NPS Form 10-900 OMB No. 1024-0018

United States Department of the Interior
National Park Service

SG-706

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form.* If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

RECEIVED
JAN 20 2017
Natl. Reg. of Historic Places
National Park Service

1. Name of Property

Historic name: Cumberland Towers
Other names/site number: _____
Name of related multiple property listing:
N/A
(Enter "N/A" if property is not part of a multiple property listing

2. Location

Street & number: 311 E. 8th Street
City or town: Little Rock State: AR County: Pulaski
Not For Publication: ☐ Vicinity: ☐

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this X nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property X meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

___national ___statewide X local

Applicable National Register Criteria:

X A ___B ___C ___D

_____

Signature of certifying official/Title: **Date**

Arkansas Historic Preservation Program

State or Federal agency/bureau or Tribal Government

In my opinion, the property ___ meets ___ does not meet the National Register criteria.

_____

Signature of commenting official: **Date**

Title : **State or Federal agency/bureau or Tribal Government**

4. National Park Service Certification

I hereby certify that this property is:

✓ entered in the National Register

___ determined eligible for the National Register

___ determined not eligible for the National Register

___ removed from the National Register

___ other (explain:) _____

Signature of the Keeper

3.7.2017
Date of Action

5. Classification

Ownership of Property

(Check as many boxes as apply.)

Private:	☐
Public – Local	X
Public – State	☐
Public – Federal	☐

Category of Property

(Check only **one** box.)

Building(s)	X
District	☐
Site	☐
Structure	☐
Object	☐

Cumberland Towers | Pulaski County, AR
Name of Property | County and State

Number of Resources within Property
(Do not include previously listed resources in the count)

Contributing	Noncontributing	
1		buildings
		sites
		structures
		objects
1		Total

Number of contributing resources previously listed in the National Register 0

6. Function or Use
Historic Functions
(Enter categories from instructions.)
DOMESTIC – Multiple Dwelling

Current Functions
(Enter categories from instructions.)
DOMESTIC – Multiple Dwelling

7. Description

Architectural Classification
(Enter categories from instructions.)
MODERN MOVEMENT – International style

Materials: (enter categories from instructions.)
Principal exterior materials of the property: Walls: Concrete, Glass
Roof: Asphalt

Narrative Description
(Describe the historic and current physical appearance and condition of the property. Describe contributing and noncontributing resources if applicable. Begin with **a summary paragraph** that briefly describes the general characteristics of the property, such as its location, type, style, method of construction, setting, size, and significant features. Indicate whether the property has historic integrity.)

Summary Paragraph

The Cumberland Towers is an 11-story International Style residential tower located on a two-acre city block, approximately three quarters of a mile south of the Little Rock downtown. Built in 1974 as public senior housing, the property is “a tower in the park,” which consists of high-rise domestic buildings set in large landscaped sites. Historically, the surrounding neighborhood was predominately single-family housing, but today is more diverse with a mix of commercial and residential. The balance of the site is a parking and lawn. The tower itself is steel frame, best understood as two overlapping blocks each 130 feet east and west and 50 feet north and south. The exterior has a stuccoed brick skin with vertical definition created by paired full height recessed windows. The interior has a ground floor with lobby, offices, library, and community rooms and maintenance space. Floors two through 11 are similar with a double-loaded corridor. Typical finishes include vinyl composite tile floors and baseboards, gypsum-board walls, acoustic tile and gypsum-board ceilings, tile, and concrete floors. In total, the building has 178 units, including 106 studios, 68 one-bedrooms, and four two-bedrooms. The building is in good condition with a high degree of integrity.

Narrative Description

Setting: Cumberland Tower is located in downtown Little Rock, three blocks east of Main Street and two blocks west of MacArthur Park. The area was historically single-family residential but today contains more commercial and institutional uses. The site is bounded by 8th Street at the south, 9th Street at the north, Cumberland Street at the west, and Rock Street at the east. Cumberland is a one way southbound street with two traffic lanes and parking on both sides of the street; Rock Street is similar, but north bound. Eighth Street is one way westbound with three traffic lanes. Ninth Street is two-direction with two lanes of traffic in each. South of the property is the First Lutheran Church, a low-rise apartment building, and a single-family residence. To the southwest is the Second Baptist Church with a surface lot directly to the west. To the north there are two low-rise apartment buildings. To the east are one- and two-story single-family homes.

Site: The two-acre site is a full city block, roughly 300 feet square. The tower is oriented east-west. It is set on the parcel toward the west and slightly to the south. The perimeter is lawn with a modern four-foot-tall metal-rail fence. At the north and south are parking lots. Along the east are mature trees in a park-like setting with a modern gazebo. There are two additional lawns located at north and south edges of the block. Access to the main entrance is from Cumberland Street at the west. The north parking lot is also accessible from Cumberland Street, while the south parking lot is accessible from Rock Street.

Structure: The site contains a single building with a reinforced-concrete frame, which is a rectilinear 11-floor tower built on grade. In form, the building is best understood as two overlapping rectangular masses, roughly 130 feet on the east-west axis and 50 feet on the north-south axis. The two masses meet at the center of the east-west axis. The west mass is set to the north of the east. The building contains a metal-panel mansard roof.

Exterior: Cumberland Towers is rectilinear in form and best understood as an example of the International Style of architecture. Materials are consistent on all four elevations with stucco over brick skin and vertical definition achieved by full-height recessed paired sliding windows. The north and south elevations are approximately identical, with the primary difference being the location of the main entrance located centrally at the north elevation. Similarly the east and west elevations are identical.

Each section of the north and south elevations consists of a flat stuccoed-brick plane. Fenestration is consistent throughout and consists of full-height glazed aluminum-frame sliding doors recessed to allow a shallow balcony. These windows are paired across four bays, while the outside bays are a single window.

North Elevation: The rectilinear north elevation is rhythmically defined by flat stucco vertical members which breaks the massing into 11 bays. Ten continuous stucco columns, painted a darker color than the surrounding stucco, articulate the bays. The elevation is further divided into two sections: a western section composed of five bays, which is set back from the eastern section of six bays. Vertically, the building is a modern expression of the classical base, shaft, and capital form, with the first floor comprising the base.

The first floor contains either single or paired recessed divided aluminum and glass windows in each bay. Where the windows are paired, a stucco column, painted in a color darker than the surrounding stucco divides the windows and functionally articulates each unit. The primary entrance is located in the easternmost bay of the set-back west section. The entrance is distinguished by a flat stucco canopy and features two sets of modern aluminum and glass doors, topped with transom windows. A stucco bulkhead which runs the length of the building divides the first floor from the upper floors. The upper floors contain recessed window bays and contain either paired or single aluminum and glass windows in each bay. The easternmost and westernmost bays in both sections of the building contain single windows, while all other bays contain paired windows. Each unit contains a terrace with metal railings. The top, 11th floor, expresses the capital of the building, painted a darker shade than the lower floors.

South Elevation: The south elevation is essentially identical to the north elevation, but the first floor at this elevation is set back from the building plane. In addition, where the columns and bulkhead above the first floor are painted stucco, the remainder of the elevation contains painted brick.

East Elevation: The east elevation is two bays wide, composed primarily of painted brick with no fenestration. Stucco outlines the perimeter of both bays. A central painted concrete pillar which rises above the roof line divides the south bay. The first floor contains a secondary entrance in the south bay, which features a modern single-panel metal door.

West Elevation: The west elevation is essentially identical to the east elevation, but contains an additional secondary entrance in the south bay. The entrance features modern aluminum and glass double doors.

Interior: At the first floor, the building is accessible from the main entrance which opens onto a lobby located to the east of the entrance. A secondary entrance from the west elevation leads to the back of the lobby. Single panel wood doors in the lobby provide access to various amenity spaces including the meeting room, crafts room, and workshop rooms. Finishes in these spaces include vinyl composite tile floors, vinyl baseboard, painted gypsum-board walls and ceilings, and acoustic ceiling tiles. The meeting room also contains built-in wood shelving. The western section of the building contains a double-loaded corridor which accesses a series of offices, mechanical

rooms, a mail room, janitor closet, and men's and women's restrooms, as well as two two-bedroom apartment units. The corridor contains vinyl composite tile floors, vinyl baseboard, gypsum-board walls and ceilings and graspable wood guide rails. The offices and mechanical rooms contain vinyl composite tile floors, baseboard, and gypsum-board walls and ceilings. The restrooms contain tile floors and baseboard and gypsum-board walls and ceilings.

The upper floors are vertically accessible by two stairs located at the east and west ends of the building, as well as freight and passenger elevators located at the western wall of the lobby. The elevators contain metal surrounds. Stairs have concrete treads and risers with painted-steel railings.

Floors 2-11 are defined by a central double-loaded corridor which follows the "S"-shape of the building. Finishes within the units are consistent and include vinyl composite tile, baseboards, gypsum-board walls, gypsum-board ceilings, and modern kitchens and bathrooms. Each unit contains a terrace, accessible by aluminum and glass sliding doors.

Alterations: The building is in good condition with a high degree of integrity. Floor plans and public spaces are intact. Alterations are minimal, and are generally cosmetic. In select units, kitchens and bathrooms have been upgraded. Some of the ground floor public spaces have been repurposed without physical change.

8. Statement of Significance

Applicable National Register Criteria
(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- [X] A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- [ ] B. Property is associated with the lives of persons significant in our past.
- [ ] C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- [ ] D. Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations
(Mark “x” in all the boxes that apply.)

- [ ] A. Owned by a religious institution or used for religious purposes
- [ ] B. Removed from its original location
- [ ] C. A birthplace or grave
- [ ] D. A cemetery
- [ ] E. A reconstructed building, object, or structure
- [ ] F. A commemorative property
- [X] G. Less than 50 years old or achieving significance within the past 50 years

Areas of Significance
(Enter categories from instructions.)
POLITICS/GOVERNMENT

Period of Significance
1973-1974

Significant Dates
1973-1974

Significant Person
(Complete only if Criterion B is marked above.)
N/A

Cultural Affiliation
N/A

Architect/Builder
WITTENBERG, DELONY, & DAVIDSON

Statement of Significance Summary Paragraph (Provide a summary paragraph that includes level of significance, applicable criteria, justification for the period of significance, and any applicable criteria considerations.)

Cumberland Towers was constructed in 1973-1974 as public housing built specifically for the elderly by the Little Rock Housing Authority (LRHA). The property is locally significant under Criterion A for POLITICS/GOVERNMENT. Specifically, Cumberland Towers, along with Parris and Powell Towers, was developed directly in response to a shift in federal policy for public housing for families to targeting senior citizens. This policy shift dates to the Housing Act of 1956, which gave funding priority to senior housing construction and resulted in the first federally-funded senior housing projects in the country. Prototypical design adhered to Corbusier's "Tower in the Park" concept with efficiencies and one-bedroom units stacked in a single high-rise building surrounded by a larger green space. These projects were typically located in residential areas at the perimeter of downtowns. Social programs and services were integral to the senior housing projects. This policy shift began with the Eisenhower administration with the passage of the Housing Act of 1956. Upon election, the Kennedy Administration redoubled efforts with the passage of the Housing Act of 1961. The combination of the housing acts resulted in a significant boost in federal funding for affordable senior housing. The policy was further developed during the Johnson Administration as part of his Great Society platform. The overall trend resulted in several hundred senior housing projects around the country. The trend ended in 1973 when the Nixon Administration placed a moratorium on new construction and shifted federal policy to replace publically-constructed and managed housing projects to a public housing voucher system. Cumberland, along with Parris and Powell, are the only examples of this historic context in Little Rock.

Narrative Statement of Significance (Provide at least **one** paragraph for each area of significance.)

History of the Building

In February, 1969, the *Arkansas Democrat* reported that the Little Rock Housing Authority (LRHA) has secured federal funding to plan the construction of 800-1,200 affordable apartments for the elderly and planned to develop three high rise towers.[1] As LRHA director Clifton Giles stated, "we think there is a great need for safe, decent housing for our senior citizens in Little Rock."[2]

The Housing Authority located the second of what would be three senior housing projects just east of Main Street in downtown Little Rock, in the area around MacArthur

[1] "Housing agency plans apartments for elderly." *Arkansas Democrat*. February 27, 1969. 6B.
[2] "HUD to Guarantee $4 Million To Build Housing for Aged," *Arkansas Gazette,* June 2, 1970. 3A.

Park.[3] In October of 1972, plans for a 180-unit high-rise apartment building for the elderly, located on a block bounded by Eighth, Ninth, Cumberland, and Rock streets, were first published.[4] The announcement came as the construction of Fred W. Parris Towers, the first of the three planned towers, was nearing completion.

Like its predecessor, Parris Towers, Cumberland Towers would provide 180 units in a modern tower that supported independent living. Floor plans were consistent on the upper floors. Units consisted of primarily efficiency studios and one-bedroom apartments, 111 and 64 respectively. These were of similar size with roughly 400 square feet. Kitchens open to the living/dining areas and located adjacent to the entrances. Bathrooms were located off the bedroom/sleeping area. The building also contained a limited number of two-bedroom units, two on the first floor intended for live-in management and four on the 11th floor, intended to be used by married couples or friends. All units included air conditioning and small balconies off the living rooms and bedrooms. Additional elements were designed with seniors in mind, such as the installation of waist-level electrical outlets and grab rails, and a warning system in each room so residents could summon help from the management office with the push of a button.

The building also featured a number of very specific spaces that demonstrated a holistic approach to senior housing design. These included a large ground floor divisible meeting room with adjacent full kitchen and kitchen storage, a craft room with kiln and workshop room with work benches. The maintenance supervisor also occupied a unit in the building. The project included a LRHA office in addition to on-site management offices.

The project architects were the Little Rock firm of Wittenberg, Delony & Davidson. The roots of the firm dated to 1919 when George Wittenberg founded their firm, focusing mainly on residential projects. One of his early major projects was a 1927 collaboration with architect John Parks Almand in the design and construction of Little Rock High School (the site of the Little Rock Nine integration crisis of 1957). At the time of construction, the $1.5 million school was one of the largest and most expensive in the country. Through the 1930s and 1940s the firm focused on military, collegiate, and commercial work, including the PWA-funded Robinson Auditorium in Little Rock. In 1959, the firm incorporated to become known as Wittenberg Delony & Davidson, Inc. School commissions made up the majority of the firm's work, followed by residential, commercial, and collegiate. In the 1960s, in addition to work with the LRHA, the firm won design awards for the Empire Life Building, the State Health Department Building, and the Arkansas State Hospital.

[3] Newspaper articles from the period state the Cumberland Towers was the third senior housing tower funded by HUD, with Powell Towers as the second. However, funding issues caused construction delays with Powell Towers, making it the third completed tower, not the second.

[4] Brenda Tirey. "High rise for elderly approved," *Arkansas Gazette*, October 11, 1972. 2A.

The Cumberland Towers project was funded by a loan from HUD for $3,241,000. The land was purchased for approximately $300,000. Funds not used for construction and land acquisition were to be used for administrative expenses and architect fee. LRHA repaid HUD through the sale of 40-year tax-free revenue bonds.

In October of 1972, preliminary plans for Cumberland Towers were approved and a rendering was published in the *Arkansas Gazette*. As of December of 1973, the building was 30% complete, and a drawing was published in the newspaper illustrating its appearance upon completion. A photograph of the building nearing completion published in May of 1974, was captioned "the 180-unit structure rises against the skyline," highlighting its prominent downtown location, and included descriptions of features that were designed specifically for the elderly, as was previously seen in Parris Towers.

Cumberland was completed in December of 1974, and tenants began occupying the units in May of 1975. A Sunday feature in the *Arkansas Gazette* in April of 1975, stated that the reservation list of apartments at Cumberland Towers was almost full. To qualify for lease, an applicant needed to be 62 years of age or handicapped under Social Security, could not have assets in excess of $10,000 or an annual income of over $4,200 (or $4,800 for a couple). Preference was given to Little Rock residents, followed by Arkansas residents.

The *Arkansas Gazette* article also described the senior-specific amenities throughout the building, such as wide door openings designed to accommodate wheelchairs, waist-level electrical outlets and light switches, and a push-button alarm system located in the bathrooms and bedrooms of each unit. The article stated that SCAT would operate a recreation and social program on the first floor, expanding the program already in place at Parris Towers. Lastly, the article declared that Cumberland Towers and Powell Towers, which was under construction, would be the last apartment buildings built by the LRHA, as legislation "changed the approach HUD is taking in providing housing for low income residents, and a method is being worked out where they can shop for existing housing and get assistance form the government," signaling the arrival of housing vouchers issued by HUD.[5]

Since completion, Cumberland Towers has remained under ownership and management of the housing authority with slight change.

Criterion A: Politics/Government

Cumberland Towers is locally significant under Criterion A for POLITICS/ GOVERNMENT. Specifically, Cumberland - along with Parris and Powell Towers - was developed directly in response to a shift in federal policy for public housing to targeting

[5] "Apartments for Elderly Get Final Check; to Open in May," *Arkansas Gazette*, April 20, 1975.

senior citizens. The following discussion consists of three components: 1) establishment of federal policy to create public housing for the elderly; 2) design parameters of urban senior public housing; and 3) senior public housing in Arkansas and Little Rock.

Public Housing for Seniors: Federal Policies

Perhaps surprisingly today, public housing built specifically for the elderly was largely non-existent until the 1950s. For much of America's history, the societal expectation was for family members to care for the elderly. During the Industrial Era, seniors with limited mobility and financial means were relegated to almshouses along with the mentally ill, orphans, and the physically disabled. As the 19th century progressed, the rise of charitable organizations and religious groups drew other groups and the more privileged elderly out of the almshouses and into institutions, hospitals, and other care facilities. By the 1920s the almshouses were overrun with the impoverished elderly. The almshouses came to embody the "distresses of abandonment, disgrace, poverty, loneliness, humiliation, and degradation."[6]

According to a United States Social Security Board from the 1930s, "the predominance of the aged in the almshouse is a sign of their increasing dependency." [7] Due to this rising concern over the fate of the elderly, and the rising poverty as a result of the Great Depression, the Federal government intervened for the first time in 1935 with the Social Security Act, as part of FDR's New Deal legislation. In order to eradicate the hated almshouses, the act stipulated that seniors living within almshouses could now receive federal pensions. However, by blocking almshouse residents from pensions, aged individuals in need of long-term care were forced to seek shelter in private institutions. While the almshouse was eradicated, this forced many seniors into unregulated sanitariums. The proliferation of the sanitariums made it clear to lawmakers that not all elderly individuals could be supported in their own homes with monthly federal pensions; many needy older adults required long-term care and additional financial assistance, including housing.

However, during this era, federal public housing policy targeted low-income families; the public sector was generally unresponsive to the needs of seniors for studio and one-bedroom units. Seniors were left to fend for themselves in the private marketplace, often occupying deteriorated downtown hotels.[8] The first known public housing project specifically for the elderly was the Fort Greene Houses in Brooklyn, New York, built in 1942 and funded through state bond funds.[9] When the Truman Administration passed the Housing Act of 1949 which created urban renewal, one of the programmatic

[6] Adapted from: Foundation Aiding the Elderly, "The History of Nursing Homes." http://www.4fate.org/history.pdf
[7] *Ibid.*
[8] J. Kevin Eckert, *The Unseen Elderly: A Study of Marginally Subsistent Hotel Dwellers*, San Diego, CA: The Campanile Press, San Diego State University, 1980, p. 15.
[9] "Public Housing For the Elderly," in *Progressive Architecture*, March 1961, p. 144-152.

requirements required urban renewal agencies to replace any lost housing units. However, across the board, early urban renewal programs failed to meet this goal and the loss of downtown hotels as single resident occupancy buildings exacerbated the plight of independent seniors. As described by Kevin Eckert in his book *The Unseen Elderly*, "the downtown elderly, among the most limited body in income and coping resources, find themselves with fewer housing options and supportive neighborhoods."[10]

Simultaneously, demand for senior housing was also rapidly growing, with a rapidly growing senior population. In 1900, the percentage of older Americans was only 4% of the general population. In 1950, seniors represented 8% of the overall population. By 1970, it was 10% and in 1980, 11.5%. The majority of seniors, 14.6 million or 73%, lived in urban areas with 6.8 million in highly urbanized central cities. As characterized by sociologist Margaret Clark, "inner city elderly are, both physically and psychologically sicker than their age peers in other groups. They have a harder time surviving . . . like the rats that are often their only company." [11] The *Oregonian* described similar situations in Portland: "thousands of Portland's senior citizens, living in unhealthy, drafty buildings, with unsafe stairways; buildings with vermin, rodents, debris and filth, buildings with inadequate plumbing or situations where too many people share a dirty, poorly lighted toilet facility."[12] In 1960, average social security income nationwide was $99.33 per month with rent often taking up to 50% of that income.

