



## **US Army Corps of Engineers®**

Chicago District  
Planning Branch  
231 South La Salle Street  
Suite 1500  
Chicago, Illinois 60604  
312-353-6400

### **Appendix K – Section 106 Review and SHPO supplementals**

Draft Supplemental Environmental Assessment  
Morgan Shoal Revetment Reconstruction (45th - 51st)

## State Historic Preservation Office Coordination



**DEPARTMENT OF THE ARMY**  
U.S. ARMY CORPS OF ENGINEERS, CHICAGO DISTRICT  
231 SOUTH LASALLE STREET, SUITE 1500  
CHICAGO IL 60604

June 27, 2024

Environmental & Cultural Resources Section  
Planning Branch

Ms. Carey Mayer  
Deputy State Historic Preservation Officer  
Old State Capitol Building  
One Old State Capitol Plaza  
Springfield, IL 62701

SUBJECT: Morgan Shoal Revetment Repair Project

Dear Ms. Mayer:

The U.S. Army Corps of Engineers (USACE) is proposing to replace an existing failing revetment structure along the Morgan Shoal reach of the Chicago shoreline (undertaking) in Cook County, Illinois (Figure 1). As part of our review under Section 106 of the National Historic Preservation Act, USACE has determined that the proposed federal action is an undertaking that has the potential to affect historic properties. The Corps has determined and documented the area of potential effect (APE) for the undertaking and is consulting with your office under Section 106 as provided at 36 C.F.R. § 800.4(a). The letter also summarizes efforts that the Corps has taken to date to identify historic properties that may be affected by the undertaking.

The undertaking proposes a complete replacement of existing failing revetment structures along the Morgan Shoal reach. The new revetment will consist of approximately 3,700 linear feet of rubble mound revetment, 1,000 linear feet of dynamic cobble revetment with underwater breakwater, and 800 linear feet of steel sheet pile and stepped concrete revetment. The steel sheet pile and stepped concrete revetment will only be used around the peninsula at 51st Street. Suitable existing materials would be salvaged to be included in the revetment throughout the reach.

The project would modify the shoreline and fill approximately 7 acres of Lake Michigan to create usable parkland with headlands and land extension with approximately 310,000 cubic yards of clean fill below the Ordinary High-Water Mark (OHWM). The reconstruction of the revetment would provide a more stable and durable shoreline to withstand the coastal forces of Lake Michigan. Work would be conducted with heavy machinery on land and by barge on the lake.

The proposed undertaking is located in Sections 2 and 12, Township 39 North, Range 14 East, Cook County, Illinois (Figure 2). The APE for the undertaking encompasses the project area including staging, access, etc. and totals approximately 66 acres. USACE

believes that the APE is sufficient to identify and consider both direct and indirect effects of the proposed project.

USACE has conducted an archival review for the project study and APE. The Morgan Shoal reach of the Chicago shoreline consists entirely of post-1920 landfill, armored with a deteriorated limestone block revetment, originally installed in 1925 and topped with a concrete walkway between 1946 and 1949. Burnham Park, which includes Morgan Shoal, is eligible for listing on the National Register of Historic Places (NRHP) and is part of the larger Historic Resources of the Chicago Park District Multiple Property Documentation Form. No other listed properties are located within the project APE. Although not listed on the NRHP, the remains of the Silver Spray shipwreck are located off the shore of Morgan Shoal. The Silver Spray, a 109-foot passenger steamer, ran aground the Morgan Shoal in July 1914, just off the shore of Hyde Park's 49<sup>th</sup> Street Beach. The shipwreck is outside the footprint of the proposed undertaking.

USACE requests your review and agreement with our determination of the APE and would like to solicit any additional comments regarding the proposed undertaking. If you have any questions or desire additional information, please contact the project archaeologist, Ms. Ashley Dailide, at [ashley.m.dailide@usace.army.mil](mailto:ashley.m.dailide@usace.army.mil) or (312) 846-5581. I may be contacted at [alex.r.hoxsie@usace.army.mil](mailto:alex.r.hoxsie@usace.army.mil) or (312) 846-5587.

Sincerely,

A handwritten signature in black ink that reads "Alex Hoxsie". The signature is written in a cursive, slightly slanted style.

Alex Hoxsie  
Chief, Environmental & Cultural Resources  
Chicago District

Enclosures

Figure 1. Project Vicinity Map

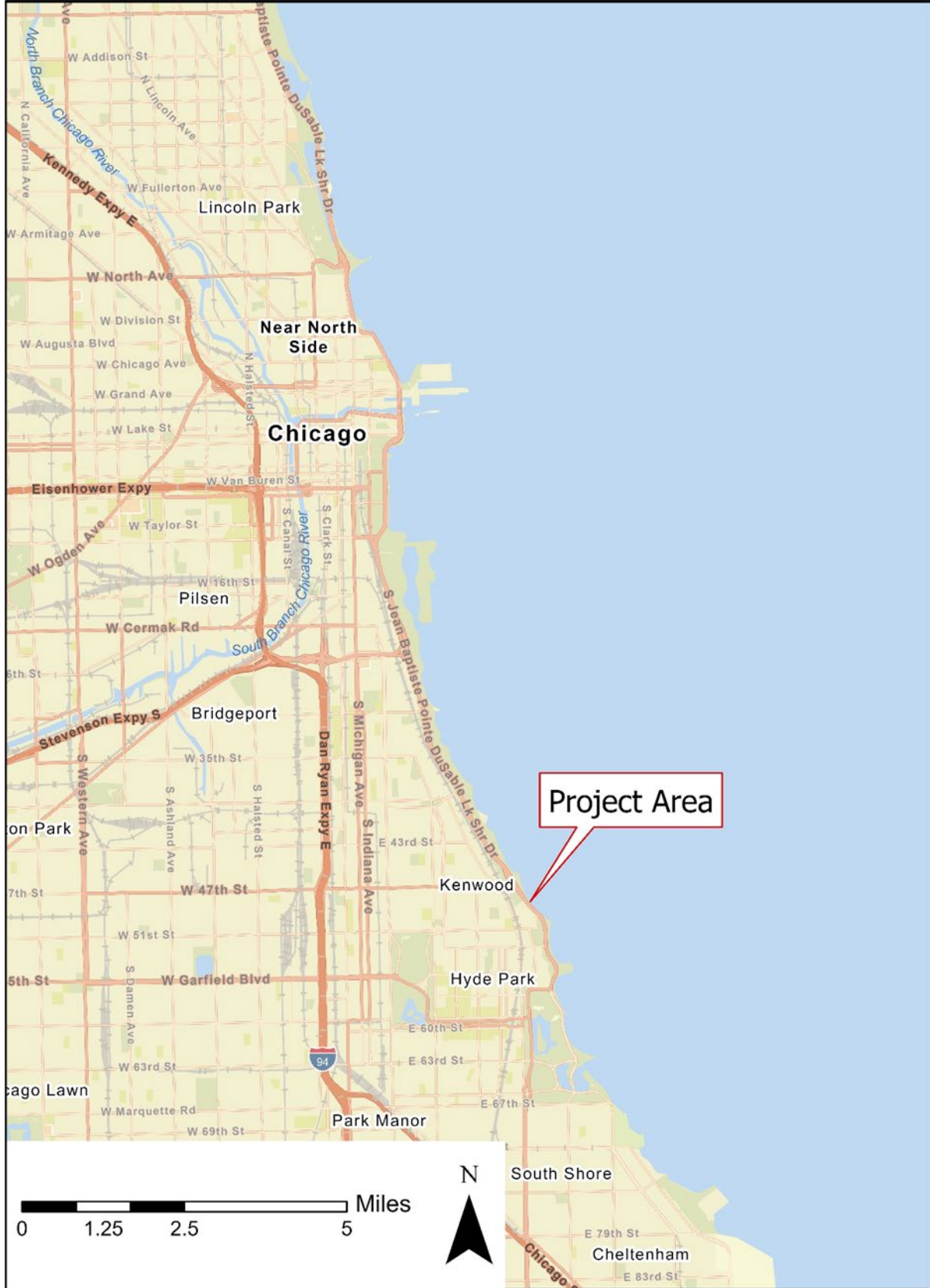


Figure 2. Proposed Project Rendering



Figure 3. Project APE Map

# Morgan Shoal Revetment Reconstruction APE



**Legend**  
Morgan Shoal  
Revetment  
Reconstruction APE

0 0.23 0.45 0.9 Miles





**Cook County  
Chicago**

**Shoreline Revetment Reconstruction, Reach IV, Morgan Shoal  
Lake Michigan Shoreline between 45th St. and 51st St. Part of Burnham Park**

