



June 23, 2022

Members of the Lincoln City Council
City of Lincoln
555 S 10th St, Rm 111
Lincoln, NE 68508

Att: Tammy Ward, Chair
Tom Beckius, Vice-Chair
James Michael Bowers, Member
Richard Meginnis, Member
Jane Raybould, Member
Sändra Washington, Member
Bennie Shobe, Member

Dear City Council Members:

The redevelopment proposal for downtown Lincoln's iconic Gold's building, currently being reviewed by City staff and appointed and elected officials in the City of Lincoln, is of great concern to the Preservation Association of Lincoln (PAL), a 501(c)(3) nonprofit organization. We understand that the project will be reviewed by the City Council at the June 27th, 2022, Council meeting.

The principal mission of PAL is promotion of the preservation of historic resources in Lincoln and Lancaster County. We have followed the Gold's redevelopment project as it has been presented thus far to the City's Historic Preservation Commission and the Lincoln/Lancaster County Planning Commission. This proposed project is of considerable concern to us because it is being proposed for the benefits of tax increment financing (TIF), while the protection of the City's historic resources, as well as major urban design impacts of the project, appear to have not been given adequate consideration and scrutiny.

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Our primary concerns relate to the demolition of a large part of the Gold's building and the building at 1023 O Street without a solid plan and commitment by the developer to constructively address the severe impact that would have on downtown Lincoln and the National Register status of the Gold's building. While the project under review by the City Council purportedly deals only with the first-constructed part of the Gold's building (the 72-foot by 142-foot six-story portion at the corner of 11th and O Streets) and the building at 1023 O Street, the City's decision regarding the project at this point has serious adverse implications for the remainder of the Gold's building, all of Block 55, and a large part of Lincoln's downtown core.

In the May 25, 2022, Lincoln/Lancaster County Planning Commission meeting, representatives of both the City's Urban Development Department and the developer for the proposed project stated unequivocally that the south part of the Gold's building would be demolished if the proposed project were to proceed. Further, the architectural renderings that were made available clearly show a surface parking lot on the half block where the south part of Gold's currently exists. Even though the demolition presumably would not be funded in part or in whole by TIF, City approval of redevelopment of the northeast portion of the Gold's building, involving the use of TIF, also would implicitly endorse the ill-advised demolition of the south part of the building.

Due to the proposed use of tax increment financing, this is not a solely-private-sector project. The City is playing a significant role in the project. We expect our City leaders to maximize the benefits and minimize the adverse impacts of projects that utilize public funds and/or benefits.

Our concerns are based on the following points:

1. Protecting Historic and Cultural Resources

a. Importance of Gold's as a National Register-listed property

The Gold and Company Store Building has been listed in the National Register of Historic Places (NRHP) since 1982. The National Register is the official U.S. list of districts, sites, building, structures, and objects deemed worthy of preservation for their historical significance. We note that the 1982 nomination of the Gold's building for listing in the National Register of Historic Places was authored by professional staff in the Lincoln/Lancaster County Planning Department. We hope that the City's leadership today, forty years subsequent, still holds firm on the value of this building to the City.

As a National Register-listed property, Gold's sits within a high-density cluster of other National Register-listed multi-story buildings: the First National Bank (now the Lincoln Building) at the southeast corner of 10th and O Streets; the Terminal Building at the southwest corner of 10th and O Streets; Government Square, bounded by 9th, 10th, O and P Streets; the Lincoln Liberty Life Insurance

Building (later the LES Administration Building and now the TEN40 Condos) at the northwest corner of 11th and O Streets; and the Hotel Capital (now the Georgian Place Apartments) at the southwest corner of 11th and P Streets. The density and close proximity of these individually-listed National Register properties is unmatched anywhere else in Lincoln. This cluster represents an important and distinguished historical core of downtown Lincoln, a group of buildings worthy of sensitive preservation, restoration, and reuse.

The nomination for listing the Gold's building was prepared for the entire building — all four phases of its construction (1929 to 1950) — and was based on three of the possible National Register criteria available in 1982: architectural significance, commercial significance, and social/humanitarian significance.

Architectural Significance. The L-shaped Gold's building occupies nearly three-quarters of the block bounded by 10th, 11th, N, and O Streets. The successful and visually unified expansion of this building over several years is one of its architecturally distinguishing characteristics. Terra cotta cladding, textured and colored to resemble gray granite, unifies all four street-facing sides of the building. Davis and Wilson, a long-established and prominent Lincoln architectural firm, skillfully detailed the terra cotta on the building. The terra cotta on the original corner building reflects subtle Gothic detailing; later additions incorporate detailing reflective of the Art Deco and Modern movements in architecture.

Overall, the Gold's building architecturally demonstrates a remarkable consistency in scale, texture, and color, making it an undeniably harmonious assemblage. This is arguably the most extensive use of terra cotta on any building in Lincoln and is one of the qualities that makes this building a Lincoln treasure.

