

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
1	ACHP	The Effects Report, however, does not articulate how the overall undertaking is altering or diminishing the integrity of the character defining landscape characteristics, including spatial organization, land use, and views; circulation; vegetation; and buildings, structures, and small-scale elements. It is difficult to comprehend the degree of change that will occur to the individual character defining elements as thoroughly defined in Appendix F of the HPI and to the landscapes as a whole. The ACHP recommends the effects analysis (pages 23 – 33) be reorganized and rewritten to summarize how the landscape characteristics and the overall cultural landscapes will be altered based on the types of effects (physical, visual, traffic, and noise) instead of, or at least in addition to, the current analysis that is divided based on effects from the various federal actions.	The revised AOE articulates how the overall undertaking alters or diminishes the integrity of the character defining landscape characteristics as requested. The discussion of adverse effect on the cultural landscape is augmented to include a separate section (3.5.2.1.1 Summary of the Adverse Effect to the Cultural Landscape) that is organized by character-defining landscape characteristic and refers to each contributing feature of the cultural landscape relevant to the determination of adverse effect. The new section is directly related to the following section (3.5.2.2 Effect to the Cultural Landscape from Federal Actions) which is organized by federal action.	Section 3.5.2.1.1 Section 3.5.2.2
2	ACHP	Additionally, it remains unclear from the Effects Report if the proposed undertaking will result in the properties no longer being listed in the NRHP.	The Jackson Park Historic Landscape District and Midway Plaisance will continue to be listed in the NRHP if the proposed undertaking is implemented as described in the AOE. While the proposed undertaking will have an adverse effect to Jackson Park Historic Landscape District and Midway Plaisance, the Illinois Department of Transportation cultural resource staff, who meet the Secretary of Interior's professional qualification standards, reviewed the continued NRHP eligibility of the historic district in light of the effect determination and concluded that the proposed changes will not sufficiently diminish or remove the overall integrity of the historic district in such a way that it would no longer qualify for NRHP listing (See Appendix E: IDOT Memorandum). This has been clarified in the revised AOE.	Appendix E
3	ACHP	The ACHP recommends that FHWA restate in the Effects Report that it has determined that the archaeological sites identified in Jackson Park as part of the subject undertaking are not eligible for the NRHP under criteria A, B, C, or D and the Illinois State Historic Preservation Officer (IL SHPO) concurred with this finding in September 2018.	The Illinois State Archaeological Survey (ISAS) conducted field investigations within the limits of the Archaeological APE. The deposits and materials retrieved during the field investigations were evaluated for National Register of Historic Places (NRHP) eligibility and ISAS concluded that the archaeological sites are not eligible for the NRHP under any criteria; SHPO concurred with these findings on March 28 and September 12, 2018. As there are no archaeological sites identified as listed or eligible for the NRHP within the Archaeological APE, there are no effects to either historic or pre-historic archaeological sites as a result of the federal undertaking.	Section 2.1
4	ACHP	The ACHP recommends that FHWA include information and data explaining if the surrounding historic residential neighborhoods will experience traffic changes due to the road closures and changes, and if these changes will affect historic properties. In particular, the Traffic Impact Study should be expanded to include the roads in the historic neighborhoods surrounding Jackson Park.	Traffic impacts will be further analyzed as part of the environmental review process under NEPA. With respect to impacts on historic landscapes and properties, traffic increases on certain roadways (including the Dan Ryan Expressway, State Street, ML King Drive, Cottage Grove Ave, Woodlawn Ave, Midway Plaisance (WB), 63rd Street, and 67th Street) will not require additional roadway expansion or changes to the roadway configurations. Existing capacity on these roads will operate at an acceptable level of service even with the additional traffic from the closed roadways; therefore, there are no direct impacts from the redistributed traffic on these roads. Any adjacent historic properties next to these roadways would see only modest additional traffic increases. Because the increases in traffic are modest, the changes in traffic patterns would not introduce visual, atmospheric, or audible elements that diminish the integrity of any historic properties, if present. In order for a change in traffic noise to be perceptible to the human ear, traffic would need to be doubled. The largest traffic increase (on roads not requiring additional capacity) is a 31% increase on 67th Street. Without physical changes to the roadway there are no indirect visual impacts to historic properties and the modest traffic increases do not result in perceptible noise or atmospheric changes to adjacent historic properties.	Section 3.2.2
5	ACHP	...several consulting parties requested a viewshed analysis from a higher perspective to ensure all visual effects could be thoroughly assessed. The ACHP agrees that such an analysis would be useful and recommends that FHWA determine the feasibility of capturing viewpoints from above-ground level considering the proposed height of the new Obama Presidential Center (OPC) could potentially affect surrounding historic properties. The Effects Report should include a discussion of this analysis, and whether any viewsheds will be affected by the undertaking.	Supplemental visual analysis was prepared in response to comments received on the Draft AOE. The additional analysis includes simulated views from historic properties located in APE Sub Areas I and II whose height extends above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall). These simulated views were generated using a combination of drone photography and computer modeling to depict elevated views from these historic properties toward the OPC Museum.	Section 3.1.2 Section 3.2.3 Appendix D