**COEC,  
SHPO Log #013102522**

**August 9, 2024**

**Alex Hoxsie  
U.S. Army Corps of Engineers, Chicago District  
231 S. LaSalle St., Suite 1500  
Chicago, IL 60604**

**Dear Mr. Hoxsie:**

Thank you for your submission of the Area of Potential Effect (APE) and list of historic resources for the Morgan Shoal shoreline stabilization project (SHPO log # 013102522), which we received on 6/28/24. Our comments are required by Section 106 of the [National Historic Preservation Act of 1966](#), as amended, 54 U.S.C. § 306108, and its [implementing regulations](#) (36 CFR Part 800) (Act).

This office does not concur with the USACE's proposed APE, which includes only Morgan Shoal. The APE should also include Burnham Park, of which Morgan Shoal is a part.

We concur with the USACE that Burnham Park is eligible for listing to the National Register of Historic Places (NRHP) and Morgan Shoal is a contributing resource within it.

We look forward to the next stage of the consultation process.

Sincerely,

**Carey L. Mayer, AIA  
Deputy State Historic Preservation Officer**

**c: Mike Padilla, U.S. Army Corps of Engineers, Chicago District  
Ashley Dailide, U.S. Army Corps of Engineers, Chicago District**





**DEPARTMENT OF THE ARMY**  
U.S. ARMY CORPS OF ENGINEERS, CHICAGO DISTRICT  
231 SOUTH LASALLE STREET, SUITE 1500  
CHICAGO IL 60604

February 26, 2025

Environmental & Cultural Resources Section  
Planning Branch

Ms. Carey Mayer  
Deputy State Historic Preservation Officer  
Old State Capitol Building  
One Old State Capitol Plaza  
Springfield, IL 62701

SUBJECT: Morgan Shoal Revetment Repair Project APE Definition (SHPO Log:  
013102522)

Dear Ms. Mayer:

The U.S. Army Corps of Engineers (USACE) is responding to your August 9, 2024, letter regarding the definition of the Morgan Shoal revetment repair area of potential effect (APE). This letter is a response to your office's (SHPO) proposal to expand the project APE to include all of Burnham Park as well as the potential eligibility of Morgan Shoal as a contributing resource.

USACE disagrees with the SHPO's proposal to expand the boundaries of the APE to include the entirety of Burnham Park. Burnham Park extends from the 14<sup>th</sup> St Beach south to 56<sup>th</sup> St, comprised of 658 acres in total. Morgan Shoal represents approximately 23 acres of Burnham Park, or 4% of the existing parkland (Figure 1). Given the linear nature of Burnham Park, the relatively limited geographic area and scale of the project, and the dynamic natural systems of the shoreline, USACE has revised its determination of the APE to expand the boundaries to allow a greater focus on the portions of Burnham Park closest to the northern and southern extents of the project area, as well as to encompass the parkland west of Lake Shore Drive, comprised of approximately 368 acres (Figure 2). Furthermore, upon reviewing maps of the historic shoreline, the redefined APE better reflects the temporal and spatial increment in which fill was imported and developed for the creation of parkland in the 1920s.

USACE would also like to clarify that at this time we have made no determinations of National Register of Historic Places (NRHP) eligibility for Morgan Shoal or stated that Morgan Shoal is a contributing resource to the eligibility of Burnham Park as a whole. While Burnham Park has been listed in the Chicago Park District Multiple Property Documentation Form, no formal NRHP eligibility determination has been completed for the park, and it is beyond the scope of this project for USACE to complete this evaluation. USACE will evaluate the eligibility of Morgan Shoal as an individual element of Burnham Park to

determine if it retains significant integrity and meets the criteria for listing on the NRHP pursuant to 36 C.F.R. § 800.4.

USACE requests your review and agreement with our revised determination of the APE and would like to solicit any additional comments regarding the proposed undertaking. If you have any questions or would like to set up a meeting to discuss this project, please contact the project archaeologist, Ms. Ashley Dailide, at [ashley.m.dailide@usace.army.mil](mailto:ashley.m.dailide@usace.army.mil) or (312) 846-5581. I may be contacted at [alex.r.hoxsie@usace.army.mil](mailto:alex.r.hoxsie@usace.army.mil) or (312) 846-5587.

Sincerely,

A handwritten signature in black ink that reads "Alex Hoxsie". The signature is written in a cursive, slightly slanted style.

Alex Hoxsie  
Chief, Environmental & Cultural Resources  
Chicago District

Enclosures

Figure 1. Burnham Park

Burnham (Daniel) Park (27)  
435 E McFetridge Dr



Chicago Park District  
Dept. of Planning & Construction  
2023 Cook County Aerial 7/2/2024 - JAT



Figure 2. Revised APE Map





**Cook County**

**Chicago**

**Shoreline Revetment Reconstruction, Reach IV, Morgan Shoal**

**Morgan Shoal, Lake Michigan Shoreline between 45th St. and 51st St. Contributing to Burnham Park**

**Historic Resources of the Chicago Park District MPS, approved by NPS 5/21/1990**

**SHPO Log #013102522**

**March 17, 2025**

**Ashley Dailide**

**U.S. Army Corps of Engineers, Chicago District**

**231 S. LaSalle St., Suite 1500**

**Chicago, IL 60604**

**Thank you for your February 26, 2025 letter responding to SHPO's August 9, 2025 letter requesting an expanded Area of Potential Effect (APE) for the Morgan Shoal project. Based on guidance from the Advisory Council on Historic Preservation (ACHP), SHPO requests the Corps revise the APE to consider the other types of direct effects of the undertaking, which may include 1) portions of Burnham Park where visual effects may be experienced and potentially affect the Burnham Park Historic District and 2) Promontory Point, where visual effects may also be experienced.**

**SHPO has determined that the project has the potential to introduce visual effects to the Burnham Park Historic District. If the Corps agrees to these revisions to the APE, we do not see a need to fully inventory the entirety of the District; however, we propose conducting a study of the resources in the direct project area (within a 500-foot radius) to identify contributing properties and assess visual effects.**

**We look forward to continued consultation about the revision of the APE and finding of effects. Please feel free to contact CJ Wallace, Cultural Resources Coordinator, at (217) 785-5027 or at [Carol.Wallace@Illinois.gov](mailto:Carol.Wallace@Illinois.gov). Sincerely,**

**Carey L. Mayer, AIA**

**Deputy State Historic Preservation Officer**



**DEPARTMENT OF THE ARMY**  
U.S. ARMY CORPS OF ENGINEERS, CHICAGO DISTRICT  
231 SOUTH LASALLE STREET, SUITE 1500  
CHICAGO IL 60604

May 27, 2025

Environmental & Cultural Resources Section  
Planning Branch

Ms. Carey Mayer  
Deputy State Historic Preservation Officer  
Old State Capitol Building  
One Old State Capitol Plaza  
Springfield, IL 62701

SUBJECT: Morgan Shoal Revetment Repair Project APE Definition (SHPO Log:  
013102522)

Dear Ms. Mayer:

The U.S. Army Corps of Engineers (USACE) is responding to your March 17, 2025, letter regarding the definition of the Morgan Shoal revetment repair area of potential effect (APE). Based on this communication and considering the guidance from the Advisory Council on Historic Preservation (ACHP), USACE has redrawn the APE for the Morgan Shoal Project to include a minimum 500-ft buffer around the project's construction footprint, including potential staging and access areas (Figure 1).

