

1.3 National Register of Historic Places Criteria

This section identifies the four primary criteria of historical significance (A through D) that are used in making Determinations of Eligibility and nominating properties to the National Register of Historic Places. The section also includes a brief review of *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*,²² and states that the first requirement for determining eligibility is that “the resource must be associated with an *important* historic context (emphasis added, p. 6).” The bulletin does not say that “important” historic contexts have to be assessed, but instead explains that the historic *significance* of properties must be evaluated within their historic contexts, the “patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear.”²³ To state that historic contexts themselves require “import” could lead to faulty inferences that a post-WWII local housing context, for example, is in some degree different (lesser) than a high-design country estate context. Our understanding is that differences of “import” in evaluating resources are generally reflected in the *area* of significance (determining the type of theme of the context, e.g., transportation, landscape architecture) and in the *level* of significance assigned to the resource (i.e., local, state, national), not as a function of the “import” of the context.

The seven aspects of *integrity* are also identified in this section of the draft CRE: location, design, setting, materials, workmanship, feeling, and association (p. 11). However, it should be noted that the subsequent evaluations of National Register-eligibility for the fourteen (14) resources in the narrow, direct-effects APE ***only address the design aspect of integrity***. This omission is significant because of the integrity of location, setting, feeling, and association that are demonstrated with respect to these resources, including the vegetation element of the landscapes.

The draft CRE (p. 11) explains the National Register-eligibility evaluation process with reference to “pre-contact Native American” sites and the “ruins of African American slave settlements from the 1820s,” and other antebellum-era resources. The complete omission from the draft CRE (in the narrative and References) of the National Park Service publications specific to most of the property types in the narrow (and full) APE for the Bowman Field undertaking is puzzling and unsupportable. These publications include the following, as well as local contexts:

- *National Register Bulletin, Historic Residential Suburbs: Guidelines for Evaluation and Documentation for the National Register of Historic Places*. Washington D.C.: U.S. Department of the Interior, National Park Service National Register History and Education, Prepared by David L. Ames, University of Delaware, and Linda Flint McClelland, National Park Service. 2002.

²²The citations to *Bulletin 15* in the draft CRE are to Savage and Pope 1998. However, the Internet-based version does not contain a revision year of 1998 and identifies Patrick W. Andrus as the primary finalization author and Rebecca Shrimpton as the editor. www.nps.gov/nr/publications/bulletins/nrb15/. Beth Savage and Sarah Pope are identified as coordinators of the last revision of the bulletin (1997).

²³*Bulletin 15*, p. 7.

- *Historic Residential Suburbs in the United States, 1830-1960. National Register of Historic Places Multiple Property Documentation Form.* Prepared by Linda Flint McClelland, David L. Ames, and Sarah Dillard Pope. 2003.
- *National Register Bulletin 18, How to Evaluate and Nominate Designed Historic Landscapes.* U.S. Department of the Interior, National Park Service, Interagency Resources Division. Prepared by J. Timothy Keller, ASLA, and Genevieve P. Keller, Land and Community Associates, Charlottesville, Virginia. No date.
- *Preservation Brief 36, Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes.* U.S. Department of the Interior, National Park Service, Preservation Assistance Division. Prepared by Charles A. Birnbaum, ASLA, Coordinator, Historic Landscape Initiative. 1994.
- *Suburban Development in Louisville and Jefferson County, 1868-1940. National Register of Historic Places Multiple Property Documentation Form.* 1988. Prepared by Leslee Keys, Mark Thames, Joanne Weeter, Jefferson County Office of Historic Preservation & Archives. 1988.
- *Strathmoor Village. Kentucky Historic Resources Group Survey Form.* Prepared by Rachel Kennedy and Jennifer Ryall, University of Kentucky. 2010.

Key concepts from these documents that are relevant to the identification and evaluation of the primary property type in this undertaking are summarized in Table 1, beginning on the next page. The CRE for the Bowman Field Safety Program must utilize these resources in the identification and evaluation phase of Section 106 compliance.

In addition, multiple other documents exist that are relevant to the survey and evaluation in this Section 106 consultation of the types of Bowman Field-environs historic residential suburbs include:

- *A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing.* National Cooperative Highway Research Program Report 723. Prepared by Mead & Hunt, Inc. (Pettis et al.) and Louis Berger Group, Inc. (Kuhn et al.). 2012.
- The research references and resources identified in the *Historic Residential Suburbs Multiple Property Documentation Form*, Section I, Bibliography.
- Science-based publications for the general education of the public with respect to beautification of their private yards, such as the U.S. Department of Agriculture's "Farmers' Bulletin" series and, later, the "Home and Garden Bulletin" series. Many of these bulletins have been digitized and are available through the National Agricultural Library Digital Collections (naldc.nal.usda.gov/naldc/home.xhtml).

Table 1. Key Concepts for Suburban and Associated Landscape Historic Context Development and Evaluation

Publication/Concept	Page
<i>Historic Residential Suburbs in the United States, 1830-1960, National Register of Historic Places Multiple Property Submission</i>	
The four stages of the evolution of American suburbs, named for the primary transportation mode of the time and with general periods of chronology: (1) Railroad and Horsecar Suburbs (1830-1890); (2) Streetcar Suburbs (1888-1928); (3) Early Automotive Suburbs (1908-1945); and (4) Post-World War II and Early Freeway Suburbs (1945-1960)	E, 3
Developers and the development process included “community builders,” real estate entrepreneurs in the first decade of the 20 th century who acquired large tracts of land for residential development. These builders favored zoning and subdivision regulations to “promote predictability in the land market and protect the value of their real estate investments.” J.C. Nichols of Kansas City, a leader in the National Association of Real Estate Boards, “greatly affected land use policy” in the U.S.	E, 9, 13
Subdivision development by community builders often included design professionals (engineers, landscape architects, and architects). Prior to zoning, these builders used written deed restrictions to control the character of their development by specifying requirements and prohibitions on individual lot development and maintenance.	E, 9
Landscape influences: Andrew J. Downing, <i>Treatise on the Theory and Practice of Landscape Gardening</i> (1841) (the “picturesque” or “beautiful” “aesthetic ideal”) later influenced American landscape practices associated with the City Beautiful movement and WWI-era English Garden City planning, resulting in “distinctive American garden suburbs with gently curving, tree lined streets; open landscaped lawns and gardens; and attractive homes in a panoply of styles.”	E, 14; F, 55
<i>National Register Bulletin: Historic Residential Suburbs</i>	
The Bulletin and the Multiple Property Submission are intended to “foster the development of local and metropolitan suburbanization contexts.” Focus is on privately financed and constructed neighborhoods. Landscape approach (not just vegetation) based on understanding that important landscape characteristics took form in a three-layered process: selection of location; platting and layout; and design of the house and yard.	iii-iv

(continued next page)

Table 1. Key Concepts for Suburban and Associated Landscape Historic Context Development and Evaluation (cont.)

<i>National Register Bulletin: Historic Residential Suburbs (cont.)</i>	
Understanding historic residential suburbs as cultural landscapes: (1) developer's site selection (geographic location), affected by cultural factors (e.g., transportation, amenities); (2) subdivision design (plat) w/ precise boundaries, internal circulation network, buildable house lots; (3) arrangement of each home and yard, including plantings. <u>The private yard is the "distinguishing feature" of American suburbs</u> , but there are common areas too (parks, playgrounds). Yards included some designed landscapes but also vernacular landscapes influenced by popular trends in home design and gardening. Whether designed or not, the domestic yard includes "arrangement of the house and garage in relationship to the street or common areas; the placement of walks and a driveway; and the division of front, back, and side yards . . . yards include walks, driveways, lawns, trees and shrubbery, foundation plantings, and a variety of specialized areas, including gardens, patios, . . ." Platted setbacks ensure private-public green space and chance to plant a front yard tree.	7-9
Private yards and privacy – plantings provide privacy between homes. "Vegetation" – trees, shrubs, and other plantings often contribute to the historic setting and significance of historic neighborhoods. Conscious effort to create an attractive neighborhood (whether by street trees or private shade/ornamental); pre-existing trees may have been retained. "By the 1930s neighborhood planting was considered important for maintaining long-term real estate value."	12, 13
Garden Suburbs and Country Club Suburbs: J.C. Nichols et al sought ways to enhance the "park-like setting" of their neighborhoods and reinforce the city/suburb separation, including community parks and nearby country clubs.	41
Evaluation: Criteria A and C include community planning and design, architecture, and landscape architecture. Includes patterns of yard design: open lawns, fences or hedges, patios and outdoor terraces, gardens, specimen plants, foundation plantings. Criterion C - distinctive characteristics of design in planning, architecture, and landscape and can include landscape architecture (unified program of street tree plantings, landscape design of yards, conservation of natural features, entrance ways or roadways, scenic vistas).	92-99
Historic integrity: Consider original design and evolution of the plan and the cumulative effect of multiple changes and alterations.	101
Applying the qualities of integrity: location; design; setting ("semi-rural character created through park-like settings of landscaped streets, private yards, sometimes public parks"); materials (including vegetation planted as lawns, shrubs, trees, and gardens: <u>"Original plant materials may enhance the integrity, but their loss does not necessarily destroy it. Vegetation similar in historic species, scale, type and visual effect will generally convey integrity of setting although integrity of materials may be lost</u> (emphasis added)); workmanship includes planting and maintenance of vegetation; feeling – the intangible, cumulative effect of the other elements; and association , the "direct link" between the suburb and important events that shaped it, including continued residential use and community traditions (such as landscaping).	102-105
(continued next page)	

Table 1. Key Concepts for Suburban and Associated Landscape Historic Context Development and Evaluation (cont.)

