



**City of Waukesha**  
201 Delafield St. Waukesha, WI 53188  
Tel: 262.542.3700  
waukesha-wi.gov

<b>Committee:</b> Landmarks Commission	<b>Meeting Date:</b> 12/4/2024
<b>Item Number:</b> ID#24-10610	
<b>Subject:</b> <b>Update, discussion, and possible action on the pending application to adjust the boundaries for the individual National Register listing for the Senator William and Henrietta Blair House.</b>	

**Details:** Cultural Resource Management has completed the application to amend the boundaries of the individual National Register listing for the Blair House and submitted it to the State Historic Preservation Office. In the coming weeks the Landmarks Commission will receive official notice of the submission from the SHPO, along with an invitation to comment on the nomination. However, since the nomination was prepared for the City, we are able to provide a copy of the application right away. It is attached to the agenda for this meeting, along with photo documentation submitted by Cultural Resource Management.

The SHPO staff have also provided some additional information to help the Landmarks Commission review the application. An email from Jason Tish, our Certified Local Government Coordinator, explains the responsibilities of the Landmarks Commission (which is the local Historic Preservation Commission). As he summarizes, the Landmarks Commission should write a report explaining its opinion as to whether the nomination meets the criteria for the National Register nomination. In this case, it should include an opinion on whether the boundary decrease is justified. Jason stated that the Landmarks Commission could instead make a statement declining to express an opinion.

Also attached are two bulletins from the National Parks Service on the standards for determining and adjusting boundaries. The bulletin on amending documentation includes the standards that will be applied, on Page 5. There are four justifications for altering a previously approved National Register boundary:

- professional error in the initial nomination
- loss of historic integrity
- recognition of additional significance
- additional research documenting that a larger or smaller area should be listed.

In order for a boundary change to be approved, the Historic Preservation Review Board will need to find that at least one of those justifications has been met.



The bulletin on defining boundaries explains the standards that should be applied for defining National Register boundaries in the first place. Section I, Defining Boundaries for National Register Properties, is useful. In particular, the summary on Page 2 (Page 8 of the PDF) includes a list of guidelines for selecting boundaries. One of the guidelines states that boundaries should “exclude peripheral areas that no longer retain integrity due to alterations in physical setting caused by human forces, such as development, or natural forces, such as erosion. The bulletin also includes a note on revising boundaries on Page 4 (PDF page 10).

In this case City staff, SHPO staff, and the staff at Cultural Resource Management believe the consultants who prepared the original nomination for the Blair House made several professional errors in their boundary selection. As the nomination form states in the Boundary Justification on Page 11, the property at the base of the hill did not retain its historic integrity by 1983. It had been altered into a parking lot for what was then the Police Department headquarters at 130 Delafield St. Including it within the boundaries of the historic designation was an error. If the authors of the nomination intended for the 130 Delafield St. parking lot to be part of the designation, they should have included some justification for it in the nomination form. They did not.

However, staff believes the parking lot was most likely included unintentionally, due to a misunderstanding of the legal description. The legal description from the original nomination is an abbreviated description, which is provided on County tax files, rather than a full legal description which is typically required for surveys and similar legal documents. Figure 3 on Page 30 of the nomination form was prepared by City staff before Cultural Resource Management was hired. It includes an approximate outline of the 1983 boundary. A City GIS Specialist drew the outline for the Blair House designation from the legal description, using the same method that is used to create all new properties in the City mapping software. It doesn't follow the actual property boundaries because the legal description is incorrect. The distances described from one landmark to another do not match the actual distances.

The parcel described in the legal description has an area of approximately 1.87 acres. The original nomination form states that the Blair House designation has an area of “less than one acre.” This is clearly another error, and most likely is evidence that the preparers of the original nomination did not realize the legal description included the parking lot. The proposed boundary in this new nomination, which includes all of the property at 434 Madison Street and excludes all City property, has an area of just under one acre.

When the Madison Street Historic District was created and nominated for the National Register in 1990, the tax parcel for the Blair House property still included the parking lot, but it was excluded from the district, avoiding the individual nomination's error. The Madison Street Historic District boundary was drafted by Timothy Heggeland, a historic preservation consultant, and approved by the State Historic Preservation Officer at the time. The local designation for the Madison Street Historic District, adopted by the Landmarks Commission, follows the boundaries of the national district.

If the Landmarks Commission chooses to make a statement either supporting the nomination and boundary decrease or declining to express an opinion, City staff can draft the statement, provide it for

review and approval at the January or February meeting (or both), and give it to the mayor to send to the state. If the Landmarks Commission chooses to make a statement opposing the boundary decrease, a Landmarks Commission member will need to draft it, but otherwise the process will be no different.

**Relevant Secretary of the Interior Standards:** N/A

**Paint and Repair Grant info:** N/A

**Staff Recommendation:** N/A