USACE requests your review and agreement with our revised determination of the APE and would like to solicit any additional comments regarding the proposed undertaking. If you have any questions or would like to set up a meeting to discuss this project, please contact the project archaeologist, Ms. Ashley Dailide, at [ashley.m.dailide@usace.army.mil](mailto:ashley.m.dailide@usace.army.mil) or (312) 846-5581. I may be contacted at [alex.r.hoxsie@usace.army.mil](mailto:alex.r.hoxsie@usace.army.mil) or (312) 846-5587.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Hoxsie".

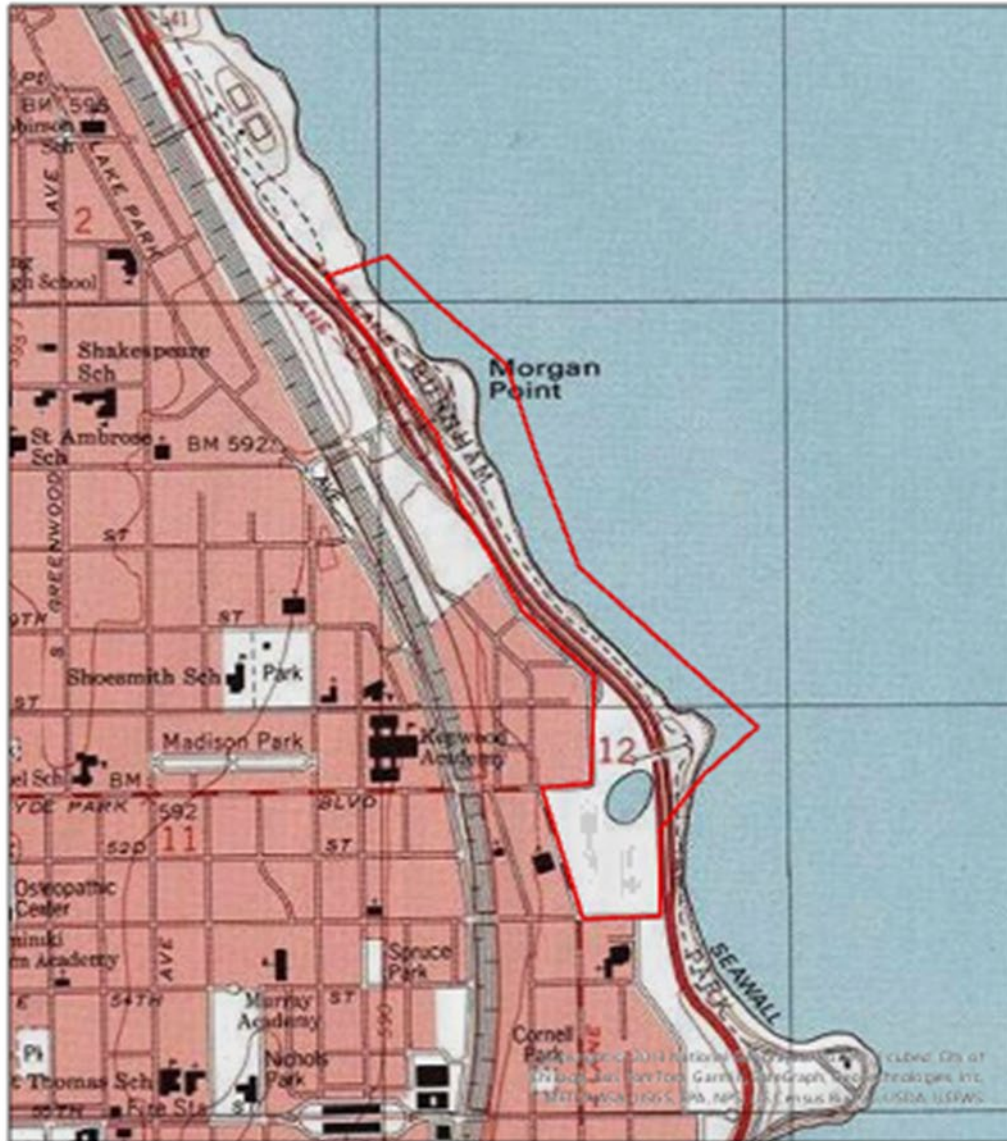
Acting for:

Alex Hoxsie  
Chief, Environmental & Cultural Resources  
Chicago District

Enclosures

Figure 1. Revised APE Map

# Morgan Shoal Revetment Repair Project APE



**Legend**  
Morgan Shoal APE

0 0.28 0.55 1.1 Miles





Illinois  
Department of  
**Natural  
Resources**

JB Pritzker, Governor • Natalie Phelps Finnie, Director  
One Natural Resources Way • Springfield, Illinois 62702-1271

[www.dnr.illinois.gov](http://www.dnr.illinois.gov)

**Cook County, Chicago**

**Shoreline Revetment Reconstruction, Reach IV, Morgan Shoal, Lake Michigan Shoreline between 45th St. and 51st St.**

**COEC, SHPO Log #013102522**

**June 30, 2025**

**Ashley Dailide**

**U.S. Army Corps of Engineers, Chicago District**

**231 S. LaSalle St., Suite 1500**

**Chicago, IL 60604**

**Thank you for submitting the proposed Area of Potential Effect (APE) for the Chicago Shoreline Erosion Interim Project, located at Morgan Shoal, Lake Michigan Shoreline between 45th St. and 51st St., which we received on May 27, 2025. Our review is required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties."**

**Morgan Shoal contributes to Burnham Park, which is eligible for listing to the National Register of Historic Places (NRHP) under the Historic Resources of the Chicago Park District Multiple Property Documentation, approved by the National Park Service on May 21, 1990.**

**Our March 18, 2025, letter suggested establishing a 500-foot boundary around Morgan Shoal for the Area of Potential Effect (APE). Upon further examination of the site and its surroundings, we believe that this undertaking should accommodate both the direct and indirect (i.e., visual) effects of the project to Morgan Shoal and to surrounding areas beyond our previously suggested 500-foot radius. The 500-foot buffer around the project's construction footprint, including potential staging and access areas, should be expanded to include South DuSable Lake Shore Drive as the western boundary, Promontory Point as the southern boundary, and Oakwood Beach, which is a part of Burnham Park, as the northern boundary. It is from these vantages that changes to Morgan Shoal would be visible.**

**We do not see the need to fully inventory all elements within the entirety of the potentially eligible Burnham Park Historic District. We propose acknowledging the potential effect to the historic district and then assessing historic resources starting with Oakwood Beach to the north and to Promontory Point to the south.**

**We look forward to receiving additional information regarding the determinations of eligibility on historic properties within the APE and effects to them.**

**If you have any further questions, please contact CJ Wallace, Cultural Resources Coordinator, at (217) 785-5027 or at [carol.wallace@illinois.gov](mailto:carol.wallace@illinois.gov).**

**Sincerely,**



*Carey L. Mayer*

**Carey L. Mayer, AIA**  
**Deputy State Historic Preservation Officer**



**DEPARTMENT OF THE ARMY**  
U.S. ARMY CORPS OF ENGINEERS, CHICAGO DISTRICT  
231 SOUTH LASALLE STREET, SUITE 1500  
CHICAGO IL 60604

June 30, 2025

Environmental & Cultural Resources Section  
Planning Branch

Ms. Carey Mayer  
Deputy State Historic Preservation Officer  
Old State Capitol Building  
One Old State Capitol Plaza  
Springfield, IL 62701

SUBJECT: Morgan Shoal Revetment Repair Project APE Definition (SHPO Log:  
013102522)

Dear Ms. Mayer:

The U.S. Army Corps of Engineers (USACE) is responding to your June 30, 2025 letter regarding the definition of the Morgan Shoal revetment repair area of potential effect (APE). USACE has no objection to expanding the APE to include the suggested visual area as part of the indirect APE (Figure 1).