<i>NPS Bulletin 18: Designed Historic Landscapes</i>	
Bulletin includes small residential grounds, public spaces, subdivisions, golf courses, parkways, drives, trails, etc. "Landscape" features are not just vegetation but include topography/grading, circulation system, natural features, benches, urns, planters, landscape dividers, etc.	2-3
Evaluating integrity: "Vegetation, another important feature of most landscapes, is not stable. . . . <u>A designed historic landscape need not exist today exactly as it was originally designed or first executed if integrity of location and visual effect have been preserved.</u> " <u>"Condition will play a significant role in evaluating integrity [of vegetation]. It may be possible to enhance integrity through maintenance, replanting, or other restoration...."</u> (emphases added)	7-8
<i>NPS Preservation Brief 36: Protecting Cultural Landscapes</i>	
Historic designed landscape – "a landscape that was consciously designed or laid out by a landscape architect, master gardener, architect, or horticulturist according to design principles, or an amateur gardener working in a recognized style or tradition. The landscape may be associated with a significant person(s), trend, or event in landscape architecture; or illustrate an important development in the theory and practice of landscape architecture. Aesthetic values play a significant role in designed landscapes. Examples include parks, campuses, and estates."	2
Historic vernacular landscape – "a landscape that evolved through use by the people whose activities or occupancy shaped that landscape. Through social or cultural attitudes of an individual, family or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives. Function plays a significant role in vernacular landscapes. . . ."	2

2.0 Historic Context

In addition to the national guidance on identification and evaluation addressed in PFTT's foregoing comments, the SHPO's *Specifications* provide, among other requirements, that cultural resource reports for standing structures "shall include" a summary of existing applicable historic contexts, recommendations by previous investigators concerning National Register eligibility and actual nominations prepared, and a definition of the standards used to evaluate integrity.²⁴

As explained below, the draft CRE does not address these KHC requirements. Omissions include most of the salient historic contexts to guide the evaluation of significance for the specific resources within the narrow APE, and the full APE. While the *Louisville Survey East Report* excerpts provides valuable information on the development of this area, it was not developed specifically as a historic context for the broad area of what is now near-east Louisville. In the late 1970s, when it was researched and prepared, the concept of cultural landscapes, including designed and vernacular landscapes, was not formalized, for example.

Some important historic context reports are included in the "References Cited" section of the report, i.e., *They Came, They Saw, They Bought!: The Twentieth Century Housing Boom in Louisville, Kentucky, 1920-1970* (Brother, Ryall, and Stottman), *The New Deal Builds: A Historic Context of the New Deal in East Kentucky, 1933-1943* (Kennedy and Johnson), and *House in a Box: Prefabricated Housing in the Jackson Purchase Cultural Landscape Region, 1900-1960* (Johnson and Kennedy). However, it is not clear how these architectural and public works contexts were specifically applied in the draft CRE. As noted in our comments below on Section 3.9 (Seneca Village No. 2), for example, *House in A Box* describes the primary architectural styles of Gunnison prefabricated homes (p. 39). However, the draft CRE does not distinguish the architectural styles within this neighborhood, which features predominantly Gunnison homes according to the report author. The *New Deal Builds* context identifies airports as part of the New Deal Works Progress Administration (later Work Projects Administration) (WPA) and Public Works Administration (PWA) work in Kentucky (p. 116). Bowman Field's first concrete runways were installed as a WPA and PWA project; however, the draft CRE fails to evaluate the historic significance of these public works.

Historic contexts and other documents relevant to the public and private recreational areas affected by the Bowman Field Safety Programs (Seneca Park and Big Spring Country Club) are not addressed. The 1979 National Register nomination (although dated) for Louisville's Olmsted-designed Iroquois Park, Shawnee Park, Cherokee Park, and parkways was apparently not reviewed, nor were any other relevant Olmsted contexts or nominations. Sometime in the mid-2000s, the Kentucky Transportation Cabinet sponsored a cultural resource evaluation, that included River Road Country Club (a private club and golf course, first established circa 1895), during the Section 106 consultation for the widening of River Road from Frankfort Avenue to Zorn Avenue. This report may be useful for comparison to the evaluation of Big Spring Country Club. Other relevant and instructive evaluation reports may be available.

²⁴SHPO's *Specifications*, pp. 32, 37.

2.1 Suburban Development in the Vicinity of Bowman Field

The ten-page narrative presented as an “historic context” in Section 2.1 of the draft CRE is cut and paste verbatim from portions of the 110 or so pages that comprise Chapters I through IV (“A History of Eastern Louisville”) of the 1979-1980 *Louisville Survey East Report*.²⁵ I have extensively used this report going on almost two decades with respect to Clifton, a horsecar-era to post WWII-era suburb of Louisville that is *not* a garden suburb. The *Louisville Survey East Report* reflects a prodigious amount of historical research into a broad area of what is now near-east Louisville. However, it is important to understand the scope of the report and its limitations for sole use as an “historic context” in this Section 106 review. In general, the purpose of the report was to identify neighborhoods featuring “conservable” housing stock (mostly historic) that might be candidates for the Community Development Block Grant (CDBG) program that had been newly rolled out by the federal Housing and Urban Development agency in the mid-1970s. Carl Kramer’s history describes land use, transportation, politics, and sewage infrastructure at a level of detail that greatly informs our current understanding of the area within the narrow and full APEs. This history should be used to re-organize Section 2.0 into historic contexts that reflect the discrete property types and chronological periods relevant to this cultural resource evaluation. Other relevant historic contexts (listed at pp. 11-12 above) should be synthesized as well.

However, the historical narrative of the *Louisville Survey East Report* is a product of its time. It fails to address cultural landscapes and ethnic heritage (i.e., the Jewish community in the Bowman Field environs). The excerpts that are presented require clarification, and additional relevant information needs to be included. The remainder of our comments on Section 2.0 begin with the omission of an historic landscape context and ends with comments specific to the portions of Mr. Kramer’s work that was excerpted in the draft CRE.

The Landscape Component of the Historic Contexts Applicable to all of the Suburban Environs of Bowman Field Must be Addressed

The CRE must address the framework, methodology, and analysis of the landscape component (designed, vernacular) of the neighborhood evaluations and those of Seneca Park and Big Springs Country Club. PFTT’s comments above on Sections 1.2 and 1.3 summarize the key national, state, and local historic contexts and identification and evaluation guidelines for a landscape analysis that should have been used in this Section 106 document.

Our own research indicates that the designed and vernacular landscape component of local suburban residential development (marketing of homes, establishment of private yards), including vegetation such as trees, appears to have mirrored the trends underway in the U.S. over comparable chronological periods of development, from the streetcar suburbs to the freeway suburbs. The draft CRE fails to reflect that builders and developers in the Bowman Field environs realized the value of attractive, landscaped neighborhoods and lawns. Further, they consciously marketed and designed their subdivisions and demonstration homes to reflect the

²⁵October 1979. *Louisville Survey East Report*. City of Louisville Community Development Cabinet. There are several acknowledged contributors to this report, including Carl E. Kramer the project historian.

current aesthetic in landscape design. “Designed landscapes,” as per the National Park Service guidance, may not be present in high-style. Nevertheless, some original intent of design, as well as vernacular landscapes, is abundantly evident, represented by the planting of trees, foundation shrubs, and other aesthetically pleasing shrubs and flowers. A walk-through of these neighborhoods shows this still to be the case.

The *Louisville Survey East Report*, in a portion not excerpted in the draft CRE, notes that early 20th century plans of development in upper middle class subdivisions by Louisvillians, such as C.C. Heatt and William F. Randolph, were “calculated to respect the natural contours of the land. . . . [reflecting] a growing belief among professional developers across the United States that the use of a subdivision design formula which employed large lots, served natural greenery and topography, fostered good architecture, and removed through traffic from residential streets

– even at the cost of lowering density – was more profitable in the long run than a repetitive checkerboard pattern, especially when appealing to the more affluent home buyers.”²⁶



Home Sites
Nestled Among The Trees

APPROXIMATELY 5,000 people visited Castleton last Sunday to see the beautiful home sites, the exclusive Old English homes and the “Haddon House” now completely furnished.

The illustration shows the wonderful setting of the “Haddon House” now open to the public afternoons and evenings. It is of the Old English type and completely furnished by Dollinger. Interior decoration by Lillian Timmons Bells.

Your opportunity to secure an ideal setting for your future home is now while property values are lowest.

Our representatives are on the ground to tell you all about them. Don’t wait—come out today.

DEGRAW PROPERTIES CO., Owners
INCORPORATED
MUELLER & METZNER CO., Selling Agents
PHONE CITY 4412

Castleton
LOUISVILLE’S BEAUTIFUL COLONY OF EXCLUSIVE OLD ENGLISH HOMES

GATEWAYS ON EASTERN PARKWAY AND ON BARRET AVENUE - LOCATED JUST ACROSS FROM CASTLEWOOD

September 15, 1926 “Nestled Among the Trees” advertisement in the *Louisville Courier-Journal*. Castleton is to the west of the study area in the Tyler Park neighborhood.

Directing You to Something New
Out the Bardstown Road Just Beyond “City Taxes” You Will Find Under Development a Garden Spot for Your Inspection.

WELLINGTON

A Heatt Brothers development, embodying all the latest ideas of a modern home community.

Representative on Property Every Afternoon This Week

HIEATT BROS.
City 8890 231 Fifth St. City 8890

C.C. Heatt’s “Wellington advertisement as a “Garden Spot” and a “modern home community.” *Louisville Courier-Journal*, Sept. 27, 1926. Wellington is in the full APE, south of Taylorsville Rd.

While Louisville developers marketed the attractive vegetation settings of their upscale neighborhoods, home consumers were also consciously marketed. For example, in spring 1926

²⁶*Louisville Survey East Report*, p. 99.

during the period that the streetcar suburbs along Taylorsville Road and the J-town interurban line were platted and slowly began to develop, the Better Homes Bureau, “personally endorsed by President Coolidge,” sponsored a “Better Homes Exposition” at the Jefferson County Armory (now the Louisville Gardens). Promising the “biggest and handsomest” and “most complete and comprehensive” home expo ever attempted in Louisville, the event featured numerous booths of local vendors for all aspects of home living, including “[s]hrubbery and attractive green things for the lawn or the garden.”²⁷ The highest attendance, on Thursday, March 4, 1926, reached 11,574 persons.²⁸ Following the success of the Home Expo, nurseries, among other home vendors, continued to market the value of their greenery to homeowners, as the following advertisements from the *Louisville Courier-Journal* illustrate:



Come to Garden Headquarters!
The Home of the Famous Blue Ribbon Seeds.

Nowhere in the country will you find better seed for your lawn and garden than these we offer you. Our seed is fresh and clean, full of life and vigor. It has been carefully tried and tested, and we stand squarely back of its quality.

If you have never grown Blue Ribbon seeds we urge you to give them a trial this season. Their unfailing high quality will make a lawn and garden you will be proud of.

Use Our Wizard Brand Sheep Manure For Best Results. Evergreen Lawn Grass Seed Makes the Finest Lawns.

Call City 4610—We Deliver Anywhere in Louisville.

For Flowering Shrubs, Trees and Perennials
Call Highland 2452—The Louisville Nurseries—Daily Deliveries.

