana, evaluating the natural, cultural, and recreational resources and considering several NPS management options. The study found that the collection of cultural resources in the Calumet region were of national significance, and listed Pullman Historic District among them. It described the resources as suitable because they were multi-faceted and intact within their urban context, which was not represented in the National Park System. However, the study found that the cultural resources of the Calumet region as a whole were not feasible for addition to the National Park System, citing magnitude of the area,
hazardous waste, and limited public access to many historic sites, some of which were active industrial sites. The study did not consider the suitability or feasibility of individual sites or districts.

**Pullman Factory Task Force Report, 2000**

The Pullman Factory Task Force was a joint task force organized by the State of Illinois and the City of Chicago in 1999 to chart the future of the Administration and Factory Complex, the major part of the Pullman State Historic Site, following the devastating fire in December 1998. The Task Force held meetings in the Pullman communities, and used interviews and small working groups to develop reuse scenarios for the site. The recommendation was to develop the site as a historic center and tourist attraction. Major steps towards accomplishing this would be a full conceptual study of potential visits and attractions, the complete stabilization and exterior rehabilitation of the factory buildings, and additional study of site archeology, environmental conditions, and an update to the NHL nomination.

**Urban Land Institute Technical Assistance Panel Report: The Pullman State Historic Site, 2011**

The Technical Assistance Panel (TAP) program provides access to strategic advice from a multi-disciplinary team of experts through the Urban Land Institute (ULI) in Chicago. The TAP was invited by the Illinois Historic Preservation Agency to identify short and long term rehabilitation strategies for the property under state ownership: The Factory Complex, Rear Erecting Shops, Hotel Florence, and Hotel Annex. The report resulting from the two-day panel working session identified two feasible redevelopment options; a mixed-use, phased redevelopment, or a labor/transportation museum with a national scope as recommended in the Pullman Factory Task Force Report. The report noted that both options would require a mission-driven partner to manage redevelopment, as well as both public and private monies. The report recommends a Phase 1 environmental and archeology review prior to the issuance of a request for proposals (RFP) for any reuse at the Factory Complex and Rear Erecting Shops.
As discussed in the introduction, there are certain criteria set forth in law and policy that the National Park Service applies in determining whether to recommend an area as a potential new unit of the National Park System in a special resource study. A reconnaissance survey undertakes only a preliminary analysis of the criteria for inclusion, so the conclusions will summarize the potential or likelihood that the resources would meet the established criteria. The criteria are significance, suitability, feasibility, and need for NPS management.
PART II
Preliminary Application of the Criteria for Inclusion
SIGNIFICANCE

For a cultural resource to be considered “nationally significant,” a property must be found to qualify as a National Historic Landmark (NHL). NHLs are cultural properties designated by the Secretary of the Interior as possessing national significance, and are acknowledged as among the nation’s most significant historic places.\(^{50}\) They must also retain a high degree of historic integrity, which is composed of key characteristics of location, design, setting, materials, workmanship, feeling, and association.

Significance: The significance of the Pullman Historic district is definitively known, as it has already been designated a National Historic Landmark District. The district was designated as the first major planned industrial town in which an array of concerns – industrial, residential, recreational, cultural, and religious – were addressed by design; on the basis of the importance of the Pullman Strike of 1894 and its influence on the American labor movement; and for representing the architecture of Solon Spencer Beman.

At the time of designation in 1970, the significance of the district was recognized for architecture, landscape architecture, urban planning, and the “social/humanitarian” area of significance, which encompassed the 1894 strike. No period of significance was identified. The boundaries of the NHL District were based on the original town, bounded by Cottage Grove Avenue on the west side of the district, the Illinois Central railroad tracks on the east, 103rd Street on the north, and 115th Street on the south.\(^{51}\)

Additional Likely Significance: Since 1970, the Pullman NHL District has come to be understood in a broader context. The field of labor history has evolved and come to greater prominence, and the “new labor history” approach goes outside the union narrative of marches and legal reforms to tell a wider story of working-class experiences, including women and workers of color who were neglected by or may never have belonged to unions. The new labor history pushes beyond the trade unions themselves to integrate labor history and social history, focusing on familial, communal, and cultural resources.\(^{52}\) As a result, a greater segment of Pullman’s history - the social history of living and working in the model town as reflected in the buildings and landscapes - would likely contribute to the significance of the Pullman NHL District.