USACE requests your review and agreement with our revised determination of the APE and would like to solicit any additional comments regarding the proposed undertaking. If you have any questions or would like to set up a meeting to discuss this project, please contact the project archaeologist, Ms. Ashley Dailide, at [ashley.m.dailide@usace.army.mil](mailto:ashley.m.dailide@usace.army.mil) or (312) 846-5581. I may be contacted at [alex.r.hoxsie@usace.army.mil](mailto:alex.r.hoxsie@usace.army.mil) or (312) 846-5587.

Sincerely,

A handwritten signature in black ink that reads "Andrew J. Miller".

Digitally signed by  
MILLER.ANDREW.JOSEPH.1619  
932885  
Date: 2025.06.30 20:59:11 -05'00'

Acting for:  
Alex Hoxsie  
Chief, Environmental & Cultural Resources  
Planning Branch

Enclosure

Figure 1. Revised APE Map

# Morgan Shoal Shoreline Project APE



**Legend**  
Morgan Shoal APE

0 0.25 0.5 1 1.5 2 Miles





Illinois  
Department of  
**Natural  
Resources**

JB Pritzker, Governor • Natalie Phelps Finnie, Director  
One Natural Resources Way • Springfield, Illinois 62702-1271

[www.dnr.illinois.gov](http://www.dnr.illinois.gov)

**Cook County**

**Chicago**

**Shoreline Revetment Reconstruction, Reach IV, Morgan Shoal**

**Morgan Shoal, Lake Michigan Shoreline between 45th St. and 51st St. Contributing to Burnham Park**

**Historic Resources of the Chicago Park District MPS, approved by NPS 5/21/1990**

**COEC, SHPO Log #013102522**

**July 1, 2025**

**Alex Hoxsie**

**U.S. Army Corps of Engineers, Chicago District**

**231 S. LaSalle St., Suite 1500**

**Chicago, IL 60604**

**Thank you for your June 30, 2025 letter regarding the revised determination of the Area of Potential Effect (APE) of the Morgan Shoal revetment repair. We agree with the revised determination of the APE. Please contact our office if you have questions and we look forward to continued consultation.**

**Sincerely,**

**Carey L. Mayer, AIA**

**Deputy State Historic Preservation Officer**

**c:**

**Mike Padilla, U.S. Army Corps of Engineers, Chicago District**

**Ashley Dailide, U.S. Army Corps of Engineers, Chicago District**

**Samantha Belcik, U.S. Army Corps of Engineers, Chicago District**

## Tribal Coordination



**DEPARTMENT OF THE ARMY**  
U.S. ARMY CORPS OF ENGINEERS, CHICAGO DISTRICT  
231 SOUTH LA SALLE STREET, SUITE 1500  
CHICAGO IL 60604

December 1, 2022

Planning Branch  
Planning, Programs and Project Management

**SAMPLE**

The Honorable Joseph Rupnick, Chairperson  
Prairie Band Potawatomi Nation  
16281 Q Road  
Mayetta, KS 66509

SUBJECT: Morgan Shoal Shoreline Protection Project, Cook County, Illinois

Dear Chairperson Rupnick:

The U.S Army Corps of Engineers, Chicago District (Corps) will be preparing a National Environmental Policy Act document on the potential impacts associated with a proposed shoreline coastal protection project in the City of Chicago, Cook County, Illinois (Figure 1). The purpose of the project undertaking is to address the degraded shoreline along the Morgan Shoal corridor. To assist in our review, we are requesting your assistance in gathering information you might have to identify properties which may be of religious or cultural significance that may be affected by the project as specified by the implementing regulations for Section 106 as provided by the National Historic Preservation Act (36 C.F.R. § 800.4(a)(4)). Additionally, the Corps would appreciate any comments, concerns or modifications you might have about any potential environmental or social impacts from this currently proposed project.

The proposed project involves the reconstruction of the existing revetment along the Morgan Shoal corridor within the larger Burnham Park. Proposed coastal structures include a combination of rubble mound and dynamic revetment, stepped stone blocks, and transitional concrete and sheetpile revetment at the existing 51<sup>st</sup> Street structure. Shoreline improvements also include the addition of up to 9.5 acres of new parkland that enhance connectivity and recreation, promote natural and nature-based features for ecological functions, and reduce flooding and erosion. Additional details can be found in the 2015 Morgan Shoal Framework Plan ([https://assets.chicagoparkdistrict.com/s3fs-public/documents/page/Burnham\\_Park\\_-\\_Morgan\\_Shoal\\_Framework\\_Plan\\_%28Final%29.pdf](https://assets.chicagoparkdistrict.com/s3fs-public/documents/page/Burnham_Park_-_Morgan_Shoal_Framework_Plan_%28Final%29.pdf)).

The revetment reconstruction project will provide coastal protection and flood damage reduction to the eroded Chicago Park District land and provide stability to the nearshore DuSable Lake Shore Drive. An Environmental Assessment will be prepared that evaluates alternatives to accomplishing this project with minimal impact to the environment and to the community.

The undertaking is in Section 12, Township 38 North, Range 14 East in Chicago, IL (Figure 2). The Area of Potential Effect (APE) for the undertaking encompasses the project area including staging, access, etc. and totals approximately 25 acres. The Corps believes that the APE is sufficient to identify and consider potential effects of the proposed project.

If you have information, comments or concerns regarding properties which may be of religious or cultural significance that you believe may be affected by this project, please contact one of the contacts noted below as soon as possible. A copy of this letter with enclosures will be furnished to Raphael Wahwassuck.

If you have any questions, comments or desire additional information, please contact either Samantha Belcik, Biologist and Planner at [samantha.d.belcik@usace.army.mil](mailto:samantha.d.belcik@usace.army.mil) or (312) 846-5467 or Ms. Ashley Dailide, Project Archaeologist and Tribal Liaison at [ashley.m.dailide@usace.army.mil](mailto:ashley.m.dailide@usace.army.mil) or (312) 846-5581.

Sincerely,

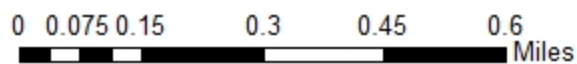
A handwritten signature in black ink that reads "Susanne J. Davis". The signature is written in a cursive style with a large initial 'S' and 'D'.

Susanne J. Davis, P.E.  
Chief, Planning Branch  
Chicago District


Enclosures

Figure 1: Morgan Shoal project Area of Potential Effect (APE) map  
Figure 2: Morgan Shoal project location map

# Morgan Shoals Shoreline Protection Project APE



## Legend

 Morgan Shoals APE





TRIBAL CORRESPONDANCE - FOREST COUNTY POTAWATOMI

**From:** [Dailide, Ashley M CIV USARMY CELRC \(USA\)](#)  
**To:** [Belcik, Samantha D CIV USARMY CELRC \(USA\)](#)  
**Cc:** [Padilla, Michael C CIV USARMY CELRC \(USA\)](#)  
**Subject:** FW: Morgan Shoal Shoreline Protection Project  
**Date:** Monday, December 5, 2022 1:01:02 PM

---

FYSA – my assumption is that this area is entirely fill, but it's something we should get confirmation on.