The Eisenhower Administration became increasingly aware of the issue and formulated a federal response. In 1956, Eisenhower established the *Federal-State Council on Aging* to more effectively coordinate policy and to help determine the "resources of the States and of the Federal government that can be mobilized in an attack on the problems of the later years." A group gathered for a three-day conference in Washington, DC, to explore solutions for seniors that could benefit from coordination of Federal and State Resources. Two years later, in 1958, Eisenhower signed the White House Conference on Aging Act create a national citizens' forum to focus attention on the problems of older Americans and to make consensus policy recommendations on how to enhance the economic security of this demographic group. This directly led to the 1961 White House Conference on Aging which called on Congress to expand public housing for seniors.[13]

Most importantly, Eisenhower signed the Housing Act of 1956 into law. This law gave priority to the development of public housing for seniors. It also modified eligibility requirements to allow one- and two-person households if the occupants were over 65 and increased construction allowances per room for units of one or two rooms intended

[10] The Unseen Elderly, p. 18.
[11] The Unseen Elderly, p. 17.
[12] *The Oregonian*. January 17, 1960. 37.
[13] United States Senate, Special Committee on Aging, "Basic Policy Statements and Recommendations." *The 1961 White House Conference on Aging*. Washington, DC: U.S. Government Printing Office, 1961.

to cover the higher costs of smaller rooms. Unfortunately, despite these initiatives, by March 1960, only 681 elderly public housing units had been built nationally. One of the first was a high rise in Somerville, Massachusetts. [14]

Beginning with the election of John F. Kennedy, public housing programs generally benefited from a shift in the political climate toward liberalism and gradual acceptance of the policy by the real estate and building industries. A keystone Kennedy initiative was the Housing Act of 1961 which provided $4.88 billion in loans and grants to communities around the country for varied forms of public and subsidized housing. Robert Weaver, the administrator of the Housing and Home Finance Agency (HHFA), which was responsible for administering these funds, was deeply concerned with the future of America's seniors and prioritized elderly housing policy. The Housing Act of 1961 not only expanded federal funding for low-income senior public housing, but also liberalized financing for seniors to purchase their own homes. The 1961 Act also provided funds for seniors to rehabilitate their own homes, and funding for nursing homes. In addition, the federal program of direct loan to non-profit organizations for the construction of housing for elderly was expanded.[15] A stimulus from the Public Housing Administration to local housing authorities granted an additional $10 per month per unit for elderly housing units.[16] As a result, senior housing increased exponentially across the U.S. For context, the HHFA financed as many projects in 1961 as the previous five years combined.[17]

President Lyndon Johnson was more aggressive in making urban issues one of the centerpieces of his administration. He elevated HHFA to a cabinet level position, forming the Department of Housing and Urban Development (HUD), and directed Congress to expand government housing programs. Under Johnson's leadership, the Housing Act of 1965 was passed, which authorized 60,000 units of public housing over the next four years. This was followed by the Housing and Urban Development Act of 1968 which set an ambitious goal of 26 million new dwellings, including 6 million new units for low and moderate income households over the next 10 years. Accordingly, average public housing starts rose to more than 35,000 in the 1960s and by 1970, the total number of public housing units built, under construction, or planned had reached 1,155,300.[18]

[14] "Public Housing For the Elderly," in *Progressive Architecture*, March 1961, p. 144-152.

[15] *Housing Act of 1959*, Section 202.

[16] "Role of Government in Housing for Senior Citizens." Address by Sidney Spector, Assistant Administrator Housing for Senior Citizens, Housing and Home Finance Agency to the Western Gerontological Society. San Francisco, California. April 28, 1962. 7.

[17] "Role of Government in Housing for Senior Citizens." Address by Sidney Spector, Assistant Administrator Housing for Senior Citizens, Housing and Home Finance Agency to the Western Gerontological Society. San Francisco, California. April 28, 1962. 2-3.

[18] Von Hoffman, Alexander, "History Lessons for Today's Housing Policy: The political Processes of Making Low-Income Housing Policy." In *Housing Policy Debate*, New York: Taylor & Francis, 2012, p. 314-315.

Design of Elderly Public Housing, 1956-1973

Unlike public housing for families and veterans, which the federal government had been subsidizing since World War II, elderly housing presented a new set of issues and design challenges including not only affordability, but also the special needs of elderly populations.

Under the aforementioned 1961 Housing Act, elderly housing aimed to avoid the feeling of an institution, while minimizing isolation among senior tenants. To avoid isolation, projects included community centers and social rooms within housing complexes.[19] Organizations such as the AFL-CIO which advocated for the elderly, recommended, "sponsoring such housing that dwellings for the elderly should contain special features and equipment required by the elderly, including adequate community facilities and services, insofar as possible should be integrated into the community as a whole."[20] In addition, elderly housing was viewed as a "new" problem, which would need a certain degree of flexibility in its implementation. There was also recognition that while there was a high demand for elderly housing in many US cities, elderly housing projects should be more accessible to amenities and neighborhoods.[21] This ideology stood in opposition to low-income public housing from the same period, which was often massive in scale (containing a higher density and larger number of units) and isolated in location.

The HHFA laid out guidelines for the design of new elderly housing in a 1962 internal memo prioritizing housing "designed and located to promote the dignity and maximum independence of the individual older person." The memo further stipulated that housing for seniors cannot be molded to a single pattern, but should offer a wide range of opportunities for the maximum exercise of free choice of living arrangement. Urban, rural, and suburban housing, therefore, would be designed to fit with the surrounding fabric.[22] The HHFA also stressed design with an emphasis on physical safety including such features as the avoidance of steps and thresholds; easy-to-reach kitchen equipment; sit-down sinks; non-skid floors; sit-down tubs and showers; wider doors and corridors; safety and grab bars in bathrooms; higher heat control; waist-level ovens and safety shut-offs on stoves; accessible wall plugs; and dwelling units whose size and design permit easy maintenance. HHFA "encourage[d] imaginative design, adequate size of units, and elements of beauty in architecture and furnishings…this will go toward boosting one's evaluation of self and induce a sense of pride and belongingness." [23]

[19] "The 1961 White House Conference on Aging, Basic Policy Statements and Recommendations." May 15, 1961. U.S. Government Printing Office. Washington: 1961, 67. 72.

[20] Statement of Boris Shishkin Secretary, Housing Committee, AFL-CIO before the Housing Subcommittee on Banking and Currency. July 11, 1962.

[21] "The 1961 White House Conference on Aging." 70.

[22] Memorandum: Housing for Seniors. From Sidney Spector to Robert C. Weaver, Administrator. Housing and Home Finance Agency. July 25, 1962.

[23] Memorandum.

While HHFA accepted varying building forms, the architectural community was coalescing around the high rise form in urban areas. As early as 1957, the industry, in the influential publication, *Progressive Architecture*, saw Modernist high rise apartments generally as the solution to urban growth, particularly within the framework of urban renewal. Rather than the chaos of perimeter housing developments, the editors of *Progressive Architecture*, the high rise offered "controlled multiple housing," emphasizing the livability of high rise providing natural light and air with panoramic views in response to limited land availability.[24]

This focus on the high rise in the architecture community extended to senior public housing projects. In 1961, as HHFA was offering its design guidance on ideal housing for seniors, *Progressive Architecture* focused specifically on "Public Housing for the Elderly." The article begins with a detailed survey of the senior housing problem - 16 million seniors 65 and older with 51% single. Most of the population faced physical, emotional, social and economic problems, and all were anticipating diminishing financial and physical health. The article then details the housing requirements, repeating much of the HHFA guidance and emphasizing improved heat, light and sound insulation. Largely focused on eliminating stairs, the authors conclude only two types of buildings are appropriate: one-story cottage-style and the high-rise building. The authors also note the importance of residents remaining within their current neighborhood, though they anticipated this would require zoning modifications.[25]

That same issue of *Progressive Architecture* offered "One Solid Achievement" as the prototype for elderly housing. Conceived in 1956 and completed in 1959, Victoria Plaza in San Antonio, Texas, is a nine-story, T-shaped tower with 185 units located on a 2+-acre site with fountained gardens and parking. Through interviews, architects determined that potential residents did not favor cottages on the edge of town, but rather wanted to live near the center of the city. The high rise design also offered "the advantages of superior natural ventilation and separation from street sounds."[26] The first floor incorporated spaces for health, recreation, a library, and a senior counseling center. Access to the upper floors was via paired elevators to spacious yet flexible units.

The next year, the *Association of Schools of Public Health Journal* offered an article entitled "Housing for Senior Citizens" by E. Everett Ashley.[27] It too offered Victoria Plaza as "an outstanding example" of what senior housing should look like. In particular, it noted the presence of the social programming and recreational/social areas that included a community kitchen, library and counseling office.

[24] "Apartment houses their new significance," in *Progressive Architecture*, April 1957, p. 107-125.
[25] "Public Housing For the Elderly," in *Progressive Architecture*, March 1961, p. 144-152.
[26] "Public Housing For the Elderly," in *Progressive Architecture*, March 1961, p. 144-152.
[27] E. Everett Ashley, "Housing for Senior Citizens." In *Public Health Reports (1896-1970),* Vol. 77, No. 5 (May, 1962), pp.398-400.

Similar high-rise senior public housing appeared throughout the United States. The first such project in the Pacific Northwest was Northwest Towers. Conceived in 1960, the high rise was completed in 1964. The 150-unit, 13-story project was lauded by HHFA, HEW and PHA officials as exemplary and warranting replication. Similar examples can be found in cities throughout the country: Atlanta's 1966 17-story Palmer House, Seattle's 1967 17-story Jefferson Terrace, Chicago's 1968 nine-story Drexel Square, Baltimore's 14-story Lakeview Tower and Philadelphia's 1973 nine-story Germantown House, to name but five of hundreds. Of the initial projects constructed under the Housing Act of 1961, high-rise, elevator buildings prevailed.[28]

For its part, the editors of *Progressive Architecture* revisited senior housing in 1967. This time, the 15-story George Crawford Manor in New Haven, Connecticut, was presented as "making architecture work for the elderly in an urban environment." One resident was quoted as saying "I went from Hell to Heaven when I moved from the boarding house to Crawford Manor." "The overwhelming opinion of the residents is that Crawford Manor is an exciting place in which to live. The garden to the rear will relieve some of the pressure for social space during the summer and the enclosure, with its handsome wall, provides a usable private green space in the middle of the city."[29]

In addressing this form of public housing, it is important to draw a distinction between the high-rise designs for families and those for seniors. High-rise designs for families from this era are epitomized by the infamous Pruitt-Igoe public housing project in St. Louis, designed by Minoru Yamasaki. Competed in 1955, Pruitt-Igoe consisted of 33 11-story apartment buildings on a 57-acre site. In total, the complex had 2,870 apartment units. While the architecture was hailed, crime and decay resulted in its demolition in 1971. In contrast, the high-rise paradigm for seniors was typically limited to a single building and typically set on a lawned site. In addition, seniors were viewed as more docile tenants, who tended to stay within their apartments and had fewer visitors than families. The difference in population allowed for housing authorities to control and actively manage the site.

Public Housing for the Elderly in Little Rock

Similar to most other communities in the country, Little Rock did not have senior public housing until late into the 20th century. Cumberland Towers, along with Parris and Powell Towers were the first projects. However, the LRHA had developed public housing for families displaced by urban renewal. The first public housing projects built under the redevelopment plans were Tuxedo Courts in 1951, and the 400 units of Joseph A. Booker Homes at the far southeastern city limits in 1953.[30] To this point,

[28] "Housing for Senior Citizens: A Report to Senator John Sparkman, Chairman of the Subcommittee on Housing, Senate Committee on Banking and Currency." The Housing and Home Finance Agency, Office of Housing for Seniors. February 1962. 17-18.

[29] "Houses and Housing The Elderly," in *Progressive Architecture*, May 1967, p. 124-134.

[30] Nelson, Robert C. "Little Rock Slum Work Hailed." *The Christian Science Monitor*. November 5, 1958, pg. 20.

the last public Little Rock public housing project was Hollingsworth Grove, built in 1955 for African-Americans families in east Little Rock. All of these projects were low-rise garden style apartments. By 1968, LRHA owned and operated 1,173 apartments, generally located in isolated neighborhoods.

With new legislation and new funding available in 1969, LRHA director, Clifton Giles, recognized a need for senior public housing in Little Rock. One of his first steps was an education tour with board members of projects in Hot Springs, Arkansas, and North Little Rock, Arkansas.

Hot Springs, a town roughly one-third the size of Little Rock, was home to Mountain View, a public housing project completed in 1967 and designed by Little Rock architects, Wittenberg, Delony & Davidson. That project consisted of two sites combining for 29 acres that included both family and elderly housing. The first site, 17 acres, was adjacent to the National Park and included an 11-story 120-unit senior housing tower adjacent to low-rise family housing. The second site mixed senior townhouses with family residences. The high rise in particular was well received in the low-rise town. As quoted in a *Progressive Architecture* article, "high rise" is ordinarily a derogatory term in Arkansas, yet the authors noted a poem on the community bulletin board, "Ode to Our High-Rise." The building leased quickly and was well-regarded by the tenants. Tenants said that they particularly liked the balconies, but also the mix of social spaces on the ground floor, including kitchen, club rooms and hobby area.

North Little Rock, located just cross the Arkansas River, is half the size of Little Rock. Here, three senior public high rise projects were constructed. The first was Campus Towers, completed in 1966 with seven stories and 71 units; it is located northeast of the town center in a predominately single-family residential area. The second was Heritage House, completed in 1967 with 11 stories and 171 units; it is located northwest and somewhat remote from the town center. At this time, Willow House was also under construction. Willow House was completed in 1969, with 12 stories and 215 units. All three units were similar in design and programming with high rise construction, double-loaded corridors, balconies with ground floor public spaces that include kitchen, recreation spaces, hobby and club rooms.

Subsequently, Giles took board members to San Antonio to see the Victoria Plaza senior housing project. Since construction in 1959, the high-rise had been hailed as a model by government officials, architects, planners and social scientists.

Afterward, the board submitted an application to HUD for 1,200 units in November of 1969. The federal government approved 600 of the units, and LRHA began design development and site selection for three towers[31]

[31] "Little Rock Opens First Elderly Public Housing," *Journal of Public Housing*, Vol. 29, No. 8, September 12, 1972.

In describing the proposed buildings, Giles described a state-of-the-art facility, one that went far beyond mere sheltering and very similar to successful Victoria Plaza in San Antonio and the North Little Rock paradigms. The proposed building would provide 180 units in a modernistic tower that supported independent living: units were compact: 400 square feet.

They were also considered eminently livable: an April of 1974 *Arkansas Gazette* article by Charles Allbright titled "How to Grow Old in High Rises," described daily life:

> *These are the old persons who live in tall apartment buildings put up specifically for them. The buildings are efficient, safe, afford inexpensive space to the occupants, and almost without exception they rise in places earlier abandoned by the ongoing community- withal, a near perfect blending of judicious land use and applied demographics, held solidly together by the mortar of public monies. High rises for the elderly are prized by the early systems evaluators as one of society's truly enlightened gestures toward its own.*[32]

Allbright went on to state that, "any argument that life-style in the high rise for the elderly might be reductive of personality, even of dignity, lacks relevance." The towers were a welcome solution to the increasing problem of inadequate housing for the low-income elderly population. The average rent of $34 included a new lifestyle that "almost exceeds comprehension." For many residents, living in the towers was the first opportunity in their lives to have access to an indoor toilet and running water, as well as air conditioning and an electric stove. "Most of the residents think it is just like living in a luxury high rise, except they can afford it.[33]

As discussed above, federal public housing policy shifted dramatically in 1973 from the construction and management of housing to a voucher system. Parris and Cumberland Towers were completed prior to this policy change; Powell was completed after. Regardless, these three properties represent the entirety of Little Rock's response to the federal policy for elderly public housing, a policy that spanned from 1956 to 1973.

CRITERION CONSIDERATION G - PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS

Cumberland Towers is significant as a local expression of federal policy to develop senior public housing between 1956 and 1973. While its date of construction is less than 50 years old, the property is associated with a historic trend that is and fully represents the historic values embodied in that trend.

In 1956, federal housing policy changed to accommodate and facilitate the construction of public housing for the elderly. Prior to that time, public housing focused on sheltering

[32] Charles Allbright, "How to Grow Old in High Rises," *Arkansas Gazette*, April 7, 1974. 4E.
[33] Charles Allbright, "How to Grow Old in High Rises," *Arkansas Gazette*, April 7, 1974. 4E.

families; while federal programs did not specifically exclude seniors, eligibility requirements generally precluded them as tenants. Beginning with the Housing Act of 1956, complemented by the Housing Acts of 1961 and 1965, and by the Housing and Urban Development Act of 1968, public housing for seniors not only became federal public policy, but received substantial funding that accelerated particularly after the 1968 HUD Act. Due to the application process to secure funding for planning, site acquisition, construction and occupancy, the pre-development period for most projects extended three or more years. This policy came to an end in 1973 when the Nixon Administration placed a moratorium on public housing construction.

The policy resulted in hundreds of similarly constructed high-rise senior housing projects throughout the country, conceived and built between 1956 to the mid-1970s. In Little Rock, this policy resulted in the construction of the Parris, Cumberland and Powell Towers.

While the policy was not proscriptive in design, it tended toward significant uniformity. Almost immediately, political, professional and academic opinion leaders hailed Victoria Plaza in San Antonio, conceived in 1956 and completed in 1959, as the model project. This was followed by accolades for similar high-rise projects at dedication ceremonies around the country, including a planned celebration of Northwest Towers in Portland by President Kennedy. Thus, in pursuing funding, agencies tended to replicate the Victoria Plaza model. When the Little Rock Housing Authority embarked on housing for the elderly, leadership made a point to visit Victoria Plaza prior to its grant application.

As illustrated by Victoria Plaza, the model senior public housing project, particularly in urban areas, was high-rise construction of 9-17 stories. They were located proximate to downtown or urban commercial areas, in predominately residential areas with single-family houses. Conceptually, the designs embodied Le Corbusier's notion of a "tower in the park" with a central rectangular high-rise building with limited ornamentation other than repeating balconies set in a surrounding larger landscaped green space. The first floor featured a smallish lobby leading to paired elevators, but also included substantial community spaces such as meeting rooms, hobby/recreation rooms, library, and a larger dining room with kitchen. Social rooms often were located to open onto the green space. The first floor also had programmatic space for social services, including health, legal and counseling. And not infrequently, the first floor included offices for the associated housing authority. The elevators provided access to the upper floors which were defined by a simple double-loaded corridor leading to efficiency and one-bedroom units; frequently, the efficiency units were stacked on one side of the building while one-bedroom units were stacked on the opposite. Buildings included a small number of two-bedroom units, and on-site housing for property maintenance or management. Often each floor had a laundry room. Units were compact, flexible and durable with large windows for light, ventilation and views; balconies were typical.

Cumberland Towers reflects all of the character-defining features of model senior housing. As noted, Little Rock public housing officials toured high rise projects, including Victoria Plaza. Cumberland Towers reflects Le Corbusier's "tower in the park" with 180 units set on a two-plus-acre site. It is located proximate to downtown but in a predominately residential neighborhood. The first floor is marked by community, social and hobby rooms. The upper floors are access by paired elevators which lead to a double-loaded corridor. Units are stacked with efficiencies on the north and one-bedroom units on the south. Each floor has a laundry room. Units are compact and flexible. It supports affordable independent senior living with a safety net to guard against social isolation.

The time frame for the historic context has hard temporal edges. It begins with the Housing Act of 1956 which authorized and prioritized senior public housing. The policy ends in 1973 with the shift in policy to a voucher system and a moratorium on construction, though projects which were funded and underway up to that point were completed. Relying on federal grant funding for project planning, site selection, design development, bidding and contracting, these projects universally had elongated pre-development periods of three plus years.

In Little Rock, only three buildings were constructed under this policy: Parris, Cumberland and Powell Towers. All are local and intact expression of that policy and building type, a model design with roots cemented in the mid-1950s. Conceptually, these properties are not indistinguishable from the models developed earlier in other parts of the country.

It should also be noted at least one building developed within this context has been determined to be significant and eligible for the National Register. That building was the Palmer House Apartments in Atlanta which was completed in 1966, and designed as a 17-story, 250-unit public housing project for the elderly. In 2008, Georgia Historic Preservation Division determined the then 42-year old building to be eligible for the National Register. That determination was based primarily on architectural values, though the Palmer House was emblematic of the senior public housing prototype.

CONCLUSION

Cumberland Towers was constructed in 1973-1974 as senior public housing by the Little Rock Housing Authority at a cost of $3.2 Million. The property is locally significant under Criterion A for POLITICS/GOVERNMENT. Specifically, Cumberland Towers, along with Parris and Powell Towers, was developed directly in response to a shift in federal policy for public housing to initiate and create housing for senior citizens. This policy shift dates to the Housing Act of 1956, which gave funding priority to senior housing in public housing construction and resulted in the first federally-funded senior housing projects in the country. Through the Kennedy and Johnson Administrations, this policy resulted in the construction of hundreds of similarly conceived high-rise

senior housing projects around the country. In Little Rock, the policy resulted in three: Cumberland, Parris, and Powell Towers.

The designs were similar to the design that Victoria Plaza in San Antonio presented as a model. Prototypical design adhered to Corbusier's "Tower in the Park" concept with efficiencies and one-bedroom units stacked in a single high-rise building surrounded by a larger green space. Locations were typically in residential areas at the perimeter of downtowns. Integral to the concepts were associated social programs and services. Cumberland Towers retained all character-defining features of this prototype.

The trend ended in 1973 when the Nixon Administration placed a moratorium on new construction and shifted federal policy to public housing vouchers. Parris, along with Cumberland and Powell, are the only examples of this historic context in Little Rock.

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Previous documentation on file (NPS):

____ preliminary determination of individual listing (36 CFR 67) has been requested
____ previously listed in the National Register
____ previously determined eligible by the National Register
____ designated a National Historic Landmark
____ recorded by Historic American Buildings Survey #_____
____ recorded by Historic American Engineering Record # _____
____ recorded by Historic American Landscape Survey # _____

Primary location of additional data:

____ State Historic Preservation Office
____ Other State agency
____ Federal agency
____ Local government
____ University
_X_ Other
Name of repository: University of Arkansas at Little Rock Center for Arkansas History and Culture (Arkansas Studies Institute)

Historic Resources Survey Number (if assigned): PU2843

10. Geographical Data

Acreage of Property 2.07 acres

Use either the UTM system or latitude/longitude coordinates

Latitude/Longitude Coordinates (decimal degrees)
Datum if other than WGS84:_____
(enter coordinates to 6 decimal places)

1. Latitude: 34.740813 Longitude: -92.269007
2. Latitude: Longitude:
3. Latitude: Longitude:
4. Latitude: Longitude:

Or
UTM References
Datum (indicated on USGS map):

☐ NAD 1927 or ☐ NAD 1983

1. Zone: Easting: Northing:
2. Zone: Easting: Northing:
3. Zone: Easting: Northing:
4. Zone: Easting : Northing:

Verbal Boundary Description (Describe the boundaries of the property.)