Wood-Stubbs & Co.
City 4610—219-221 E. Jefferson, Opposite Haymarket, Louisville, Ky.—City 4610

Advertisement, Apr. 4, 1926, touting “Blue Ribbon seeds [Kentucky bluegrass] - Flowering Shrubs, Trees and Perennials” and “Wizard Brand Sheep Manure”



The Home Grounds Beautiful
Stately Evergreens, Trees, Shrubs, Hardy Flowers

Spring, and with it planting time, is at your door. Make your plans now! Do not wait till the end of the season. All indications point to a very busy season for the Nursery Man. Planting stock is scarce—order now and avoid disappointment later on.

Get in touch with any one of the local firms who will be glad to assist you in any way they can in solving your planting problems.

DEW'S NURSERY CO.,
St. Matthews, Ky.
Phone St. Matthews 106

R. L. HAAG,
Taylorsville Road at
Kennedy Station
Phone Jeffersontown 86-B.

LOUIS KOPFAGE,
18th St. Road, Shively, Ky.
Phone South 305.

LOUISVILLE NURSERY,
St. Matthews, Ky.
Phone St. Matthews 113.

W. H. LEEMING,
18th St. Road, Shively, Ky.
Phone 573-M.

RAY'S ST. MATTHEWS
NURSERY,
St. Matthews, Ky.
Phone St. Matthews 92.

JACOB SCHULZ CO.,
Bardstown Road and
Gardiner Lane.
Phone Highland 3100 and
Main 223.

THE WALKER NURSERY,
Peyton Street Road.
Phone South 927.

MEMBERS RETAIL NURSERYMEN'S ASSOCIATION.
"It's Not a Home 'Till It's Planted"

Advertisement, Mar. 7, 1926, “It’s Not a Home ‘Till It’s Planted”

²⁷“Home Exhibit is to Open Tonight,” *Louisville Courier-Journal*, Mar. 1, 1926. Landscape booths included Louisville Nurseries (in St. Matthews) and Wood-Stubbs & Co. of 219-221 E. Jefferson St.

²⁸“Homes Exhibit Draws 10,000,” *Louisville Courier-Journal*, Mar. 5, 1926.

City History

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This article, from the Aug. 1, 1937 edition of the *Louisville Courier-Journal*, lauded homebuyer investment in the “well-planned and well-kept” neighborhood featuring “beautified” plots.

43 Home Sites Are Sold In Seneca Gardens

17 Residences Are Constructed

An indication of the interest in new homes today is the rapid development of Seneca Gardens, where since April, 1936, forty-three home sites have been sold. Seventeen new homes have been completed there and four are now under construction in the subdivision.

Developers of the area declare that the home site buyer of today is extremely careful to select a lot in a location that provides him with modern improvements, such as gas, city water, lighted streets, wide building lines and a well-planned and well-kept neighborhood. These are important for maintaining future values and for obtaining proper financing at an attractive rate, it was said.

Seneca Gardens was laid out in large lots on both sloping and

level ground, with all the factors affecting land and neighborhood values borne in mind, the developers said.

The majority of homes being built today are well-designed and planned to utilize all available space. Plots are beautified by proper landscaping and planting. Modern heating, plumbing, kitchen equipment and insulation all play their part in the making of the modern comfortable, livable home.

Popularity of Seneca Gardens was attributed to the trend in recent years to outlying areas close to or adjoining the city boundary but readily accessible to the center of the city.

Building, Loan Men Pay Out \$590,000,000

People with money in savings, building and loan associations received about \$590,000,000 the first six months this year from completed savings programs, dividends and conversions of their holdings either partially or fully into cash, reported the United States Building and Loan League.

Gray Promotes Harmony.

When mixing paint, it is a good thing to remember that the addition of a little gray to any two colors makes those two colors harmonize.

The Louisville Home Show exhibitors of 1931 were equally creative in the materials used to model attractive homes and their landscapes.



Innovative use of cake for a model house and landscaping. 1931 Louisville Home Show. Item ULPA P_02360.1 in the R.G. Potter Collection, Univ. of Louisville Photographic Archives.

The desirability of attractive, landscaped residential settings kept apace in the 1950s and 1960s. Foster Gunnison, for example, brought a military-like discipline (perhaps based on his former service to the U.S. Navy) to mass production, but a consummate salesman's acumen for marketing to the key influencer in the home purchase decision—women. Gunnison Homes, the “World's Foremost Manufacturer of Beautiful Homes,” were advertised as “Man's Greatest Gift to Women.”²⁹ Gunnison Home advertisements and renderings were always shown with lush, landscaped yards, even the “Champion” homes, the most affordable of the line rolled out in fall 1949 (which appear to be of the type in Seneca Village No. 2). A Champion Home advertisement in a January 1950 issue of the *Terre Haute, Indiana*, newspaper identified the “Landscaped and Sodded” lawn as one of the “Outstanding Features” of the model houses on display by the local Gunnison dealer. Pleasant Ridge in Charlestown, Indiana, across the river from Louisville, is a largely intact Gunnison subdivision (built in 1941 for Indiana Army Ammunition workers) still featuring the original winding roads and cul-de-sacs and other landscape elements, including some of the original street trees.



DIY landscaping at a Champion Ranch House left; Champion landscape idea house right. Both ca. 1951-52. From the Keith Stayton collection.

²⁹Advertisement in the “Homemaker’s Page” of the *Logansport [IN] Pharos-Tribune*, Mar. 21, 1949.

Gunnison Home dealers worked from highly scripted sales materials and marketing approaches from headquarters, based on "statistics" that included the benefit of landscaping:

Gunnison Newsletter, "The Panel," July-Aug. 1950, Vol. 1, No. 2,
p. 4 (emphasis added)

Best Techniques for Showing Demonstration Houses

- 90 % of operative builders queried now use demonstration houses—a new high
- 66 % favor furnished demonstration houses—also a new high
- The majority draw crowds by on-site signs and newspaper ads
- 63 % favor Sunday afternoons; 20 % also show Saturdays
- Average number of sales persons on hand—2.7 persons
- 86 % call attention to nationally advertised products, of which about half use interior placards, and other half depends on salesmen's comments
- 85 % landscape their demonstration houses, most of them fully
- 58 % hand out literature to visitors, either their own or manufacturers'
- 63 % do not attempt to show work in process
- 88 % let visitors browse through the house, 44 % usher visitors, and the majority do not rope off areas
- Women predominantly are most interested in 1) kitchens, 2) bathrooms, 3) living rooms
- Men predominantly are most interested in construction features
- The average demonstration house is kept open slightly more than two weeks
- Estimated average weekly attendance—1,855
- Estimated number of seriously interested prospects—11 %

June, 1950—NATIONAL REAL ESTATE AND BUILDING JOURNAL

The two ads on the following two pages appeared in the Sept. 18, 1955 special "Home and Garden" section of the *Louisville Courier-Journal*. The marketing of amenities in these two early freeway suburbs (Highgate Springs and Wedgewood) by two different builder-developers, is remarkably similar (including "Landscape" as a feature). Both of these subdivisions are located south of Seneca Village No. 2. Note that the Highgate Springs ad on the following page is a development of Bryan S. McCoy, Jr., the developer of McCoy Manor (platted in 1949), located in the narrow APE of Runway 6.

M'COY REALTY

does it again...

A New Subdivision—Section 3, Highgate Springs
Hikes Lane at Furman Blvd.

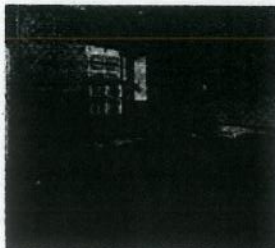
Sewers, All Schools, Churches,
Shopping Centers, Buses, Sidewalks,
Paved Streets, Fireplugs, Street Lights

Call Day or Night: Sam Putnam CH 6139—E. C. Hampton CH 2643—Bryan McCoy FR 9653
McCoy Realty Company CH 6331

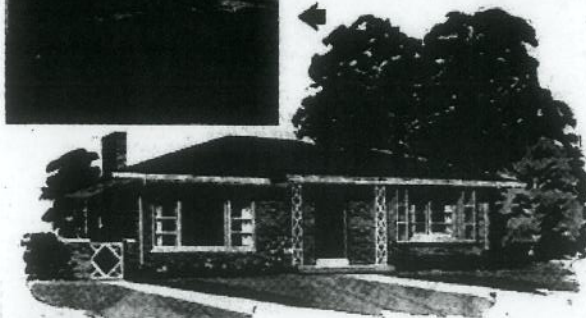
FEATURES

- 3 Bedrooms
- Brick Veneer
- 1½ Baths, all tiled
- 5 Double Closets
- Basement
- Large Kitchen with built-in eating area
- Dining Room
- General Electric Air-Wall Heating
- Landscaped
- Front Porch
- Equipped for Air-Conditioning

Elmer L. Norrington, Builder
Priced from \$17,500
1240 SQUARE FEET
OPEN DAILY and SUNDAYS



Beauty and utility crown the kitchen of this desirable home. And two outstanding features of this planned-for-tomorrow kitchen are the L. & H. custom built-in range and the Stansbury ventilating hood. It's good news for every housewife to have these attractive features included in a kitchen. Get the kitchen beautifully planned by Kitchens Unlimited, 2429 Sandtown Road, CH 6862.



Bryan S. McCoy, Jr.,
Builder

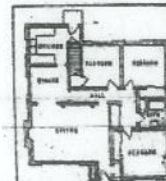
Priced from \$18,250
1200 Square Feet and Larger
OPEN DAILY and SUNDAYS



Efficiency is the keynote of the engineering in this beautiful kitchen. Features include automatic water and waste by Sanitary plus the best in kitchen ventilating for smoke removal. Efficiently planned by Kitchens Unlimited, 2429 Sandtown Road — CH 6862.

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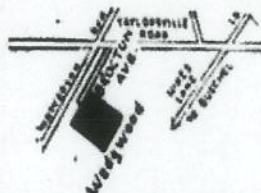


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(With brick gables \$100.00 more)

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While Louisville builders and developers thus had some landscape intent and vision, even for early freeway suburbs such as Seneca Village No. 2, their “completely landscaped” home packages did not preclude individual homeowner elaborations. “Do-it-yourself” promotions abounded through advertising and volunteer groups, such as neighborhood homemakers clubs. The Strathmoor Homemakers Club meeting of Oct. 9, 1950, for example, featured the club’s “landscape leader,” who gave a “landscape lesson” and took orders for magnolia and pink dogwood trees.³⁰

During the 1960s, beautification of the environment was elevated to national status through President Lyndon B. Johnson’s and Lady Bird Johnson’s interest. The Presidential Task Force on Natural Beauty formally convened May 24-25, 1965 in Washington, DC.³¹ Over 800 individuals and organizations from throughout the United States participated (including Grady Clay of Louisville). First Lady Mrs. Johnson addressed the group in an opening session and stayed throughout the two days, and the president presided over the closing session in the East Room of the White House. Groups tackled highways, parks, Army Corps projects, and other intrusive infrastructure, while the “New Suburbia” group recommended enhancements to the natural features of suburbia in America. “Beautification” trends of the 1960s definitively included early freeway-era suburbs.