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6	ACHP	Several consulting parties questioned why potential effects to Washington Park are not included in this Effects Report. Given that Washington Park, Jackson Park and Midway Plaisance are interrelated as part of the original Olmsted design, it would be beneficial to understand if the undertaking could indirectly or cumulatively affect Washington Park. Specifically, in the final version of the Effects Report, FHWA should consider whether any upcoming projects in Washington Park may affect Jackson Park and/or the Midway Plaisance. The effects may include changes in the number of visitors, or in the pedestrian or bike circulation.	Section 106 regulations define the APE as the "geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist." Regulations also require agency officials, namely FHWA, NPS, and USACE, for this undertaking, to determine and document the APE delineation in consultation with the SHPO. The delineation of the APE boundary was discussed with Consulting Parties and the public during the December 1, 2017 Consulting Party Kick-off meeting. Comments regarding the APE boundary were collected and modifications to the APE boundary were made, as appropriate. Both the archaeological and historic architecture APE boundaries were coordinated and agreed upon with the IL SHPO. The delineation of the APE is discussed in the Historic Properties Inventory (HPI) and summarized in the AOE. Washington Park is located approximately one mile west of Jackson Park. While it is part of the historic South Parks System, it is independently and individually listed on the NRHP, as opposed to jointly listed with Jackson Park and the Midway Plaisance. Both the historic properties are contributing resources to the Chicago Park Boulevard Historic District. Due to its distance from the undertaking, Washington Park will not experience any direct or indirect effects as a result of the undertaking and therefore, was excluded from the APE boundary. Traffic impacts are addressed in the revised AOE.	Section 2.1
7	ACHP	It remains unclear how this site was selected under the Urban Park and Recreation Recovery (UPARR) Program, and if other sites were considered that would avoid effects to historic properties. The Effects Report should demonstrate how the choice of the replacement parcel may affect historic properties, and what avoidance measures were considered as part of the selection process.	The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3 of the final AOE. Under the UPARR program, the City has the authority to select a site to replace the lost recreational opportunities using criteria that best meet the needs of its community; the NPS role is to determine if the proposed replacement site and proposed recreation opportunities are equivalent to what was lost.	Section 1.1.1.3
8	ACHP	...the Effects Report will need to consider the potential effects from the final design for the selected replacement recreation area. Should the final design be decided at a later date, the Section 106 agreement should include a design review process that will include the consulting parties as well as design criteria. ☐	The conceptual design for the replacement recreation on the Midway Plaisance encompasses the types and locations of spaces and uses in the area, including playground space, open space, landscaping, massing, and spatial interrelations among new and existing elements. The design provides a sound basis for action under UPARR and for anticipating potential effects to historic property under NHPA. The final design of the proposed replacement recreation on the Midway Plaisance will encompass selection of actual playground equipment, paint colors, plant types, and other detailed aspects of the conceptual design. The final design is not anticipated to appreciably change the basis for analyzing the potential effects on historic or environmental resources. The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements.	Section 1.1.1.3 Section 3.5.2.2
9	ACHP	Lastly, based on questions brought up during the last consultation meeting, we request FHWA clarify the division of responsibility between NPS, which manages the UPARR Program, and FHWA on the overall environmental review and explain what each agency is reviewing under the National Environmental Policy Act (NEPA) and Section 106 of the NHPA	The revised AOE includes a summary of the various federal agency responsibilities for the undertaking. The FHWA is the lead federal agency for the NHPA Section 106 process, and the NPS is the lead federal agency for NEPA. FHWA's scope of authority is limited to transportation improvements it funds or approves, i.e., improvements along Lake Shore Drive, Hayes Drive, Stony Island Avenue, and pedestrian improvements. The NPS's scope of authority is limited to identifying changes to UPARR parks that convert recreational uses to non-recreational uses and evaluating proposed replacement recreation, including its equivalent usefulness and location. Upon conducting this evaluation, the NPS is responsible for amending UPARR grant agreements to remove conversion areas from the UPARR boundary and to incorporate replacement recreation areas. The USACE is a cooperating agency in the Section 106 process due to its permitting and approval authority. The USACE's authority is derived from Section 404 of the Clean Water Act and Section 14 of the Rivers and Harbors Act of 1899 (33 USC 408, "Section 408"). A Section 404 permit is required for the proposed widening of the 59th Street Inlet Bridge along Lake Shore Drive. A Section 404 permit may also be required for the proposed improvements on the east end of the Midway Plaisance. Effects to existing areas improved under the Great Lakes Fishery and Ecosystem Restoration (GLFER) program require approval from USACE under Section 408.	Section 1.0
10	Dept. of the Army	Our overarching concern is that the District is anticipating actions under our authority... As these federal actions must also comply with Section 106 of the National Historic Preservation Act, the District would prefer to be a full signatory-level participant, by right of our federal approval authorities, in this process.	USACE will serve as a consulting party in the Section 106 process.	Section 1.0 Section 1.4

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11	<i>Dept. of the Army</i>	Please revise all references to the National Park Service and Federal Highway Administration in aggregate as the federal action agencies, to include the US Army Corps of Engineers.	These references are revised as requested.	Various