The subject is located on Block 43, City of Little Rock, Pulaski County, Arkansas. The Property Identification Numbers (PIN) as assigned by the Pulaski County Assessor's Office is 34L020.0301500.

Boundary Justification (Explain why the boundaries were selected.)

The boundary is the historic and legally recorded boundary lines for the building for which National Register status is being requested.

---

11. Form Prepared By

name/title: John M. Tess, President, edited by Ralph S. Wilcox, National Register & Survey Coordinator
organization: Arkansas Historic Preservation Pgrogram
street & number: 1100 North Street
city or town: Little Rock state: AR zip code: 72201
e-mail ralph.wilcox@arkansas.gov
telephone: (501) 324-9787
date: September 7, 2016

Additional Documentation

Additional Document 1: Site Plan, 1972
Additional Document 2: First Floor Plan, 1972
Additional Document 3: Typical Floor Plan, 1972
Additional Document 4: Typical Efficiency Plan, 1972
Additional Document 5: Typical One-Bedroom Plan, 1972
Additional Document 6: Typical Two-Bedroom Plan, 1972
Additional Document 7: Typical Efficiency, Handicapped Plan, 1972
Additional Document 8: Typical One Bedroom, Handicapped Plan, 1972
Additional Document 9: *Arkansas Gazette,* February 27, 1969
Additional Document 10: *Arkansas Gazette,* October 11, 1972
Additional Document 11: *Arkansas Democrat*, December 11, 1973
Additional Document 12: *Arkansas Democrat*, May 26, 1974

Submit the following items with the completed form:

- **Maps:** A **USGS map** or equivalent (7.5 or 15 minute series) indicating the property's location.

- **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.

- **Additional items:** (Check with the SHPO, TPO, or FPO for any additional items.)

Photographs

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels (minimum), 3000x2000 preferred, at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map. Each photograph must be numbered and that number must correspond to the photograph number on the photo log. For simplicity, the name of the photographer, photo date, etc. may be listed once on the photograph log and doesn't need to be labeled on every photograph.

Photo Log

Name of Property: Cumberland Towers

City or Vicinity: Little Rock

County: Pulaski State: Arkansas

Photographer: Heritage Consulting Group

Date Photographed: June 2016

Description of Photograph(s) and number, include description of view indicating direction of camera:

1 of 16 Exterior, North Elevation, Looking South

2 of 16 Exterior, West Elevation, Looking East

3 of 16 Exterior, North Elevation, Looking South

4 of 16 Exterior, South and East Elevations, Looking Northwest

5 of 16 Exterior, North Elevation, Looking South at Entrance

6 of 16 Site, Looking East

7 of 16 Site, Looking South

8 of 16 Interior, First Floor, Looking East at Lobby

9 of 16 Interior, First Floor, Looking West at Lobby

10 of 16 Interior, Fourth Floor, Looking West at Corridor, Typical

11 of 16 Interior, Fourth Floor, Looking West at Laundry Room, Typical

12 of 16 Interior, Fifth Floor, Unit #509, Looking West, Typical

13 of 16 Interior, Fifth Floor, Unit #509, Looking North, Typical

14 of 16 Interior, Tenth Floor, Unit #1010, Looking North, Typical

15 of 16 Interior View, Tenth Floor, Unit #1010, Looking East, Typical

16 of 16 Interior View, Eleventh Floor, Looking North at Elevator Lobby, Typical

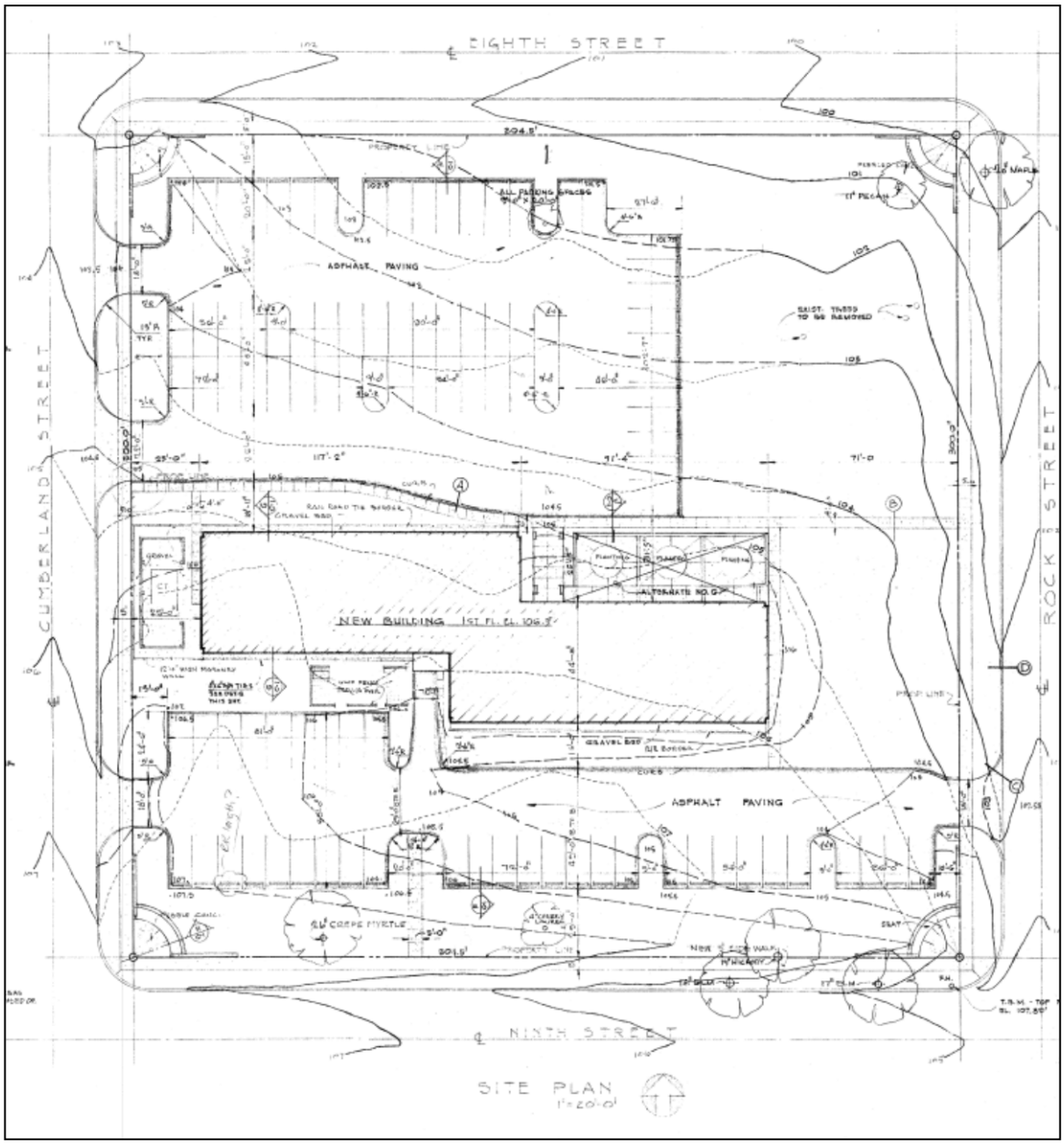
United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet

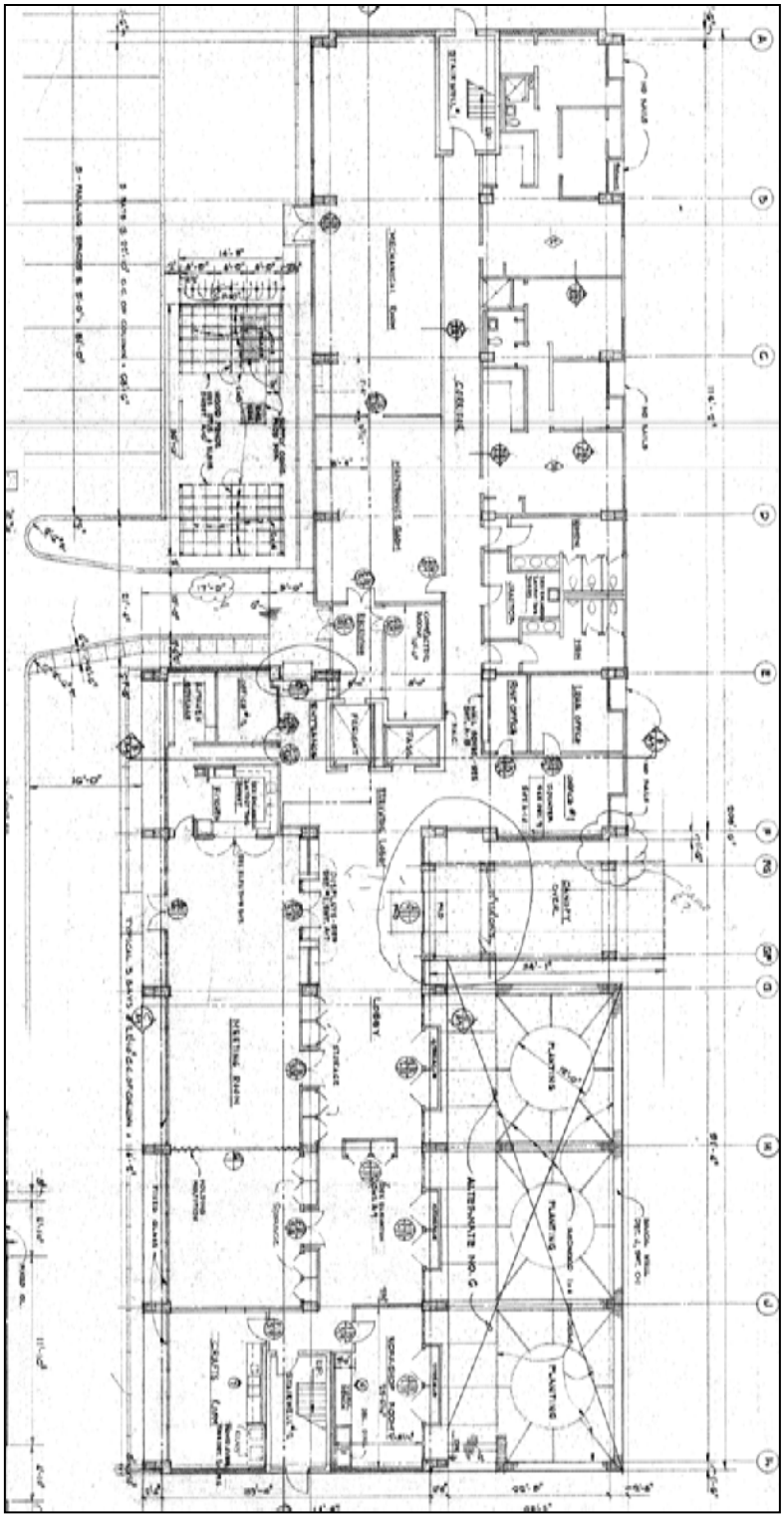
Cumberland Towers
Name of Property
Pulaski, Arkansas
County and State
N/A
Name of multiple listing (if applicable)

Section number Add. Documents Page 31

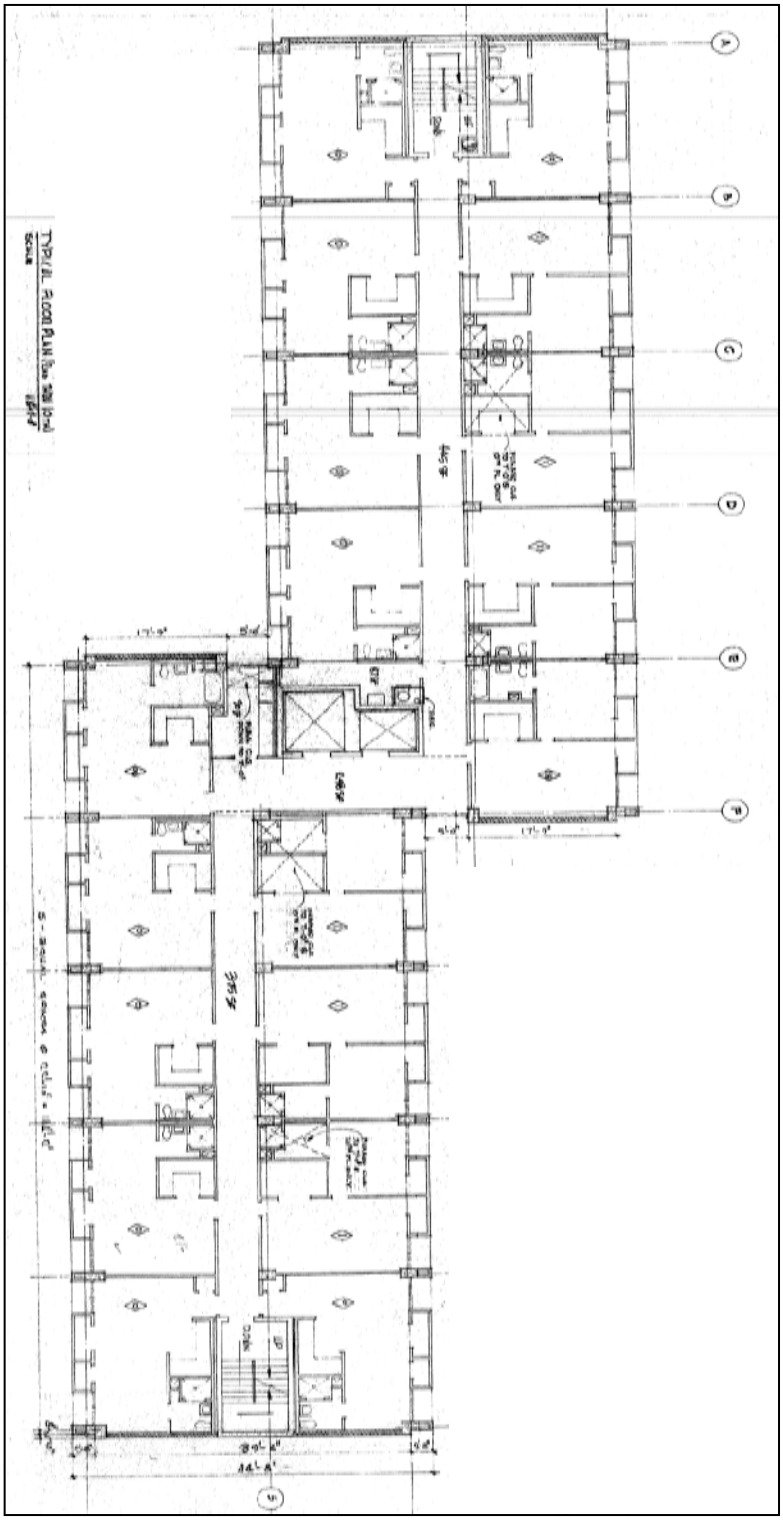
Additional Document 1: Site Plan, 1972



Additional Document 2: First Floor Plan, 1972



Additional Document 3: Typical Floor Plan, 1972



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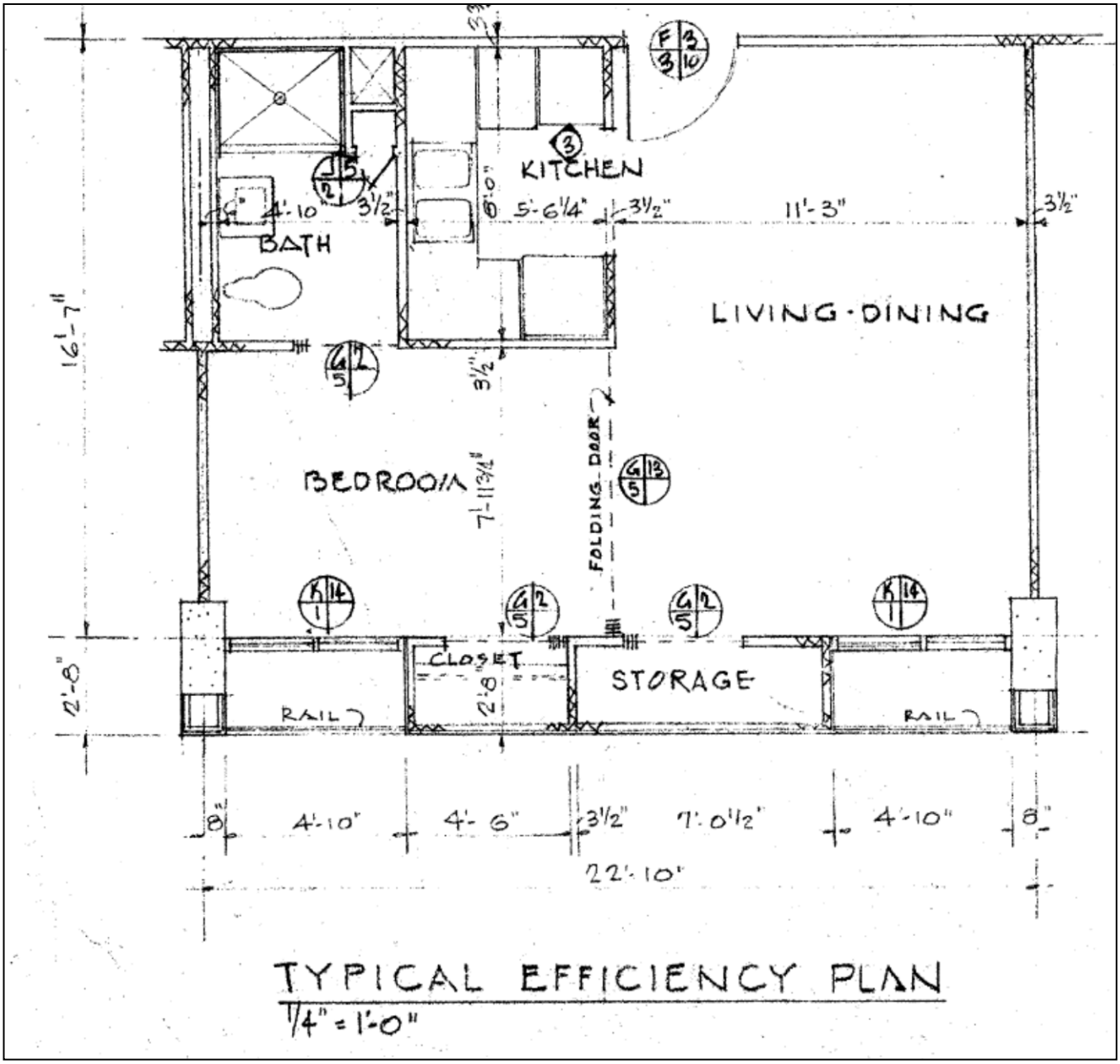
United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet

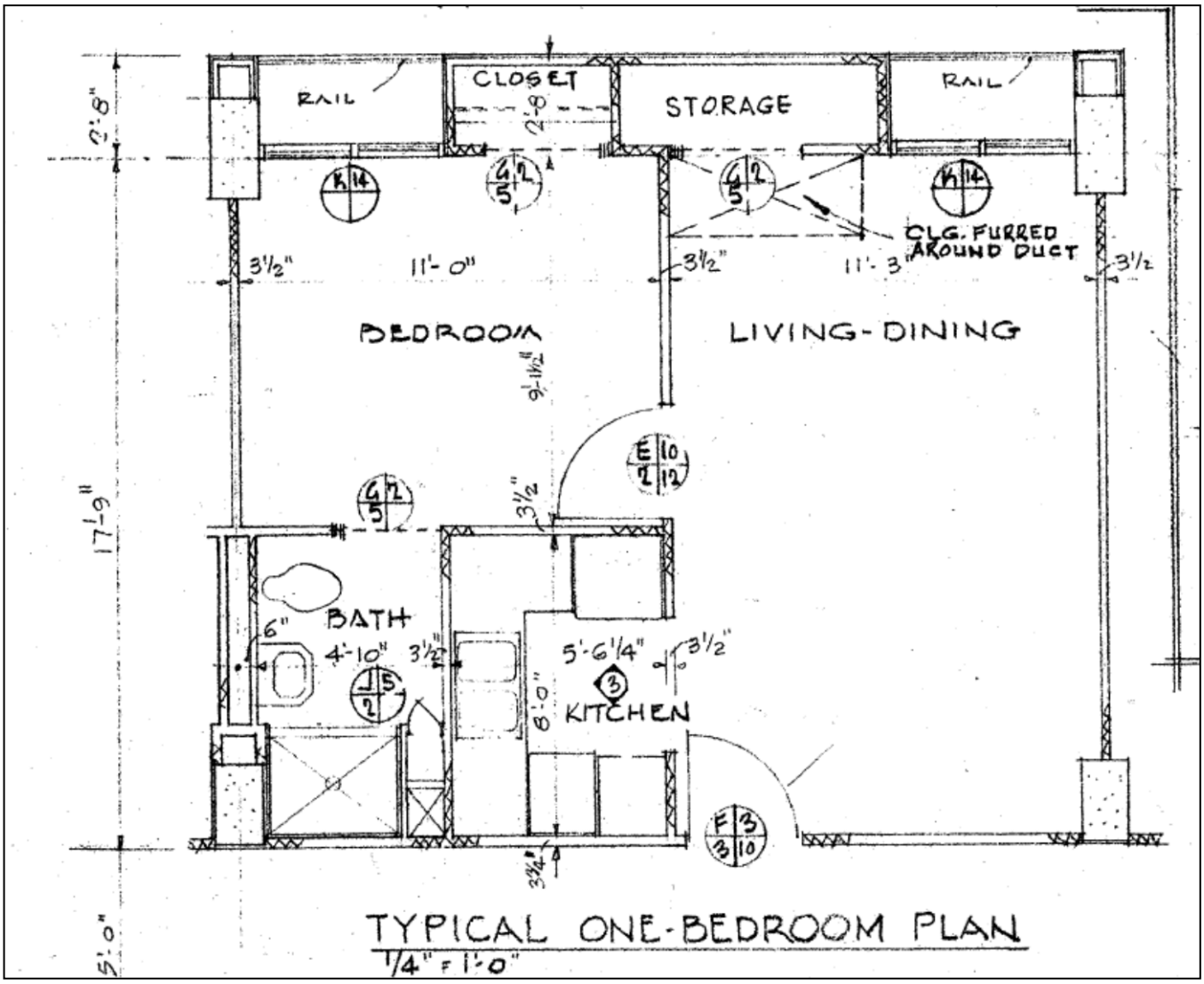
Cumberland Towers
Name of Property
Pulaski, Arkansas
County and State
N/A
Name of multiple listing (if applicable)