In sum, the vegetative components of these eras of suburban developments still contribute to their historic significance. Returning now to the excerpts of *Louisville Survey East Report* that were selected for inclusion in Section 2.0 of the draft CRE, the excerpted text requires explanation and expansion, as follows.

Eighteenth and Nineteenth Century Development Should be Addressed

The excerpted history in Section 2.0 includes little reference to land use by Euro-Americans in this area prior to the 20th century. The land that now encompasses Kingsley, Strathmoor, and the suburbs west of Bowman Field (e.g., Seneca Vista, Seneca Gardens, Seneca Manor, McCoy’s Manor) were part of John and Lucy Speed’s Farmington estate, a Gentleman Farm. The Speeds subsequently sold this area in the 1825 to 1846 timeframe to their estate

DIY landscape promotion,
Louisville Courier-Journal,
Sept. 18, 1955

³⁰“Homemaker Clubs - Strathmoor,” *The Jeffersonian, Jeffersontown (Jefferson County) Kentucky*, Nov. 24, 1950, p. 3.

³¹The Task Force recommendations and presidential interest were instrumental in the enactment of the National Historic Preservation Act of 1966. Barras, Leslie E. 2010. *Section 106 of the National Historic Preservation Act: Back to Basics – Part 2: Technical Report*, pp. 6-8.

gardener Jacob (and his spouse Henrietta) Wetstein (of Swiss origin).³² The Wetstein's house at 2501 Denham Road still exists and is in the full APE. By 1913, much of the Wetstein tract had been subdivided in conveyances, although Fig. 2.2 in the draft CRE (p. 16) shows remaining tracts north of Taylorsville Rd. in ownership of Ed Wetstein and the Chas. Wetstein estate (sons of Jacob and Henrietta).

The Importance of the Streetcar in Spurring Suburban Development Needs Emphasis

The excerpted history could be read as emphasizing the development of early automotive suburbs around Taylorsville Road, thus minimizing the early and "potent impact" on county-wide suburban land development associated with the Beargrass Railway Company's construction of six electric trolley lines (the interurban) beginning in 1904 and operating until 1936.³³ Addressing the import of the interurban with respect to suburban residential development would help correct the misimpression of some members of the general public that Bowman Field preceded all surrounding residential development.

The Jeffersontown Division ("J-town line") of the interurban served as the impetus for conversion of farms to suburban development in the present day environs of Bowman Field. A 30-ft. strip of land along Taylorsville Road was deeded by Special Commissioner W.J. Semonin to the Louisville & Interurban Railroad Co. in June 1903,³⁴ which became the J-town line. Regular runs were underway by 1904, increasing property values along the entire line from 50% to 200%.³⁵

By 1908-09, land promotion along Taylorsville Road was in high gear, resulting in the platting of characteristically linear streetcar suburbs.³⁶ Kaelins Subdivision, at the intersection of Taylorsville and Bardstown Roads was platted in September 1906; Woodbourne in December 1908; and Bon Air in December 1909 (each plat depicting proximity to the "Beargrass Railroad," "Louisville Railway," or "electric car line" on Taylorsville Rd.).³⁷

Subsequent streetcar suburban developments included Strathmoor (1920); Broadmeade (1922); Briscoe Subdivision 1 and Addition (1922); Strathmoor Addition (1923); Kingsley (1925, platted as an "Extension of Strathmoor"); Beaumont (1925); Broadmeade Sec. 4 (1926); Hathaway (1926); Airview (1928); Seneca Village (1929); and Broadmeade Sec. 5 (1931).

In addition to the J-town line, the Okolona Division and Prospect Division resulted in other streetcar garden suburb developments that exist today and that serve as appropriate comparison when evaluating the qualities of integrity: the National-Register listed Audubon

³²"A History of the City of Seneca Gardens, Kentucky," December 1991. Acknowledgements of contributors provided by George Stroud on p. 2.

³³The "potent impact" was described in "Rapid Transit Converts Country Towns Near Louisville Into Charming Suburbs," *Louisville Courier-Journal*, Jan. 2, 1909.

³⁴Jefferson County Deed Book 592, 43.

³⁵"Rapid Transit Converts Country Towns," Jan. 2, 1909.

³⁶*Historic Residential Suburbs* notes the continuous corridor layout of streetcar suburbs, p. 20, as opposed to those of earlier railroad suburbs.

³⁷PFTT has prepared a table that identifies all suburban development around Bowman Field by historically platted names and includes plat book references, developers, and like information, available upon request.

Park along Preston Highway and the James T. Taylor Subdivision along Upper River Road (National Register nomination pending 2015), respectively. It should be noted that the James T. Taylor Subdivision is a streetcar-era garden suburb planned and developed by an African American developer (James T. Taylor) for African Americans exclusively (he deed restricted “Caucasians” from the neighborhood). The district-wide intentional tree plantings (Mr. Taylor’s, homeowners’) are an individual contributing element to the historic significance of the neighborhood from 1920-1965.³⁸

The Relationship of Seneca Park and Bowman Field Should be Clarified

The excerpted text from the *Louisville Survey East Report* states that the Von Zedtwitz³⁹ land was acquired to establish Bowman Field, which had “the effect of adding a large new section of institutional open space to the city-scape” and that this “excess land was developed as Seneca Park” (draft CRE, p. 17). This excerpt infers that the park was an afterthought or excess to the airport property, when the two uses developed almost contemporaneously. The text should be clarified in this regard. Following conveyance of the Von Zedtwitz tract to the Board of Park Commissioners (BPC), the group accepted the land into the park system and named it as “Seneca Park” at a regular meeting held on Aug. 27, 1928.⁴⁰ No doubt the success of the adjacent and contiguous Cherokee Park undoubtedly promoted the plans for another park, which was the last public park designed by the Olmsted firm in Louisville (1928). Further comments regarding Bowman Field and Seneca Park, and the omission of these resource in the draft CRE, are addressed in PFTT’s comments on Section 3.0 below.

The Historic Context Needs to Include the Post-WWII Early “Freeway Suburbs”

Two of the residential areas within the narrow APE—Seneca Village and Seneca Village No. 2 (located south of Taylorsville Road and Runway 33)—were developed as early freeway suburbs, during a real estate boom spurred by housing needs for war veterans and their families, ...⁴¹ By the time that Seneca Village No. 2 (and No. 3, to the south of No. 2, divided by the highway) were platted in 1951 and 1955, respectively, the highway was identified in the plats as the “Inner Belt Highway” and “Henry Watterson Expressway,” respectively. Construction on the Inner Belt Highway (today, the Watterson/I-264) began in 1949.⁴²

A basic research effort to inform the history presented in the draft CRE would have revealed the additional importance of city sewer service in the development of the post-World

³⁸Ball, Robert W. *James T. Taylor Subdivision. Nomination to the National Register of Historic Places*. 2014.

³⁹The *Louisville Survey East Report* refers to the “Von Zedwitz” lands, and the draft CRE repeats this spelling. The correct spelling of the family name is “Von Zedtwitz,” see, *inter alia*, *Von Zedtwitz v. Sullivan, Alien Property Custodian*, 26 F.2d 525 (DC App. 1928) (failed attempt to reclaim the confiscated land) and Waldemar Conrad Von Zedtwitz’s conveyance of 540.07 acres to the Louisville Board of Park Commissioners, Jefferson County Deed Book 1347, 95 (recorded June 14, 1928). The family name is spelled correctly in Kramer’s “The Strange Genealogy of Louisville’s Bowman Field and Seneca Park,” 1986.

⁴⁰“Seneca Park is Name Selected for Von Zedtwitz Property Here,” *Louisville Courier-Journal*, Aug. 8, 1928.

⁴¹“House Hunters Here Went Suburban Faster in ’52 Than Any Previous Year – 67 Pct. Built Outside of City” and “Express Roads are Certain to Cause Great Changes in Real-Estate Values,” by Grady Clay, Real Estate Editor, *Louisville Courier-Journal*, Jan. 18, 1953.

⁴²*Encyclopedia of Louisville*, p. 926.

War II early freeway suburbs of this area, such as Seneca Village and Seneca Village No. 2. The Taylorsville Road-Hikes Lane area was reported as second highest in suburban growth in the early-to-mid 1950s, with homes selling in the range of \$14,000-\$18,000.⁴³ “Drainage” features were prominently addressed in advertising, such as this ad for “Lynnview” that ran in the *Louisville Courier-Journal*’s Sunday morning special edition on homes and gardens on September 18, 1955: “No Sewerage Problems Here - Both Sanitary and Storm Sewers are in.”

The draft CRE correctly notes that the architectural styles and materials of construction of these neighborhoods reflect the more modest socioeconomic conditions of the initial inhabitants, including the prevalence in Seneca Village No. 2 of pre-fabricated houses by Gunnison Housing Corporation of New Albany, Indiana. Foster Gunnison, who aspired to “organize the General Motors of the homebuilding field,” pioneered the mass production and use of waterproof plywood, stressed-skin panels for walls, floors, ceilings, and roofs, a technology first developed by the U.S. Forest Products Laboratory of the U.S. Department of Agriculture.^{44, 45}

The Historic Context of Jewish Settlement and Community Development Needs to be Evaluated

There are resources within the narrow and full APEs that require evaluation under Criterion A and C for associations with settlement of Jewish families and the construction of related faith and community institutions. Two written resources have primarily informed our understanding of the Jewish community in the environs of Bowman Field:⁴⁶ *Adath Louisville, The Story of a Jewish Community* and *Jewish Louisville, Portrait of a Community*.⁴⁷

Ely’s work describes the movement of Jewish families from downtown Louisville to the Highlands/Taylorsville Road area from the 1930 to the 1970s, which was the impetus for construction of the current Jewish religious and community institutions in the Bowman Field area. While some neighborhoods had deed restrictions that prohibited sales to Jews, others did not, on a block-by-block basis. According to Ely, Castleberry Road and Village Drive were

⁴³“All Records Broken for Home Building in Louisville Area,” by Michael J. O’Dea, President, Kentucky Real Estate Association, *Louisville Courier-Journal*, Sept. 18, 1955.