12	<i>Dept. of the Army</i>	In Section 1.1, please add the following to the fourth sentence: "and the authorization of discharges of fill material into waters of the United States and permission to alter the Great Lakes Fishery & Ecosystem Restoration project, both by U.S. Army Corps of Engineers (USACE)."	The statement has been added as requested.	Section 1.1 Section 1.4
13	<i>Dept. of the Army</i>	In Section 1.1.1.3, please remove the terms "isolated low-quality" from the fifth sentence of the tenth paragraph.	The term has been removed as requested.	Section 1.1.1.3
14	<i>Dept. of the Army</i>	In Section 1.1.1.3, (and Section 5.0) please consider that "the future public process regarding the changes on the Eastern Midway" will need to be addressed more fully in order to meet the conditions of the District's Regional Permit Program (RPP); or alternately, the USEPA's Guidelines for Specification of Disposal Sites for Dredged or Fill Material ("404(b)(1) Guidelines"). The District's action vis-à-vis the wetland fill on the Eastern Midway has the effect of needing the proposed park conversion to be detailed enough to allow the District to comply with the NHPA.	<p>The proposed work in and adjacent to the wetland will include regrading, reseeding, and providing a catch basin to drain the east end of the Midway Plaisance just west of Stony Island Avenue. The proposed grading and drainage improvements will facilitate converting the area to active recreational space. The regrading work will generally involve leveling the existing area and generally restoring to the original (circa 1894) grading. The proposed catch basin will provide positive drainage for the area which currently has none.</p> <p>The conceptual design for the replacement recreation on the Midway Plaisance encompasses the types and locations of spaces and uses in the area, including playground space, open space, landscaping, massing, and spatial interrelations among new and existing elements. The design provides a sound basis for action under UPARR and for anticipating potential effects to historic property (under NHPA).</p> <p>The final design of the proposed replacement recreation on the Midway Plaisance will encompass selection of actual playground equipment, paint colors, plant types and other detailed aspects of the conceptual design. The final design is not anticipated to appreciably change the potential effects on historic resources.</p> <p>The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements.</p>	Section 1.1.1.3 Section 3.5.2.2

Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park
Appendix F. Public Comments and Responses

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15	Dept. of the Army	<p>Add a Section 1.4 addressing the USACE actions. The District suggests the following as a starting draft: "The purpose of the USACE actions are to authorize the proposed City of Chicago actions insofar as they require a discharge of fill material and/or alter a federal civil works project. The City of Chicago's underlying purpose for requesting these authorizations is stated previously in Sections 1.1.1.2 and 1.1.1.3.</p> <p>The City's decision to widen Lake Shore Drive involves expanding the bridge abutment, which as proposed, will result in a discharge of fill material which requires authorization under Section 404 of the Clean Water Act (33 USC 1251 et seq.). Further, the City's decision to temporarily dewater the portion of the lagoon under Hayes Drive to complete bridge improvements will result in a discharge of fill material requiring a Section 404 authorization. The City's proposal to fill a wetland on the Eastern Midway Plaisance is a discharge of fill material requiring a Section 404 authorization. Finally, the Chicago Park District proposes to temporarily impact 1.7 acres and permanently impact an additional 1.3 acres of the Great Lakes Fishery & Ecosystem Restoration (GLFER) project in Jackson Park. This proposed alteration requires USACE permission pursuant to Section 14 of the Rivers and Harbors Act of 1899 (33 USC 408).</p> <p>Evaluation of the USACE Section 404 actions is expected to be completed using the USACE Chicago District's Regional Permit Program (RPP), whereby USACE staff will determine whether the City's actions comply with the terms and conditions that were established as part of the public interest review undertaken in the establishment of the RPP. If so, the USACE will "verify" the activities are authorized by the RPP. If not, the USACE will process the requests under the Individual Permit process described at 33 CFR 325.</p> <p>Evaluation of the USACE Section 408 action will be completed as described in Engineer Circular 1165-2-220. This includes a determination whether the proposed alteration will impair the usefulness of the GLFER project, and whether the proposed alteration is in the public interest."</p>	This section and content has been added as requested.	Section 1.4
16	Dept. of the Army	In Section 3.3.2.2, under the subheading "City Proposed UPARR Replacement Area within the eastern Midway Plaisance," please directly reference the District's Section 404 permit action for the proposed wetland fill.	The proposed wetland fill, which requires a Section 404 permit authorization from the USACE, is referenced in this section of the revised AOE.	Section 1.4 Section 1.1.13 Section 3.5.2.2
17	Dept. of the Army	In Section 3.3.2.2, under the subheading "Improvements along Lake Shore Drive," please directly mention the District's actions, i.e. Section 404 in the second paragraph and Section 408 in the fourth paragraph.	The report text is revised to acknowledge these actions.	Section 1.4 Section 1.1.13 Section 3.5.2.2
18	Dept. of the Army	In Section 3.3.2.2, under the subheading "Hayes Drive Reconfiguration," please directly mention the District's actions, i.e. Section 408 in the second paragraph, Section 408 in the third or fourth paragraph, and Sections 404 and 408 in the fifth paragraph.	The report text is revised to acknowledge these actions.	Section 1.4 Section 1.1.13 Section 3.5.2.2
19	Dept. of the Army	In Section 3.3.2.2, under the subheading "Other Transportation Improvements," please directly mention the District's actions, i.e. Section 408 in the first and third paragraphs. Please also clarify which agencies are included in the phrase "Federal Undertaking" in the third sentence of the first paragraph.	The report text is revised.	Section 1.4 Section 1.1.13 Section 3.5.2.2

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20	<i>Dept. of the Army</i>	In Section 3.3.2.2, under the subheading “Bicycle/Pedestrian Enhancements,” to the extent that the activities in the first and/or second paragraph(s) will have impacts on the GLFER project, please directly mention the District’s action.	The report text is revised.	Section 1.4 Section 1.1.13 Section 3.5.2.2