Section number Add. Documents Page 34

Additional Document 4: Typical Efficiency Plan, 1972



Additional Document 5: Typical One-Bedroom Plan, 1972



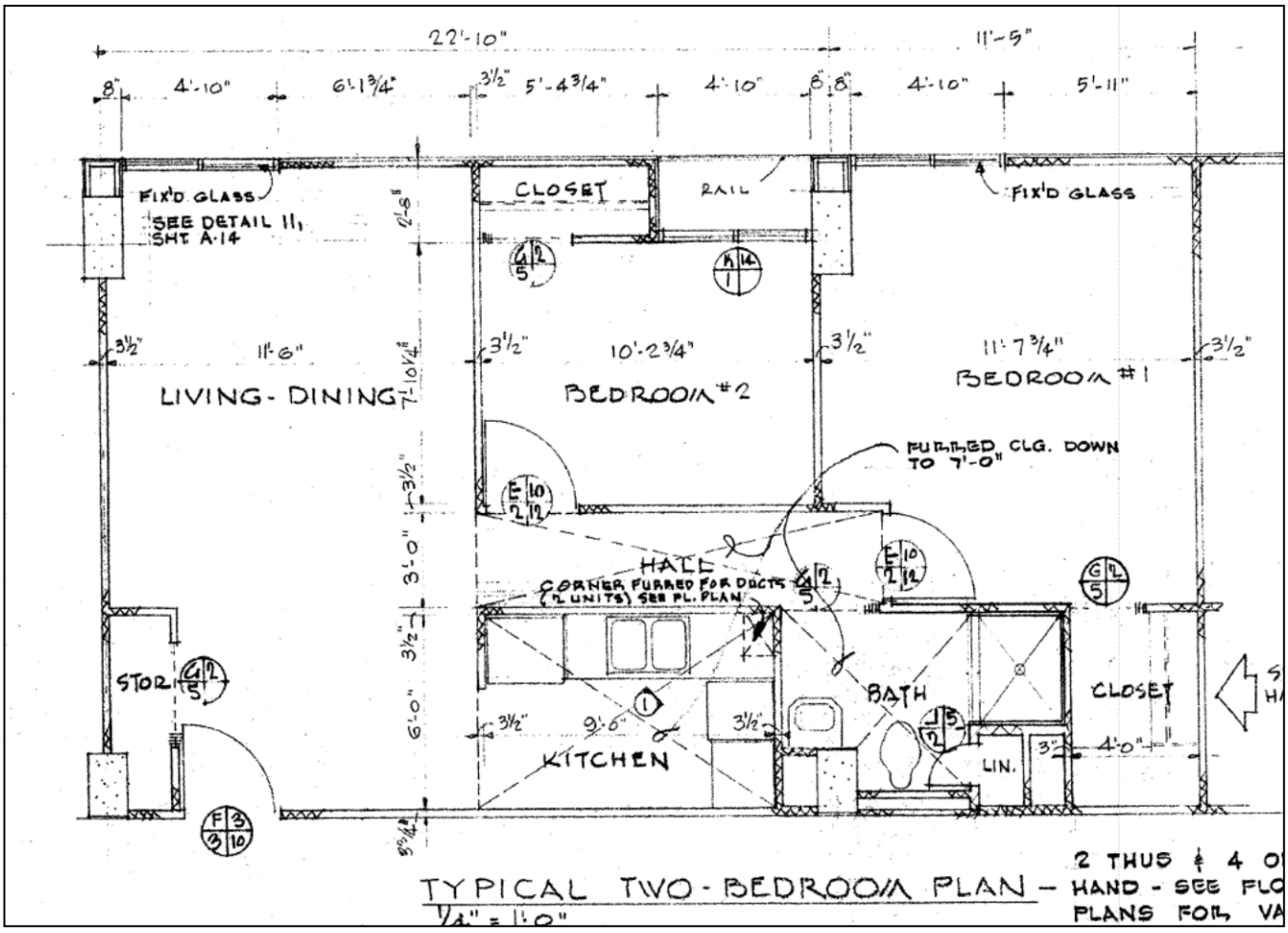
United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet

Cumberland Towers
Name of Property
Pulaski, Arkansas
County and State
N/A
Name of multiple listing (if applicable)

Section number Add. Documents Page 36

Additional Document 6: Typical Two-Bedroom Plan, 1972



United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet

Cumberland Towers
Name of Property
Pulaski, Arkansas
County and State
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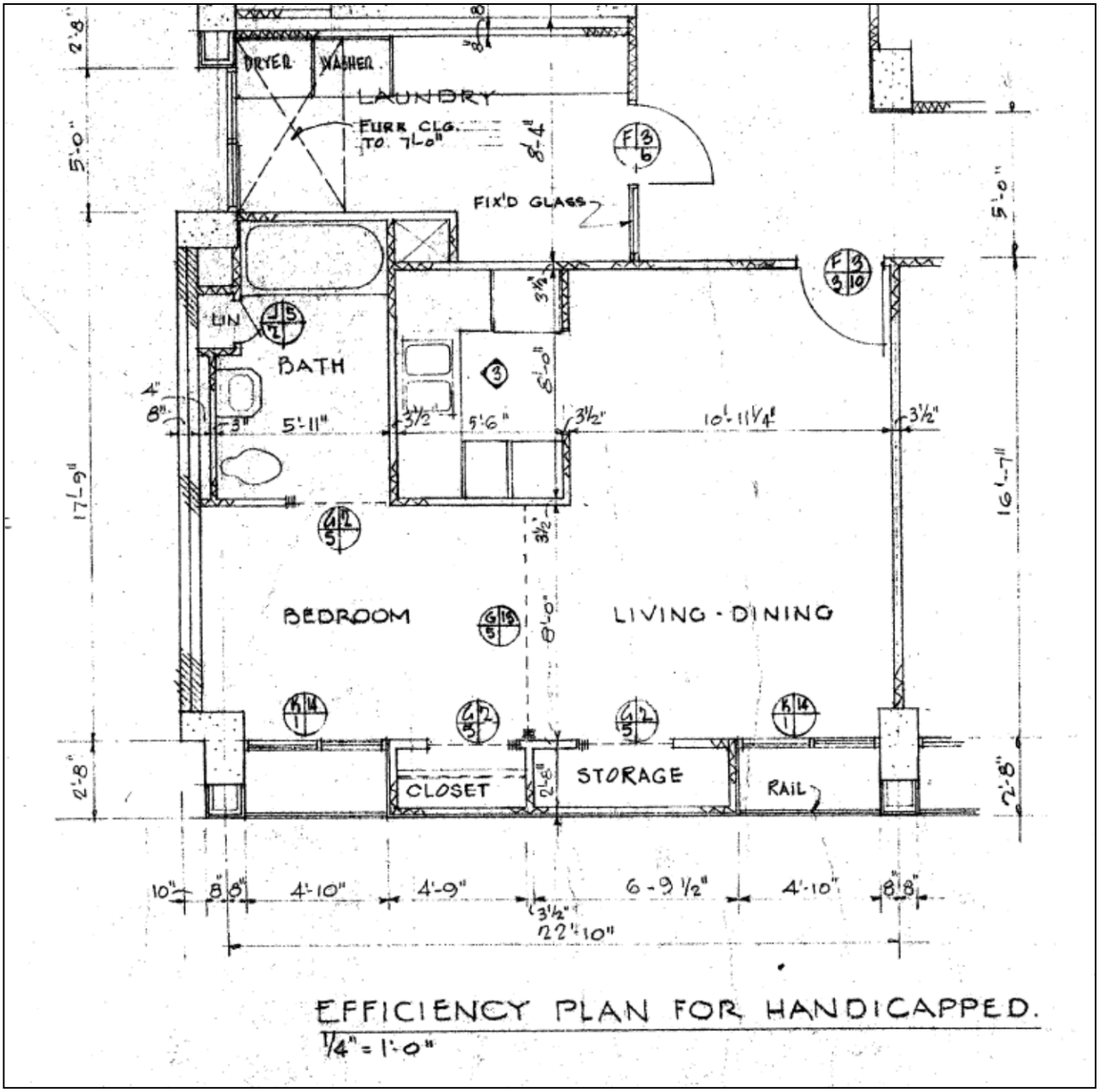
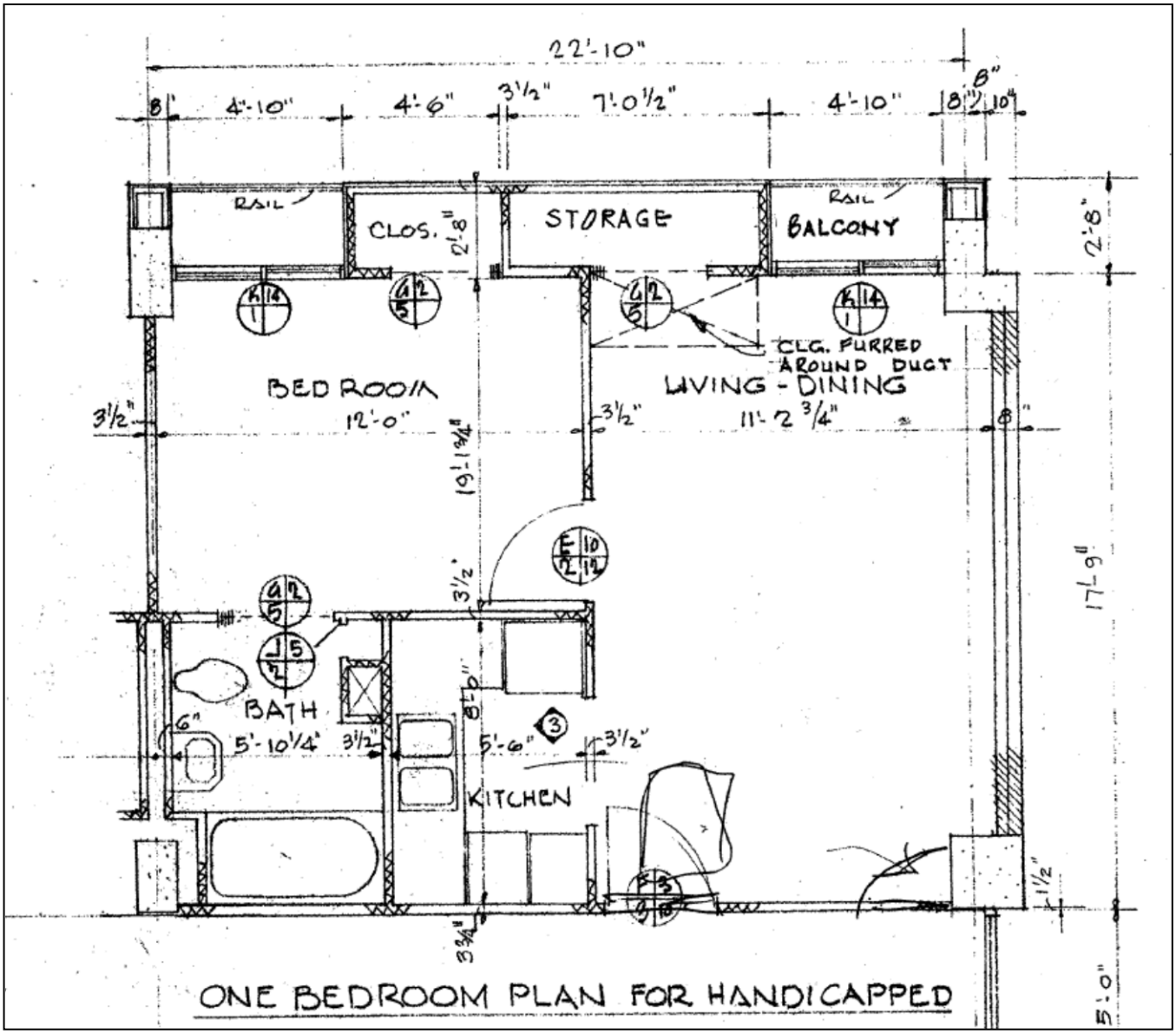
Name of multiple listing (if applicable)

Section number Add. Documents Page 37

Additional Document 7: Typical Efficiency, Handicapped Plan, 1972



Additional Document 8: Typical One Bedroom, Handicapped Plan, 1972



Additional Document 9: *Arkansas Gazette*, February 27, 1969

22A • ARKANSAS GAZETTE, Thurs., Feb. 27, 1969.

Housing Units For Elderly Planned in LR

The Little Rock Housing Authority proposed Wednesday to apply for $480,000 in federal funds to plan a high-rise housing project for the elderly.

The Authority and the city Manager Board met jointly Wednesday noon to discuss the plan.

George Millar, executive director of the Authority, said there were indications that a demand exists for public housing for the elderly. North Little Rock has 200 units and a waiting list of 800 names, he said.

The Authority's proposal calls for four or five high-rise projects containing a total of 800 to 1,200 units. No site has been selected but the general idea is have them close to the downtown area.

Authority Would Issue Bonds

If the application for planning funds is approved, the sites would be selected and the Authority would issue bonds to be repaid out of the rent money from the projects. If the rent money was not sufficient, the federal government would pay off the bonds.

Construction of the first project would take about a year, following the close of the planning period.

The Authority thinks a high demand might be placed on the existing public housing projects, on which there is no age limit, for relocation purposes during the execution of the Model Cities program. Moving the elderly persons out would provide more relocation room in the other projects. The Authority also believes that elderly persons would prefer to live with persons of their own age group instead of in a project containing a mixture of age groups.

The City Manager was asked to consider authorizing the Authority to apply for the funds. The Board agreed to discuss the matter at its regular meeting Monday night.

United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet

Cumberland Towers
Name of Property
Pulaski, Arkansas
County and State
N/A
Name of multiple listing (if applicable)

Section number Add. Documents Page 40

Additional Document 10: *Arkansas Gazette,* October 11, 1972

12B • ARKANSAS GAZETTE, Wed., Oct. 11, 1972

Building Approved For the Elderly

The Little Rock Housing Authority Board approved preliminary plans Tuesday for the proposed 11-story 189-unit apartmest building for the elderly on the block bounded by East Eighth, Ninth, Rock and Cumberland Streets.

Wittenberg, Delony and Davidson are the architects for the $3.2 million project. The proposed structure would have a small balcony for every apartment.

Another apartment building for the elderly is proposed by the Housing Authority at West Tenth and Battery Streets, and a third, the Fred Parris Towers, is nearing completion at Broadway and Eighteenth Street. Clifton L. Giles, director of the Housing Authority, said that all of the structures would have two-bedroom, one-bedroom and efficiency units. Persons living alone will be encouraged to live in the efficiency units, and that married couples or friends living together would probably be able to get one-bedroom or two-bedroom units.

He was asked whether unmarried and unrelated men and women would be permitted to live together and said there probably would be some applications for that, but that each would be reviewed carefully. Probably the only applications of that nature that would be approved would be in cases where one of the two is incapacitated and there is a history of the other's caring for him, he said.

Purvell Smith, a Board member, said he would "oppose unmarried [and unrelated] men and women living together" in the public housing developments "unless it can be established that the man is a eunuch."

"We're not running houses of assignation," he said. He requested that any application for an unmarried and unrelated man and woman to share one of the high-rise for the elderly apartments "be brought before us so I can vote against it."

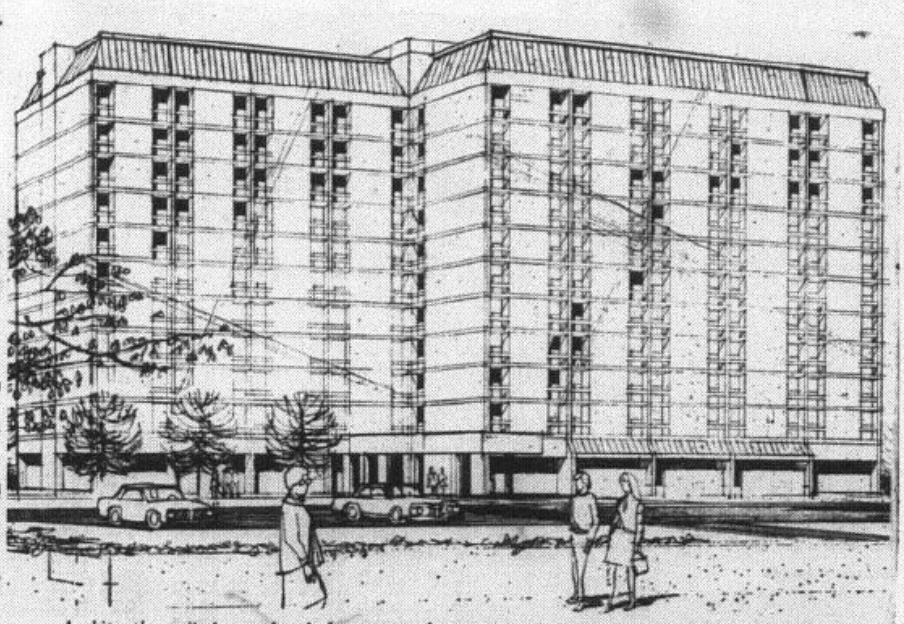
Other Board members said there might be reasons to justify unmarried men and women living together such as the example given by Giles.

Residents of the apartments must have limited income and must be at least 62 years old.

More moremore

The Board re-elected Ben F. Scroggin, 51, president of Commonwealth Federal Savings and Loan Association, as its chairman, and re-elected Lou B. Hoffman, 52, president and owner of Lou Hoffman Enterprises, as its vice chairman.

The Board unanimously recommended that Jesse Powell, 79, of 1309 Ringo Street, be named by the city Board of Directors to serve another five-year term on the Housing Authority Board. Powell has served one full term and part of another. He is a retired grocer.



Architect's preliminary sketch for proposed apartment building for elderly on the east side.

Giles presented to the Board preliminary plans for development of a 9-acre tract at the northwest corner of University Avenue and Twelfth Street. The land is in the University Park Urban Renewal Project and is for sale for $1,050,000.

Colonial Corporation of Charleston, W. Va., submitted the preliminary plans, which call for construction of a 16-story hotel. The plans must be approved by the Board, by the federal Housing and Urban Development Department and the city before the tract of land can be sold.

The Board agreed to sell these tracts of land:

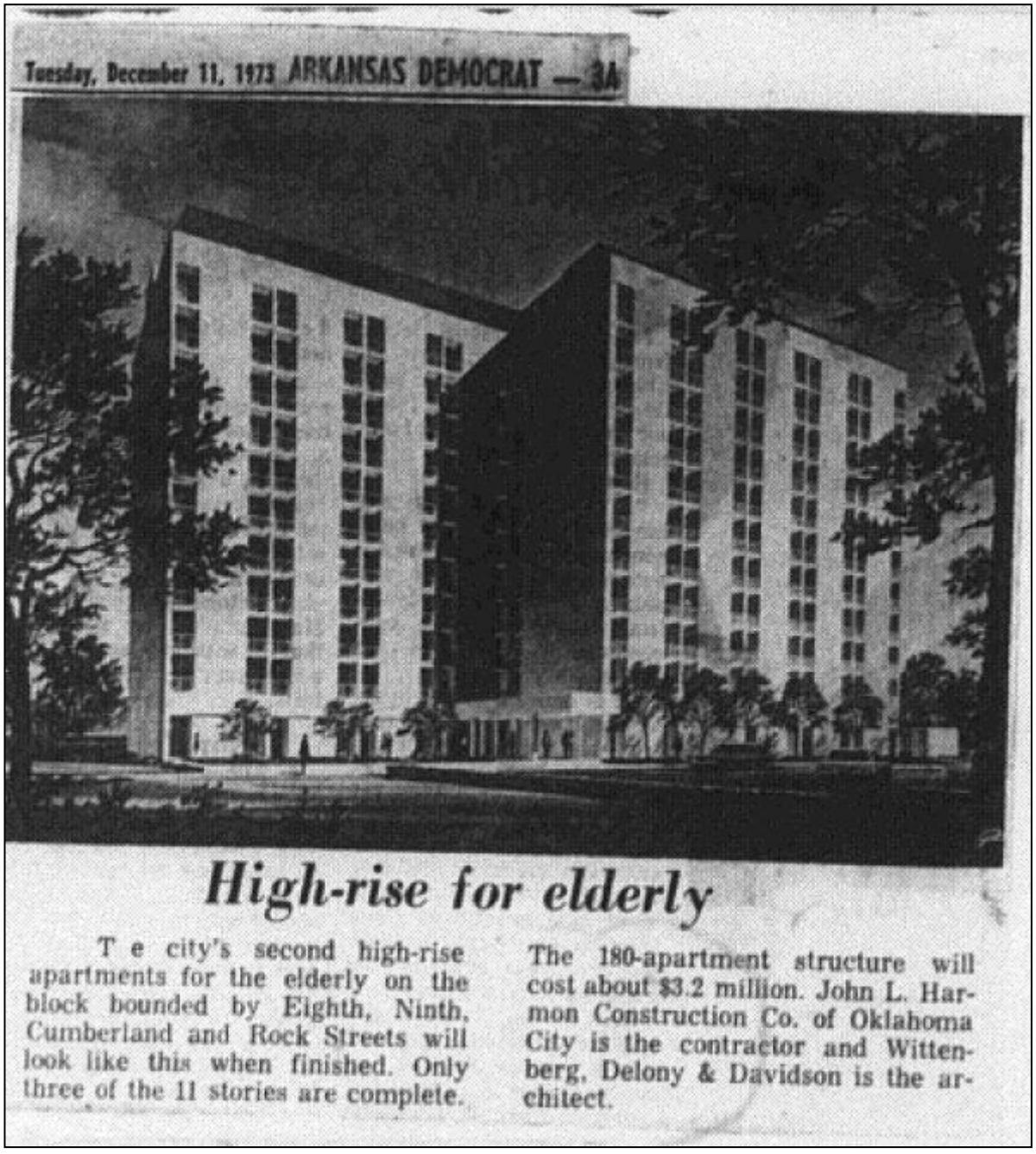
★ Northeast corner of Ninth and Izard Streets, to Allied Glass and Aluminum Company, for $42,000 (21,000 square feet).