The American Labor History Theme Study, undertaken by NPS in phases in the late 1990s and early 2000s, recommended an update to the Pullman NHL District documentation. A revision of the NHL documentation was begun in 1997, but the revised draft NHL nomination was not completed or submitted for consideration by the NHL Committee.

In addition to a broader understanding of Pullman in labor history, the district is potentially also significant for its role in the history of industry, commerce, and transportation history. The model town of Pullman took the company town concept to new extremes and epitomized social engineering and corporate paternalism. The Pullman palace car concept, in which cars were not bought but leased to railroads with attendants employed directly by the Pullman Company, was a way of selling a comfortable, luxury long-distance travel experience. Additional research into these aspects of the Pullman Company and its impact may yield new facets of the NHL District’s significance.

Another new area of understanding in the history of the Pullman Company is the importance of the Brotherhood of Sleeping Car Porters (BSCP) and their charismatic leader A. Philip Randolph in labor history and the civil rights movement. The hard won BSCP agreement with the Pullman Company became “one of the most important markers since Reconstruction of African-American independence from racist paternalism and a model for other black workers.”\(^{53}\)

Unlike the Pullman Company’s factory workers, who worked at specific locations, the Pullman porters worked around the country across miles and miles of rail lines. While Pullman porters were not permitted to live in Pullman, excluded because of their race, many were employed in the major rail hub of Chicago.\(^{54}\) Organizing and the quest for union recognition took place in a variety of locations.\(^{55}\) Though there is not a

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\(^{52}\) ALHTS 2003, 3.

\(^{53}\) ALHTS 2003, 148.

\(^{54}\) Hughes. African-Americans were excluded from Pullman.

\(^{55}\) ALHTS 2003, 102-103 and 148. Sites associated with BSCP in Chicago include former BSCP union locations at 224 East Pershing
direct physical connection between the BSCP and the Pullman NHL District, sites of organizing in Chicago include office and meeting space at the Metropolitan Community Church in Chicago, associated with the BSCP’s large and influential Chicago division. Pullman Company headquarters were at the Pullman Building on Michigan Avenue in downtown Chicago from 1884 until 1948.56

Thematically, the story of the Pullman porters and the labor struggle and triumph of the BSCP is related to the Pullman NHL District. Though the events of the BSCP story physically occurred elsewhere, the thematic connection to the Pullman Company and system of sleeping cars that George Pullman built is strong at the site. In the absence of other venues where the Pullman porter story is being told, the Pullman NHL District is an appropriate place to interpret the BSCP story as a part of the Pullman Company’s relationship with labor in the 19th and 20th centuries including the historic 1937 labor agreement between the Pullman Company and the BSCP. The importance of that agreement adds to the significance of the district. Both the 1894 Pullman Strike and the quest for recognition by the BSCP can be seen as part of a larger trajectory of struggle between companies and a workforce often wracked by social, gender, and racial divisions.

Integrity: Since its designation, the Pullman NHL District has maintained the overall level of integrity for which it was designated. By the time of designation in 1970, some signature industrial building including the water tower, Allen Paper Wheelworks, and the Corliss engine house were lost, and other industrial concerns took their place on the eastern portion of the industrial heart of the district. This pattern of land use persists today. The overwhelming majority of residential structures remain intact. Thanks to the protection of historic preservation ordinances and the efforts of community groups, and dedicated owners, most houses continue to maintain excellent integrity.

Summary: The Pullman Historic District is significant as an example of 19th century community planning, architecture, and landscape design, exemplifying the “principles of welfare capitalism.” It is the paramount example of the work of architect Solon Spencer Beman, who - given a commission unique in American architecture until that time - executed harmonious and efficient buildings reflecting the ideas and ideals of his patron. It was the site of the 1894 Pullman Strike, one of the first truly national labor conflicts that resulted in a changed relationship between the federal government and unions.

With additional research and documentation, other aspects of Pullman may be found to contribute to the significance of the historic district upon revision of the NHL documentation. Beyond the strike, the district reflects the social and economic history of manufacturing industry of the time in the ethnic diversity of the work force, the role of women in the workplace, and has a thematic tie to the story of the BSCP. The impact that the Pullman Company had on industry, commerce, and transportation history may also be found to contribute to the Pullman NHL District’s significance.