Commercial Significance. The incremental expansion of the multistory Gold's building over nearly three decades to occupy a substantial portion of a city block in the core of downtown Lincoln demonstrates the entrepreneurial acumen of three generations of the Gold family to develop a highly successful and legendary retail business in Lincoln. At the apex of its success, the store had over 1,000 employees and was one of the two largest retail department stores in Nebraska.

Social/Humanitarian Significance. The National Register nomination states, "The Gold family was held in high regard by Gold Store employees and by the Lincoln community for their generosity and promotion of community and state welfare." The nomination cites numerous community leadership roles held by the store's founder, William Gold, as well as his son, Nathan Gold (1894-1970), who became president of Gold and Company in 1936, and Nathan's son, William II, who became president of the company in 1955.

Nathan Gold's legacy was commemorated in 1996 by his election to the Nebraska Hall of Fame as a businessman, civic leader, and philanthropist. His bust is displayed along with the other 25 members of the Hall of Fame on the second floor of the Nebraska State Capitol.

b. Likelihood of Removal of Gold's from the National Register of Historic Places

The original nomination and subsequent listing of the Gold's building for the National Register of Historic Places was based on the entire building as it existed in 1982 (and today, 40 years later).

If a substantial portion of the Gold's building is demolished, the building likely would be removed from the National Register of Historic Places. The Code of Federal Regulations (36 CFR 60.15) delineates grounds for removal of properties from the National Register. Under §60.15 Removing Properties from the National Register, part (a)(1) states the following grounds for removal: "The property has ceased to meet the criteria for listing in the National Register because the qualities which caused it to be originally listed have been lost or destroyed, or such qualities were lost subsequent to the nomination and prior to listing."

The portion of the building proposed for demolition occupies over two-thirds of the total land area upon which the building stands today. This is an extreme demolition, which would essentially devoid the building of its full significance as the historic resource that was defined in the 1982 National Register nomination. The remaining segment of the building would become a small token of the iconic building that was initially designated for listing in the National Register.

Removal of any historic property in Lincoln from the National Register for Historic Places due to the criterion cited in part (a)(1) of 36 CFR 60.15 would be lamentable, but especially inexcusable if the City of Lincoln, through its granting of incentives to developers, directly or indirectly enables or encourages that to happen. In addition to negative public reaction, it would set a terrible precedent for the City's direct or indirect involvement with projects that include NRHP-listed properties or, in general, properties with historical and cultural importance to the city. Depending on its role in projects that lead to the demolition of parts or all of NRHP properties, the City's standing as a Certified Local Government under the National Historic Preservation Act of 1966 also could be questioned.

c. Adhering to Locally-Adopted Policies and Guidelines

The "Lincoln/Lancaster County Planning Commission Staff Report" prepared for the Planning Commission hearing on May 25, 2022, reviews three key planning

documents that are intended to provide policy guidance to the Planning Commission and the City Council on growth and development decisions: The *Comprehensive Plan*, the *Downtown Master Plan*, and the *Lincoln Center Redevelopment Plan*. The Staff Report shows that each of these planning documents presents goals and policies that embrace historic preservation, as well as high density and infill development, in downtown Lincoln.

A plethora of historic preservation goals and policies in these documents repeatedly state a commitment to historic preservation. For example, the Staff Report cites strategies and actions in the *Downtown Master Plan*, including:

- Respect historic properties and encourage reuse instead of demolition, whenever possible.
- Provide and promote funding mechanisms for preservation and rehabilitation of historic structures through available national, state, and local sources.

We strongly urge City leaders to use the mechanism of TIF to assertively apply these strategies and actions for rehabilitation of the entire Gold's building. We expect our City leadership to consistently support the City's formally-stated and adopted historic preservation goals, strategies, and actions.

2. Ensuring Appropriate Land Use and Quality Urban Design

According to the Staff Report prepared for the Planning Commission, the *Downtown Master Plan* states, "When additional hotels are proposed and request TIF assistance, the City should require a market study as part of the application from the developer." We are not aware of such study being conducted for the Gold's project, and given the "soft market" for downtown hotels described in the *Downtown Master Plan*, we wonder whether such a study has been required of the developer, and more importantly, what conclusions are presented in the study.

According to the minutes of the April 21st meeting of the Historic Preservation Commission, discussion included comments about structural inadequacies of the south part of the Gold's building. We wonder about the authenticity of those comments and whether there are studies or documentation by licensed professional structural engineers or City plan reviewers or inspectors to justify those claims and whether corrective measures have been explored to correct any deficiencies. After all, that part of the building has been standing and actively used for over 70 years without any apparent structural failure.

The Gold's building has been a uniquely-designed and visually distinctive part of Lincoln's downtown commercial core since the mid-1920s. The building's size and visual impact are undeniable qualities that contribute to its importance. The L-shaped building occupies three-quarters of Block 55 and fronts on all four sides of the block, giving it a powerful visual and symbolic presence, as well as continuity of streetscapes on four important and heavily-traveled downtown streets. From an

urban design perspective, the entire Gold's building serves as a vital visual connector in the City's urban fabric.