21	<i>Dept. of the Army</i>	In Section 3.3.2.3, under the subheading “OPC Site Development,” the fourth through sixth sentences of the eighth paragraph refer to GLFER impacts for the proposed water lift station. Because this is part of the District’s Section 408 action, this should be included in Section 3.3.2.2 as a federal action.	The report text is revised.	Section 5.1.4
22	<i>Dept. of the Army</i>	In Section 3.4, the District recommends that the District’s actions be included in the assessment of effects for each property. While large portions of the District’s actions overlap in physical footprint with NPS and FHWA actions, the GLFER replacement areas and the GLFER water lift station impact, do not overlap with the NPS or FHWA actions. The effect of these actions should be addressed for each property.	An evaluation of the USACE actions for each of the properties outside of Jackson Park is included in the revised AOE.	Section 3.7.2.3 Section 3.7.3.3
23	<i>Dept. of the Army</i>	In Section 5.0, the District recommends a subheading “USACE Actions” which would state that the District has actions including the Section 408 authorization for the GLFER replacement areas and the small water lift station, and Section 404 and Section 408 approvals for other areas already included in the NPA and FHWA actions. This section should then address how the proposed design minimizes impacts on the Historic Properties.	This content is added to Section 5.0.	Section 5.1.4
24	<i>Dept. of the Army</i>	In Appendix A, Exhibits 2a, 2b, 3a, 3b, 4a, and 4b, and Appendix C, Exhibit C-1, please clarify in the map legend that the “GLFER Replacement” areas are a USACE Undertaking, and add a map symbol to indicate areas of GLFER impacts, also a USACE Undertaking. Please consider adding a map symbol to indicate the locations of the Section 404 permit areas, as a USACE Undertaking.	The appendices have been revised as requested.	Appendix A, Appendix C
25	<i>Business Leadership Council</i>	The facilities and planned changes to the park can bring a cohesive, positive change to Jackson Park that unites the Southside and the City of Chicago	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
26	<i>Chicago History Museum</i>	The Obama center would increase public engagement with the park, create jobs and give the South Side and economic boost.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2

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27	Chicago History Museum	Can anyone really argue this specific site is contributing significantly to Jackson Park or the community, or embracing Olmsted's vision?	<p>The perimeter of Jackson Park, including the western perimeter, is significant to the overall park design and the nomination of Jackson Park as a historic landscape. The recreational use of the western perimeter contributed to the surrounding community and reflected historic recreational use within historic spatial patterns. Not only are important aspects of the original Olmsted design manifested in the connection between the Midway Plaisance and Jackson Park at the western perimeter, but also, Olmsted designed specific spatial patterns (north and south fields/gymnasias divided by the children's playground and English Comfort Station) that have integrity today. Additional historical context is provided in the AOE and HPI.</p> <p>The Jackson Park Historic Landscape District and Midway Plaisance will still be listed in the NRHP if the proposed undertaking is implemented as described in the AOE. Further, as proposed, while the undertaking will cause an adverse effect to this historic property, it will not sufficiently diminish or remove the overall integrity of the historic property in such a way that it will no longer qualify for NRHP listing. These conclusions are based on analysis by the Illinois Department of Transportation cultural resource staff, who meet the Secretary of Interiors professional qualification standards. The IDOT analysis is included in the final AOE in a memo dated 09/19/2019.</p>	<p>Section 3.5.2.1.1 Section 3.5.2.2 Section 3.5.2.3</p>
28	Chicago History Museum	Another question that has been raised is whether or not it is appropriate to locate a museum in a park. Do the two uses work together, or against each other? What is being proposed with the presidential center is a relationship that has been well-known in Chicago since the time of the World's Columbian Exposition in 1893: a museum that faces the city and serves as one of many gateways for members of all communities into a large park.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>The City has a historic practice of placing important cultural institutions in regional public parks - a practice expressed since Burnham and Bennett's 1909 Plan of Chicago. The 1972 Lakefront Plan of Chicago echoes this practice and recommends siting major cultural institutions "within the lakeshore parks." The City's authority to allow private, not-for-profit organizations to construct and operate museums in public parks is derived from the Illinois Park District Aquarium and Museum Act, 70 ILCS 1290/0.01 et seq. (Museum Act), which was first adopted in 1893 and was most recently amended in 2015 to apply to presidential centers. Museums in public parks are subject to a large measure of public control, including requirements for free admission and public access. Throughout its history, Chicago has recognized the importance of culture and recreation, and the combination of the two in City parks, for the wellbeing of its residents and the future of the City on the regional, national and international stage. The OPC proposal follows in this tradition. By locating the OPC in Jackson Park, Chicagoans are guaranteed an institution that will remain devoted to public purposes in perpetuity.</p>	<p>Section 1.1 Section 1.2 Section 5.1.2</p>
29	Chicago Park District	<p>Page 24 - Section 3.3.2.2 - UPARR Replacement Area within the eastern Midway Plaisance No detail has been provided for treatment of the Cheney Goode Memorial other than depiction of a new pathway near the bench as indicated on Figure 3 east of the memorial. This memorial includes an accompanying sundial (only the sundial pedestal is extant), and both the bench and sundial require extensive conservation. A possible mitigation action could include restoration of this memorial.</p>	As the Section 106 process moves into the resolution of adverse effects stage, this suggestion will be taken into consideration as a potential mitigation item.	N/A