SUITABILITY

To be suitable for inclusion in the National Park System, an area must represent a natural or cultural theme or type of recreational resource that is not already adequately represented in the National Park System or is not comparably represented and protected for public enjoyment by another land-managing entity. Adequacy of representation is determined on a case-by-case basis by comparing the proposed area to other units in the National Park System for differences or similarities in the character, quality, quantity, or combination of resources, and opportunities for public enjoyment.

This reconnaissance survey provides a preliminary evaluation of the study area’s suitability for inclusion in the National Park System by a comparative analysis of similarly-themed sites managed by the NPS and others. Because of the combination of themes present at the Pullman Historic District - architecture, landscape architecture, urban planning, industry, transportation history, and significant labor history events – comparable sites that match all of these aspects are difficult to identify. This preliminary evaluation will discuss the most prominent themes the Pullman Historic District illustrates, and then discuss sites within and outside of the National Park System that also represent those themes.

Themes

In evaluating the suitability of a cultural resource, the NPS uses its “Thematic Framework” for history and prehistory. An outline of major themes that help conceptualize American history, it describes eight concepts that encompass the multi-faceted and interrelated nature of human experience. The concepts are: Peopling Places; Creating Social Institutions; Expressing Cultural Values; Shaping the Political Landscape; Developing the American Economy; Expanding Science and Technology; Transforming the Environment; and the Changing Role of the United States in the World Community. The Pullman Historic District primarily relates to Expressing Cultural Values and Developing the American Economy.

Expressing Cultural Values

This theme encompasses expressions of culture: people’s beliefs about themselves and the world they inhabit, as well as the way that people communicate their moral and aesthetic values. Topics that help define this theme include: educational and intellectual currents; visual and performing arts; literature; mass media; architecture, landscape architecture, and urban design; and popular and traditional culture.

The Pullman Historic District reflects the expression of cultural values through architecture, landscape architecture, and urban design. In his model factory town George Pullman not only sought to reflect his own morals, fastidiousness, and appreciation of beauty - through its very design and operation, he compelled residents and visitors to adopt them as well. The architecture of Solon Spencer Beman reflects both elegance and economy in the use of local brick and the absence of ostentatious ornament. The landscape architecture of the town was meant to invite enjoyment for the betterment of workers. The design of the model town and its control by the company were meant to create an industrial utopia. The scale and sophistication of its design as a planned town were unsurpassed. Famous in its own time, the town became infamous when the experiment touched off a nationwide strike.

Developing the American Economy

This theme reflects the ways Americans have worked, including slavery, servitude, and non-wage, as well as paid labor. It also reflects the ways Americans have materially sustained themselves by the processes of extraction, agriculture, production, distribution, and consumption of goods and services. Topics that help define this theme include extraction and production, distribution and consumption, transportation and communication, workers and work culture, labor organizations and protests, exchange and trade, governmental policies and practices, economic theory.

Pullman strongly embodies this theme, particularly the transportation, workers and work culture, and labor organizations and protests topics within it. The model industrial town of Pullman was an experiment in encouraging contentedness and productivity in workers by providing clean, reliable housing - a stark contrast with the unsanitary and over-crowded living conditions found in most working class areas at the time. The labor action that began with a strike at the Pullman factories blossomed into a boycott that attracted national attention and had wide repercussions for national labor. Though never physically present in the Pullman Historic District, the story of the Pullman Company’s relationship with the Pullman porters is a topic within this theme, reflecting work culture and labor organization.

Comparable Sites Within the National Park System

Units within the National Park System that represent both Expressing Cultural Values and Developing the American Economy in similar ways include Paterson Great Falls National Historical Park, Lowell National Historical Park, and Keweenaw National Historical Park.

Paterson Great Falls National Historical Park in Paterson, New Jersey, preserves the site of the first American attempt to harness the power of a major river for a planned new city. Alexander Hamilton and a group of investors planned a manufacturing city in the early 1790s, engaging Pierre L’Enfant to design a system of raceways to harness water power. The venture was a failure, but the group formed by the investors lived on to administer real estate and water rights. Eventually, a city as Hamilton envisioned came to be. Industries in Paterson included textile, silk, and locomotive manufacturing. The city of Paterson was also the site of the 1913 silk strike, the national visibility from which helped the development of child labor and minimum wage laws.58

Lowell National Historical Park in Lowell, Massachusetts, preserves and interprets canals, locks and the textile mills they powered. The mills were constructed in early 19th century. Over 140 acres, Lowell interprets the development of American industrialization as it occurred in one of the first and most influential planned industrial communities in America. Interpretive topics include mass production, working and living conditions, women and immigrants, and union organization. After the company construction of mill, infrastructure, and housing, corporate control at Lowell centered around providing boarding houses with strict rules for the mostly single, female workforce. The mills experienced strikes, notably in the 1830s.