O Street has always been the principal east-west spine, or main street, of the City. Lincoln's "Greater Downtown Principal Corridors Revitalization Project" (a project included in the *Lincoln Center Redevelopment Plan*) includes the O Street corridor, which is defined as the publicly- and privately-owned property between the north side of the P Street right-of-way and the south side of the N Street right-of-way—extending from 9th Street to 28th Street. The Gold's building lies within this defined strip, a short distance from the west principal entryway to the corridor, and among the cluster of historically significant buildings described above.

Revitalization of the O Street corridor is laudable; however, the proposed demolition of the building façade at 1023 O Street detracts from that goal. While we understand that the building behind the façade may be structurally unsound, many fine precedents of new construction behind historic façades can be found in the world of historic preservation. One local example is The Stack, 1222 P Street.

We urge more creative thought be given to ways in which the continuity and integrity of the south block face on O Street between 10th and 11th Streets can be preserved. Complete demolition of the 1023 building will give that block face a "missing tooth" appearance that is counter to the environment of a vibrant downtown core that we all are hoping will be maintained and strengthened.

We question how demolishing the portion of the Gold's building on the entire south half of Block 55 and replacing it with a surface parking lot contributes to positive downtown revitalization. Committing a half block to surface parking where a multi-story historic building once stood essentially decimates a block that currently contributes significantly to the urban character of downtown Lincoln. A block-long surface parking lot would provide an unappealing foreground for the view from N Street toward the equally unappealing back sides of O Street buildings.

Among other adverse impacts of a half-block surface parking lot, property tax revenues from a privately-owned surface parking lot would be miniscule compared to a rehabilitated multistory historic building occupying the same land area. We assume that City leaders do not want to encourage and incentivize the eventuality of a half-block surface parking lot that would result from the currently-proposed project.

We hope that the time for surface parking lots in downtown Lincoln has passed. Lincoln history has shown that once established, surface parking lots remain as parking lots for years. We expect that there is no tolerance or desire among our City leaders to support establishment of surface parking lots in the center of the unique historic core of downtown.

The demolition of both the south part of the Gold's building and the 1022 O Street building would leave the remaining token corner piece of the building on an island surrounded by surface parking and concrete, an outcome vividly depicted in the architectural renderings. This is in the core of downtown Lincoln. This is not a good idea.

3. Adhering to Energy Conservation Measures

Architect Carl Elefante, FAIA, FAPT, Principal Emeritus at the firm Quinn Evans, with offices in Washington, D.C., and five other cities, wrote in a 2007 article in *The Journal of the National Trust for Historic Preservation*: “The greenest building is. . . one that is already built” — a phrase used widely in subsequent years to summarize the importance of historic preservation in today's world of efforts to achieve sustainable stewardship.

In the *Lincoln-Lancaster County 2050 Comprehensive Plan*, also known as *PlanForward 2050*, as well as in the City of Lincoln's recently adopted *2021-2027 Climate Action Plan*, multiple goals and policies related to the City's intention to achieve a more efficient and sustainable energy future and to reduce greenhouse gas (GHG) emissions are stated.

Rehabilitation of historic buildings, such as the Gold's building, can be a means for achieving energy efficiency by preserving the energy already represented by the manufacture of materials that were used to construct the building, as well as the energy-consuming aspects of the construction process itself (all described as “embodied energy”). Demolition of a building, on the other hand, requires commitment of “wasted energy” that is needed to fuel demolition machinery and vehicles, as well as the costly and unsustainable allocation of landfill space to bury demolition debris. Repurposing of old buildings, especially ones that are vacant, reduces the need for construction of new buildings and consumption of land, energy, materials, and financial resources that they require.

Demolition of the south part of the Gold's building and creation of a half-block surface parking lot would require the energy needed for the building demolition and debris removal, but also the energy and materials needed for construction of the parking lot. The parking lot would also create a heat island in the core of the city. All of the energy-consumption and climate-change-related outcomes of this approach are contrary to the energy future envisioned in city plans.

We propose and urge that City Council action on this project be postponed to allow the developer and City an opportunity to pursue a more comprehensive approach to determining the future of the Gold's building. Thinking of this as two separate projects is a deception. This is one building; this is one project. Decisions on one part of the building affect decisions on other parts. The building needs to be considered and thought about holistically. Clearly, for a variety of reasons outlined in this letter, we

advocate for the preservation of this entire National Register-listed building, even though we acknowledge that some relatively minor alterations may be necessary to make reuse feasible.

Since this project involves the granting of tax increment financing, PAL fervently advocates that the City's approach to the project needs to ensure preservation, as much as is feasible, of the integrity of the entire building's unique architectural qualities. Thinking about the building holistically and designing a workable, comprehensive, integrated approach for its rehabilitation and reuse is not an insurmountable challenge.

We appeal to the developer and our City leaders for a higher level of creativity and design sensitivity to make the Gold's project one for which citizens and visitors alike can be proud.

We appreciate the opportunity to comment on this project, and we believe it is certainly possible to see this building reused and the urban character of this historic part of downtown Lincoln retained.

We welcome your response — using our P.O. Box or our email address:
preservelincoln@gmail.com

Sincerely,

Preservation Association of Lincoln Board of Directors

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Eileen Bergt
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