⁴⁴Gunnison Homes, Inc. United States Steel Corporation Subsidiary. 1949. “A Story In Pictures,” New Albany, Indiana; “A Brief History of Prefabrication,” reprinted from *The Architectural Forum*, Time, Inc. 1943, pp. 10, 64. The six articles in the “Brief History” originally appeared in the magazine’s issues of Dec. 1942 and January, February, March, April, and June 1943. PFTT is fortunate to have access to these materials, and many of Gunnison’s own publications from the 1950s, through a loan from Mr. Keith Stayton, who purchased the collection at an estate sale of a Gunnison salesman who had lived in Jeffersonville, Indiana.

⁴⁵Although there was a boom in Gunnison houses in Louisville and throughout the U.S. in the early 1950s, the first Gunnison homes were erected much earlier, including New Albany’s first Gunnison, for Harry Barth on North State Street, in September 1937. “Gunnison Home Under Way Here,” *The New Albany (Indiana) Ledger and Tribune*, Sept. 17, 1937, p. 7. The first Gunnison test models in Louisville were erected in July 1936 on Larchmont Avenue (1407, 1409, 1411, 1413, 1415, 1417, and 1432). Louisville Metro Archives and Records Center, “Larchmont” file.

⁴⁶PFTT appreciates the generosity of time and information provided by Alan Engel, the former director of the Jewish Community Center, to educate us and provide resources for further research.

⁴⁷Landau, Herman. 1981. *Adath Louisville, The Story of a Jewish Community*. H. Landau and Associates. Louisville, KY. Ely, Carol. 2003. *Jewish Louisville, Portrait of a Community*. Jewish Community Federation of Louisville’s Foundation. Louisville, KY.

almost completely Jewish in the 1950s and 1960s, but Sulgrave Road, one block over, was restricted.⁴⁸ Cherokee Gardens was restricted, but Meadows Road was not. One former resident recalled that “We grew up in the Bon Air neighborhood [south of Bowman Field], a neighborhood that the Catholic kids called ‘O Little Town of Jerusalem’ because of the majority of Jewish families.”⁴⁹

Chapter 5 of *Adath Louisville* provides a history of the Congregation Keneseth Israel, whose synagogue at 2531 Taylorsville Road is located within the narrow APE and is wholly unevaluated in the draft CRE. This congregation, which is affiliated with the United Synagogue of Conservative Judaism, dates to 1926 when the predominantly Russian and Lithuanian B’nai Jacob and Beth Hamedrash Hagodol congregations in downtown Louisville merged because of their discomfort with “local deviations” from traditional Judaism. Construction of I-65 demolished their initial synagogue and their second building, at Preston and Fehr, was sold to the Volunteers of America in the 1930s.⁵⁰ By the 1950s, the congregation’s third synagogue, at Floyd and Jacob Streets, was distant to the member families who had moved to the confluence of Bardstown Road and Taylorsville Road, prompting a 1956 vote to move to the Bowman Field area.

A 4.6-acre tract, located on Taylorsville Road and situated within a 2-mile radius of $\frac{3}{4}$ of the Keneseth Israel members, was purchased for \$67,000.00.⁵¹ Thomas J. Nolan & Sons designed the educational center, and a groundbreaking ceremony was held on June 9, 1963 for the construction by Platoff Construction Company. The congregation used the educational center first while they were fundraising for the sanctuary. Ultimately, groundbreaking for the sanctuary was held in June 1969 and services started March 27, 1971. Joseph & Joseph Architects, who “built much of 20th century Jewish Louisville,”⁵² designed the sanctuary and I. Bush & Sons constructed the building. The current sanctuary is known as “The One with the Windows” because of the twelve distinctive inverted triangular windows (and associated interior artwork) that line the front façade, created by artist and member Bill Fischer.⁵³

A history of congregation Anshel Stard is found in Chapter 4 of *Adath Louisville*. Construction of I-65 also displaced this congregation and its synagogue in downtown Louisville. Aware of the proposed highway construction in the late 1950s, the leaders considered that their membership was moving to the “east end” of Louisville and that the Young Men’s Hebrew Association (YMHA) had purchased 16 acres on Dutchman’s Lane across from Bowman Field.⁵⁴

⁴⁸*Jewish Louisville*, p. 151.

⁴⁹*Ibid.*, p. 152. A current, long-term resident of Drayton Drive recalls the neighborhoods as having “religious enclaves,” with Kingsley predominantly Catholic, and Valletta and Meadows Roads predominantly Jewish; it left an impression on the resident that the Jewish families had no televisions in their house. Personal interview with L. Barras, July 2, 2012.

⁵⁰*Adath Louisville*, p. 57.

⁵¹*Ibid.*, p. 61. Ely states that Seneca Gardens tried to block construction of the synagogue, but lost a lawsuit filed by the congregation, p. 157. See also “Suit seeks rezoning of site for Synagogue Keneseth Israel, city can’t block synagogue,” *Louisville Courier-Journal*, Mar. 7, 1959.

⁵²*Jewish Louisville*, p. 103.

⁵³www.kenesethisrael.com/#!/the-one-with-the-windows/c1oz0.

⁵⁴*Adath Louisville*, p. 52.

In 1955, the congregation purchased 17.5 acres adjoining the YMHA property. The first phase of the synagogue construction opened in early 1958.⁵⁵

The current location of the Jewish Community Center (JCC) at 3600 Dutchman's Lane dates to the mid-1940s when the YMHA began fundraising for a new building to replace the one at Jacob Street and 2nd Street).⁵⁶ A membership survey determined that 57% of the approximately 8,000 Jewish residents of Louisville lived in the Highlands or Taylorsville Rd. area.⁵⁷ After a siting study that included land tracts now occupied by Mid-City Mall and Bellarmine University, the Association selected the Dutchman's Lane location, across from the Big Springs Country Club.⁵⁸ The JCC opened on Dutchman's Lane on Dec. 10-11, 1955.⁵⁹ In 1978, the City of Louisville gave land use approval to build Shalom Towers on the site of the former JCC ball fields, and the first residents began to occupy the building in September 1979.⁶⁰

3.0 Results of the Architectural Survey

PFTT provides section-by-section comments below. However, the omission of re-evaluation of the Bowman Field Historic District is addressed first.

Bowman Field Historic District

Every map depicting the undertaking in the draft CRE erroneously identifies the boundaries of the Bowman Field Historic District. In particular, the Administration Building (the Art Moderne terminal) is excluded in the maps. The drawings at the end of the National Register nomination depict the National-Register boundaries of the terminal, Curtiss Flying Service Hangar, and Army Air Corps Hangar and associated areas (approximately 15 acres) when the district was listed in 1988.⁶¹

The three buildings and immediate environs were listed under Criterion A (for association with transportation) and Criterion C for architecture, and the terminal was also listed under Criteria A and C for association with the WPA program and the work of Wischmeyer and Arrasmith. The CRE needs to evaluate Bowman Field *in its entirety* for historical significance and expanded boundaries. The nomination is almost 30 years old. Much more information is now available about Bowman Field and its unique role in civil and military aviation over the past 90 or so years.

Section 800.4(c)(1) of the ACHP's Section 106 regulations provide that "[t]he passage of time, changing perceptions of significance, or incomplete prior evaluations may require the agency official to reevaluate properties previously determined eligible . . . "⁶² In addition, the

⁵⁵Ibid., p. 54.

⁵⁶Ibid., p. 94.

⁵⁷*Jewish Louisville*, p. 153.

⁵⁸Ibid., p. 159.

⁵⁹*Adath Louisville*, p. 102.

⁶⁰*Jewish Louisville*, p. 198.

⁶¹The State Review Board minutes of its Sept. 22, 1988 meeting reflect that the LRAA objected to the listing.

⁶²See also *SHPO's Specifications*, p. 28.

Kentucky Heritage Council's requirements for historic architectural assessment reports provide that "[e]xisting National Register properties shall be reevaluated."⁶³

With respect to the period of significance, the beginning year of the period of significance (1929) should be re-evaluated for an earlier date, possibly 1923, the year of incorporation of the Aero Club of Kentucky, the first operator. The author of the nomination selected the year 1929 based upon construction of the Curtiss Flying Service Hangar. However, there was enough air traffic that the City of Louisville adopted an ordinance on March 21, 1923 requiring planes and balloons to maintain a minimum altitude of 2,000 feet above ground level (excepting aerial photography), and establishing civil fines of \$10 to \$100 per offense.⁶⁴ During the winter of 1925, *Miss St. Petersburg*, one of Henry Ford's "tin geese" planes, departed from Dearborn, Michigan on its way to Florida to be put into air mail service. The all-metal plane veered off course due to snowstorms and hoped to land at Bowman Field, but the airport was "obscured due to smoke hovering over the city," although the plane was able to refuel there the following day.⁶⁵ Charles Lindbergh's brief stop at Bowman Field in the *Spirit of St. Louis* on August 8, 1927 was greeted by "some 10,000 spectators."⁶⁶ By 1933, the City of Louisville had adopted a master plan that included an airport component even though Bowman Field was located outside of the city limits.⁶⁷

The end date of the nomination's period of significance is 1937, when the terminal expansion was completed. We propose that the end year be advanced to 1965 (50 years from the current period). In doing so, the airfield's significance during World War II, the Korean War, and the Vietnam War would be recognized (including the conversion of WWII barracks into veterans and public housing in the late 1950s to early 1960s).

With respect to Criterion A, the 1988 nomination recognizes the expansion of the terminal in 1936 under the auspices of the New Deal WPA. However, construction of the

⁶³Ibid. p. 38.

⁶⁴"Aeroplanes and Balloons Flying at Certain Heights," Sections 1-3, approved Mar. 21, 1923. *1923 Compilation of General Ordinances of the City of Louisville*, compiled by Wm. T. Bassett, Department Counsel, pp. 20-21. An amendment in 1931 required that planes register with the Board of Park Commissioners and prohibited throwing advertisements out of planes. By 1954, the ordinance had been moved to the "Morals, Safety and Welfare" chapter of the Louisville Code of Ordinances (Sections 86-35 through 86-40), but maintained the minimum flying height restriction of 2,000 ft. and required aircraft registration with the Louisville and Jefferson County Air Board. Revisions adopted in 1961 required that fixed wing aircraft altitude be maintained no lower than 2000 ft. and helicopters no lower than 1000 ft. "Aircraft," Chapter 503. *The Codified General Ordinances of Louisville*. This ordinance remained the same (except for a re-designation from Ch. 503 to Ch. 91 in 1980) through 1994. The 1994 version, Sec. 91.99 increased civil penalties for minimum height limits to \$25-\$100 and added up to 30 days imprisonment for violations. The ordinance was repealed sometime between 1995 and 2002.

⁶⁵"Lost 'Tin Goose' Fails in Efforts to Rejoin Fleet," *Ludlington [OH] Daily News*, Dec. 30, 1925.