★ Southeast corner of Third and Rock Streets, to Dalton Dailey, for $48,800 (21,000 square feet).

★ 2 Hughes Court, to John W. Smith, for $4,000.

★ 6608 Sterling Drive, to Jim Lusk, for $3,150.

Additional Document 11: *Arkansas Democrat*, December 11, 1973



Tuesday, December 11, 1973 ARKANSAS DEMOCRAT — 3A

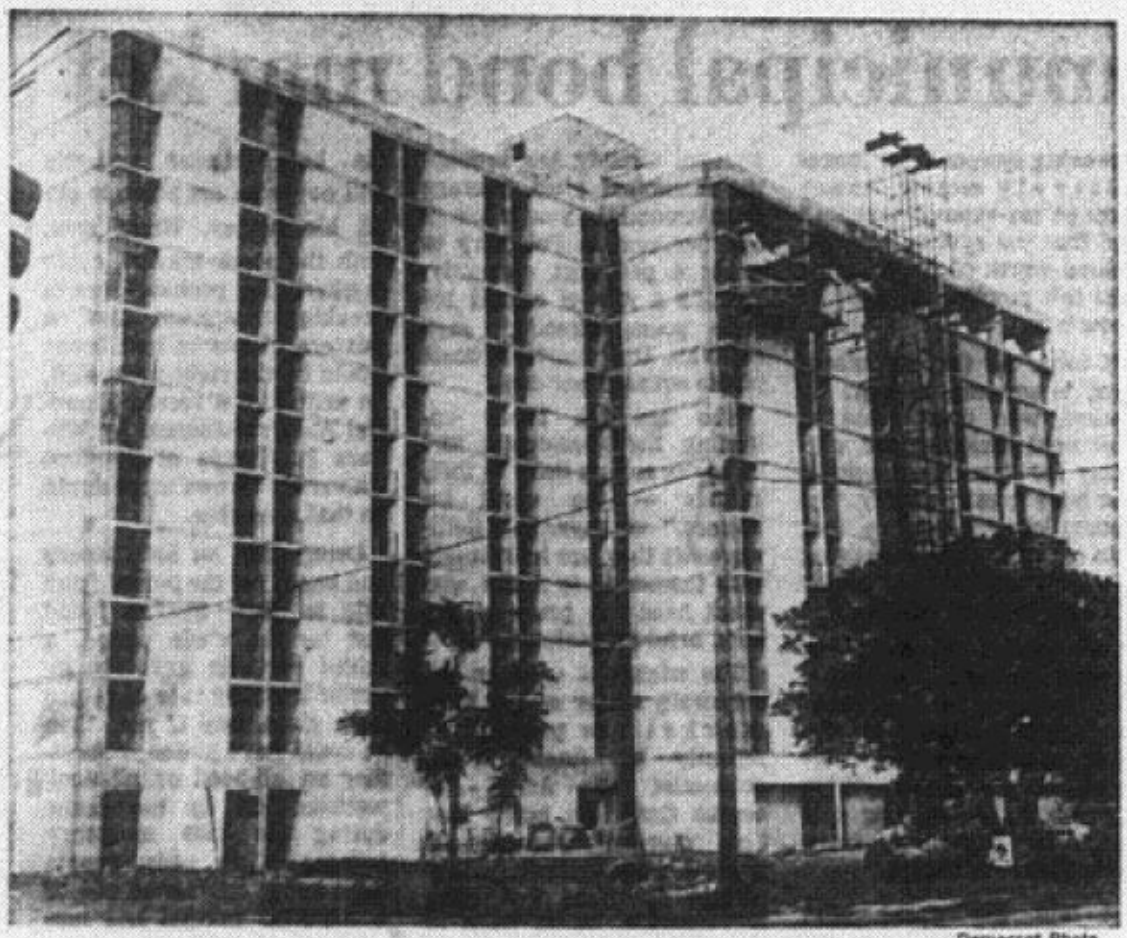
High-rise for elderly

T e city's second high-rise apartments for the elderly on the block bounded by Eighth, Ninth, Cumberland and Rock Streets will look like this when finished. Only three of the 11 stories are complete.

The 180-apartment structure will cost about $3.2 million. John L. Harmon Construction Co. of Oklahoma City is the contractor and Wittenberg, Delony & Davidson is the architect.

Additional Document 12: *Arkansas Democrat*, May 26, 1974

6D — ARKANSAS DEMOCRAT ••• Sunday, May 26, 1974



Democrat Photo

Skyscape: Cumberland Towers

The exterior of Cumberland Towers, the 11 story high rise apartment building for older Americans, is nearing completion in downtown Little Rock. The 180-unit structure rises against the skyline in the block bounded by West Eighth, West Ninth, Cumberland and Rock Streets. Approximate date for occupancy of the structure being built by the Little Rock Housing Authority is early 1975. Architect is the firm of Wittenberg, Delony & Davidson of Little Rock. John L. Harmon Construction Co. of Oklahoma City is general contractor.

United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet

Cumberland Towers
Name of Property
Pulaski, Arkansas
County and State
N/A
Name of multiple listing (if applicable)

Section number Photographs Page 43

Exterior Photo Key

Photo 1. Exterior, North Elevation, Looking South

Photo 2. Exterior, West Elevation, Looking East

Photo 3. Exterior, North Elevation, Looking South

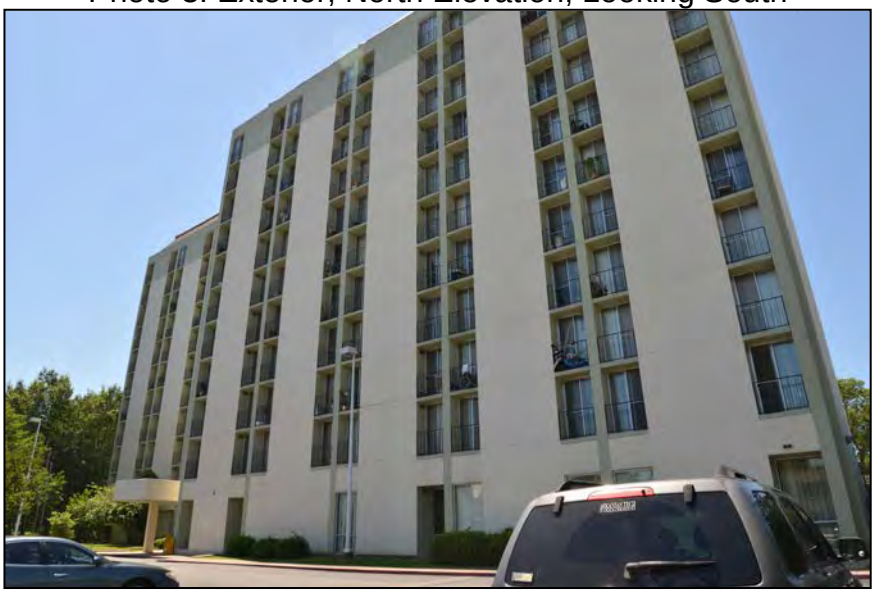


Photo 4. Exterior, South and East Elevations, Looking Northwest

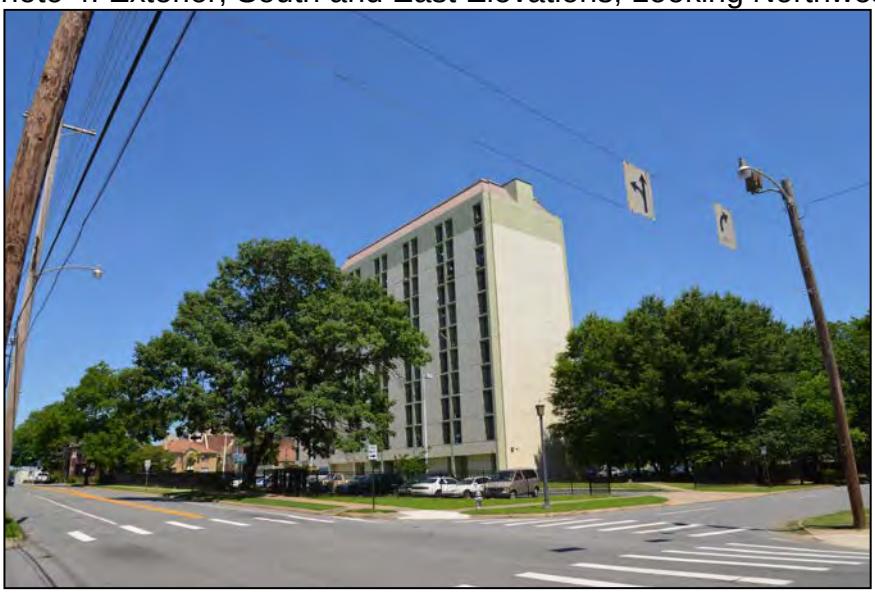


Photo 5. Exterior, North Elevation, Looking South at Entrance

Photo 6. Site, Looking East

Photo 7. Site, Looking South

Photo 8. Interior, First Floor, Looking East at Lobby

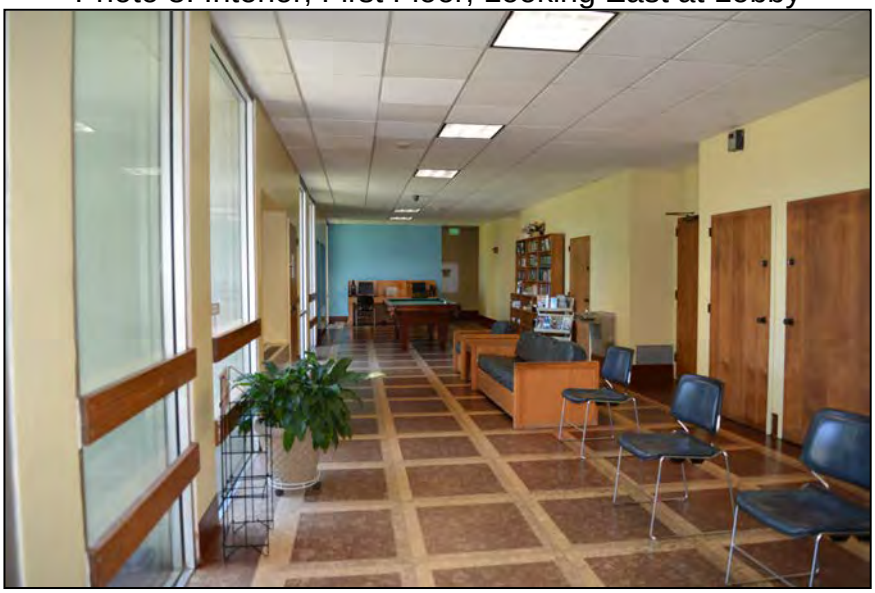


Photo 9. Interior, First Floor, Looking West at Lobby

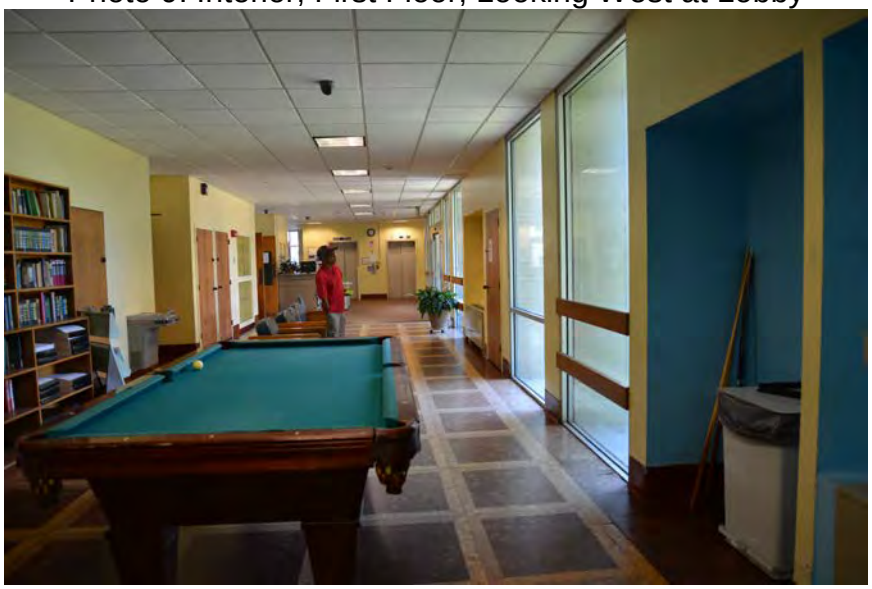


Photo 10. Interior, Fourth Floor, Looking West at Corridor, Typical

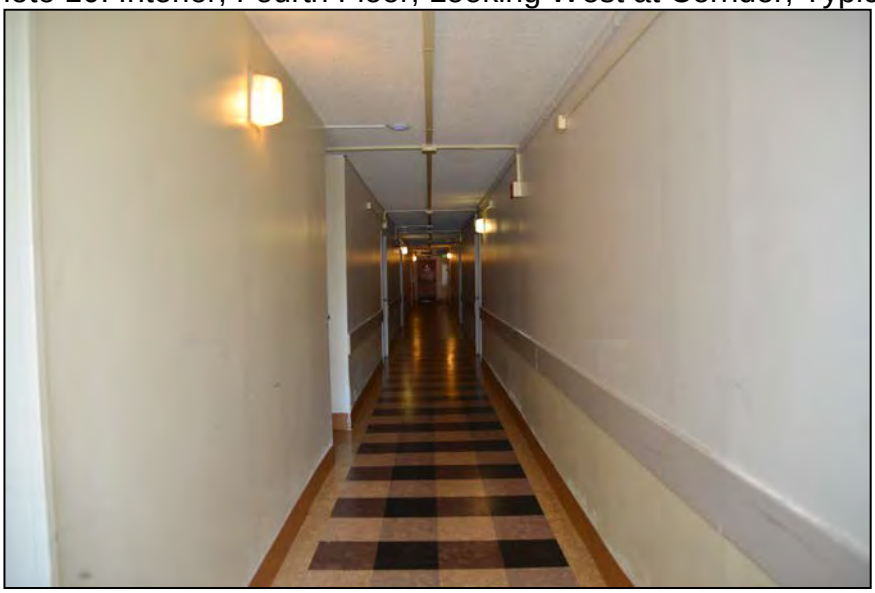


Photo 11. Interior, Fourth Floor, Looking West at Laundry Room, Typical

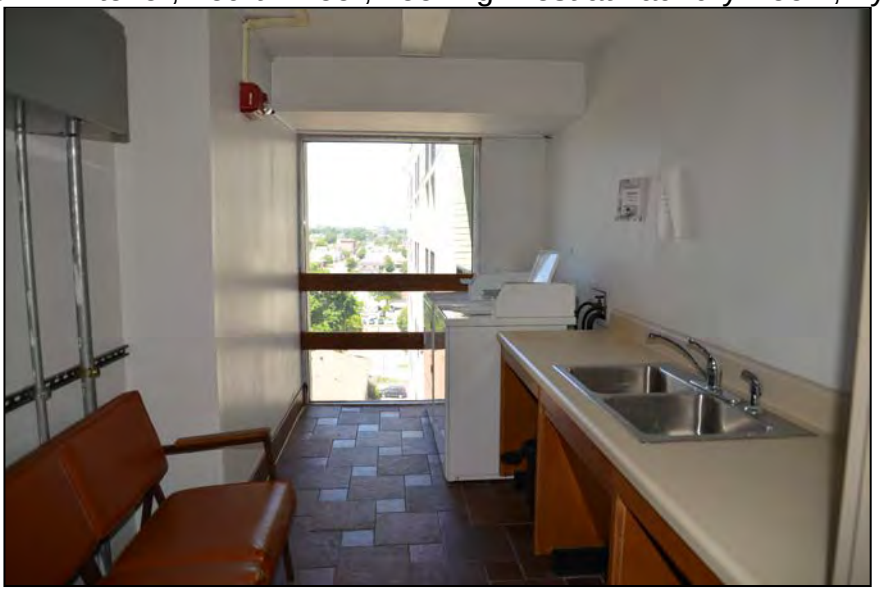


Photo 12. Interior, Fifth Floor, Unit #509, Looking West, Typical

Photo 13. Interior, Fifth Floor, Unit #509, Looking North, Typical

Photo 14. Interior, Tenth Floor, Unit #1010, Looking North, Typical

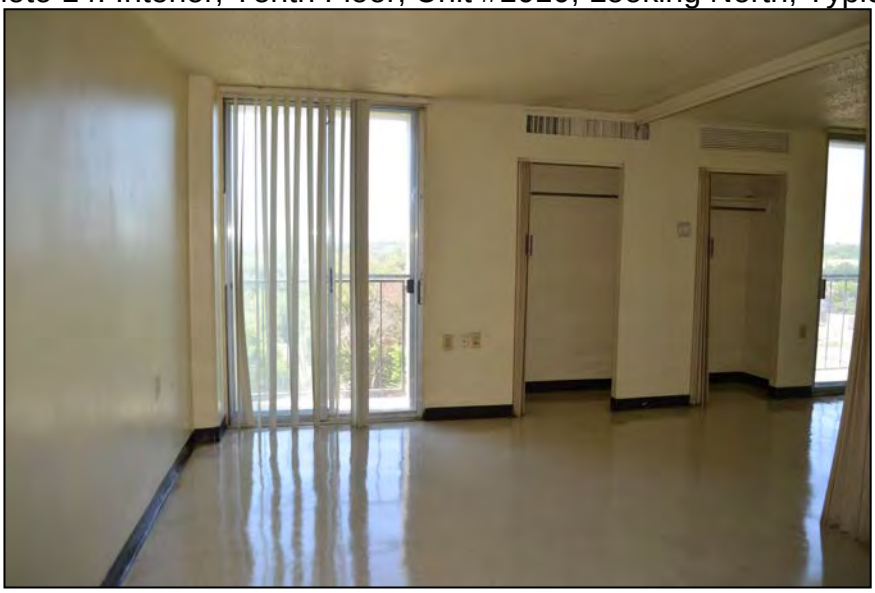
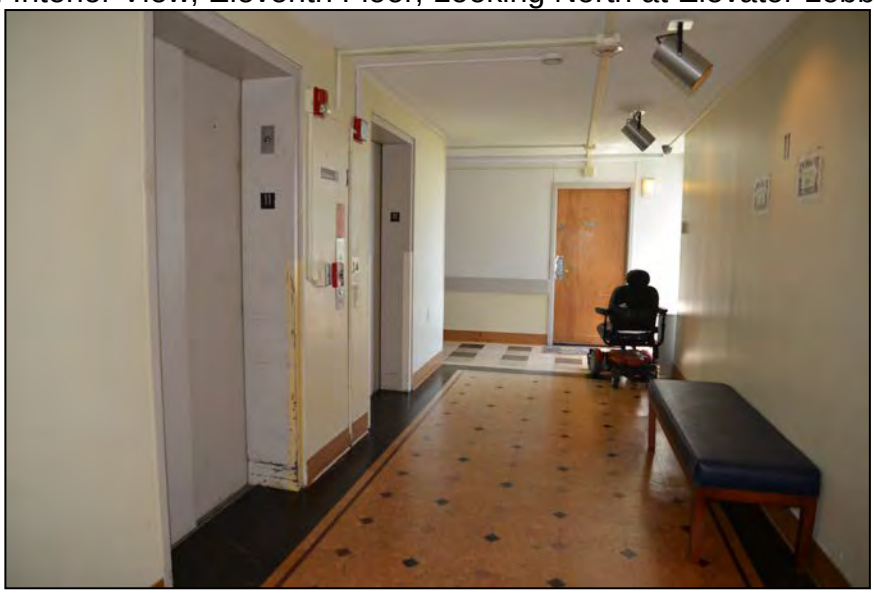


Photo 15. Interior View, Tenth Floor, Unit #1010, Looking East, Typical

Photo 16. Interior View, Eleventh Floor, Looking North at Elevator Lobby, Typical




ARKANSAS TECH

National Register of Historic Places
Memo to File

Correspondence

The Correspondence consists of communications from (and possibly to) the nominating authority, notes from the staff of the National Register of Historic Places, and/or other material the National Register of Historic Places received associated with the property.
Correspondence may also include information from other sources, drafts of the nomination, letters of support or objection, memorandums, and ephemera which document the efforts to recognize the property.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES
EVALUATION/RETURN SHEET

Requested Action:	Nomination
Property Name:	Cumberland Towers
Multiple Name:	
State & County:	ARKANSAS, Pulaski

Date Received:	Date of Pending List:	Date of 16th Day:	Date of 45th Day:	Date of Weekly List:
1/20/2017			3/7/2017	3/16/2017

Reference number:	SG100000706
Nominator:	State

Reason For Review:

X Accept _____ Return _____ Reject **3/7/2017** Date

Abstract/Summary Comments:	Automatic listing - Federal Register notice failed to print before 45th day. Nomination reviewed and found adequate. Reviewed by Lusignan within context of draft public housing context and found to be adequately documented within local context
Recommendation/ Criteria	Accept / A, g

Reviewer Jim Gabbert Discipline Historian

Telephone (202)354-2275 Date

DOCUMENTATION: see attached comments : No see attached SLR : No

If a nomination is returned to the nomination authority, the nomination is no longer under consideration by the National Park Service.