Keweenaw National Historical Park on the Upper Peninsula of Michigan is significant for copper mining history. The park consists of two units 12 miles apart, Calumet and Quincy. Extant buildings in Calumet reflect the Calumet and Hecla Company’s provisions for their workers – they constructed or sponsored the construction of the library, schools, and churches. There are also houses built by the company for their workers, typically clustered around the mine shafts, within the

58 The Pietro and Maria Botto House in Paterson, designated as an NHL for its association with the strike, is not within Paterson Great Falls National Historical Park.

Calumet unit. Calumet was affected by the unsuccessful nine-month Copper Country Strike of 1913-1914. Several Keweenaw Heritage Sites (partner sites) are museums interpreting the lives of mine laborers. Unlike industrial towns on the outskirts of larger metropolitan areas like Pullman or Lowell, the Keweenaw Peninsula was relatively isolated, and providing worker housing was a necessity.

Existing NPS units representing different time periods that focus on labor history, though not labor organization, include Rosie the Riveter WWII Home Front National Historical Park and Saugus Iron Works National Historic Site. Sites including Steamtown National Historic Site, Allegheny Portage Railroad National Historic Site, and Golden Spike National Historic Site tell the story of railroads, but do not represent production or labor conflict. A site that interprets manufacturing labor organization within the National Park System is the Kate Mullany House National Historic Site, an affiliated area that preserves and interprets the home of a labor organizer in the detachable collar manufacturing industry.

Many National Heritage Areas interpret manufacturing resources and labor stories across larger landscapes. National Heritage Areas (NHAs) are designated by Congress as places where natural, cultural, and historic resources combine to form a cohesive, nationally important landscape; they are run by grassroots-organized entities and draw on NPS for technical and limited financial assistance. The John Chaffee Blackstone River Valley National Heritage Corridor, Rivers of Steel National Heritage Area, Delaware and Lehigh National Heritage Corridor, and MotorCities National Heritage Area all interpret manufacturing and industrialization in their areas.

**Comparable Sites Outside the National Park System**

There are many National Historic Landmarks and NHL Districts that represent labor and working life, architecture, or community planning and development. Few represent these elements in combination and are preserved for public enjoyment. Founded a few years after Pullman, the Ybor Historic District in Tampa, Florida, contains the country’s largest inventory of cigar industry buildings and a collection of workers’ housing and ethnic clubs that represent an unusual multiracial, multiethnic industrial community in the Deep South.59 The Ybor City Museum State Park interprets the history of Ybor City.

Other company towns where corporate paternalism took some form, such as Gary, Indiana (United States Steel Corporation), Marktown, Indiana (Mark Manufacturing Company), Gwinn, Michigan (Cleveland-Cliffs Iron Company), Endicott and Johnson City, New York (Endicott-Johnson Shoe Company), McDonald, Ohio (Carnegie Steel Company), Ambridge, Pennsylvania (American Bridge Company), Hershey, Pennsylvania.59

59 ALHTS 2003, 140.
Pennsylvania (Hershey Chocolate Company), Alcoa, Tennessee (Aluminum Company of America), and Kohler, Wisconsin (The Kohler Company), have either limited integrity or are not preserved or interpreted for public enjoyment.

The Pullman Historic District and the three sites most comparable to it (Paterson, Lowell, and Keweenaw) share similar themes, but Pullman presents a unique combination of historic resources that embody those themes related to architecture, landscape, and urban planning as well as labor organizing and protest history.

Paterson, Lowell, and Keweenaw all had some corporate planning of their communities. In the case of Paterson and Lowell, the planning for these new cities was centered on the provision of water power for factories. At Pullman, the planning was complete, leaving no aspect of the town undersigned (or, later, uncontrolled) by the company. If Paterson Great Falls represents early industrial planning activity in the United State and Lowell represents its flowering, then later developments at Pullman represent industrial maturity and an all-encompassing design approach to solving the urban social problems industrial maturity created. Keweenaw, representing the isolated company towns of the extractive industries, is not as closely connected to the urban industrial setting at Pullman.

