

April 30, 2021

To the honorable Chair and Commissioners:

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The Milwaukee Preservation Alliance supports the nomination of the Marshall & Ilsley Bank Building at 770 N. Water St. to the National Register of Historic Places. We concur with the nominator's finding of local significance under Criterion A as a defining example of a post-war International Style Modernist high rise banking building.

As the Commission is likely aware, Modernism is severely underrepresented in historic designation in the City, and this building would appear to be the first building of the period in Milwaukee to be individually listed for its architectural significance. With its striking verticality; symmetry; and prominent use of concrete mullions with glass and aluminum curtain walls, the building serves as an excellent example of the late International Style. In addition, the recessed glass of the first floor behind concrete piers that appear to be "holding up" the rest of the tower show a flaunting of new technology characteristic of Modernist styles of the period.

Further, the interior of the building, especially open character defining public spaces on the lower levels, convey the late International Style through mid-century fixtures, materials like walnut and travertine, and a verticality mirroring the building's exterior.

These features also represent how Modernism was used in the post-war period by banks to project a far different image from the strong, secure, and stodgy persona put forth in earlier times. The Modern bank was meant to be open, accessible, and transparent, and the Modernist architectural expression of the M&I Bank Building clearly reflects this. As the nominator states, "The building's International-style design, with its exterior curtain wall divided by vertical concrete mullions and sleek, open bank lobby, clearly represents the progressive, transparent, and customer-oriented image that bankers in the post-war period strove to project."

While not explicitly nominated for its cultural significance, the building also played an important role in its early and influential use of computerized technology in banking. As the nomination states, "The corporation pioneered the use of computers for high-speed check processing in the 1960s and became the first bank in Wisconsin to process all of its checks by computer. Because the IBM machines did not include software, M&I created a team within the company to develop its own banking software, which it later sold to client banks around the country." In addition, the building's occupants helped develop the first shared public cash access terminal system in the nation, and the building housed what could be considered the nation's first ATM in its lobby.

We believe the building also retains sufficient integrity to convey its association distinctly as a post-war International Style banking tower. While the loss of the original connected parking garage is unfortunate, we do not believe this loss is sufficient to render the building as it stands ineligible. The newer BMO Tower that occupies the former garage site reads as a separate building and is connected only by a relatively short passageway, thus making it possible to consider the buildings as two separate buildings. The separation of the former property into two lots also provides a sensible way to designate just the historic parcel.

If the buildings must be considered one, a precedent for the listing of individual distinct parts of buildings exists in Columbus, OH, where the LeVeque Tower and its component Palace Theater are listed separately on the National Register despite having been designed and built together. This same thought process could allow the M&I Bank Building to be designated individually despite its having been built concurrently with the lost parking garage.

Additionally, the M&I Bank building as it stands clearly conveys the architectural Modernism and story of mid-century banking of its period of significance. The building reads as a standalone International Style banking and office tower and maintains integrity of location, materials, workmanship, feeling, and association. The building's interior is a particularly rare and intact example of a Modernist bank aesthetic for the City. Amidst a growing concern within the preservation movement about the challenges steep integrity hurdles present for the preservation of Modernist and other underrepresented building types and populations leading to an incomplete cultural and architectural record of our nation's stories and architecture, designation would help to protect the integrity that remains and ensure Milwaukee can keep this excellent example of architectural Modernism.

For these reasons, we believe the Marshall & Ilsley Bank Building deserves the commission's support for National Register listing.

Thank you as always for your hard work on behalf of the people and places of Milwaukee.

Respectfully,

Jeremy Ebersole Executive Director Milwaukee Preservation Alliance