30	Chicago Park District	<p>Page 26 - Section 3.3.2.2 - Hayes Drive Improvements No detail has been provided for treatment of the Statue of the Republic other than an indication of new paving beyond the original memorial site as indicated on Exhibit 4a 1-2j and as described in the second and third paragraphs on page 26. This monument features an elaborate base and formal paving that require extensive conservation. A possible mitigation action could include restoration of this memorial.</p>	As the Section 106 process moves into the resolution of adverse effects stage, this suggestion will be taken into consideration as a potential mitigation item.	N/A

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31	Chicago Park District	Page 26 - Section 3.3.2.2 - Hayes Drive Improvements The Assessment of Effects states that the historic design highlighted the statue as the focal point of surrounding roads and that the monument placement was intended to be viewed from vehicles or at a distance. However, the park serves many more users than just vehicles passing by and should balance park users with vehicular use. The Park District believes the change to the triangular intersection of Hayes Drive and Richards Drive will allow park users to access and interact more safely with this memorial without compromising the ability to still view the statue from the roadway.	The AOE addresses changes to extant historic resources that contribute to the significance of the listed property. The AOE is consistent with CPD's comment that the proposed removal of one of the last remaining triangular intersections (Hayes Drive and Richards Drive) at the Statue of the Republic is a change in the historic character of contributing features of the historic district. It is a deviation from the historic integrity, character, and condition of the statue's setting (spatial organization, use, views, circulation, etc.) and removal of part of a contributing roadway that results in an adverse effect to the cultural landscape. The proposed pedestrian plaza minimally impacts views to the statue from remaining sections of roadway; however, the addition of traffic control devices in this area do impact views related to the setting of the statue.	Section 3.5.2.2
32	Chicago Park District	Page 27 - Section 3.3.2.2 - Stony Island Avenue Improvements This section discusses the landscape features along Stony Island. Note that the screened buffer has been altered over time and the landscape understory is no longer present in several sections along Stony Island. A possible mitigation action could include restoration of the landscape features mentioned in this section.	As the Section 106 process moves into the resolution of adverse effects stage, this suggestion will be taken into consideration as a potential mitigation item.	N/A
33	Chicago Park District	Page 30 - Section 3.3.2.3 The Assessment of Effects refers to the English Comfort Station but does not provide detail for the treatment of this building. The English Comfort Station is in need of rehabilitation and a possible mitigation action could include rehabilitation of this building.	As the Section 106 process moves into the resolution of adverse effects stage, this suggestion will be taken into consideration as a potential mitigation item.	N/A
34	Chicago Park District	Page 30 - Section 3.3.2.3 There is an inaccurate reference to Exhibit 4a 1-2m, believe it should be Exhibit 4b 1-2m.	The order of the exhibits has changed. The text correctly references 4a.	Section 3.3.2.3
35	Chicago Park District	Page 51- Section 5.0 This section header (Minimization and Mitigation of Effects) does not match with the introduction sentence "The following summarizes efforts made to minimize or avoid impacts of effects to historic properties". Any efforts to avoid effects should also be noted in this section.	The section title and content has been revised.	Section 5.0
36	Chicago Park District	Page 57 - Appendix A Organization of Exhibits 2a through 4b would read more clearly if the matchlines for exhibits directly faced each other.	The order of the exhibits has been changed.	Appendix A
37	Chicago Urban League	I am writing to reiterate the Chicago Urban League's support for the Obama Presidential Center (OPC) in Jackson Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
38	Chicago Urban League	While we applaud the efforts to assess any potentially adverse effects for the park and surrounding community, we firmly believe that, far from taking anything away from Jackson Park, the addition of the OPC will enhance its use as a recreational resource.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2

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39	<i>Chicago Urban League</i>	Along with enhancing Jackson Park, the Center is expected to generate jobs and have a positive economic impact of \$3.1 billion for the Chicagoland area.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
40	<i>Coalition for the Obama Presidential Center</i>	Please consider this as our urgent recommendation to that the Obama Presidential Center be built without needless delay. The opportunity to generated real and sustainable economic development in the above noted communities is overwhelming compelling.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
41	<i>Don Nash Park Advisory Council</i>	I am writing to express our overwhelming support for locating the Obama Presidential Center (OPC_ in Jackson Park and for the plans the Obama Foundation has taken to minimize and mitigate any "adverse" effects as identified in the Assessment of Effects Report developed as part of the Federal 106 Review Process	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1.1 Section 3.4
42	<i>Don Nash Park Advisory Council</i>	Any "adverse" effects should be treated the same as has been done for other historic parks. Similar opportunities for minimization and mitigation should be advocated in recognition of the historic and significant impact the OPC will provide.	A discussion of the avoidance and minimization measures regarding adverse effects is provided in the revised AOE. Mitigation measures will be considered as part of the next step in the Section 106 process.	Section 5.0, Section 6.0
43	<i>Emerald South Economic Development Collaborative</i>	I write in support of the efforts to improve Jackson Park and enhance its historic nature with the addition of the Obama Presidential Center... ...We are pleased that numerous aspects of the OPC design further historic preservation goals while retaining the open space and key features of Jackson Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