Lowell and Keweenaw both mention corporate paternalism as being present in the history of their sites, and all three sites experienced some labor unrest. However, the intensity of corporate control at Pullman went far beyond other industrial towns, and the labor issues that sprang directly from corporate paternalism were highly historically significant and had a nation-wide scope and impact. That the history of corporate paternalism at Pullman fed directly into the 1894 Pullman Strike is a connection that cannot be understated and is not shared by the labor conflict at Paterson, Lowell, or Keweenaw.

Summary: The Pullman Historic District seems to represent a unique combination of themes in a time period of American industrialization and labor not represented in the National Park System or adequately preserved and interpreted elsewhere; it is likely a full special resource study would have a positive finding for suitability.
To be feasible as a new unit of the National Park System, an area must be of sufficient size and appropriate configuration to ensure long term protection of the resources and to accommodate public use. It must have potential for efficient administration at a reasonable cost. Important feasibility factors include landownership, acquisition costs, staff and development requirements, access, existing degradation or threats to the resources, the socioeconomic impacts of designation, and public support. The evaluation also considers the ability of the NPS to undertake new management responsibilities in light of current and projected constraints on funding and personnel.

The preliminary assessment of feasibility includes potential for public enjoyment, potential acquisition and development costs and staffing requirements, and level of local public support. Because the reconnaissance survey does not develop specific proposals for management, the feasibility can only be discussed generally. The landownership patterns, planned future use of the study area, and contamination issues are described above in Part I: Historic Context and Existing Conditions.

**Potential for Public Enjoyment**

Providing opportunities for public enjoyment is an important part of the NPS mission. Public enjoyment means providing opportunities that are appropriate to the purpose for which the park was established, and that can be sustained without causing unacceptable impacts. For cultural resources, these opportunities are frequently educational and interpretive experiences in historic spaces. Sites within the National Park System provide these experiences differently depending on the size and type of resource.

The Pullman Historic District as a whole has the potential for public enjoyment, even without interior access to buildings, since much of the planning and architecture of the district can be experienced from the street. Regular access to the industrial buildings and museum exhibits at Pullman addressing the town’s planning and role in the 1894 Pullman Strike would increase opportunities beyond what is currently available.

Also central to the Pullman Historic District labor story is the life and accommodation of workers. Understanding that story would be substantially enhanced if historic housing units were available to public interpretation.

The potential for interior workers’ housing interpretation is present in the plans for the Bielenberg Historic Pullman House Foundation, assisted by the Historic Pullman Foundation, though it may be many years before funds and staffing enable those organizations to restore them and present regular programs.

**Potential Acquisition and Development Costs and Staffing Requirements**

The potential development costs of a national park unit at Pullman are dependent on the boundaries of a potential site and which buildings would be the responsibility of the NPS. Without a proposal for which resources in the Pullman Historic District would be within a park boundary or managed and protected by the NPS and what level of visitor services may be required, estimates for development costs cannot be developed.

Typically, NPS acquires properties by donation or from a willing seller within its authorized boundary. Acquisition costs cannot be estimated without a proposed boundary and knowledge of the disposition of current property owners; both are outside the scope of a reconnaissance survey. Acquisition and development of the Pullman Historic District’s large underutilized buildings may prove financially infeasible in light of current NPS responsibilities and projected appropriation levels.

Staffing requirements are also contingent on the size of a site and the intensity of operations. Because size and scope of a potential unit of the National Park System at Pullman is uncertain, the staffing requirements cannot be estimated.

Thematically comparable sites and other historic sites in metropolitan areas can offer examples of operational costs. The table above shows several examples and shows the acreage within park boundaries (not all of which is necessarily owned by NPS); full-time-equivalent staffing levels, and annual operational funding (this does not include project funding for large capital improvements, exhibits, or major planning documents.)

Lowell National Historical Park is the most intensive in terms of staff and budget; the park also has a larger legislative mandate to work with partner groups in Lowell to preserve and interpret the history there. Keweenaw National Historical Park has unique legislation as a partnership park. Least intensive is New Orleans Jazz National Historical Park, which does not own any
related historic assets, but offers walking tours and interpretive exhibits about the jazz heritage of the Tremé neighborhood. Each park has different boundaries and a different mandate, enshrined either in legislation or the presidential proclamation that set them aside for protection and public enjoyment.