THE DEPARTMENT OF ARKANSAS
HERITAGE

Asa Hutchinson
Governor

Stacy Hurst
Director

Arkansas Arts Council

Arkansas Natural Heritage Commission

Arkansas State Archives

Delta Cultural Center

Historic Arkansas Museum

Mosaic Templars Cultural Center

Old State House Museum

ARKANSAS HISTORIC PRESERVATION PROGRAM

National Historic Preservation Act 1966-2016

1100 North Street
Little Rock, AR 72201

(501) 324-9880
fax: (501) 324-9184
tdd: 711

e-mail:
info@arkansaspreservation.org
website:
www.arkansaspreservation.com

An Equal Opportunity Employer

September 30, 2016

Mr. Brian Minyard, Planner
City of Little Rock
723 West Markham Street
Little Rock, AR 72201

Re: Cumberland Towers – Little Rock, Pulaski County

Dear Mr. Minyard, Brian

We are pleased to inform you that the above referenced property will be considered by the State Review Board of the Arkansas Historic Preservation Program, an agency of the Department of Arkansas Heritage, for nomination to the National Register of Historic Places. The National Register of Historic Places is the federal government's official list of historic properties worthy of the preservation. Listing in the National Register of Historic Places provides recognition and assists in preserving our nation's heritage.

Listing of this property provides recognition of the community's historic importance and assures protective review of the federal projects that might adversely affect the character of the historic property.

Listing in the National Register does not mean that limitations will be placed on the property by the federal government. Public visitation rights are not required of property owners. The federal government will not attach covenants to the property or seek to acquire it.

We have enclosed a copy of the National Register nomination for your review. If you have any comments on the proposed nomination, please submit a letter with your comments, concerns, or concurrence to the Arkansas Historic Preservation Program at least 24 hours prior to the date of the State Review Board meeting.

You are invited to attend the State Review Board meeting at which the nomination will be considered. The board will begin meeting at 10:00 a.m. on Wednesday, December 7, 2016 at the Old State House Museum at 300 West Markham Street, in Little Rock.

If you have any questions regarding the State Review Board meeting feel free to call Ralph Wilcox, Callie Williams or Travis Ratermann at (501) 324-9880.

Sincerely,

Frances McSwain
Director

Little Rock HISTORIC DISTRICT COMMISSION

DEPARTMENT OF PLANNING AND DEVELOPMENT

723 West Markham Street
Little Rock, Arkansas 72201-1334
Phone: (501) 371-4790 Fax: (501) 399-3435

CERTIFIED LOCAL GOVERNMENT NATIONAL REGISTER NOMINATION REVIEW

Name and Address of property:
Cumberland Towers, 311 E 8th Street, Little Rock, AR 72201

Name of Owner:
Metropolitan Housing Alliance

Project Sponsor:
André Blakley, Gorman & Company, Inc. and
John Tess & Robb Mawson Heritage Consulting Group

CLG Name:
City of Little Rock, Arkansas

Date of Public Hearing by CLG:
November 14, 2016

Applicable Criteria:
__√__ Criterion A (Historic Events)

_____ Criterion B (Important Person)

_____ Criterion C (Architecture)

_____ Criterion D (Archaeological)

The Little Rock Historic District Commission hereby supports the above stated property for nomination.

Attest:

Chair — Date: Nov 14, 2016

Secretary/Staff — Date: 11-14-2016

DAVID JOHNSON

SENATOR
32ND DISTRICT
OFFICE: 501-682-6107
david.johnson@senate.ar.gov

ARKANSAS SENATE
500 WOODLANE AVENUE
STATE CAPITOL, ROOM 320
LITTLE ROCK, ARKANSAS 72201

THE SENATE
STATE OF ARKANSAS

CHAIR:
JOINT RETIREMENT & SOCIAL SECURITY

MEMBER:
LEGISLATIVE COUNCIL
JOINT BUDGET
JUDICIARY
STATE AGENCIES & GOVERNMENTAL AFFAIRS
RULES, RESOLUTIONS & MEMORIALS

November 28, 2016

Dr. Jamie Brandon, Chair
State Review Board
c/o Stacy Hurst, State Historic Preservation Officer
Arkansas Historic Preservation Program
1100 North Street
Little Rock, Arkansas 72201

RE: Fred W. Parris Towers (1800 S. Broadway Street, Little Rock, Pulaski County, AR)
Cumberland Towers (311 E. 8th Street, Little Rock, Pulaski County, AR)
Jesse Powell Towers (1010 Wolfe Street, Little Rock, Pulaski County, AR)

Dear Dr. Brandon:

I understand the State Review Board will consider Cumberland, Paris and Powell Towers for listing on the National Register of Historic Places. I am writing in favor of this proposal.

As the State Senator for District 32, which includes Cumberland Towers and the surrounding McArthur Park Historic District, I support the inclusion of these residential towers on the National Register. The buildings are representative of a specific era and have been recognized by the City of Little Rock's Historic District Commission as historic assets.

Thank you for your time and attention in this matter. If I can be of further assistance, please do not hesitate to contact me.

Sincerely,

David Johnson
State Senator
District 32

REPRESENTATIVE
Warwick Sabin
ASSISTANT SPEAKER PRO TEMPORE
P. O. Box 250508
Little Rock, Arkansas 72225-0508

501-372-4650 Residence
wsabin@wsabin.org

DISTRICT 33

Counties:
Part Pulaski

COMMITTEES:

Education
Kindergarten through Twelve, Vocational/Technical Institutions Subcommittee

City, County and Local Affairs
Finance Subcommittee

Legislative Joint Auditing Committee

STATE OF ARKANSAS

House of Representatives

OFFICIAL

NOV 29 2016

DIRECTOR'S OFFICE

November 28, 2016

Dr. Jamie Brandon, Chair
State Review Board
c/o Stacy Hurst, State Historic Preservation Officer
Arkansas Historic Preservation Program
1100 North Street
Little Rock, AR 72201

RE: Fred W. Parris Towers (1800 S. Broadway St., Little Rock, Pulaski County, AR)
Cumberland Towers (311 E. 8th Street, Little Rock, Pulaski County, AR)
Jesse Powell Towers (1010 Wolfe Street, Little Rock, Pulaski County, AR)

Dear Dr. Brandon:

I am writing to ask that the State Review Board to recommend the Parris, Cumberland and Powell Towers for listing on the National Register. Two of the buildings – Powell Towers and Cumberland Towers – are in my district and the residents are my constituents.

These three buildings are important modern historic resources. Little Rock has a great and enduring history. However, the Little Rock I understand is a modern community that has transformed in the decades following World War II into a progressive 21st century city. These buildings are part of that transformation and speak to changing views on what the government should and should not do. It is hard to imagine a time when Little Rock did not have a safety net for its senior citizens. These three properties represent a fundamental milestone in recognizing our responsibilities as a government.

I understand that the Little Rock Historic District Commission unanimously recommended these properties for listing. I ask that the State Review Board embrace Little Rock's notion of what we believe to be our history and support listing the properties.

I urge the Board to recommend these buildings forward.

Sincerely,

Warwick Sabin

Warwick Sabin
State Representative
District 33

FRENCH HILL
2nd District, Arkansas

COMMITTEE ON FINANCIAL SERVICES
Subcommittee on Capital Markets and Government Sponsored Enterprises
Subcommittee on Oversight and Investigations

WASHINGTON, DC OFFICE
1229 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
PHONE: (202) 225-2506
FAX: (202) 225-5903

CONWAY DISTRICT OFFICE
1105 DAVIS STREET, SUITE 12
CONWAY, AR 72032
PHONE: (501) 358-3401
FAX: (501) 358-3404

LITTLE ROCK DISTRICT OFFICE
1001 NORTH UNIVERSITY AVENUE, SUITE 160
LITTLE ROCK, AR 72207
PHONE: (501) 324-5941
FAX: (501) 324-6029

Congress of the United States
House of Representatives
Washington, DC 20515

December 6, 2016

Jamie C. Brandon, Ph.D.
Chair
State Review Board
Arkansas Historic Preservation Program
C/o Stacy Hurst, State Historic Preservation Officer
1100 North Street
Little Rock, AR 72201

RE: Fred W. Parris Towers (1800 S. Broadway St., Little Rock, Pulaski County, AR)
Cumberland Towers (311 E. 8th Street, Little Rock, Pulaski County, AR)
Jesse Powell Towers (1010 Wolfe Street, Little Rock, Pulaski County, AR)

Dear Dr. Brandon:

I understand that the Arkansas State Review Board is considering if the above three properties should be recommended for the National Register of Historic Places. These buildings have been an important part of Arkansas's history, benefitting thousands of low income residents in Little Rock with affordable housing for decades.

I request that the proposal be given full and fair consideration and that you apprise me of its progress. Please do not hesitate to contact Jill Cox in my Little Rock office at (501) 324-5941 or at Jill.Cox@mail.house.gov with any questions.

Sincerely,

French Hill
Member of Congress

ARKANSAS HISTORIC PRESERVATION PROGRAM
State Review Board Meeting Minutes
December 7, 2016
Old State House Museum
300 West Markham
Little Rock, Arkansas

The December meeting of the State Review Board of the Arkansas Historic Preservation Program was called to order at 10:01 a.m. by Dr. Jamie Brandon, chairman.

Ralph Wilcox made a few brief announcements. Food and drink are only allowed in the meeting room. No food or drinks are allowed in the museum galleries. For those who parked on the parking deck under the Double Tree Hotel, the Old State House Museum front desk can validate your ticket for one hour. He also advised guest that are interested in making public comment on a property would need to sign the sign-in sheet for public comment at the table at the entrance.

Dr. Brandon called roll.

MEMBERS PRESENT
Dr. Ann Early
Dr. Jamie Brandon
Dr. Ben Johnson
Bob Kempkes
Carl Miller
Baxter Sharp

Board members Andrijana Vukovich, Donna Jones, and Joseph Kelly were absent.

OTHERS PRESENT
Stacy Hurst – DAH, Director
Rebecca Burkes – DAH, Deputy Director
Tim Dodson – AHPP
Rachel Silva – Preserve Arkansas
Olan Reeves – AG Office
Catherine Barrier – AHPP, CLG Coordinator
Revis Edmonds – AHPP,
Paul Porter – AHPP, Easement Coordinator and Technical Assistant
Laura Winning – Homard House
Laurie Woods – Homard House
Rob Mawson – Heritage Consulting Group (Cumberland, Parris, and Powell Towers)
John Tess – Heritage Consulting Group (Cumberland, Parris, and Powell Towers)
Andre Blakley – Gorman & Company, Inc. (Cumberland, Parris and Powell Towers)
Rev. Gordon Maroney – St. John's Episcopal Church
Robin Loucks – Downtown Neighborhood Association
Harry Loucks – Governors Court Apartments
David Blick – HUD

Brian Minyard – City of Little Rock
Starre Haas – Parris and Cumberland Towers
Ted Dickey – Metropolitan Housing Alliance
Sandra Taylor Smith – Homard House
Rodney Forte – Metropolitan Housing Alliance
Anthony Swell – Metropolitan Housing Alliance
Kathy Wells – Parris and Cumberland Towers
Carol Worley – Homard House
Tom Fennell – Parris Towers
Jill Judy – Cumberland, Parris, and Powell Towers
Dana Arnette – Metropolitan Housing Alliance
Marvin G. Dalla Rosa – Cumberland, Parris, and Powell Towers
Mark Brown – Parris Tower
Richard Butler – former SRB Board member
Boyd Maher – Capitol Zoning
Chris Ladner – Darragh Building
Dustin Smith – Darragh Building
Matt Bell – Darragh Building
Virginia L. Shaver – First Evangelical Lutheran Church
Dottie Toake – First Evangelical Lutheran Church
Patricia Blick – AHPP, Deputy Director
Shayla Albey – Arkansas State Parks
Melinda Miller – Arkansas Department of Parks and Tourism
Laura Sergeant – Parris Towers
Ed Sergeant – Parris Towers
Sharon Welch-Blair – Cumberland, Parris, and Powell Towers

MINUTES

Dr. Brandon called for a motion to accept the minutes from the August 3, 2016, State Review Board Meeting. Dr. Ann Early stated that Tim Dodson's name is misspelled on page vii and she questioned the name Caddo Valley Academy Complex. The Caddo Valley Academy Complex was correct. Carl Miller made a motion to accept the minutes from the August 3, 2016, State Review Board Meeting and Dr. Ann Early seconded the motion. The motion passed.

DIRECTOR'S REPORT

Frances McSwain (Missy) informed the board that the staff has moved into the new office building at 1100 North Street in Little Rock and have settled in. There is a beautiful view of the Baring Cross Bridge and the Arkansas River. We plan on having the next State Review Board Meeting at the new office.

In November, Missy attended the National Conference of State Historic Preservation Officers Fall quarter meeting. She added that our government liaison told us that he does not think that federal rehabilitation tax credits are under fire. He thinks that we will actually have a better opportunity to hold on to everything with the incoming administration. The incoming president has actually used the federal historic tax credit on the old United States Post Office in Washington, D.C. We will continue to keep you informed.

GRANTS

Missy also announced that applicants for the HPRG and county courthouse grants will have to apply online. It will be as early as next week and the process will be electronic and there is a learning curve. Applicants will need a password and they will have to remember the password. The AHPP staff will be available to help applicants. Missy will provide the grant schedule in the director's report that she will send to the board members later this week.

Missy stated that the office was subject to a federal tax audit by the state. It was discovered that what we have been doing with our CLG grants for many years needed to be brought up-to-date. So now CLG grants will also be going out earlier in order to use CLG funds in a wise manner.

We are still in the process of acquiring the Jacob Wolf House in Baxter County. We have just hired staff for the location. His name is Marlon Moudy and he will be the Heritage Projects Manager. He will live in the area in order to get the house open for visitors hopefully by early spring.

Missy announced the next Walks Through History tour will be at the Selma United Methodist Church and the Selma Rosenwald School, both in Drew County and both structures are beautiful. We have given grants to each location and hold easements on both of them. The tour is Saturday, December 10, 2016. Missy handed out a copy of the 2017 Walks Through History and Sandwiching in History tour schedule to each of the board members.

Missy announced new staff member Revis Edmonds, Education Outreach Coordinator (Adult). She also announced that new staff member Amy Milliken, who replaced Shelle Stormoe as Preservation Outreach Coordinator (K-12). Our Section 106 Coordinator resigned so we are waiting on approval from the Office of Personnel Management to open the position for hiring.

PRESERVE ARKANSAS

Rachel Silva announced that the Arkansas Preservation Awards will take place at the Albert Pike Masonic Temple at 712 Scott Street in Little Rock, on Friday, January 27, 2017. The reception starts at 6 p.m. and the dinner and program start at 6:45 p.m. Cheryl Nichols will receive the Parker Westbrook Award for Lifetime Achievement and there will be 9 other award winners including the Arkansas Historic Preservation Program for the 50th Anniversary Celebration of the National Historic Preservation Act.

February 1, 2017, is our legislative reception. Every year when the legislature meets for the full session, Preserve Arkansas and the Quapaw Quarter Association co-host this reception. Everyone is invited to attend from 5-7 p.m. at Curran Hall to tell our lawmakers to support historic preservation in Arkansas.

SPECIAL PRESENTATION

In Honor of Pearl Harbor Day

USS Hoga – North Little Rock, Pulaski County
National Register Listed 6/30/1989
National Historic Landmark 6/30/1989

The *USS Hoga* is a United States Navy Woban-class tugboat named after the Sioux word for "fish." The boat was built by Consolidated Shipbuilding Corporation in New York State. The tugboat was launched on December 31, 1940, and was assigned to Pearl Harbor carrying common firefighting equipment. After the bombing of Pearl Harbor the tugboat was ordered to assist wherever they could. The tugboat was used to assist several ships including moving the damaged *USS Nevada* out of the main entry channel of the harbor. The tugboat was later used to fight fires on the *USS Maryland*, *USS Tennessee* and *USS Arizona* and continued to work on repair and salvage at Pearl Harbor throughout the war. In 1948, the tugboat was transferred to the city of Oakland, California, and renamed Port of Oakland and used for 40 years. The tugboat was returned to the Navy in 1994 and then donated to the Arkansas Inland Maritime Museum in 2005 and arrived at the Museum on November 23, 2015.

The AHPP has recently awarded the Arkansas Inland Maritime Museum a $27,000 grant for a master plan and installation of an HVAC, which is scheduled for completion in May 2017. The delay is due to the historic nature of the fabric of the boat. It has been an engineering challenge integrating the new system to a structure that has never had an HVAC system. There is a program today in celebration of Pearl Harbor at the Arkansas Inland Maritime Museum.

EASEMENTS
Paul Porter gave a presentation of the property at 511 E. 8th Street (c. 1903) in Little Rock, Arkansas, in the MacArthur Park Historic District. He showed slides of the 1892, 1897, and 1913 Sanborn maps of the location for examples of changes to the structure over the years. The MacArthur Park Historic District was listed in the National Register of Historic Places on 7/25/1977. The owner undertook a state tax credit for rehabilitation on 511 E. 8th and received certification in April 6, 2016. Subsequently, it was certified as a contributing resource to the MacArthur Park Historic District on September 16, 2016, by the National Park Service for a charitable contribution for conservation purposes.

Mark Christ gave an overview of the events surrounding the historic events that occurred at Prairie D'Ane Battlefield. The National Park Service reports on the Prairie D'Ane Battlefield: "While portions of the battlefield have been altered by road construction and growth around the town of Prescott, most of the historic landscape retains good integrity. The battlefield will continue to suffer development pressures if preservation of the landscape does not occur in the near future. The battlefield should be viewed as the highest priority for its protection among the Camden Expedition battlefields given its current good condition and the continuing threat of development." The Prairie D'Ane Battlefield was listed in the National Register of Historic Places on 3/22/1974 and designated a National Historic Landmark on 4/19/1994.

Mark spoke with Dr. Nathan Patrick Hale, who called from Florida and told him that he had a portion of the Prairie D'Ane Battlefield that he would like to sell for preservation and

development as a heritage tourism site. Mark put him in touch with the Civil War Trust and they had the 808 acre tract appraised. The appraisal came in at $1.4 million, and Dr. Hale made the incredibly generous offer to sell it for $900,000 – a $500,000 contribution. The Civil War Trust and Dr. Hale have signed an agreement confirming that contribution and calling for the sale to be concluded by November 2017.

The American Battlefield Protection Program will almost certainly provide a grant for half of the appraised value: $700,000, leaving $200,000 to be raised for the remainder. The Nevada County Depot Museum will lead the fund-raising effort and will hold title to the property after its purchase. The AHPP will hold an easement on the property. Other funding for the purchase will come from the following:

AHPP: $40,000
AEDC: $50,000
Ross Foundation: $10,000
Senator Teague: $10,000

That leaves only $90,000 to be raised.

The Museum, along with the Prescott-Nevada County Economic Development agency, are working toward raising the remaining funds.

After its purchase, the battlefield land, which lies immediately adjacent to the Highway 24 exit off of I-30 at Prescott, will be developed as a heritage tourism site to bolster economic development in the area. The Prescott group has already hired a consultant to produce an interpretation/development plan for both the Prairie D'Ane and Elkins' Ferry Battlefield sites.

Dr. Early asked if this piece of land is natural prairie and Mark agreed. She asked if maybe there is an entity that might be interested in the natural environment that might partner with the owners of the battlefield. Mark responded that he had made a trip to the battlefield with Natural Heritage Commission employee Theo Whitsell. He did find areas with extant prairie plants.

Mark added that tax deductible donations are accepted for the Prairie D'Ane Battlefield purchase fund.

Missy wished everyone a happy holiday and thanked them for their service on the State Review Board.

DELISTING
Cove Creek Bridge – Matinville, Conway County
Demolished between December 3 and December 9, 2012, and replaced with a brand new bridge

Leonard Gordon Homestead: Hexagonal Grain Crib – Twentythree, White County
Demolished approximately 2005, but uncertain of actual demolition date
US 63 Black River Bridge – Black Rock, Lawrence County

Demolished between May 26, 2015 and September 1, 2015, and replaced with a brand new bridge

S. S. P. Mills and Son Building – Wilton, Little River County
In the process of being demolished and is essentially gone as of a week ago

Bruno School – Bruno, Marion County
Demolished about 2007 per the owner

Mississippi County Jail – Osceola, Mississippi County
Demolished February 25, 2016

Dr. Ben Johnson made a motion to delist each of the now demolished properties from the National Register of Historic Places. Baxter Sharp seconded the motion and the motion passed.

NATIONAL REGISTER PROPERTIES
Ralph Wilcox announced that the first three properties to be presented were written and will be presented by a consultant from Portland, Oregon. They have been submitted to the Park Service for tax credit purposes. The consultants and the property owners are also going through the National Register Process. Our office, as of yesterday, has received letters of support from Senator David Johnson and State Representative Warwick Sabin. These properties were presented to the Little Rock Historic District Commission and they voted to support these nominations. The properties will be presented in a block because they have essentially identical histories. The properties will be presented by Rob Mawson and John Tess who are with a Portland, Oregon, consulting firm. If you are a member of the public and want to speak for these nominations or any other nominations today, please be sure to sign in on the public comment sign-in sheet.

Fred W. Parris Towers – Little Rock, Pulaski County
Presented by Rob Mawson and John Tess, Heritage Consulting

Fred W. Parris Towers was constructed in 1971-1972 as public housing built specifically for the elderly by the Little Rock Housing Authority (LRHA). The property is **locally significant** under **Criterion A** for POLITICS/ GOVERNMENT. Specifically, Parris Tower, along with Cumberland and Powell Towers, was developed directly in response to a shift in federal policy for public housing to targeting senior citizens. This policy shift dates to the Housing Act of 1956, which gave funding priority to senior housing in public housing construction and resulted in the first federally-funded senior housing projects in the country. Prototypical design adhered to Corbusier's "Tower in the Park" concept with efficiencies and one-bedroom units stacked in a single high-rise building surrounded by a larger green space. These projects were typically located in residential areas at the perimeter of downtowns. Integral to the concepts were associated social programs and services. Despite best efforts, progress in the Eisenhower Administration was slow. Upon election, the Kennedy Administration redoubled efforts; the passage of the Housing Act of 1961 resulted in a significant boost in federal funding for

affordable senior housing. The policy then blossomed with the largess of President Lyndon Johnson's Great Society, though the allocation of federal funding often resulted in a protracted development process. The overall trend resulted in several hundred senior housing projects around the country. The trend ended in 1973 when the Nixon Administration placed a moratorium on new construction and shifted federal policy to public housing vouchers. Parris, along with Cumberland and Powell, are the only examples of this historic context in Little Rock.