44	<i>Emerald South Economic Development Collaborative</i>	New development projects, in particular the creation of the OPC, present an unprecedented opportunity to spur innovative and impactful investments.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
45	<i>Emerald South Economic Development Collaborative</i>	...we believe that closing Cornell drive to vehicles will increase access and enjoyment for park visitors while also honoring the park's historic design and delivering greater economic benefits for nearby residents.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
46	<i>Emerald South Economic Development Collaborative</i>	...the Park was originally intended to provide opportunities for both passive and active recreation. For example, the Assessment of Effects points out that the original design for the Park incorporated a gymnasium area. The AOE doesn't acknowledge, however, that development of the OPC would, in fact, increase opportunities for active recreation in Jackson Park. The proposed plan for the OPC includes additional and expanded children's playground areas. These playground improvements will be a tremendous benefit to the families with young children in our community. Similarly, the Program, Activity and Athletic Center (PAAC) of the OPC will be able to support a variety of active recreational opportunities for children and adults alike.	The AOE noted that the proposed playground and picnic areas would be larger than the historic play areas. Additional text in the revised AOE notes the continuation of community recreation in this area.	Section 3.5.2.3
47	<i>Friends of the Parks</i>	Agrees with the adverse effect findings.	Your comment will be included in the project record.	Appendix F
48	<i>Friends of the Parks</i>	While Section 106 is a federal process, it is City staff that is managing it, which in and of itself is problematic in terms of conflict of interest, especially when the former mayor had previously been the chief of staff to the president whose center is in question. ...we call upon the Mayor Lightfoot to manage this process according to the higher standards articulated by the new administration, whose stated priorities include Transparency, Transformation, Accountability, Equity, and Diversity and Inclusion.	The City of Chicago's role is the "applicant" for federal assistance. The City is entitled to and has participated in the Section 106 process as authorized under 36 CFR Part 800. However, the FHWA remains legally responsible for all required findings and determinations. The FHWA, in cooperation with NPS and USACE, is working to meet these requirements. The Federal agencies will continue to review and independently evaluate all analyses completed for the Section 106 process as they have done since the initiation of the Section 106 process.	Section 1.0
49	<i>Friends of the Parks</i>	The Section 106 processes has immediately bypassed "avoidance" and goes straight to "minimization" and "mitigation." ...The Consulting Parties were not consulted in the discussion or development of avoidance or minimization efforts as we should have been.	The FHWA, in coordination with NPS and USACE, is following the Section 106 process as described in the regulations at 36 CFR Part 800. The third and current step of the Section 106 process assesses effects of the project on historic properties. The AOE documentation describes the efforts undertaken to avoid and minimize effects to historic properties, to date. It is appropriate for the Federal agencies to consider avoidance and minimization efforts early and throughout the Section 106 process to meet their obligation under Section 106 and other environmental laws. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During Step 4 of the Section 106 process, if adverse effects still remain to historic properties, the Federal agencies will continue in their efforts to avoid, minimize, or mitigate the adverse effect. The Federal agencies remain open to any avoidance and minimization efforts proposed by the consulting parties that are within the Federal area of jurisdiction. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.	Section 5.0 Section 6.0
50	<i>Friends of the Parks</i>	The Obama Foundation should pay for actual mitigation in a way that reflects the \$175 million public investment that is required to facilitate the plan that they insist on.	If adverse effects cannot be avoided, any measures to resolve adverse effects will be documented in a Memorandum of Agreement (MOA). It is the Federal agencies' responsibility to ensure any mitigation measures identified in an MOA are completed. Mitigation measures are eligible for FHWA federal-aid funding when the impacts are a result of a federally funded highway project, the proposed mitigation measures represent a reasonable public expenditure when weighed against other social, economic, and environmental values, and the benefit realized is commensurate with the proposed expenditure. The MOA will describe responsibilities for mitigation measures amongst the signatories to the document.	Section 6.0

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
51	<i>Friends of the Parks</i>	While Friends of the Park has not taken a position on the road closures, any straightforward examination of the process will reveal that there has not been any public consideration of any options other than closing the roads - a very costly measure. (Even though green space organizations like ours can appreciate the closure of the roads, we have also seen the Chicago Park District employ traffic calming measures in other large parks in Chicago. These options - minimizing the number of lanes and adding crosswalks and islands to facilitate pedestrians crossing the street - have not been offered for public vetting in this case.)	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>Consideration of roadway changes was part of the City's process of evaluating the proposed OPC site plan. Closures of the eastbound Midway Plaisance and Cornell Drive between 63rd Street and 59th Street are necessary to accommodate development of the project. The additional roadway closures will reduce the number of multilane roads that currently divide Jackson Park. The City has also proposed improvements to the roadway, pedestrian, and bicyclist network to address the changes in travel patterns that arise from the proposed roadway closures and to improve public safety, access and circulation throughout the park.</p>	Various