As part of a special resource study, a joint powers agreement between local, state and federal government entities could be explored. The outcome of such an agreement might impact potential costs of a future site. Illinois’s Intergovernmental Cooperation Act allows for an intergovernmental cooperation agreement between a state agency and other units of government to share resources and staff capacity.  

**Level of Local Public Support**

In a reconnaissance survey, public input is not formally sought as it would be in a special resource study, so a determination about support for NPS involvement would be incomplete.

Support for National Park Service involvement in the district has been expressed by preservation and interpretation organizations within the district during the preparation of this reconnaissance survey, and by boosters in the community to news outlets. Municipal support was expressed by the Chicago Mayor and City Council in a March 2013 resolution urging Congress to establish a national historical park or the president to use the executive authority of the Antiquities Act to bring an unspecified area of the district into the National Park System.

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Summary: Due to the variations in potential configurations and mandates for an area as large as the Pullman Historic District, the potential feasibility of the site, especially when related to costs and partnerships, cannot be evaluated; the NPS makes no preliminary finding at this time. A special resource study would be needed to fully assess the interest of property owners, possible commitments from private and/or public partners, and the degree of direct responsibility the NPS would have for the restoration and development of the site.

In the event a full special resource study were authorized, a finding of feasibility would rely heavily on the existence of a strong partnership with a consortium of private and public organizations. Evaluation of that complexity is outside the scope of a reconnaissance survey.

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5 ILCS 220/1 et seq.

Melissa Harris, “Boosters want to turn Pullman into national park,” *The Chicago Tribune*, (March 10, 2013).


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<table>
<thead>
<tr>
<th>National Park Unit</th>
<th>Acres</th>
<th>Staffing (FTE)</th>
<th>Annual Operational Funding</th>
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<td>New Orleans Jazz National Historical Park</td>
<td>5</td>
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</tr>
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Table 1: Size, staffing, and cost for sample existing NPS units. Amounts are from fiscal year 2010, the most recent year available for all units. Paterson Great Falls National Historical Park was not a unit of the National Park System until 2011.
NEED FOR DIRECT NPS MANAGEMENT

The final criterion for potential new park units, need for direct NPS management, will be discussed briefly. To be recommended as a unit of the National Park System, an area must require direct NPS management, and that management must be clearly superior to other possible management options. Because management options are not developed in a reconnaissance survey, this section will consider unmet needs in the Pullman Historic District.

As discussed in *Existing Conditions*, the historic resources of the Pullman neighborhood are in a variety of stewardships and uses. Private homes are for the most part in good repair and protected by private individuals under city historic preservation ordinances. No one group dominates the stewardship of historic resources in the Pullman Historic District. Existing community groups, nonprofits, and the state are all working at capacity in Pullman. There is no need for NPS management of those resources.

Yet there are unmet needs for preservation, regular public access, and comprehensive interpretation. The most prominent instance of unmet need is the Administration and Factory Complex. The buildings have been in search of a permanent use for decades. While the North Wing and the grounds themselves are used by community groups and for special events, they are not regularly accessible to the general public and at this time the Pullman State Historic Site does not offer any permanent exhibits. The question of how to program the ample space at the Administration and Factory Complex has been the topic of much study, and further exploration of how it could be used under NPS ownership would require more study.

**Summary:** A full study may determine that there is a need for NPS management, or that existing management is adequate if supported by targeted NPS programmatic assistance. Because of the strength of existing organizations, it seems that if NPS were to have a role in Pullman, it would be more effective as part of that system, rather than wholly relieving any current group of their responsibilities.
The Pullman Historic District is conclusively nationally significant. The NPS reiterates the recommendation made in the American Labor History Theme Study to update the NHL documentation for the Pullman NHL District. In a preliminary evaluation of suitability, the Pullman Historic District appears likely to be found to represent a resource not preserved and interpreted for public enjoyment elsewhere by the NPS or comparably by another entity in a full special resource study.

The preliminary evaluations of feasibility and need for direct NPS management are challenging in a large district with a variety of possible NPS responsibilities. Due to the complexity of potential management configurations, partnerships, and costs in the Pullman Historic District, the likelihood of feasibility cannot be evaluated within the constraints of this reconnaissance survey.