⁶⁶LeMay, Jason, SFC(R) John M. Trowbridge, and CW4(R) Harold Canon, "Kentucky's Flying Soldiers, A History of the Kentucky Army National Guard's Fixed Wing Aviation," p. 13.

<http://kynghistory.ky.gov/nr/rdonlyres/e2347f73-5996-4924-ad3f-7b1e58f4300a/0/kyngfixedwing60thhistory.pdf>.

⁶⁷"An Ordinance to adopt a plan for the location of airports as a part of the master plan for the physical development of Louisville, including areas outside its boundaries," approved Oct. 20, 1932. *1933 Supplement to the 1931 Compilation of the General Ordinances of the City of Louisville*, p. 296. Compiled by Gavin H. Cochran and L.L. Wehner of the Department of Law.

airport's first concrete runways was also a WPA and PWA project,⁶⁸ which needs to be reflected in an updated evaluation. The original concrete runway configuration (depicted shortly after construction in Fig. 2.3, p. 18, of the draft CRE) is largely still intact, although parallel runways have been constructed. Further, the length of the original runways has been maintained as a conscious decision. The Jefferson County Air Board, predecessor to the LRAA, noted in public testimony in 1967 that "[t]o lengthen the runways [at Bowman] would only open the airport to a larger category of aircraft, which should be accommodated at Standiford Field. It is believed that the runway length at Bowman "serves as a check to keep the size of the aircraft using the field compatible with the surrounding residential neighborhood."⁶⁹

Bowman Field's historical significance under Criterion A should also be recognized for associations with military readiness, preparedness, and response from the early-to-mid 20th century. (The 1988 nomination only touches upon a limited aspect of this theme, primarily the construction of the Army Air Corps Hangar in 1931 for the 325th Observation Squadron, Organized Reserves.) Readily available research into Bowman Field's military past was conducted for the 2006 publication "Kentucky's Flying Soldiers, A History of the Kentucky Army National Guard's Fixed Wing Aviation." The history in this publication discusses the period from the Army's occupancy at Bowman Field starting in 1922 and the subsequent principal military tenant activities at the airfield, with an emphasis on the period through the Korean War. The loss of the Kentucky Air National Guard light aviation section and heavy maintenance section to Frankfort's Capitol City Airport in 1960 as also reviewed.

The legacy of military use of Bowman Field is also reflected in the transition of some of the WWII-era barracks into affordable housing for returning veterans of the war, and later public housing, before their demolition in 1963.⁷⁰

3.1 Overview

3.2 Big Spring Country Club

Our consultation comments on this private club are hindered by the lack of physical access to the site and its records. It appears from Fig. 1.4 that nineteen (19) mature trees are proposed to be removed, in addition to the 54 trees that were harmed in the Safety Program's fall 2013 action (39 cut; 15 trimmed – see cumulative effects discussion above). We also note that the draft CRE evaluates Big Spring Country Club in its entirety (see also Fig. 3.1), including the areas outside of the narrow APE. What is the rationale for doing so, and yet not evaluating the full boundaries of Seneca Park and Bowman Field in the same manner?

LRAA has stated that the fall 2013 removal action affected trees for which there were existing easements at Big Spring; why does Fig. 1.5 then only show the area of proposed aviation easement and not the existing easements? Elsewhere in the report, Fig. 1.6

⁶⁸"Statement of Foster V. Jones Before the Mayor's Citizens' Advisory Committee," Jan. 13, 1967, p. 4. *See also* the Goodman-Paxton [KY WPA Director] Photographic Collection, PA64M1, Special Collections, University of Kentucky. http://kdl.kyvl.org/catalog/xt7nvx05xv47_266_34/guide (men paving Bowman Field runway).

⁶⁹"Statement of Foster Jones," p. 5.

⁷⁰*Ibid.*, p. 6.

specifically, the report depicts existing easements outside of the narrow APE (in Hathaway, just southwest of Runway 33 and south of Taylorsville Rd.).

3.3 Seneca Park Golf Course

The draft CRE erroneously evaluates only the Seneca Park Golf Course—and not the entirety of Seneca Park of which the golf course is one feature, and not to the Seneca Park lands and public paths along present-day Pee Wee Reese Road. It should be noted that there are mature trees in Seneca Park along the western edge of Pee Wee Reese Road that appear to be slated for destruction in the Bowman Field program and have not been evaluated in the draft CRE.

The draft report concludes that “[a]s a designed landscape, the golf course possesses little degree of its **original design integrity** (p. 46, emphasis added).” The basis for this conclusion is dubious since the previous page states that the “**original design layout** could not be located (emphasis added),” and, thus, the golf course eligibility evaluation is made with reference to a “new layout” dated 1955. The reference section of the draft CRE indicates that the Seneca Park golf pro was interviewed on Aug. 19, 2014 (p. 121).

However, the Principal Investigator did not contact any Metro Parks landscape architect or planner to obtain their professional perspectives on historical significance and evaluation of integrity or to gain access to the Seneca Park files. Through a simple search of the Metro Parks records by a PFTT volunteer, several relevant documents were obtained that are essential for an evaluation of Seneca Park and all of its features, including, but not limited to:

- The “General Plan for Seneca Park, Olmsted Brothers – Landscape Architects, Brookline – Massachusetts” (1928), showing the “panhandle” portion to the northeast and the entire north-south tract, including the original design of the golf course and the landscaped “automobile concourse” on the west side of Bowman Field (the “aviation field” is also included in the plan drawing), linking the park and Taylorsville Road. Also shown are the designs for the landscaped entrances and exits that integrated Seneca Park with the surrounding neighborhoods. The Olmsted firm’s Seneca Park Planning Plan and Planting Plan of 1930 are available in the Metro Parks files.
- A 1928 aerial photograph of the park and environs by Bowman-Park Aero Co.
- A deed from Wetstein Land Co. to the Board of Park Commissioners (BPC) (Jefferson County Deed Book 1411, 169, Sept. 19, 1929) conveying a portion of the east side of the Seneca Vista subdivision for construction of a park road to plans and specifications of the BPC by Sept. 1, 1929. Other deeds of the same period on file at Metro Parks conveyed entrances from existing neighborhoods to the BPC for incorporation into Seneca Park.
- A deed from William Randolph to the BPC (Jefferson County Deed Book 1671, p. 88, May 2, 1938) conveying triangular lot “F.” This lot is now the treed entrance to Seneca Park in the northwest corner of the intersection of Taylorsville Road and Pee Wee Reese Road, where the public walking path of the park turns to the north (along the west side of Pee Wee Reese Road). This entrance (as well as the Seneca Park land

on the east side of “Park Road”) is depicted in the 1938 “Planting Plan of Taylorsville Road Entering Seneca Park,” prepared by Carl Berg for the BPC.

- A Map of Seneca Park Showing Proposed Improvements, 1936-1937, Board of Park Commissioners, Carl Berg, Landscape Architect. This map presents the same overall plan view as the 1928 Olmsted General Plan, but reflects changes that had been implemented, including the elimination of the Beargrass Creek amphitheater, and the proposed changes for the WPA projects at the golf course.

Other key documents that need to be reviewed for the CRE include the *Master Plan for Louisville's Olmsted Parks and Parkways*

Additional considerations relating to evaluation of Seneca Park as a whole, including vegetation features, are as follows:

- The period of significance should begin at least from 1928 (when the BPC acquired the Von Zedtwitz tract) through 1965 (50 years from the current undertaking).
- The evaluation of Seneca Park should include the public's participation over the decades in maintaining and perpetuating the vegetation, including the tree canopy. This phenomenon is important to the associative quality of the Park's integrity (the conscious perpetuation of the vegetation). As early as 1932, fifteen trees were planted in the park by the Fifth District Federation of Women's Clubs to commemorate George Washington.⁷¹ The Washington Memorial trees include “native woods” such as American elm, ash, sycamore, beech, and pine oak. The Olmsted Conservancy has spent countless hours of its staff time and been supported by volunteer labor to eradicate invasive species in the park and restore native habitat. The American Cancer Society Living Memorial Grove of Trees program at Seneca Park was initiated in 1998 and is situated along the eastern edge of Seneca Vista for donations of trees (with a minimum donation of \$1,000.00/tree), shrubs, and park benches by families and friends of loved ones lost to cancer or who have survived cancer.
- With respect to the seven qualities of integrity, we defer to Metro Parks' views as a consulting party. We offer the following observations, however:
 - **Location.** The park is still bounded within the original boundaries established through acquisition of the Von Zedtwitz tract and the associated private parcel conveyances for connections to adjoining neighborhoods.
 - **Design.** In comparing the original 1928 General Plan to the 1936-37 proposed improvements, later layouts, and current conditions, it is clear that portions of the original Olmsted plan were never executed or were modified over the decades. However, that is true for all Olmsted plans. The evaluation should address how modifications to the General Plan compare to the execution of other relevant Olmsted plans, including those in Louisville.
 - **Setting.** The setting has been compromised by the intrusion of I-64 across the northern portion of the park. However, the intact tracts of the park still seem to

⁷¹“Federation gives city 15 trees planted in Seneca Park as Washington Memorial,” *Louisville Courier-Journal*, Mar. 27, 1932.

convey integrity of setting (and **feeling**), including the buffering that has been developed along I-64.

- **Materials and Association.** Vegetation, including trees, in Seneca Park are subject to a planned, intentional program of historic preservation treatment and ecological restoration the concepts of which are set out in the *Master Plan for Louisville's Olmsted Parks and Parkways*.
- **Workmanship.** Specific to vegetation, the plantings and their maintenance have reflected the efforts of landscape architects, including those of Metro Parks.
- The WPA program within Seneca Park included not only the golf course improvements described in the draft CRE, but an unrealized plan to develop a Recreation Center in the panhandle portion. A plan advertisement featured an outdoor "Safety Pool," flanked by a diving pool and wading pool; an indoor pool; indoor tennis courts; outdoor tennis courts; badminton courts; and horseshoe pits, all landscaped. The WPA's contribution to the \$80,000.00 was to be 65%, with the rest raised through the sale of memberships; non-members would be charged a daily use fee.⁷²
- *National Register Bulletin, Historic Residential Suburbs* (p. 4) recognizes that parks and pathways located adjacent to historic neighborhoods can contribute to the significance of those neighborhoods if they are 'integrally related to the neighborhood by design, plan or association and share a common period of historic significance.' It is clear from the BPC's early land acquisitions of Seneca Park entrances to Seneca Vista, Cherokee Gardens, Cherokee Court, and Beals Branch Rd./Alta Vista that a seamless link between garden suburbs and the suburban park was consciously planned. Further, many of the original residential plats (e.g., Seneca Vista, Seneca Village, Seneca Gardens, and Seneca Gardens 2) identify the planned developments specifically with reference to Seneca Park. In addition to independently evaluating Seneca Park as a historic property, the evaluations of the surrounding garden suburbs should consider the park as a contributing resource to those districts.