52	<i>Friends of the Parks</i>	... if is the only opportunity to call for mitigation measures, we would name appropriate mitigation as the replacement of 19.3 acres of green space by the creation of parks and playlots throughout the communities surrounding Jackson Park, according to the needs and desires of those communities. And we call for the Obama Foundation to pay for a new field house in Jackson Park and new sports fields conceived of in the South Lakefront Framework Plan...	<p>As the Section 106 process moves into the mitigation stage, the federal agencies will consider suggestions from consulting parties as possible mitigation measures. If adverse effects cannot be avoided, any measures to resolve adverse effects will be documented in a Memorandum of Agreement (MOA). It is the Federal agencies' responsibility to ensure any mitigation measures identified in an MOA are completed. Mitigation measures are eligible for FHWA federal-aid funding when the impacts are a result of a federally funded highway project, the proposed mitigation measures represent a reasonable public expenditure when weighed against other social, economic, and environmental values, and the benefit realized is commensurate with the proposed expenditure. The MOA will describe responsibilities for mitigation measures amongst the signatories to the document.</p> <p>The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p> <p>The UPARR regulations, at 36 CFR § 72.72, do not require an acre-for-acre replacement of land that is converted to non-recreation use. As proposed, the acreage for replacement recreation is larger than the acreage to be converted from recreation use. Of the 19.3-acre OPC site, 4.6 acres will be converted to non-recreation use; the remaining 14.7 acres will still be available for recreation. Roadway modifications will convert an additional 5.3 acres from recreation use. In total, approximately 9.9 acres will be removed from recreation use within the existing UPARR boundary. The replacement recreation is proposed to be located on the east end of the Midway Plaisance and on roadways within Jackson Park that will be closed to traffic and opened for recreation use. The total proposed replacement recreation will expand the UPARR boundary by adding approximately 16.1 acres of land for recreation use, compared to converted acreage of approximately 9.9 acres – resulting in a net enlargement of the UPARR boundary by approximately 6.2 acres.</p>	N/A
53	<i>Friends of the Parks</i>	...the South Lakefront Framework Plan public process took place long before the Section 106 process was announced. ...The public sessions called for by the Section 106 process cannot be satisfied by meetings that took place before it was announced.	<p>Input from consulting parties and the public input has been sought throughout the Section 106 process for this undertaking. Opportunities to date have included three consulting parties meetings which have provided overviews of and opportunities to comment on (1) the Section 106 process generally, (2) the Historic Properties Inventory, and (3) the draft Assessment of Effects. The general public was also afforded opportunities to participate and provide input at these milestones. Going forward, additional consulting party meetings will be held including a webinar to discuss the final, revised AOE and a separate meeting to resolve adverse effects.</p> <p>The South Lakefront Framework Plan (SLFP) is a local planning document which describes the Chicago Park District's vision for Jackson Park and the South Shore Cultural Center. The development of the SLFP is not a Federally funded activity and is not subject to Federal requirements. The public involvement process for the SLFP is under the jurisdiction of CPD. The Federal agencies are not relying upon the public involvement process the CPD used for the SLFP to satisfy its consulting party and public involvement responsibilities under Section 106.</p>	Section 4.0 Appendix F

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
54	<i>Friends of the Parks</i>	...it is absurd to replace a baseball field with a playground, anyway. Regardless of what a community-led conversation about what is best for the east end of the Midway would come up with, the UPARR requirements call for an amenity that serves the same user community. Those who use a baseball facility at a huge park like Jackson Park and those who use a playground for children at a neighborhood park are not the same user community.	<p>Pursuant to 36 C.F.R. § 72.72(b)(3), a replacement recreation opportunity under UPARR "need not provide identical recreation experiences." Rather, UPARR "provides the administrative flexibility to determine" the location of replacement recreation areas "recognizing that the property should meet existing public recreation needs." The City has indicated that the new track and field facility will displace one junior baseball playing field and one senior baseball playing field. The City has also indicated that the senior baseball playing field will be moved to another location within Jackson Park and that the remaining baseball diamonds in the park are adequate to meet demand. These changes were discussed with the public during the planning process for the South Lakefront Framework Plan (SLFP) and do not result in a conversion of recreation under UPARR. The Chicago Park District is responsible for managing shifting interests in recreational activities and user group expectations, while at the same time serving the broadest needs of the public. For instance, some neighborhoods have asked to convert tennis courts to either mini soccer pitches or pickleball courts as those sports have gained prominence.</p> <p>Concerning the proposed conversion of recreation relating to the OPC, the final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements. NPS will evaluate the replacement recreation to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p>	N/A
55	<i>Friends of the Parks</i>	...we also call for minimization efforts in the vein of planning ahead to assure that the OPC does not cause displacement... The City should explore programs to help create healthy, mixed-income communities in the neighborhoods around Jackson Park.	As proposed, the undertaking will not require the demolition of any historic buildings and no residential or business relocations are required. Further, there are no reasonably foreseeable impacts that will result in the demolition of historic buildings.	N/A
56	<i>Hyde Park Academy</i>	It is with an enormous amount of enthusiasm and excitement that the administration, staff and students of Hyde Park Academy anticipate the opening of the Obama Presidential Center.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
