



DEPARTMENT OF THE ARMY

DETROIT DISTRICT, CORPS OF ENGINEERS

BOX 1027

DETROIT, MICHIGAN 48231-1027

January 30, 2007

IN REPLY REFER TO

Engineering & Technical Services
Regulatory Office
File No. 05-054-002-0

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Dear Consulting Parties:

The Detroit District of the U.S. Army Corps of Engineers is reviewing an application by Harbor Shores Redevelopment for a Department of the Army (DA) permit to discharge fill material associated with the construction of a championship golf course in wetlands adjacent to the Paw Paw River in Benton Harbor (Berrien County), Michigan (Sections 13 and 14, Township 4S, Range 19W). The golf course is intended to provide an economic incentive for extensive economic redevelopment over approximately 500 acres of land. This letter is being provided to you to assist our review of historic property issues under the National Historic Preservation Act. We are seeking input on these historic property issues: determining whether Jean Klock Park reflects significant historic values, and if so, determining the nature and extent of effects that would be caused by the golf course and related proposed improvements.

Three of the holes for the proposed golf course (Holes 16, 17, and 18) would be constructed within much of the current open areas on and behind the lake dune and would take

up approximately 22 acres of Jean Klock Park, a beachfront city park in Benton Harbor. Portions of the work area are vegetated in dune grass, small trees, and shrubs. Other portions are currently paved parking lot and roadways. A small wetland fill is proposed for Hole 16 at the edge of a large lagoon and wetland area. Site plans for the current proposal within the park area are enclosed (Encl. 1).

The Michigan State Historic Preservation Office (SHPO, Encl. 2) notified the Corps of Engineers that Jens Jensen, a noted landscape architect, prepared a design for the park, and that the site may be eligible for listing on the National Register of Historic Places (National Register). SHPO instructed the Corps to seek additional information on the park's landscape features to assist in determining the effects of the project on the park.

The applicant hired a landscape architect from SHPO's list of historic landscape architects to evaluate the effect of the property on historic values, and a copy of the report by Hitchcock Design Group is enclosed (Encl. 3). In summary, the Hitchcock Design Group report states that there is no evidence that the design by Jens Jensen was ever executed, and that Jean Klock Park is not eligible for listing in the National Register.

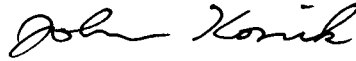
SHPO (Encl. 4) provided comments on the Hitchcock report and noted the lack of a current vegetation survey mapped against the Jensen Design, to prove whether or not the design was ever implemented. Additionally, SHPO stated that the question remains whether the park meets National Register criteria for listing as a historic park, regardless of any Jensen connection. Hitchcock Design Group responded with a supplemental letter report (Encl. 5).

Two other entities have asked to be included as consulting parties in the Section 106 process. Defense of Place has written two letters regarding the need for historic information in addition to that provided by the Hitchcock Design Group (Encls. 6 and 7). The Friends of Jean Klock Park (Encl. 8) have also provided a letter and indicated that other historic figures are associated with Jean Klock besides Mr. Jensen.

If you have information or comments on the historical character of the property, we would appreciate your input. If we do not hear from you within 30 days from the date of this letter, we will assume that you do not have concerns.

If you need additional time, or have questions on this matter, contact Thomas E. Allenson at the above address or telephone (313) 226-2221. Please refer to File Number: 04-101-002-0.

Sincerely,



John Konik
Chief, Regulatory Office
Engineering and Technical Services

Enclosures

1. Harbor Shores redevelopment plans prepared by Abonmarche Group, including Holes 16, 17, and 18, dated "July 2006"
2. SHPO letter, dated August 11, 2006
3. Hitchcock Design Group, Jean Klock Park, Benton Harbor, Michigan, Historic Assessment Report, dated October 2, 2006
4. SHPO letter, dated October 24, 2006
5. Hitchcock Design Group letter, dated November 9, 2006
6. Defense of Place letter, dated October 14, 2006
7. Defense of Place letter, dated December 4, 2006
8. Friends of Jean Klock Park letter, dated December 5, 2006

Copy Furnished:

Michigan State Historic Preservation Office, B. Conway, w/out encls.
MDEQ, Kalamazoo Office, B. Zimont (06-11-142), w/out encls.