3.4 Seneca Vista Neighborhood

The text does not identify the number of trees proposed for removal in Seneca Vista in the narrow APE. Although it is difficult to discern in Figure 1.6 of the appendix, it appears that at least seventy-five (75) mature trees are targeted for removal. However, it is not clear whether some of the mature trees on the east side of Seneca Vista are within private properties or are a part of Seneca Park, the latter of which has been wholly unevaluated in the draft CRE. Avigation easements will be newly sought for eight (8) properties in Seneca Vista (p. 59), adding to the twenty-nine (29) properties that are already permanently encumbered in the neighborhood.

Similar to the evaluation of other neighborhoods subsequently addressed in the draft CRE, Seneca Village is recommended for eligibility under Criterion A (community planning and development) and C (architecture and design) (p. 59), and a period of significance is ascribed for this residential development from 1937-1950. The ending period of significance should be

⁷²Advertisement, *Louisville Courier-Journal*, July 7, 1941, Section 1, p. 12.

advanced to at least 1965, dating back 50 years from the “current” purpose and need for the undertaking. As noted below, Kingsley is the only neighborhood for which the report proposes 1964 as the end year of period of significance (50 years prior to the date of the draft CRE). Seneca Vista and the other neighborhoods need to have a comparable end period of 1965, or the rationale for the distinction explained fully.

The draft CRE notes that Seneca Vista was platted in 1937 by William F. Randolph (p. 59; the text actually says “William H. Randolph,” but this is in error). Prior to Randolph’s acquisition of the land, the property was owned by Joseph Discher (see Fig. 2.2, p. 17, of the draft CRE). In January 1926, Randolph’s firm, the Wakefield-Davis Realty Company, purchased the approximately 27-acre Discher tract for \$55,000.⁷³ Although the company announced that it would begin subdivision development in the spring of 1926, the 1930 aerial photo on p. 88 of the draft CRE (Fig. 3.76) shows the land was still undeveloped. It should also be noted that Wakefield-Davis reported in the 1926 newspaper article that it would hire the “Olmstead [sic] Brothers, landscape specialists,” to work on the layout of a subdivision between Shelbyville and Lexington Roads, near “Fairlawn.” It is not known whether the firm did, in fact, do so; however, it is clear that Randolph was aware of the firm’s work in Louisville and saw the value in using the firm’s services, at least for another development. It should also be noted that Randolph’s plat for Seneca Vista shows “Seneca Park” on the immediate east side of the neighborhood (instead of Bowman Field), and the realty firm subsequently sold a triangular lot from Seneca Vista to the Board of Park Commissioners to connect the neighborhood more directly to the park.

Similar to the evaluation of other neighborhoods in the draft report, the author concludes that the lot layouts, circulation features, and conversion of lots to public green space are still intact, no doubt aided by the deed restrictions that Wakefield-Davis placed upon individual lot development. Nevertheless, the author does not find an intentional design element in the original development of Seneca Vista specific to vegetation and concludes that the “type” and “overall height” of the trees are not considered to be a contributing element of the neighborhood (p. 59). The report also states that some “lesser percentage of plantings” (of what types is not specified) appear to have developed “organically” or by property owners “over time” (ibid.). PFTT submits that the vegetation in Seneca Vista is contributing.

The draft report also states that the LRAA now owns nine (9) lots within Seneca Vista that “have *always* been a part of the neighborhood’s landscape (emphasis added)” (p. 58). It is not clear what this statement is intended to mean. The statement is factually incorrect based on a straightforward reading, because the LRAA’s predecessor purchased the lots in the early 1980s based upon information in the PVA’s records. This statement either needs to be removed or restated accurately.

⁷³“Firm Announces \$115,000 Deals – Wakefield-Davis Realty Company Expands its Activities,” *Louisville Courier-Journal*, Jan. 10, 1926.

3.5 McCoy Manor

McCoy Manor is within the narrow APE, as well as the full APE. Under FAA's initial direction for the Bowman Field Safety Program (compliance with TERPS departure profile guidance), the mature tree canopy in this historic neighborhood would have been substantially harmed. Under the FAA's current instructions for this project, announced in a May 15, 2013 letter from Hanson Engineering to area property owners, there are no trees identified in the only mitigation alternative under consideration by FAA (tree removal). No avigation easements are proposed for the runway approach surface evaluation; easements would have been required if the TERPS departure surface was still the operative profile. However, it is erroneous to conclude, as the draft report does (p. 71), that this neighborhood will not suffer adverse effects from the tree removal program; it will: there will be adverse visual effects from the loss of mature tree canopy in other surrounding historic gardens suburbs.

Similar to the evaluation of other neighborhoods in the draft CRE, McCoy Manor is recommended for eligibility under Criterion A (community planning and development) and C (architecture and design) (p. 70), and ascribes a period of significance for this residential development from 1949-1957. As noted elsewhere, the ending period of significance should be advanced to at least 1965, dating back 50 years from the "current" purpose and need for the undertaking. It should also be noted that this neighborhood features several multi-family properties that were recommended as eligible, with which PFTT agrees. However, the rationale for then determining that seemingly comparable multi-family residential properties developed as infill on Taylorsville Road (see Section 3.10 comments below) are "not eligible" is not clear, and needs to be explained.

The text further notes that key features of the original layout still exist (regularly spaced lots, uniform setbacks, pedestrian and vehicle circulation features), but that "[t]he general vegetation landscape is casual and does not feature an overall design or pattern in terms of trees or shrubbery" (p. 70). PFTT submits that the vegetation in McCoy Manor is contributing.

3.6 Seneca Manor

Under FAA's initial direction for the Bowman Field Safety Program (compliance with TERPS departure profile guidance), the mature tree canopy in this historic neighborhood, including the City of Seneca Gardens of which Seneca Manor is a part, would have been substantially harmed. Under the FAA's current instructions for this project, announced in a May 15, 2013 letter from Hanson Engineering to area property owners, there is one (1) tree that would be removed within the narrow APE. The tree is an approximately 100-ft. tall pin oak in the rear yard of a residence; an avigation easement is proposed as a permanent encumbrance on this property. The property, at 2625 Valletta Road, however, is not depicted in the photos presented in Section 3.6.

Seneca Manor is recommended for eligibility under Criterion A (for unspecified "historical associations," presumably community planning and development as an automotive garden suburb) and C (architecture, but not "design" unlike other neighborhoods) (p. 77), and ascribes a period of significance for this residential development from 1937-1958. As noted

elsewhere, the ending period of significance should be advanced to at least 1965, dating back 50 years from the “current” purpose and need for the undertaking.

Similar to the evaluation presented for other neighborhoods, the text notes that key features of the original layout still exist (regularly spaced lots, setbacks, vehicle circulation features). Similar to the other neighborhoods, the report concludes that there was not an intentional design element in the original development specific to vegetation and that the “type” and “overall height” of the trees are not considered to be a contributing element of the neighborhood (p. 78). The report also states that some “lesser percentage of plantings” appear to have developed “organically” (e.g., along fence rows) or in “unmanaged areas” and represent the “taller growing variety” (p. 77). Plantings by individual property owners that appeared to have developed “organically” or “over time” were also observed by the report’s author (ibid.).

Seneca Manor is a part of the City of Seneca Gardens, a sixth class city that has posted historical information about its origins and development on the city website.⁷⁴ The city has actively promoted the preservation, maintenance, and enhancement of its public and private tree canopy over the decades, including the area originally platted as Seneca Manor. The mature street trees along Valletta Rd. (noted in the draft report as exhibiting “some uniformity of high canopy oak trees,” p. 78) are a particularly prominent, though by no means, unique display of vegetative elements that contribute to the garden setting of the neighborhood. PFTT submits that the vegetation in Seneca Manor is contributing.

3.7 Kingsley

Kingsley is within the narrow APE, as well as the full APE. Under FAA’s initial direction for the Bowman Field Safety Program (compliance with TERPS departure profile guidance), the mature tree canopy in this historic neighborhood and small city would have been substantially harmed. Under the FAA’s current instructions for this project, announced in a May 15, 2013 letter from Hanson Engineering to area property owners, there are no trees identified in the only mitigation alternative under consideration by FAA (tree removal). No aviation easements are proposed for the runway approach surface evaluation; easements would have been required if the TERPS departure surface was still the operative profile. However, it is erroneous to conclude, as the draft report does (p. 85), that Kingsley will not suffer adverse effects from the tree removal program; it will. As noted by Kingsley resident Phyllis Hawkins in the June 24th meeting, there will be adverse visual effects from the loss of mature tree canopy in other surrounding historic gardens suburbs.

Similar to the evaluation of other neighborhoods in the draft CRE, Kingsley is recommended for eligibility under Criterion A (community planning and development) and C (architecture and design) (p. 84), and is ascribed a period of significance from 1926 to 1964. It is curious that Kingsley is the only neighborhood for which an end year of significance dates to 50 years prior to the date of the draft CRE. PFTT agrees with this approach (although it needs to be updated to 1965), and has noted elsewhere in these comments that the endpoint of the period of significance for *all* resources evaluated in this report should date back to at least 1965, 50 years

⁷⁴www.cityofsenecagardens.com/history.htm.

from the “current” purpose and need for the undertaking. Why was Kingsley singled out for an advancement of the end period of significance to 1964/65, when the other historic neighborhoods end year of significance were terminated the year of approximate completion of development?

The draft report notes that Kingsley “retains its distinctive park-like setting of curvilinear streets, public spaces, sidewalks and setback[s]” and the “high degree of architectural integrity” (p. 85). Unlike the other residential neighborhoods, the report does not address whether there seems to have been an intentional design element in the original development specific to vegetation nor does it evaluate whether the “type” and “overall height” of the trees are character-defining. Kingsley’s good fortune in this regard is the happenstance of a 1930 aerial photo, shot from an oblique perspective, which gives a clear view of the street trees in Kingsley some five years after the plat recordation (Fig. 3.76, p. 88). However, the draft eligibility recommendation does not expressly identify the vegetation element of Kingsley’s landscape as contributing. Our view is that the neighborhood-wide vegetation, including trees, is contributing and needs to be explicitly acknowledged in the final CRE. Nor does the evaluation include the landscapes developed in private yards, and the conscious work of the City of Kingsley over the decades to perpetuate the treescape in public and private spaces. Mr. Chris McCoy, Kingsley City Commissioner, described some of the city’s efforts to preserve and enhance the treescape.

