

TO: STATE OF WISCONSIN HISTORIC PRESERVATION OFFICER

FROM: CITY OF WAUKESHA LANDMARKS COMMISSION

RE: RESPONSE TO THE APPLICATION TO ADJUST THE BOUNDARIES OF THE NATIONAL REGISTER LISTING OF THE WILLIAM BLAIR HOUSE

DATE: JANUARY 2, 2025

The City of Waukesha Landmarks Commission is governed by Chapter 28 of the City of Waukesha Municipal Code. Its powers and duties are outlined in Section 28.05. 28.05(5)(b) specifically requires the Landmarks Commission to “Work closely with appropriate individuals and agencies in attempting to include landmarks or landmark sites on the National Register of Historic Places.”

As a certified local historic commission, it is required to have input into applications submitted under 36 CFR 60.14 governing changes and revisions to properties listed in the National Register. 60.14(a)(2) lists four justifications for altering a boundary, as follows:

1. Professional error in the original nomination;
2. Loss of historic integrity;
3. Recognition of additional significance;
4. Additional research documenting that a larger or smaller area should be listed.

Significantly, the statute also provides:

“No diminution of a boundary should be recommended unless the properties being removed do not meet the National Register criteria for evaluation.”

The Senator William E. Blair House located at 434 Madison Street in the City of Waukesha was originally added to the National Register of Historic Places in 1983. At that time, the property was owned by the City of Waukesha. The National Register application incorporated the legal description for the entire 1.9 A. parcel extending to Delafield Street.

The City of Waukesha has now submitted a new National Register application for the Senator William E. Blair House prepared by UWM Cultural Resource Management, dated November, 2024. It proposes a name change for the property as well as a boundary reduction for the site which would eliminate approximately one acre from the National Register designation.

The Landmarks Commission reviewed the November, 2024 application at its December 4, 2024 meeting. The Commission concludes that this application does not meet any of the four criteria or justifications for altering the existing boundary of the Senator William E. Blair House on the National Register of Historic Places.

Specifically, the Landmarks Commission finds:

1. Any minor professional error in the original nomination was harmless error.
2. There has been no loss of historic integrity;
3. There has been no recognition of additional significance;
4. There has been no additional research documenting that a larger or smaller area should be listed.

The 1983 application included the portion of the property then (and now) covered by an existing parking lot. It also included a tiny corner of the building which was then the Waukesha Police Department. There has been no loss of historic integrity with reference to this property between 1983 and the present date. The building corner encroachment on the property is miniscule and it predated the original application. The parking lot is still there. It can reasonably be argued that the presence of the lot in and of itself does not impair the historic integrity of the property in any way. The area around the house, which is proposed to remain on the National Register, also contains a large parking lot. Parking lots can easily be removed and landscaping restored.

It is significant that the 1983 designation included the entire property. The documentation submitted with the 2024 application clearly shows that significance. Figure 6 attached to the application, titled "Detail of 1880 bird's eye view map of Waukesha showing Blair House" documents the sweeping view of the entire downtown which Senator Blair had from his home, which he purposefully built at the top of the Madison Street hill.

Senator Blair preserved that expansive city view by keeping the hillside which extended to Spring Street (now Delafield Street) open and unimpaired. Historically, he was considered the "king of the hill." This land below the house was included in the National Register listing because it contributes to the context of the site. The site and the view are interrelated.

The City also tries to argue that the portion of the Blair property adjacent to Delafield Street was not added to the Madison St. Historic District when it was created. However, the minutes of the Common Council meeting on May 17, 1994, when the Historic District was created, annex the affected legal description which clearly includes the portion of the Blair property extending along Madison St. all the way to Delafield St. Thus, this argument does not constitute grounds for claiming "professional error" which would result in a National Register boundary reduction of 161.99' along the Madison Street boundary.

The fact that the City, in 2014, had a new Certified Survey Map prepared which separated the Blair property into two lots and thereafter sold a portion of the property and placed a conservation easement only upon the portion sold in 2016, also does not and should not affect

the property's National Register boundaries. The significance of the entire property is unchanged by these later actions.

Any "professional error" in the 1983 National Register application could only be the reference to "less than one acre." Since the correct and full legal description for the property which was attached to the application and approved describes the full 1.9 A. extending to Delafield Street, the "less than one acre" notation is a legally "harmless error." It surely does not constitute grounds for eliminating a full acre of property from the National Register designation by retroactively reducing its boundaries more than 40 years later.

Respectfully Submitted,

City of Waukesha Landmarks Commission

By: Carmen de la Paz, Chairperson

relating to properties within the City boundaries.

At the Commission's December 4, 2024 meeting, at which a quorum of members was present, voted to submit a statement objecting to the application submitted on November ??, 2024. The basis for the Commission's obje 31.??