---

**From:** Benjamin Rhodd <Benjamin.Rhodd@fcp-nsn.gov>  
**Sent:** Monday, December 5, 2022 11:45 AM  
**To:** Dailide, Ashley M CIV USARMY CELRC (USA) <Ashley.M.Dailide@usace.army.mil>  
**Subject:** [URL Verdict: Neutral][Non-DoD Source] Morgan Shoal Shoreline Protection Project

Ms. Dailide,

Thank you for the information regarding the Morgan Shoals Project revetment. However, I do have a concern from the Forest County Potawatomi Community of Wisconsin Historic Preservation Office. After perusing the proposed actions of the undertaking, I am concerned about how much land will be disturbed in this process? My concern is the intact land of the Park "behind" the proposed project that may have intact cultural resources in place and which would be disturbed or destroyed by the undertaking.

If this could be answered for the FCPC, I could then make a solid recommendation of our interest or non-interest in this proposed action.

We do request to remain as a consulting party for this project.

As a standard caveat sent with each proposed project reviewed by the FCPC THPO, the following applies. In the event an Inadvertent Discovery (ID) occurs at any phase of a project or undertaking as defined, and human remains or archaeologically significant materials are exposed as a result of project activities, work should cease immediately. The Tribe(s) must be included with the SHPO in any consultation regarding treatment and disposition of an ID find.

Thank you for protecting cultural and historic properties and if you have any questions or concerns, please contact me at the email or number listed below.

Respectfully,

Ben Rhodd, MS, RPA, Tribal Historic Preservation Officer  
Forest County Potawatomi  
Historic Preservation Office  
8130 Mish ko Swen Drive, P.O. Box 340, Crandon, Wisconsin 54520  
P: 715-478-7354 C: 715-889-0202 Main: 715-478-7474  
Email: [Benjamin.Rhodd@fcp-nsn.gov](mailto:Benjamin.Rhodd@fcp-nsn.gov)  
[www.fcpotawatomi.com](http://www.fcpotawatomi.com)



## Miami Tribe of Oklahoma

3410 P St. NW, Miami, OK 74354 • P.O. Box 1326, Miami, OK 74355  
Ph: (918) 541-1300 • Fax: (918) 542-7260  
www.miamination.com



Via email: [ashley.m.dailide@usace.army.mil](mailto:ashley.m.dailide@usace.army.mil)

December 6, 2022

Ms. Ashley Dailide, Project Archaeologist & Tribal Liaison  
US Army Corps of Engineers, Chicago District  
231 S. LaSalle Street, Suite 1500  
Chicago, IL 60604-1437

Re: Morgan Shoal Shoreline Protection Project, Cook County, Illinois – Comments of the Miami Tribe of Oklahoma

Dear Ms. Dailide:

Aya, kweehsitoolaani– I show you respect. The Miami Tribe of Oklahoma, a federally recognized Indian tribe with a Constitution ratified in 1939 under the Oklahoma Indian Welfare Act of 1936, respectfully submits the following comments regarding Morgan Shoal Shoreline Protection Project in Cook County, Illinois.

The Miami Tribe offers no objection to the above-referenced project at this time, as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site. However, given the Miami Tribe's deep and enduring relationship to its historic lands and cultural property within present-day Illinois, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case, please contact me at 918-541-8966 or by email at [THPO@miamination.com](mailto:THPO@miamination.com) to initiate consultation.

The Miami Tribe accepts the invitation to serve as a consulting party to the proposed project. In my capacity as Tribal Historic Preservation Officer I am the point of contact for consultation.

Respectfully,

*Diane Hunter*

Diane Hunter  
Tribal Historic Preservation Officer

Supplementals

# Historical Integrity Shoreline Condition

**Intact:** Structure remains largely in its original form with minimal modifications. It retains its design and original materials, maintaining historical accuracy.

**Signs:**

- Structural elements remain in their original placement
- Minimal repairs or alterations
- Consistent with historical records

**Present: 0 Linear Feet (LF)**

**Retains some design and material integrity:**

Structure has undergone modifications or environmental wear but still retains key elements of its original form and materials

**Signs:**

- Some displacement of stones or concrete
- Overall structure and form remain intact

**Present: 2097 LF (42% of project area)**

**Retains material integrity only:**

Structure has lost original design characteristics, but historic materials are still present.

**Signs:**

- Original material still present but repositions or rearranged.
- Large sections of material displaced or lost
- Significant changes to shape or function

**Present: 2432 LF (49%)**

**No original historic integrity :**

Shoreline protection structure that remains structurally sound without significant displacement, settling, or structural failure, and has

**Signs**

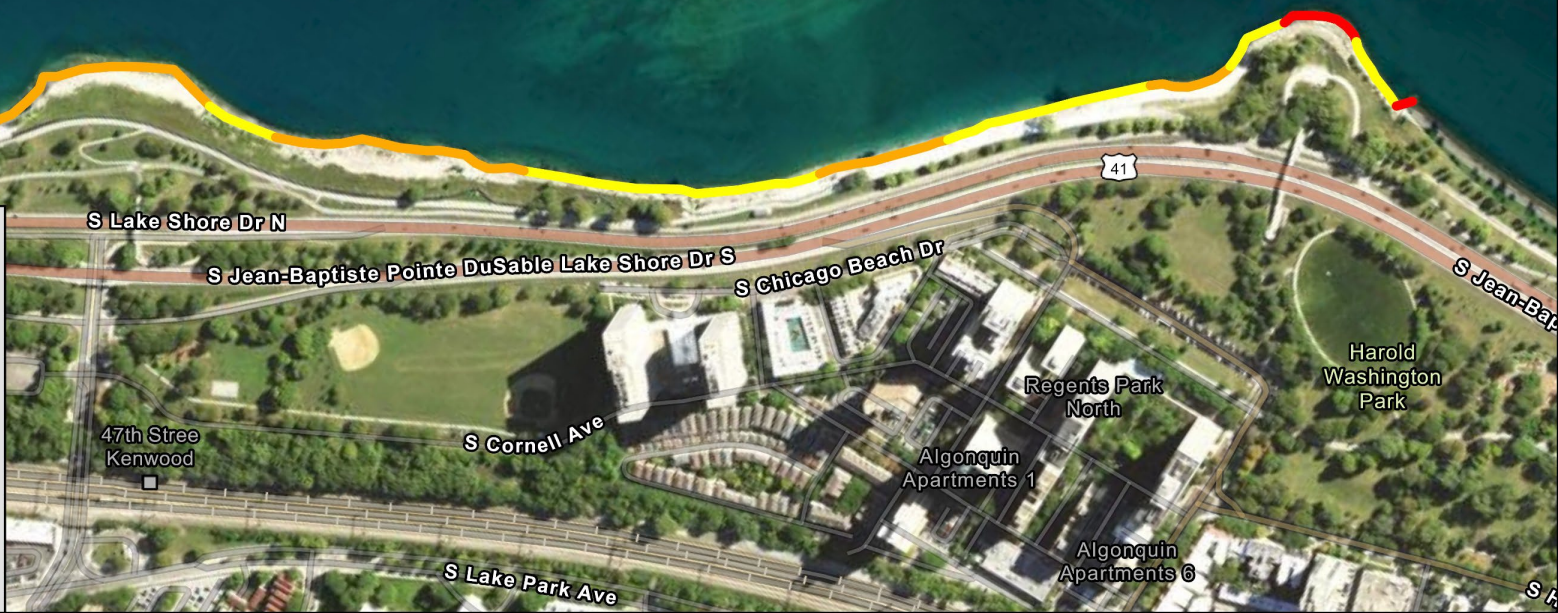
- Complete replacement with modern materials
- Total collapse or washout of materials
- No resemblance to original documentation