It is the conclusion of this preliminary evaluation that the Pullman Historic District could possibly meet the criteria for inclusion in the National Park System if further studied. Therefore, NPS recommends that a full special resource study be authorized to fully analyze the criteria, invite public involvement, and develop potential management alternatives.
Evolution of the Pullman Car

Pullman Facts No. 2

Pullman Facts No. 4

Scientific Ventilation in Pullmans


Tye, Larry. *Rising from the Rails: Pullman Porters and the...*


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IHA: Industrial Heritage Archives at Pullman State Historic Site  
LOC: Library of Congress  
NPS: National Park Service  
PSHS: Pullman State Historic Site

4: IHA; Paul Petraitis Collection at PSHS; NPS.  
7: Google.  
8: LOC, detail of HAER Drawing of Pullman 1886, north of 111th Street. HAER ILL,16-CHIG,102.  
9: IHA.  
10: White, 315.  
12: IHA.  
13: PSHS.  
14: White, 354; LOC.  
15: IHA.  
16: IHA.  
18: Harper’s Magazine (LOC)  
19: Life Magazine; Life Magazine.  
20: LOC, HAER ILL,16-CHIG,102.  
21: NPS; PSHS.  
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34: NPS.  
35: NPS.  
37: IHA.  
39: NPS; NPS; NPS.  
40: Paul Petraitis Collection at PSHS.  
41: IHA; Mario Avignone Collection at PSHS; PSHS.  
44: IHA; PSHS.  
45: NPS; NPS.  
46: Covers of “Pullman Facts” Brochures No.s 2, 4, and 6, from a series of 12, 1929. PSHS.  
50: PSHS.

Back Cover: LOC, detail of HAER Drawing of Pullman 1886, south of 111th Street. HAER ILL,16-CHIG,102.
1.3 Criteria for Inclusion

Congress declared in the National Park System General Authorities Act of 1970 that areas comprising the national park system are cumulative expressions of a single national heritage. Potential additions to the national park system should therefore contribute in their own special way to a system that fully represents the broad spectrum of natural and cultural resources that characterize our nation. The National Park Service is responsible for conducting professional studies of potential additions to the national park system when specifically authorized by an act of Congress, and for making recommendations to the Secretary of the Interior, the President, and Congress. Several laws outline criteria for units of the national park system and for additions to the National Wild and Scenic Rivers System and the National Trails System.

To receive a favorable recommendation from the Service, a proposed addition to the national park system must (1) possess nationally significant natural or cultural resources, (2) be a suitable addition to the system, (3) be a feasible addition to the system, and (4) require direct NPS management instead of protection by other public agencies or the private sector. These criteria are designed to ensure that the national park system includes only the most outstanding examples of the nation’s natural and cultural resources. These criteria also recognize that there are other management alternatives for preserving the nation’s outstanding resources.

1.3.1 National Significance

NPS professionals, in consultation with subject-matter experts, scholars, and scientists, will determine whether a resource is nationally significant. An area will be considered nationally significant if it meets all of the following criteria:

- It is an outstanding example of a particular type of resource.
- It possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation’s heritage.
- It offers superlative opportunities for public enjoyment or for scientific study.
- It retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource.
- National significance for cultural resources will be evaluated by applying the National Historic Landmarks criteria contained in 36 CFR Part 65 (Code of Federal Regulations).

1.3.2 Suitability

An area is considered suitable for addition to the national park system if it represents a natural or cultural resource type that is not already adequately represented in the national park system, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state, or local governments; or the private sector.

Adequacy of representation is determined on a case-by-case basis by comparing the potential addition to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values. The comparative analysis also addresses rarity of the resources, interpretive and educational potential, and similar resources already protected in the national park system or in other public or private ownership. The comparison results in a determination of whether the proposed new area would expand, enhance, or duplicate resource protection or visitor use opportunities found in other comparably managed areas.

1.3.3 Feasibility

To be feasible as a new unit of the national park system, an area must be (1) of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond proposed park boundaries), and (2) capable of efficient administration by the Service at a reasonable cost.

In evaluating feasibility, the Service considers a variety of factors for a study area, such as the following:

- size
- boundary configurations
- current and potential uses of the study area and surrounding lands
- landownership patterns
- public enjoyment potential
- costs associated with acquisition, development, restoration, and operation
- access
- current and potential threats to the resources
- existing degradation of resources
- staffing requirements
- local planning and zoning
- the level of local and general public support (including landowners)
- the economic/socioeconomic impacts of designation as a unit of the national park system

The feasibility evaluation also considers the ability of the National Park Service to undertake new management responsibilities in light of current and projected availability of funding and personnel.