Cumberland Towers – Little Rock, Pulaski County
Presented by Rob Mawson and John Tess, Heritage Consulting

Cumberland Towers was constructed in 1973-1974 as public housing built specifically for the elderly by the Little Rock Housing Authority (LRHA). The property is **locally significant** under **Criterion A** for POLITICS/GOVERNMENT. Specifically, Cumberland Towers, along with Parris and Powell Towers, was developed directly in response to a shift in federal policy for public housing for families to targeting senior citizens. This policy shift dates to the Housing Act of 1956, which gave funding priority to senior housing construction and resulted in the first federally-funded senior housing projects in the country. Prototypical design adhered to Corbusier's "Tower in the Park" concept with efficiencies and one-bedroom units stacked in a single high-rise building surrounded by a larger green space. These projects were typically located in residential areas at the perimeter of downtowns. Social programs and services were integral to the senior housing projects. This policy shift began with the Eisenhower administration with the passage of the Housing Act of 1956. Upon election, the Kennedy Administration redoubled efforts with the passage of the Housing Act of 1961. The combination of the housing acts resulted in a significant boost in federal funding for affordable senior housing. The policy was further developed during the Johnson Administration as part of his Great Society platform. The overall trend resulted in several hundred senior housing projects around the country. The trend ended in 1973 when the Nixon Administration placed a moratorium on new construction and shifted federal policy to replace publically-constructed and managed housing projects to a public housing voucher system. Cumberland, along with Parris and Powell, are the only examples of this historic context in Little Rock.

Jesse Powell Towers – Little Rock, Pulaski County
Presented by Rob Mawson and John Tess, Heritage Consulting

Jesse Powell Towers was constructed in 1974-1975 as public housing built specifically for the elderly by the Little Rock Housing Authority (LRHA). The property is **locally significant** under **Criterion A** for POLITICS/GOVERNMENT. Specifically, Powell Towers, along with Parris and Cumberland Towers, was developed directly in response to a shift in federal policy for public housing for families to targeting senior citizens. This policy shift dates to the Housing Act of 1956, which gave funding priority to senior housing construction and resulted in the first federally-funded senior housing projects in the country. Prototypical design adhered to Corbusier's "Tower in the Park" concept with efficiencies and one-bedroom units stacked in a single high rise building surrounded by a larger green space. These projects were typically located in residential areas at the perimeter of downtowns. Social programs and services were integral to the senior housing project. This policy shift began with the Eisenhower administration with the passage of the Housing Act of 1956. Upon election, the Kennedy

Administration redoubled efforts with the passage of the Housing Act of 1961. The combination of the housing acts resulted in a significant boost in federal funding for affordable senior housing. The policy was further developed during the Johnson Administration as part of his Great Society platform. The overall trend resulted in several hundred senior housing projects around the country. The trend ended in 1973 when the Nixon Administration placed a moratorium on new construction and shifted federal policy to replace publically-constructed and managed housing projects to a public housing voucher system. Powell, along with Parris and Cumberland, are the only examples of this historic housing trend in Little Rock.

Mr. Mawson introduced Rodney Forte (Metropolitan Housing Alliance), Andre Blakely (Gorman & Company, Inc.), and John Tess (President, Heritage Consulting) stated that the buildings that he will present the nomination for are involved in a $55 million renovation that will comprehensively upgrade the three buildings that have outlived their economically viable life. It will revitalize 597 public housing units and is driven in part by an $11 million historic tax credit. One of the keys to the timing is that it will rely on HUDs rental assistance demonstration program. That program is intended to solve a $26 billion backlog of maintenance and repairs to public housing. It allows public and private debt to be leveraged through investing property and change public stewardship and affordability.

Mr. Mawson stated that the National Park Service suggested that the best way to present this nomination as three individual nominations as opposed to a multiple property nomination.

All three properties are significant under criterion A with local significance for their association with public senior housing in Little Rock. These are the only such buildings built in the city for this purpose. The first property in chronological order is the Fred W. Parris Towers at 1800 S. Broadway. It is 14 stories with 250 units of which 140 are studios, 100 are one-bedroom, and 10 are two-bedrooms at a cost of $3.6 million. The second property is Cumberland Towers at 311 E. 8th Street. It is 11 stories with 178 units, including 106 studios, 68 one-bedroom, and four two-bedrooms at a cost of $3.2 million. The last property is the Jesse Powell Towers at 1010 Wolfe Street. It has 9 stories, 169 units of which 100 are studios, 66 are one-bedroom, and 3 are two-bedrooms, at a cost of $1.8 million.

Criterion A means the property can be eligible for the National Register if they are associated with events that made a significant contribution to broad patterns of our history. To be specific, the events in this instance is the beginning of an entirely new public housing building type to respond to the physical and social needs of low income senior citizens. This historic context is based on scholarly research that included going to the National Archives in Washington, D.C. and included exhaustive secondary research and an exhaustive and excessive survey of associated building types through the city, state, and nation. It also included contacting the HUD federal preservation officer. It is built on the National Register's document Public Housing in the United States, 1933-1949, MPS.

Mr. Mawson then gave a brief history of public housing and how senior citizens were included in the new federal policy in the United States from its beginnings in 1942 to present day.
Mr. Mawson addressed concerns about the three tower buildings ages of less than 50 years old, which is designated as a filter to ensure that enough time has passed to evaluate the property in a

historic context. However, it was not designed to be mechanically applied on a year by year basis. He stated that 3% of all National Register listing are less than 50 years old and half of those are listed under Criterion A and half of those are locally significant.

John Tess spoke briefly about his background in writing nominations for the National Register of Historic Places and the nomination of these 3 buildings. He expressed his concern that people look at the building with their association with history and not always the architectural design. He added that there was one more letter of support for the nomination of the 3 tower buildings. It was from Congressman French Hill.

Rodney Forte thanked the board for allowing the group to bring the nomination to the board. He spoke briefly about his hopes to move forward and continue to provide housing for some 600 families whose ages range from 18 to 102 in just these 3 buildings. The greatest age average is 69 to 79 years old and the average income is about $10,000 annually. Chairman Ted Dickey is in attendance today and in support of this nomination. He stated that the Housing Authority was created by the city government under state legislation. He added that the organization is solely funded by HUD and receives very few dollars from other entities. This is an incredible time for HUD in that they are leveraging funds through state organizations under low income housing tax credits as well as seeking the board's approval for federal tax credits on the historic side as well. He is here today to respond to any questions that the board might have.

Andre Blakely spoke briefly and thanked the board for allowing he and other members of the nominating group to attend today's meeting. He is from Gorman & Company, Inc., a 30 year old development company. They work across the United States and have worked with others on very similar undertakings. Most recently, they worked in Arizona where they worked with Maricopa County Housing on the largest public housing redevelopment. This is an exciting opportunity for the residents and the housing authority and for this community. It is an opportunity to leverage public and private relationships and induce public and private capital. He is excited to be partnering with the Housing Authority on this project. He is happy to answer any questions.

Dr. Brandon stated that he has a list of guests that would like to address the board.

Jill Judy passed around some photos and urged members to go against the nomination. The buildings are not 50 years old and she feels that they are not threatened or going anywhere. She believes that they are no longer senior housing and the photos show that the buildings around the towers are not being fixed up. The homeowners are concerned about having the large structure in the middle their neighborhood. She believes that Cumberland Towers is perhaps the only one that the board should consider because of its urban location. She added that the state created Capitol Zoning after the Parris Towers were built to protect the community. She believes that putting the towers on the National Register threatens the already listed historic district in which the tower buildings reside. She contends that it hasn't been senior housing for some time and will not be in the future. We are giving developers another layer of tax credits to reinvent the wheel and these are buildings that are not being built now because it is a concept that has been deemed a very bad concept moving forward. So we are going to be putting a rubber stamp on a failed public policy for the next generation of tenants that will be living there that will still be

poor and our most fragile members of society. We might want to present a better model of living where they are not on top of each other and not worried about who is in the elevator. She just thinks there is a better solution. She believes private investors should be allowed to purchase the buildings and turn the units into condos.

Kathy Wells, secretary to the Downtown Neighborhood Association, addressed the board members. Their territory includes concerns for the Parris and Cumberland Towers. She stated that the association had provided a letter and had several members present at today's meeting. She also believes the senior housing is a failed concept. She believes that Powell Towers should be the only one the board should pass. She believes that this is a short term remedy and there is no money down the line for the future when the towers fall into decay. They encouraged the board to not support the nominations of the Parris and Cumberland Towers, but to support scattered site housing with vouchers and proper services. In support of the Downtown Neighborhood Association letter, they have extracted the pertinent points of our downtown plan for the future plus a summary about the concentrated poverty policies that led to the conclusion that these high rises were very much the wrong direction. We understand the push and political reality, but this is really not the best thing for these tenants and there is a better way with scattered site housing. We have with Relocal, a recent analysis of targets for this prospect for redevelopment.

Ed Sargeant doesn't believe the Criteria Consideration G eligibility has been proven in this nomination. The level of extraordinary importance is so fragile for which the towers have survived have not been demonstrated, nor does its importance compare with the examples that have been given.

Tom Fennell stated that the housing authority has been a client of his for many years. He has been working in affordable housing and low income housing for many years and was in fact involved in using tax credits to do Madison Heights, Granite Mountain, and the old Ives Home. He has seen first-hand transformation for families who are living in substandard conditions. The opportunity to have safe affordable housing. My people and many of his friends are opposed to this work being done in their neighborhood (Parris Towers), which he also lives in. He stated that this is senior housing although someone said that it is not. It is housing for seniors and people with disabilities. The disabled do not necessarily have to be seniors, but these are the HUD guidelines and have nothing to do with the local administration. The fact that we can leverage these funds and improve all of the properties using historic tax credits reinforces the historic nature that this was a bold step for the government, Arkansas, and Little Rock to finally take care of senior housing and people who could not afford decent housing. He realizes that there might be other ways to use these buildings that are beneficial for the neighborhood, but he feels that we have a responsibility as a community to maintain this diversity and to help preserve these structures for what they represent to families and generations of elderly people in Arkansas.

Marvin Dalla Rosa lives in the neighborhood where Parris Towers is. He lives in the Kavanaugh House. He doesn't believe that using historic tax credits will guarantee that these building will remain senior housing. They are not threatened or of an age that they need to be protected. He believes that it is indicative that the materials presented by the consultants note that there are

hundreds of these buildings across the nation but they only cite one example in Atlanta that is listed on the National Register. He wants to know what is exceptional about these 3 towers. He believes the argument is weak. He believes the buildings will go into foreclosure once tax credits run out. He says it has happened several times. He is also a investor in real estate as well.

Sharon Welch-Blair owns the Hornibrook Mansion in the Governor's Mansion Historic District. She believes the 50 year guideline was set for a reason. She doesn't understand why anyone would consider the tower building would be considered historically significant. She believes they look like Stalinist buildings raised in Russia. She is appalled that we would list properties on the National Register of Historic Places just so they can receive historic tax credits. She urged the board not to subvert the reason for listing properties. She added that other cities in this country have long recognized that this is a failed approach to senior living. If you Google tearing down senior high-rises, you will easily find multiple articles talking about why other cities are tearing these buildings down, because they represent a problem for seniors. She quoted Major Sharp James in an article from the *New York Times*, March 7, 1994, who said, "This is the end of an American dream that failed." She mentioned Cabrini-Green Building in March of 2011 and why that building was torn down. It was mentioned that they created an opportunity for overcrowding, crime, vandalism, and poor maintenance. When you have that many people living in a building you create an opportunity of massive issues. She lives in the neighborhood and can the board members how many times the fire department shows up there for false alarms. She can tell the board about her neighbors that tell her about the people coming in and out doing drug deals there. We have been fighting this through the neighborhood association since she moved downtown in 1994. She can't imagine that the board would allow these designations to take advantage of the opportunities for historic taxes when we have so many better examples that would really improve senior living. She encourages the board to not subvert the real reason for placing properties on the National Register of Historic Places.

John Tess stated that the discussion is very interesting, but the fact of the matter is that properties that are placed on the National Register of Historic Places come in all shapes and sizes. He understands that a telephone booth has been placed on the National Register. Does something have to be endangered or does it have to be a successful program before it can be placed on the National Register? There are many elements that make things historic and looking at this he feels that they have made a strong argument with respect to the criteria and why these buildings should be listed. He had Rob Mawson to address some of the specific things that may have come up and specifically the idea that the National Register is only for architecturally historic buildings. He was trained as a historian and has been a historian and believes that history is reflected in the architecture, but history is more than just the architecture.

Rob Mawson addressed the board in reference to the demolition of high-rise towers. There are bad examples of high-rise design. He listed several including Cabrini Green in Chicago that are not the types of buildings and asked that the board use their sophistication as reviewers to tell the difference. He also readdressed the 50 year guideline. Under section V.Time: The 50 year period is an arbitrary span of time, designed as a filter to ensure that enough time has passed to evaluate the property in a historic context. However, it was not designed to be mechanically applied on a year by year basis. Generally, our understanding of history does not advance a year

at a time, but rather in periods of time which can logically be examined together. He believes the firm has established a historic context. The difference between these buildings and the 50 years is a matter of 3 or 4 years, depending on the building you are looking at. He believes the firm has established a historic context based on scholarship that address the question of whether these buildings have enduring value or whether they are of only passing interest. He believes that the buildings do represent an important federal solution interpreted locally to a social crisis in the 1950s.

Andre Blakley addressed some comments. One is in respect to the comment about the foreclosure rate of public housing. He stated that Ernst and Young puts an annual report out that shows a rate of .001% foreclosure rate on these types of properties. Very low foreclosure rate as it relates to tax credit developments. There was another comment about teardowns in Chicago. He asked that the board not confuse local issues in Chicago with the towers in Little Rock. That is really designed for families with 4 bedroom units and did not provide the support of services that was needed for those families. It did create massive issues. This can't be compared to a senior development. He added this partnership is not a turn and burn opportunity for the Gorman & Company, Inc. and the Housing Authority. We try to stress that they are community developers first. In that model they try to identify and recognize the issues and concerns with the very most important stakeholders that are not present today. That is the resident population. He advises them not to get distracted by the opportunity for the request that we ask for additional resources. He thinks the conversation is how do we change the situation at these towers and not necessarily divorce them from what they have known for several years in terms of moving or relocation. He believes the real focus here are the residents and the changes that are needed. He added that the company has been doing this kind of work for a while and it is not just a fly by night opportunity for them from their perspective.

Dr. Brandon reminds the board that although they have heard a lot of positive and negative things about this project, we are here to make our decision based on the criteria for placing these structures on the National Register.

Dr. Early stated that the board just delisted a bunch of properties. She asked if there was any likelihood that changes will damage the qualifications of the buildings to be on the National Register. Ralph stated that if the historic tax credit is used the Park Service will make sure that that does not happen.

Dr. Early mentioned that Rob Mawson mention that he spoke with the HUD federal preservation officer. She wondered how HUD felt about this nomination. Mr. Mawson said that they were supportive, but had not done much research.

Carl Miller asked if Capitol Zoning supported the nomination and Ralph did not think it had been presented to Capitol Zoning. He asked why. Ralph stated that he didn't think Capitol Zoning would get involved until a plan had been presented to do the work.

Bob Kempkes asked about the Palmer House in Atlanta. Ralph stated that the Palmer House was determined eligible during the Section 106 review. It was not nominated as of a few weeks ago. It was under architectural significance.

Dr. Johnson asked if there were any other public housing structures listed on the National Register in Arkansas. Ralph didn't think so unless it was done before he started working at the AHPP.

There was more discussion about other senior housing structures in the state.

Dr. Johnson agreed with the consultant's presentation, but he didn't feel like they address the context as it relates to Little Rock. He believes that history is important (critical). He also believes the board should be looking at criteria.

Dr. Brandon stated that the consultants have done a great job in the presentation, but he also believes that the context is critical.

Bob Kempkes stated that he would be hard pressed to nominate the 3 properties.

Carl Miller stated that these buildings were placed without permission from the neighborhood residents. He agrees that the security and the management is what the community is concerned about. He also added that the buildings are of the period that we are seeing in the near future and that they are not going anywhere.

Bob Kempkes thinks that it is a really good project and he had done several senior housing projects, but he doesn't think a case has been made for Criteria Consideration G.

Dr. Brandon thought there would not be as big an issue if they were 50 years old.

Dr. Early asked the staff if they have talked to the NPS in Washington, D.C., about Criteria Consideration G properties. Ralph stated that he has not spoken the Arkansas reader about these properties, but if the case is made the Park Service is happy to list them. If they do not make the case they will send them back for more information or reject them.

Dr. Ben Johnson made a motion and Dr. Ann Early seconded the motion to nominate the Cumberland Towers, Fred W. Parris Towers and Jesse Powell Towers to the National Register of Historic Places under Criterion A with local significance, and under Criteria Consideration G. The motion failed.

Dr. Brandon stated that he received a proxy vote from Joseph Kelly this morning a 9 a.m. Dr. Brandon stated that Joseph Kelly voted yes on the nomination of the Cumberland Towers, Fred W. Parris Towers, and Jesse Powell Towers. That was the only nomination he voted on.

Darragh Building – Little Rock, Pulaski County
Presented by Callie Williams

The Darragh Company Building is a Mid-Century Modern building designed by Noland Blass, Jr. of the Little Rock architectural firm of Erhart, Eichenbaum, Rauch, & Blass in 1958. It was constructed utilizing post and beam construction techniques, replacing the need for heavy-load bearing walls with steel, concrete and glass. The Darragh Building was designed for commercial use for the Darragh Company and is located just east of Downtown Little Rock at 1403 East Sixth Street, Little Rock, Arkansas, within a primarily warehouse and industrial district. The Darragh Building is approximately 4000 square feet. Significant features of the structure include: floor-to-ceiling glass walls and windows, extended floor and roof slabs that emphasize the building's horizontal lines, a roof with no slope, a building-surrounded interior atrium, floating steps leading to the building's front entrance, and exterior and interior concrete infill panels decorated with a stretched octagon and diamond three-dimensional pattern. The Darragh Company Building is being nominated to the National Register of Historic Places under **Criterion C** as an excellent example of modernist architecture in Little Rock, Arkansas, designed by Nolan Blass, Jr, with **local significance**.

Callie stated that the owners were present along with Dustin Smith.

Dr. Johnson asked Callie to add a paragraph about Frederick Kramer Darragh, Jr. to the nomination. Callie stated that she would be happy to add a paragraph.

Carl Miller asked about other Noland Blass properties nominated. Callie stated that the Strauss House was listed.

Carl Miller made a motion and Baxter Sharp seconded the motion to nominate the Darragh Building to the National Register of Historic Places under Criterion C with local significance. The motion passed.

Isaac Homard House – Little Rock, Pulaski County
Presented by Sandra Taylor Smith

The Homard House at 1217 W. 3rd Street in downtown Little Rock, Arkansas was built in 1905 and is being nominated to the National Register of Historic Places under **Criterion C** with **local significance** for its importance as an excellent example of the Neo-Classical Revival style.

The property owner, Laura Winning along with guest Laurie Woods were at today's meeting representing the Homard House. Ms. Winning spoke briefly about the work being done on the Homard House.

Dr. Early made a motion and Bob Kempkes seconded the motion to nominate the Isaac Homard House to the National Register of Historic Places under Criterion C with local significance. The motion passed.

First Evangelical Lutheran Church – Fort Smith, Sebastian County
Presented by Callie Williams

The First Evangelical Lutheran Church was designed and constructed for the local German

Lutheran congregation of Fort Smith from 1900 to 1904. The building is located just to the west of the historic heart of the town of Fort Smith, which surrounded the former army fort along the Arkansas River. The First Evangelical Lutheran Church in Fort Smith, Arkansas, is being nominated to the National Register of Historic Places under **Criterion C**, with **local significance**, as an excellent example of a Gothic Revival style church designed by local architect Williams Hornor Blakely. The property is also being nominated under **Criteria Consideration A** as a religious property deriving its primary significance from its historical importance.

Virginia Shaver and Dottie Toake are present at today's meeting representing the First Evangelical Lutheran Church. One of the ladies stated that the Lutherans have always been interested in educating the children. She stated that the Lutherans built the first school in Fort Smith after they built the church.

Dr. Johnson mentioned that it was a long discussion on integrity. Callie stated that the staff is trying to add a little more to the integrity because the staff from the Nation Park Service requested more especially about interiors. We are just trying to cover all the bases. Dr. Johnson thought it was well done.

Dr. Ben Johnson made a motion and Baxter Sharp seconded the motion to nominate the First Evangelical Lutheran Church to the National Register of Historic Places under Criterion C with local significance and under Criteria Consideration A as a religious property deriving its primary significance from its historical importance. The motion passed.

Dr. Brandon stated that he received a proxy vote from Joseph Kelly this morning a 9 a.m. Dr. Brandon stated that Joseph Kelly voted yes on the nomination of the Cumberland Towers, Fred W. Parris Towers, and Jesse Powell Towers. That was the only nomination he voted on.

The meeting was adjourned at 12:12 p.m. for lunch.

The meeting reconvened at 12:52 p.m.