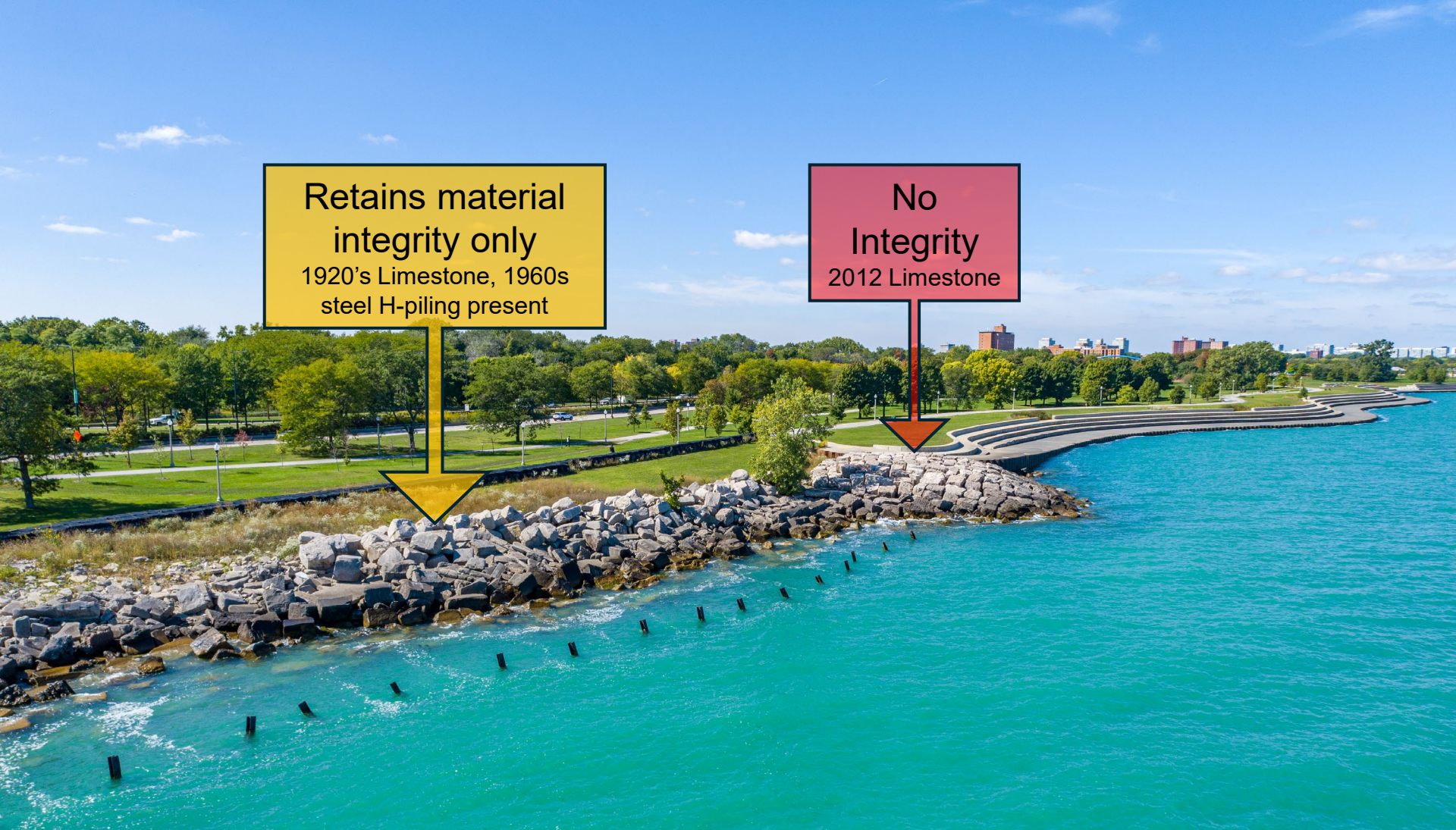
**Present: 424 LF (9%)**

**Legend**

Historical Integrity

- Intact
- Retains some design and material integrity
- Retains material integrity only
- No Original Historic Integrity

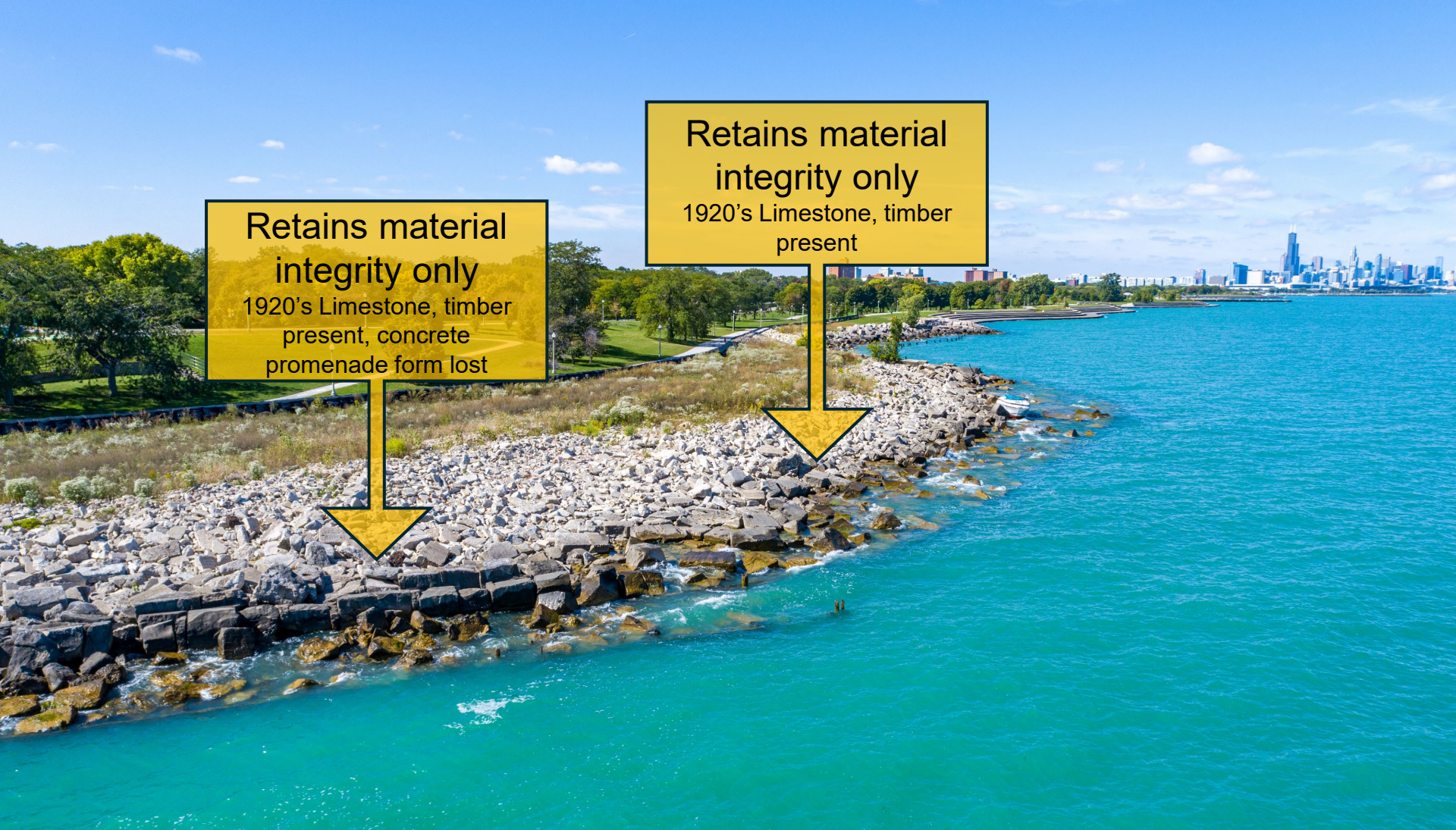




Retains material  
integrity only  
1920's Limestone, 1960s  
steel H-piling present