The draft CRE (p. 84) also recommends National Register-eligibility under Criterion B, for association with the developer C.C. Hieatt of Consolidated Realty Company. As a measure of Hieatt’s influence, by 1925, the firm reported a total business of \$7,406,553 and, by 1926, Consolidated Realty Company claimed a net worth of over \$25 million.⁷⁵ Hieatt was prominent in the National Association of Real Estate Boards (NAREB) in the 1920s,⁷⁶ and, therefore, would have known J.C. Nichols, the important community builder in Kansas City noted in *Historic Residential Suburbs* for planned, garden suburb and country club developments. Hieatt also ensured that land conveyances within Kingsley contained deed restrictions, consistent with the deed restrictions imposed upon his earlier development, Strathmoor Village.⁷⁷ A conveyance on March 27, 1928 for lots 66 and 67, for example, specified allowable exterior materials for cladding and roofs; specified front and side yard setbacks, front setbacks of vegetable gardens (at least 10 feet from the front building line), maximum heights of the primary structures, and size limits on outbuildings; authorized the construction of fences of vegetation or made of wire.⁷⁸ Racial restrictions were also included in a clause (l) that prohibited properties from being “sold, rented or leased to or occupied by any person or persons of African descent.”

⁷⁵The 1925 revenues were reported in “Realty Company Names Officers,” *Louisville Courier-Journal*, Jan. 15, 1926, while the 1926 net worth of the firm appears in a *Louisville Courier-Journal* advertisement that ran Mar. 5, 1926 for First Mortgage Bonds guaranteed by Consolidated Realty Company.

⁷⁶Hieatt drafted NAREB’s 1926 policy on legislation and taxation in the states of the U.S., which was approved at the mid-winter session in New Orleans in January 1926. “Realtors OK Hieatt Plan of Taxation,” *Louisville Courier-Journal*, Jan. 22, 1926.

⁷⁷*Strathmoor Village, Kentucky Historic Resources Group Survey Form*, prepared by R. Kennedy and J. Ryall, p. 14 of 17. However, per the deed restrictions, Kingsley’s minimum required investment per house construction was \$5,000.00 to \$6,000.00, while Strathmoor Village’s was \$4,000.00.

⁷⁸Jefferson County Deed Book 1326, 405-408.

3.8 Seneca Village

The text does not identify the number of trees proposed for removal in the narrow APE. Although it is difficult to discern in Figure 1.6 of the appendix, it appears that at least thirty-six (36) mature trees are targeted for removal. Avigation easements will be newly sought for twenty-three (23) homes in Seneca Village. Although the draft CRE states that four (4) parcels are encumbered by existing easements (p. 96), Figure 1.6 seems to reflect at least nine (9) residences encumbered by avigation easements (relevant to cumulative effects).

Similar to the evaluation of other neighborhoods in the draft CRE, Seneca Village is recommended for eligibility under Criterion A (community planning and development) and C (architecture and design) (p. 95), and ascribes a period of significance for this residential development from 1947-1954. As noted elsewhere, the ending period of significance should be advanced to at least 1965, dating back 50 years from the “current” purpose and need for the undertaking. With respect to the initiation of the period of significance, the development was platted in 1929 (Fig. 3.89, the original plat, illustrates the promotion of “Seneca Park,” across Taylorsville Road from the proposed development and the proximity to the “interurban railway (Jeffersontown Division)”). However, the draft CRE states that “the historic homes were built between 1947 and 1954” (p. 95). Did the research reveal any particular reason for the deferred period of development for this ostensibly streetcar-era suburb? What do the Sanborn Maps and City Director research show regarding any potential prior uses between the plat recordation date and 1947?

The text further notes that key features of the original layout still exist (regularly spaced lots, uniform setbacks, pedestrian and vehicle circulation features). Similar to the other neighborhoods, the report concludes that there was not an intentional design element in the original development specific to vegetation and that the “type” and “overall height” of the trees are not considered to be a contributing element of the neighborhood (p. 96). The report also states that some “lesser percentage of plantings” (unspecified as to type of plantings) appear to have developed “organically” (e.g., along fence rows) or in “unmanaged areas” and represent the “taller growing variety” (ibid). “Plantings” by individual property owners over time are were also observed (ibid.). PFTT submits that the vegetation in Seneca Village is contributing.

3.9 Seneca Village No. 2

The text does not identify the number of trees proposed for removal in the narrow APE. Although it is difficult to discern in Figure 1.6 of the appendix, it appears that at least ten (10) mature trees are targeted for removal. Avigation easements will be sought for nine (9) parcels in Seneca Village No. 2, where there are none currently.

The text notes the predominance of Gunnison housing;⁷⁹ however, the architectural styles of the houses are not described. As noted in *House in A Box*, Gunnison design began with

⁷⁹Although the select photos that are found at pp. 105-112 show houses with brick exteriors, which certainly was not a feature of a Gunnison house, at least in original construction.

traditional architectural styles, such as Cape Cod and Colonial Revival.⁸⁰ Starting in January 1951, Gunnison added a ranch-style design in five sizes, two and three bedrooms, in the \$7,000 to \$10,000 range.⁸¹ The draft CRE needs to provide some overview of architectural styles of these pre-fabricated homes, as well as documenting individual styles in the required KHC survey forms.

Similar to the evaluation of other neighborhoods in the draft CRE, Seneca Village No. 2 is recommended for eligibility under Criterion A (community planning and development) and C (architecture and design) (pp. 102-103), and ascribes a period of significance for this residential development from 1951-1960. As noted elsewhere, the ending period of significance should be advanced to at least 1965, dating back 50 years from the “current” purpose and need for the undertaking. The text further notes that key features of the original layout still exist (regularly spaced lots, uniform setbacks, pedestrian and vehicle circulation features). Similar to the other neighborhoods, the report concludes that there was not an intentional design element in the original development specific to vegetation and that the “type” and “overall height” of the trees is not considered to be a contributing element of the neighborhood (p. 103). PFTT submits that the vegetation in Seneca Village No. 2 is contributing.

3.10 Outparcels

The “outparcels” described in this section consist of five properties on the north side of Taylorsville Rd., within the draft APE for Runway 6. The building at 2615 Taylorsville Rd. was built “circa 1950s” (p. 114) and is now an office building; it appears to have been built within the Seneca Vista platted development. The brick buildings at 2605, 2609, and 2613 Taylorsville Rd. and 2542 Gladstone Avenue (which all appear to have also been built within the Seneca Vista platted development) were built “circa 1960s” as multi-family housing. The CRE concludes that none of these outparcels have “significant historical association” or possess “significant architectural merit” and recommends a National Register-ineligibility determination on all five properties (ibid).

However, it is unclear why the multi-family buildings above were deemed non-contributing when the CRE recommends National Register-eligibility status for the post-WWII, brick construction, multi-family residential buildings in McCoy Manor (2634, 2638, 2644, and 2646 McCoy Way, see p. 75), and Seneca Village No. 2’s Bowman Manor Apartments (now condominiums) in the 3400 block of Taylorsville Rd. (see p. 109). The CRE argues, at least with respect to the Seneca Village No. 2 units, that they were constructed “as part of the original development” of the platted neighborhood (p. 102). There is no evidence in either the plat for McCoy Manor or Seneca Village No. 2 that the particular lots were consciously platted for multi-family use, nor is it necessary for that to be the case for the units to have attained their own historic significance.

⁸⁰Johnson, Cynthia E. and Rachel Kennedy. 2006. *House in a Box: Prefabricated Housing in the Jackson Purchase Cultural Landscape Region, 1900-1960*, p. 39.

⁸¹Photograph and caption, *Louisville Courier-Journal*, Nov. 17, 1950, Section 3, p. 8.

Instead, it appears that all of these units were likely built in response to FHA-assisted financial incentives (particularly, Section 608 of the National Housing Act) to promote the construction of rental housing during the 1950s and early 1960s for veterans returning from WWII and the Korean War. Coupled with the scarcity of “suitable” building sites and the costs for demolishing existing homes, builders sought whatever infill lots they could find,⁸² particularly on transportation arteries.

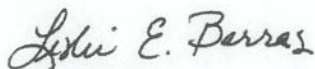
In addition to the multi-family units in the CRE, several other illustrative examples of historic affordable 1950s and 1960s apartments and duplexes exist in Louisville and should be used in the evaluation of all of the Bowman Field-area units. The National Register-listed Arcadia Apartments were constructed in 1950-51 in the streetcar-era Taylor-Berry neighborhood (southwest Louisville), assisted by Section 608 mortgage insurance.⁸³ Although these apartments constitute a larger complex, the commonality to the Taylorsville Road/Gladstone Avenue housing is that the infill “stands in contrast” to the neighboring structures “in terms of building stock and site placement.”⁸⁴ Similarly, and smaller in scale than the Arcadia complex, the “Brownsboro Cottages” in Clifton (2018-2026 Brownsboro Road) were constructed in 1950 as five “demountable” duplexes (possibly Gunnison prefabricated structures) on one of the few remaining unbuilt lots in the 400-acre neighborhood, a narrow strip of land at the base of a rocky cliff. All five duplexes (now in commercial use), have been designated as contributing to the Clifton Historic District, a predominantly Victorian-era neighborhood of quite different building styles and lot development. In summary, rather than evaluate these properties as isolated “outparcels,” the CRE should identify them in the originally platted neighborhood (Seneca Vista) in which they were later built, or as part of a larger suburban historic district, and address them in the context of post WWII-era housing.

With respect to the now-commercial office building at 2615 Taylorsville Road, what “archival research” (p. 114) was conducted to determine its origins and use? Were City Directories or Sanborn maps evaluated and, if so, what information did these sources provide?

Closing

Plea For The Trees appreciates the opportunity to serve as a consulting party and to contribute our own research and knowledge to the identification and evaluation of the cultural resources in the narrow (and full) APE. We look forward to reviewing the next draft of the CRE report and trust that our comments will be reflected in the next iteration. Please use my email lebarras@gmail.com or phone (502-298-1505) to reach me.

Sincerely,



Leslie E. Barras

⁸²“1,000 New Lower-Rent Apartments in Louisville ‘Wouldn’t Hurt the Market A Bit,’ F.H.A. Official Says,” by Grady Clay. *Louisville Courier-Journal*, Oct. 30, 1949.

⁸³Weeter, Joanne. *Arcadia Apartments. Nomination to the National Register of Historic Places*. 2010.

⁸⁴*Ibid.*, p. 3.