St. John's Episcopal Church – Camden, Ouachita County
Presented by Callie Williams

St. John's is the only Episcopal Church in Camden, AR. It was organized May 5, 1850, and the congregation has met continuously since that time. The church originally met in various locations around town before building a new church in 1888. The congregation met in this first purpose-built structure until 1925. The current church structure was designed in the Gothic Revival style by the architectural firm of Witt, Siebert & Halsey of Texarkana, Arkansas, and Texas in 1925 and completed in 1926. The style and plan of the building was chosen by St. John's Vestry in order to have both a parish hall and church on one lot and use the lot next door for a rectory to attract experienced priests. The church building was designed and constructed during the area's early 20th century oil boom. St. John's Episcopal Church in Camden, Arkansas, is being nominated to the National Register of Historic Places under **Criterion C**, with **local significance**, as an important example of a Gothic Revival style church designed by the

architectural firm Witt, Seibert & Halsey. The property is also being nominated under **Criteria Consideration A** as a religious property deriving its primary significance from its historical importance.

There are several members of the congregation of the St. John's Episcopal Church present at today's meeting. Rev. Gordon Maroney spoke briefly about a ghost presence in the church and tombstone that had been covered by carpeting. He also added that there is an over 160 year old bell in a chimney like structure at the rear of the church.

Another member of the church stated that the organ in the church was significant as it is a Hook and Hastings model from 1907 that has been electrified…

Carl Miller made a motion and Bob Kempkes seconded the motion to nominate the St. John's Episcopal Church to the National Register of Historic Places under Criterion C with local significance, and under Criteria Consideration A as a religious property deriving it primary significance from its historical importance. The motion passed.

Aristocrat Hotel – Hot Springs, Garland County
Presented by Callie Williams

The Aristocrat Motor Inn, now known as the Aristocrat Manor Apartments, is a seven-story Section 8 apartment complex which was converted from a hotel in 1978. Located at 240 Central Avenue in the heart of downtown Hot Springs, Arkansas, the structure is located within the boundaries of the Hot Springs Central Avenue Historic District (NR 6.25.1985) in Hot Springs, Arkansas (Hot Springs National Park) but was constructed outside of the district's period of significance. The hotel was constructed in 1963. This Mid-Century Modern structure is composed primarily of concrete, glass, metal, and aluminum. The Aristocrat Manor is being nominated to the National Register of Historic Places under **Criterion C**, with **local significance**, as an excellent example of Mid-Century Modern hotel design in downtown Hot Springs, Arkansas.

Bob Kempkes asked if there was support of the nomination from the property owners. Callie stated the owners actually brought the nomination to the staff.

Dr. Brandon asked if they are doing something similar to the Downtowner. Callie stated that the owners are trying to do something similar.

Dr. Early asked about expansions and development of Oaklawn and its effect on the seasonal economy. Callie stated that newspaper articles alludes to that.

Travis Ratermann stated that he worked on section 8 in the nomination and there was a brief discussion about the opening and closing of hotels around the opening and closing of race season.

Bob Kempkes stated that the hill behind the hotel has collapsed onto the rear of the hotel.

Bob Kempkes made a motion and Carl Miller seconded the motion to nominate the Aristocrat Hotel to the National Register of Historic Places under Criterion C with local significance, as an excellent example of Mid-Century Modern hotel design in downtown Hot Springs, Arkansas. The motion passed.

Federal Building, U. S. Post Office and Courthouse – Pine Bluff, Jefferson County
Presented by Ralph Wilcox

The Pine Bluff U.S. Post Office and Courthouse is being nominated to the National Register of Historic Places with **local significance** under **Criterion C**. The Pine Bluff U.S. Post Office and Courthouse is a good example of the commercial work of the noted Arkansas architecture firms of Erhart, Eichenbaum, Rauch & Blass and Brueggeman and Landauer & Associates, and is one of the few large-scale buildings in central Pine Bluff that exhibits characteristics of the International style. The combined post office and courthouse was erected at a time when federal office space was in high demand nationally after World War II and new facilities were necessary to accommodate this need. Its style was indicative of the Modern Movement with clean lines and being void of the unnecessary trappings of ornamentation. This design approach and the almost complete reliance on private architects by the federal government for development of new federal facilities typified this era in the federal public building program. As a consequence, the Pine Bluff building was a part of the post-war national trend where an increased need for federal facilities combined with a modern efficient approach to design and the use of private architects resulted in the construction of a number of public facilities across the country.

The Pine Bluff U.S. Post Office and Courthouse is also significant for its associations with the role of urban renewal in Pine Bluff. The Pine Bluff U.S. Post Office and Courthouse was built on a formerly swampy area that had been occupied by substandard housing and businesses. The construction of the Pine Bluff U.S. Post Office and Courthouse represents the pivotal role of urban renewal in modernizing and revitalizing Pine Bluff's downtown in the 1960s. As a result, the Pine Bluff U.S. Post Office and Courthouse is also being nominated to the National Register with **local significance** under **Criterion A**.

Ralph stated that the staff received a letter of support from the Jefferson County Bar Association for the nomination of the Federal Building.

Dr. Ben Johnson made a motion and Dr. Ann Early seconded the motion to nominate the Federal Building, U. S. Post Office and Courthouse to the National Register of Historic Places under Criteria A & C with local significance. The motion passed.

Dr. Early stated that Pine Bluff seems to have some intriguing and historic undiscovered or under represented structures. Ralph agreed and said that there will be a house nominated in the coming year from Pine Bluff that he believes is really intriguing.

Lake Catherine State Park Prisoner of War Structures – Hot Springs vic., Hot Spring County
Presented by Travis Ratermann

The Lake Catherine State Park Prisoner of War Structures near Hot Springs, Arkansas, are being nominated to the National Register of Historic Places with **local significance** under **Criterion A** for the role these structures played as part of a nationwide network of camps operated by the U.S. Army to house German Prisoners of War (P.O.W. or PW) during World War II. These two structures were built using German Prisoner of War labor to complete a previous Civilian Conservation Corp projects left unfinished by the onset of World War II. At this time, the Lake Catherine Retaining Wall #4 and the Outdoor Oven/Bar-B- Que pit, are the only extant resources within the former Hot Springs Branch Camp, which once housed upwards of 250 German Prisoners of War. Only one other World War II Prisoner of War resource, the Maness Schoolhouse, has been listed to the National Register of Historic Places in Arkansas. Though Arkansas was highly active in receiving German and Italian Prisoners of War during World War II, only a few Prisoner of War related resources have been determined eligible for listing, due to deterioration or demolition, only recently have a few more resources been located and are under further investigation. However, these two resources are excellent examples of the types of work undertaken by the Prisoners of War in Arkansas, which also used these prisoners extensively in the Arkansas Delta region due to labor shortages in agricultural fields.

Shayla Albey from State Parks stated that she appreciated Travis for his hard work on the nomination of the Lake Catherine State Park Prisoner of War Structures.

Dr. Early spoke briefly about Camp Robinson's Prisoner of War camp. Pan American did some good research and she feels that it should be pursued more as a nomination.

Dr. Brandon and Travis discussed research on Prisoners of War briefly.

Travis

Bob Kempkes asked about the location of the P. W. initials. Travis explained their specific location based on a slide image of the visitor's center.

Dr. Early asked about tents that the POWs lived in. Travis said you can guess where they were roughly.

Carl Miller stated that the CCC structures were nicer looking than the POW structures.

Dr. Early added that there is a lot of research on prisoner of war camps.

Travis spoke briefly about the difference between the P. W. initials and the POW initials.
Stacy Hurst asked if the nomination was initiated by State Parks. Shayla Albey stated that she initiated the nomination.

Callie stated that she has worked a lot with State Parks lately on CCC structures.

Missy mentioned the Butterfield House.

Dr. Ann Early made a motion and Baxter Sharp seconded the motion to nominate the Lake Catherine State Park Prisoner of War Structures to the National Register of Historic Places under Criterion A with local significance. The motion passed.

Brinkley Concrete Streets – Brinkley, Monroe County
Presented by Callie Williams

The Brinkley Concrete Streets are being nominated to the National Register of Historic Places with **local significance** under **Criterion A** for their associations with providing improved infrastructure to cope with increased automobile traffic in the early twentieth century. The portions of Ash Street and New York Avenue covered by this nomination are the largest contiguous sections of concrete streets remaining in Brinkley. The Brinkley Concrete Streets include approximately 3,400 feet of concrete pavement that was laid in 1928 and 1929. The streets illustrate the improvements that were undertaken to better cope with automobile traffic and to alleviate the dust and mud that were commonplace with the city's previously unpaved streets.

Revis Edmonds asked about the nomination. Ralph stated that he started the nomination.

Stacy Hurst if concrete streets were unusual in Arkansas or the nation. Ralph stated that there are several highway sections, some brick streets, and a cobblestone alley. Several board members also mentioned other areas in Little Rock and Arkansas where there are some concrete streets.

Stacy asked if this nomination would lead to more like it and Ralph said that he did not know.

Baxter Sharp made a motion and Carl Miller seconded the motion for the nomination of the Brinkley Concrete Streets to the National Register of Historic Places under Criterion A with local significance. The motion passed.

Russellville Downtown Historic District Additional Documentation – Russellville, Pope County
Presented by Ralph Wilcox

After the 1930s, the commercial area of downtown Russellville remained a vibrant and important commercial heart of the city. The 1940s period, specifically, also brought new construction to the downtown commercial district. Several new buildings were built in Russellville's downtown during the 1940s, including buildings at 106 and 122 North Commerce, 106-108, 110, 112-114, and 116 South Commerce, 217 North Denver, 111 Boulder Street, 311 West C Street. Construction even continued on a limited scale within the district during the 1950s and 1960s with the construction of the building at 104-106 North Denver in 1958 and the building at 201 North Denver in 1962.

The 1950s would have brought some changes to Russellville's downtown area, specifically with the construction of Interstate 40 in 1956. Prior to that time, U.S. 64, which follows the path of Main Street through the district, was the main highway in the area meaning that travelers

traveling between Little Rock and Fort Smith and beyond would have passed through the heart of the Russellville Downtown Historic District. The opening of I-40 would have taken some of the traffic away from the downtown area, especially those people from outside the community. Even so, Russellville's downtown area remained the community's main commercial core after the opening of the interstate.

Although Russellville's downtown remains vibrant today with businesses serving the local residents, some of the community's commercial area has shifted to the east of town on U.S. 64. Big box stores, car dealers, and assorted strip malls line the highway east of town, so that the downtown area is focused more on offices and specialty shops. Even so, the Russellville Downtown Historic District remains an important part of Russellville's commercial life, just as it has since the nineteenth century.

When the property list was updated in 2006, the period of significance was not extended as it should have been. The purpose of this additional documentation is to extend the period of significance up through 1967.

Dr. Brandon asked if the additional documentation was done for a reason. Ralph stated that it should have been done as a matter of course, but it stemmed from a tax credit project.

Dr. Ben Johnson made a motion and Dr. Ann Early seconded the motion to approve the additional documentation to extend the period of significance up through 1967 as it should have been done previously. The motion passed.

Dr. James Patrick House – Fayetteville, Washington County
Presented by Ralph Wilcox

The Dr. James Patrick House, located at 370 North Williams Drive, in Fayetteville, Washington County, Arkansas, is being nominated to the National Register of Historic Places under **Criterion C** with **local significance** for its importance as a good residential example of the Mid-Century Modern style of architecture. Built in 1965, and designed by the architect Ernie Jacks, who had worked with Edward Durell Stone, the Dr. James Patrick House represented a departure from the other homes in its neighborhood, which, for the most part, represent typical Ranch and contemporary designs of the 1960s and 1970s. Referred to as the Contemporary style in McAlester's *A Field Guide to American Houses* the Dr. James Patrick House exhibits many of the characteristics of the style, including wide overhangs, contrasting wall materials and textures, and unusual window shapes and placements.

Bob Kempkes was a student of Ernie Jacks, the architect of the Dr. James Patrick House.

Ralph mentioned that Mr. Jacks is still alive. Callie stated that he would be celebrating his 91st birthday this week.

There was a brief discussion about the design of the house.

Bob Kempkes made a motion and Carl Miller seconded the motion for the nomination of the Dr. James Patrick House to the National Register of Historic Places under Criterion C with local significance. The motion passed.

Minaret Manor – Osceola, Mississippi County
Presented by Travis Ratermann

The Minaret Manor exemplifies a myriad of architectural styles including Tudor Revival and Late Gothic Revival traditions within Mississippi County. It is not the only house in the area to have Tudor-Revival detailing, but it is a finest and most grand example of an American's interpretation of architectural styles found in England during this time period. Tudor Revival is commonly defined by the application of half-timbering and large decorative chimneys. The Minaret Manor is an elaborate example of the English or Tudor Revival in the Mississippi County and the Delta Region of Arkansas brought to the forefront by Andrew J. Florida in 1948. The Minaret Manor was built in 1948 as the residential center of a 15-acre building site in Mississippi County on what was the western edge of Osceola, Arkansas. The home is approximately 10,000 square feet and in the Tudor Revival style with some late Gothic Revival influences. This wonderful example of a Tudor Revival home was built by Andrew J. Florida, who was a noteworthy farmer, landowner, real estate developer, banker, and insurance agent in much of Eastern Arkansas and Memphis, Tennessee. Andrew J, Florida and his wife, Lennie Florida, traveled extensively throughout the world in the late 1930s and into the 1940s, and brought architectural ideas back to Osceola, Arkansas, that they would like to see constructed for themselves. Therefore, the Minaret Manor is being nominated to the National Register of Historic Places with **local significance** under **Criterion C** for its expression of Tudor Revival and Late Gothic Revival architecture.

Dr. Early asked Travis if he knew if the craftsmen who worked on the Minaret Manor were imported. Travis thought they might just be from Tennessee.

Since the Minaret Manor was donated to the Arkansas Northeastern College, Bob Kempkes asked what the college planned to do with the structure and its ancillaries. Travis stated that it may be used for incoming professors, parties and the like.

Dr. Johnson made a motion and Baxter Sharp seconded the motion to nominate the Minaret Manor to the National Register of Historic Places under Criterion C with local significance. The motion passed.

SPECIAL PRESENTATION

Ralph S. Wilcox, National Register & Survey Coordinator for the AHPP, did a presentation of:

'Clang, Clang, Clang Went the Trolley, Ding, Ding, Ding Went the Bell: 'Railroad Car Housing in America, 1900-1950

NEW BUSINESS

The next meeting will be Wednesday, April 5, 2017. It will be at the new Department of Arkansas Heritage office building at 1100 North Street in Little Rock, Arkansas.

Dr. Ben Johnson made a motion to adjourn the meeting and Dr. Ann Early seconded the motion. The motion passed.

The meeting adjourned at 2:42 p.m.

Stacy Hurst

From: John Tess <jmtess@heritage-consulting.com>
Sent: Monday, January 09, 2017 10:36 AM
To: Stacy Hurst
Subject: Little Rock Properties, Parris, Cumberland and Jesse Powell Towers

January 9, 2017

Ms. Stacy Hurst
State Historic Preservation Officer
Arkansas Historic Preservation Program
1100 North Street
Little Rock, AR 72201

RE: Fred W. Parris Towers (1800 S. Broadway St., Little Rock, Pulaski County, AR)
Cumberland Towers (311 E. 8th Street, Little Rock, Pulaski County, AR)
Jesse Powell Towers (1010 Wolfe Street, Little Rock, Pulaski County, AR)

Dear Stacy,

We want to thank you and your staff for assistance in our efforts to nominate the three properties above. As a follow up to the December 7, 2016 State Review Board meeting and to assist us in determining our next steps we would ask that you send us a copy of the meeting minutes and any transcript if there is one available. Heritage has listed over three hundred properties on the National Register and evaluated thousands of buildings across the country as historic resources. It remains our professional opinion that these are significant resources worthy of being on the National Register and the project team wishes to continue exploring this path.

To review where we are to date, as you know, one of the specific challenges to listing these properties is that they are relatively young. Much of the historic framework to support their historic significance did not exist when we started our research. Your staff has encouraged us throughout the process to strengthen the broader historic context. With each iteration of our nominations, our story has become fuller and stronger.

This dialogue with staff began last May. Since the three properties were similar, we contacted Ralph Wilcox to ask whether your office preferred that we treat the properties individually or as a group. Mr. Wilcox stated that individually would be the preferred approach.

In June, we submitted *Historic Tax Credit Part 1 – Evaluation of Significance* and *Determination of Eligibility* forms for each. On July 28th, we received letters from Callie Williams stating that because the properties were not 50 years old, they were not eligible for listing. At the same time, Thomas Marr recommended to the National Park Service (NPS) against approval of the Part 1 applications. Based on that recommendation, NPS issued its Part 1 denial within a week of receipt of the applications.

We followed up with both Mr. Marr and Mr. Wilcox on how we might best move the nominations forward. Mr. Marr stated that his recommendation on the Part 1 was based on the recommendation of your National Register staff. Mr. Wilcox stated that the decision of the National Register staff was based exclusively on the properties being less than 50 years old and that his position was primarily in anticipation of the State Review Board's perspective on the 50-year threshold. Nonetheless, Mr. Wilcox offered to place the nominations on the next State Review Board meeting agenda. New nomination documents, substantially updated and revised, were

submitted. Staff's recommendation to the State Review Board however remained in opposition to listing. In November, as part of the Certified Local Government process, the Little Rock Historic District Commission voted unanimously to support the nominations. As you know, the State Review Board did not recommend the nominations forward.

The issues surrounding these nominations have been consistent: First is the concern about age relative to the National Register 50-year threshold. The second is the lack of an existing well-accepted historic context for these properties to fit into. Throughout the process, reviews have raised good questions that have allowed us to strengthen the nominating documents.

It was for this reason that each time we submitted draft nomination documents to your staff, we asked if it would be possible to have a face-to-face meeting to discuss the projects. In its DOE letter, staff raised the question about how these properties fit into the broader question of public housing in the Post-War. In its second review, staff raised the question of how these properties compared with other examples in the state. At the State Review Board, a member raised the question about how these properties fit into Little Rock's earlier history of public housing while others questioned how these properties compared to the failed family-sized high-rise public housing during this same time. It is our belief that had we had the opportunity for face-to-face discussion, answers to these questions could have been incorporated into nominating documents. I think this may explain why the nominations had such strong support from the CLG, which had better familiarity with the properties. I also think the State Review Committee discussion may have gotten off track from the specifics of the National Register criteria.

It is our firm belief that these properties warrant listing on the National Register. The nominating documents tell a compelling story. The three buildings were all constructed in the 1970s as Little Rock's first public housing for the elderly. The story begins with a national senior housing crisis, including many World War II and Korean War widows, and continues with the direct response of the federal government with funding and best practices that addressed not only the physical need to house impoverished seniors but holistically addressed their social welfare. During this twenty-year period, high rise senior public housing was constructed in every major city in the country.

The Metropolitan Housing Alliance, Little Rock's public housing agency, nominated all three as being locally significant under Criterion A as the local expression of this national crisis and the federal-local response. Their vision is to embrace the heritage of these three properties and leverage that history with current funding sources, including HUD rehabilitation funds and historic tax credits, to preserve and rehabilitate these buildings – all nearing the end of their functional life. This initiative will result in upgraded public housing as well as job creation and economic stimulus for the Little Rock community. As we look to the future, twinning historic and affordable housing will be important – to preserve our heritage and to preserve our public housing.

At the end of the day, we believe these properties are worthy of listing. They have enduring value and specific to the 50-year threshold, respond to NPS guidance relating to Criteria Consideration G. We look forward to continuing our efforts with you to strengthen the nominations to get these properties listed on the National Register.

Sincerely

John M. Tess
President

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Portland, Oregon 97209

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HERITAGE

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Stacy Hurst
Director

Arkansas Arts Council

Arkansas Historic Preservation Program

Arkansas Natural Heritage Commission

Arkansas State Archives

Delta Cultural Center

Historic Arkansas Museum

Mosaic Templars Cultural Center

Old State House Museum

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An Equal Opportunity Employer

January 19, 2017

Mr. Jim Gabbert
National Park Service
National Register of Historic Places
1201 Eye Street, NW 2280
Washington, DC 20005

Dear Mr. Gabbert,

Enclosed please find three nominations for your review. These nominations were considered at our December 7th State Review Board meeting and had some support, but failed to gain approval. After considering these nominations further, I have decided to recommend them for inclusion in the National Register of Historic Places.

There was much public discussion at the State Review Board meeting related to HUD policy and property management that is not relevant to National Register deliberations. There were two concerns raised that were relevant and warrant examination. One is that the properties do not meet the 50-year threshold. The Arkansas SHPO has recommended such properties before, so there is a precedent for this action and I am not dissuaded from making these submissions. Secondly, there was a concern about whether or not the historic context had been established. I believe the applicant has thoroughly researched and successfully drafted a compelling narrative that provides that required context.

I have enclosed the three nominations, minutes from the December State Review Board, and an email regarding the nominations to me from Mr. John Tess. I've also enclosed letters of support from elected officials.

Thank you for your consideration. Please let me know if you need additional information.

Sincerely yours,

Stacy J. Hurst
Director
State Historic Preservation Officer

cc: Ms. Stephanie Toothman, Keeper of the National Register of Historic Places

THE DEPARTMENT OF ARKANSAS
HERITAGE

Asa Hutchinson
Governor

Stacy Hurst
Director

Arkansas Arts Council

Arkansas Historic Preservation Program

Arkansas Natural Heritage Commission

Arkansas State Archives

Delta Cultural Center

Historic Arkansas Museum

Mosaic Templars Cultural Center

Old State House Museum

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January 19, 2017

J. Paul Loether, National Register Chief
National Register of Historic Places Program
1201 Eye St. NW, 8th Floor
Washington, D.C. 20005

RE: Cumberland Towers – Little Rock, Pulaski County, Arkansas

Dear Mr. Loether:

I am enclosing for your review the above-referenced nomination. The enclosed disk contains the true and correct copy of the nomination for the Cumberland Towers to the National Register of Historic Places. The Arkansas Historic Preservation Program has complied with all applicable nominating procedures and notification requirements in the nomination process.

If you need further information, please contact me at 501-324-9155.

Sincerely,

Stacy Hurst
Director
State Historic Preservation Officer

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Enclosure