No  
Integrity  
2012 Limestone





**Retains material integrity only**  
1920's Limestone, timber present, concrete promenade form lost

**Retains material integrity only**  
1920's Limestone, timber present





**Retains material integrity only**  
1920's Limestone form lost, concrete promenade form lost, timber present

**Retains some design and material integrity**  
1920's Limestone step stone and concrete promenade form, timber present



[Red box highlighting a specific area of the shoreline]



Retains material  
integrity only

1920's Limestone form lost,  
concrete promenade form  
lost, timber present



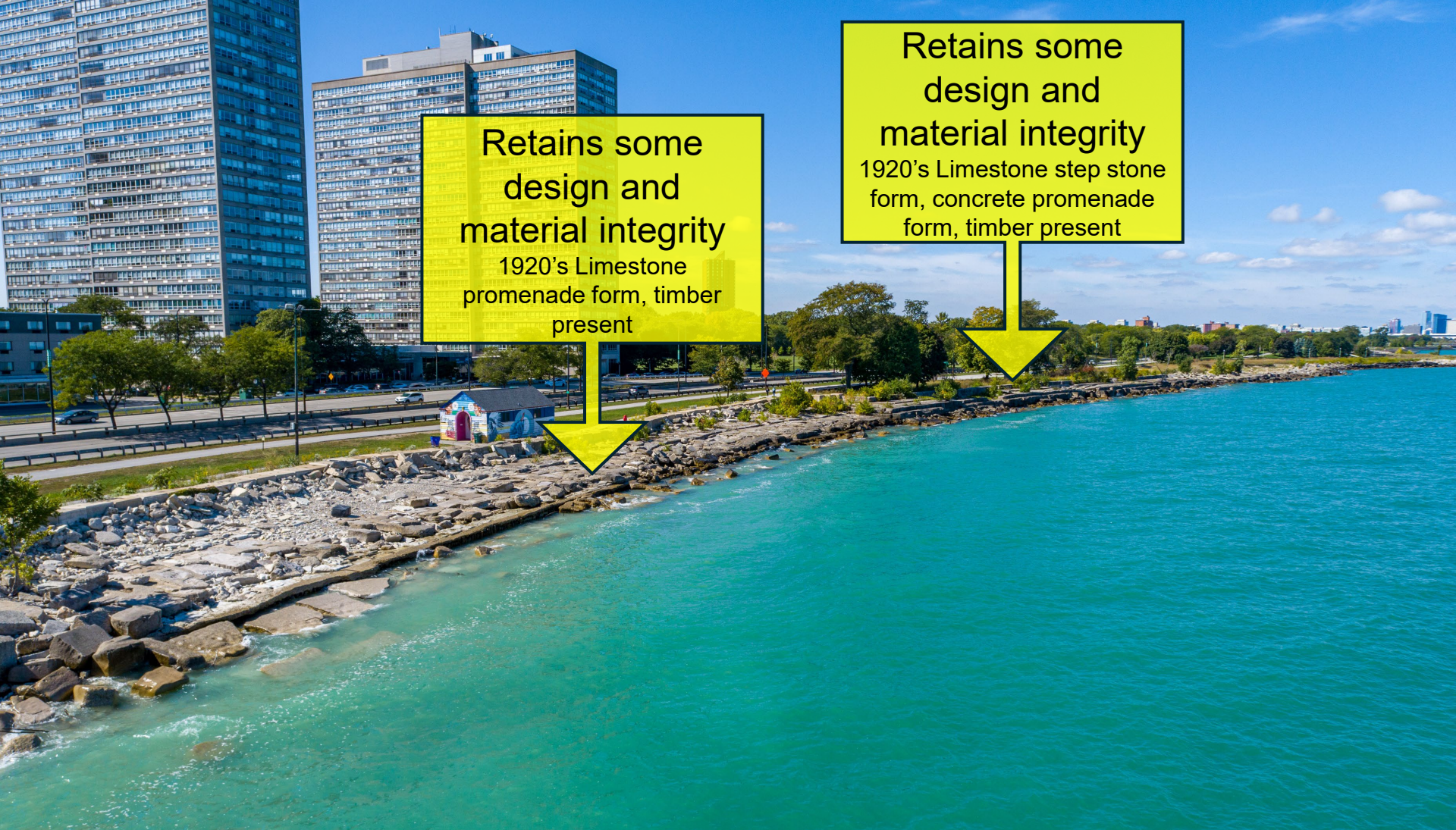




**Retains some design and material integrity**  
1920's Limestone step stone form, concrete promenade form, timber present

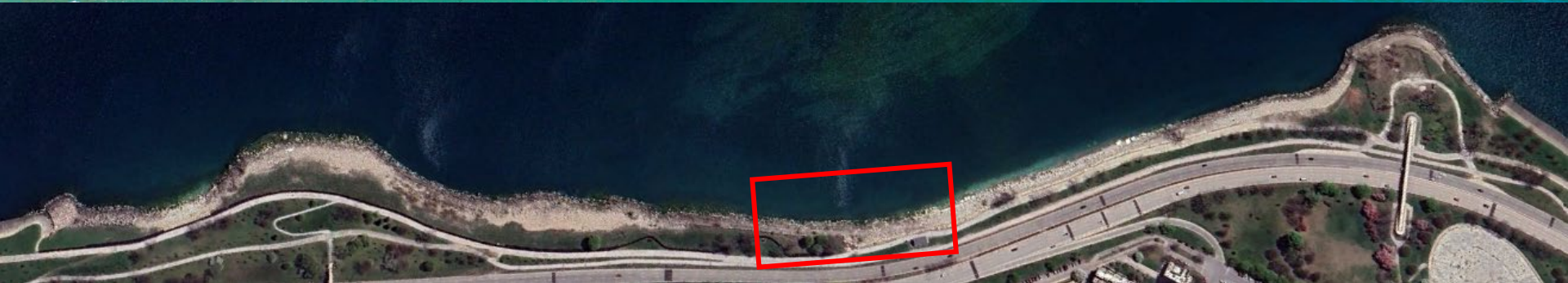
**Retains material integrity only**  
1920's Limestone form lost, concrete promenade form lost, timber present





Retains some design and material integrity  
1920's Limestone promenade form, timber present

Retains some design and material integrity  
1920's Limestone step stone form, concrete promenade form, timber present





Retains some design and material integrity  
1920's Limestone step stone form, 2020 grout and concrete aiding in structural support