An overall evaluation of feasibility will be made after taking into account all of the above factors. However, evaluations may sometimes identify concerns or conditions, rather than simply reach a yes or no conclusion. For example, some new
areas may be feasible additions to the national park system only if landowners are willing to sell, or the boundary encompasses specific areas necessary for visitor access, or state or local governments will provide appropriate assurances that adjacent land uses will remain compatible with the study area’s resources and values.

1.3.4 Direct NPS Management

There are many excellent examples of the successful management of important natural and cultural resources by other public agencies, private conservation organizations, and individuals. The National Park Service applauds these accomplishments and actively encourages the expansion of conservation activities by state, local, and private entities and by other federal agencies. Unless direct NPS management of a studied area is identified as the clearly superior alternative, the Service will recommend that one or more of these other entities assume a lead management role, and that the area not receive national park system status.

Studies will evaluate an appropriate range of management alternatives and will identify which alternative or combination of alternatives would, in the professional judgment of the Director, be most effective and efficient in protecting significant resources and providing opportunities for appropriate public enjoyment. Alternatives for NPS management will not be developed for study areas that fail to meet any one of the four criteria for inclusion listed in section 1.3.

In cases where a study area’s resources meet criteria for national significance but do not meet other criteria for inclusion in the national park system, the Service may instead recommend an alternative status, such as “affiliated area.” To be eligible for affiliated area status, the area’s resources must (1) meet the same standards for significance and suitability that apply to units of the national park system; (2) require some special recognition or technical assistance beyond what is available through existing NPS programs; (3) be managed in accordance with the policies and standards that apply to units of the national park system; and (4) be assured of sustained resource protection, as documented in a formal agreement between the Service and the nonfederal management entity. Designation as a “heritage area” is another option that may be recommended. Heritage areas have a nationally important, distinctive assemblage of resources that is best managed for conservation, recreation, education, and continued use through partnerships among public and private entities at the local or regional level. Either of these two alternatives (and others as well) would recognize an area’s importance to the nation without requiring or implying management by the National Park Service.
National Historic Landmark Criteria
36 CFR § 65.4

The criteria applied to evaluate properties for possible designation as National Historic Landmarks or possible determination of eligibility for National Historic Landmark designation are listed below. These criteria shall be used by NPS in the preparation, review and evaluation of National Historic Landmark studies. They shall be used by the Advisory Board in reviewing National Historic Landmark studies and preparing recommendations to the Secretary. Properties shall be designated National Historic Landmarks only if they are nationally significant. Although assessments of national significance should reflect both public perceptions and professional judgments, the evaluations of properties being considered for landmark designation are undertaken by professionals, including historians, architectural historians, archeologists and anthropologists familiar with the broad range of the nation’s resources and historical themes. The criteria applied by these specialists to potential landmarks do not define significance nor set a rigid standard for quality. Rather, the criteria establish the qualitative framework in which a comparative professional analysis of national significance can occur. The final decision on whether a property possesses national significance is made by the Secretary on the basis of documentation including the comments and recommendations of the public who participate in the designation process.

(a) Specific Criteria of National Significance: The quality of national significance is ascribed to districts, sites, buildings, structures and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling and association, and:

(1) That are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or

(2) That are associated importantly with the lives of persons nationally significant in the history of the United States; or

(3) That represent some great idea or ideal of the American people; or

(4) That embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; or

(5) That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or

(6) That have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

(b) Ordinarily, cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings and properties that have achieved significance within the past 50 years are not eligible for designation. Such properties, however, will qualify if they fall within the following categories:

(1) A religious property deriving its primary national significance from architectural or artistic distinction or historical importance; or

(2) A building or structure removed from its original location but which is nationally significant primarily for its architectural merit, or for association with persons or events of transcendent importance in the nation’s history and the association consequential; or

(3) A site of a building or structure no longer standing but the person or event associated with it is of transcendent importance in the nation’s history and the association consequential; or

(4) A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building or structure directly associated with the productive life of that person exists; or

(5) A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or from an exceptionally significant event; or

(6) A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived; or

(7) A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or

(8) A property achieving national significance within the past 50 years if it is of extraordinary national importance.