Retains material integrity only  
1920's Limestone present



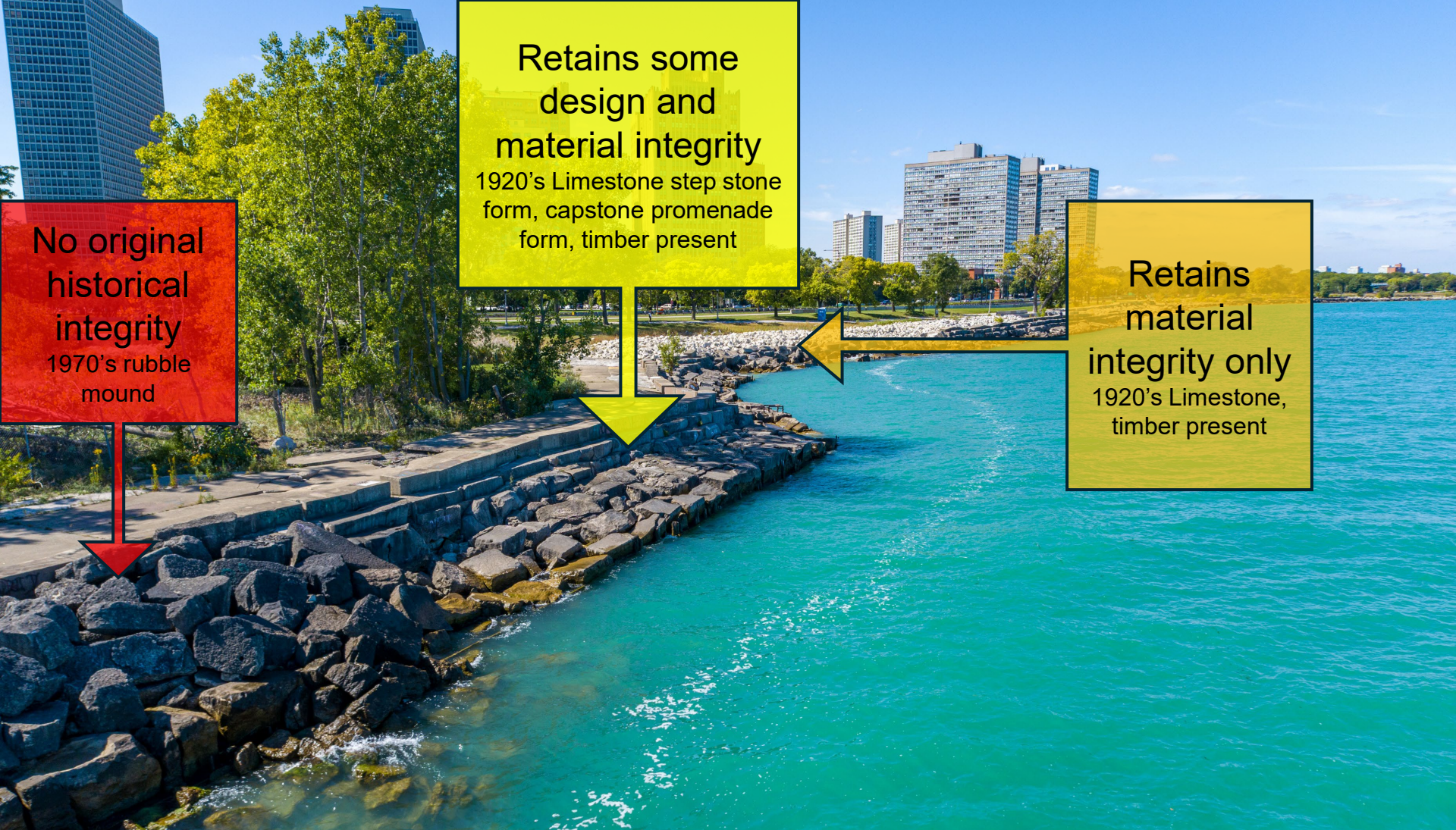


Retains some design and material integrity  
1920's Limestone step stone form, timber present, 2020 grout and concrete aiding historical form

Retains material integrity only  
1920's Limestone, timber present



[Red rectangular box highlighting a specific area of the shore]

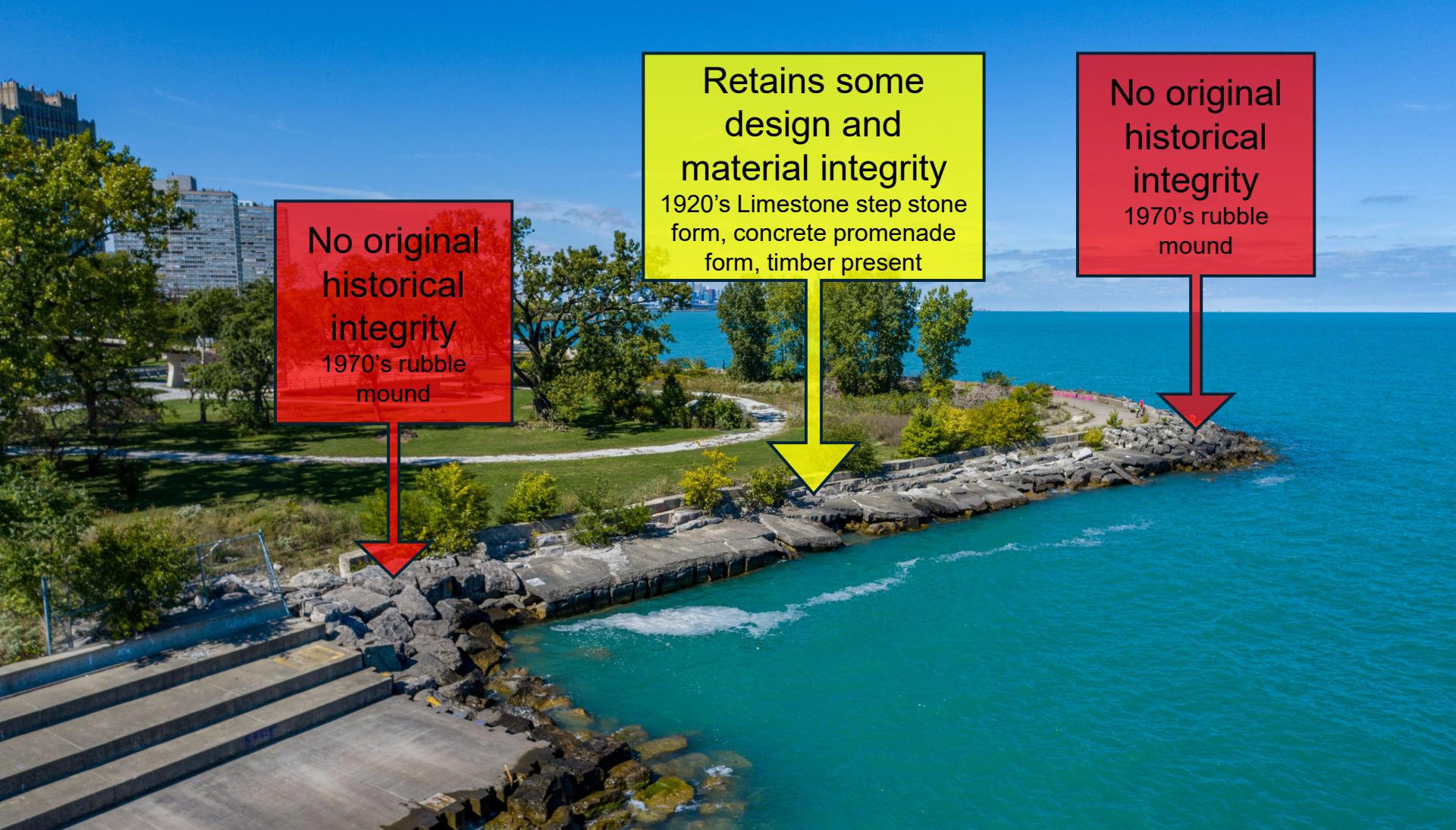


No original historical integrity  
1970's rubble mound

Retains some design and material integrity  
1920's Limestone step stone form, capstone promenade form, timber present

Retains material integrity only  
1920's Limestone, timber present





No original historical integrity  
1970's rubble mound

Retains some design and material integrity  
1920's Limestone step stone form, concrete promenade form, timber present

No original historical integrity  
1970's rubble mound





47th St  
4700 S  
NEXT LEFT











RECYCLE

WAS