57	<i>Hyde Park Art Center</i>	I write in support of the Center's proposed location in Jackson Park. As a cultural institution in the area, we believe that the addition of this cultural site will only further strengthen and enrich the neighborhood.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
58	Hyde Park Historical Society	We continue to be concerned about the Obama Presidential Center (OPC) plans for entirely removing a section of historic Cornell Drive and are distressed about the OPC's intentions to demolish the historic Women's Garden.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>While the design decisions related to the OPC are outside the scope of the federal agencies' authority, the City of Chicago provided the following information regarding recent changes to the OPC design: A previous version of the OPC plan for modifying this portion of Jackson Park included an "alternate landscape feature" in the form of a circular pool, which was similar to an unbuilt circular water basin that was included in the Olmsted, Olmsted and Eliot 1895 Revised General Plan. The proposed design has since been modified in response to concerns that the completed May McAdams/Chicago Park District design ought to be recognized as the legitimate design legacy of the site. The OPC design team appreciated the comments it received that called attention to the history of the Women's Garden, which was not mentioned as a contributing element in the 1972 National Register of Historic Places Inventory-Nomination Form for Jackson Park.</p> <p>The current plan retains most of the iconic landscape features of the May McAdams design including the shape, size, and location of the central lawn encircled by a limestone wall and perennial plantings. The wall would be rebuilt incorporating the original limestone in the exact location, and at the same elevation, as the current wall. Modifications to the grading and the pathways between the central circular lawn and the larger network of Jackson Park circulation have been proposed to create accessible routes into the space (bringing the Women's Garden into compliance with the Americans with Disabilities Act) and to facilitate stormwater management.</p> <p>The current proposal utilizes the Women's Garden unique location at a topographical low point, retaining the lawn's elevation and location while improving the perennial border's drainage and infiltration characteristics to help manage future storm events.</p> <p>The AOE text is revised to augment the history and clarify the effects, which include alteration of historic physical features as well as the impact on the direct association of the garden to its legacy of female designers.</p>	N/A
59	Hyde Park Historical Society	In addition, we urge more diligent attention be paid to remaining archaeological evidence, especially regarding Louis Sullivan's World's Columbian Exposition Transportation Building.	The Illinois State Archaeological Survey (ISAS) conducted field investigations within the limits of the Archaeological APE. The deposits and materials retrieved during the field investigations were evaluated for National Register of Historic Places (NRHP) eligibility and ISAS concluded that the archaeological sites are not eligible for the NRHP under any criteria; SHPO concurred with these findings on March 28 and September 12, 2018. As there are no archaeological sites identified as listed or eligible for the NRHP within the Archaeological APE, there are no effects to either historic or pre-historic archaeological sites as a result of the federal undertaking.	Section 2.1 Appendix E
60	Hyde Park Historical Society	We find that only superficial attempts were made in the AOE draft and the city's presentation to avoid or minimize these adverse effects. The superficial and cursory nature of the draft AOE indicates a lack of good faith that compromises the 106 process	<p>The FHWA in cooperation with NPS and USACE has been committed to following the Section 106 process as described in the regulations at 36 CFR 800. The first two steps of the Section 106 process (initiation and identification of historic properties) have been completed. The third and current step, assesses effects of the project on historic properties, also serves to document any avoidance and minimization efforts the agency has undertaken to avoid and minimize effects to historic properties. It is appropriate for the Federal agencies to consider avoidance and minimization efforts early and throughout the Section 106 process to meet its obligation under Section 106 and other environmental laws. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During Step 4 of the Section 106 process, if adverse effects still remain to historic properties, the Federal agencies will continue its efforts to avoid, minimize, or mitigate the adverse effect. The Federal agencies remain open to any avoidance and minimization efforts proposed by the consulting parties that are within the Federal area of jurisdiction. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.</p> <p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p>	Section 5.0

Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park
Appendix F. Public Comments and Responses

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
61	<i>Jackson Park Golf & Community Leadership Council</i>	After participating in more than one hundred community meetings, Chicago Park District forums, park advisory council meetings, Obama Foundation public hearings, Jackson Park Harbor membership meetings, homeowner association/block-club/residential meetings, Jackson Park Golf league forums, I can confidently say that there is overwhelming support tendered by Jackson Park area community stakeholders for the Obama Presidential Center and long-overdue improvements within Jackson Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
62	<i>Jackson Park Highlands Association</i>	Approximately 73% of the residents within our community support the site that the Obama Foundation has selected to build the OPC. We are extremely excited about this and are anxiously waiting for its construction to begin.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
63	<i>Jackson Park Highlands Association</i>	It is our belief that that the OPC will provide the South Shore community and the city of Chicago with a significant stimulation for economic development, an increase of revenue and a positive catalyst within South Shore, which is long overdue. The OPC will also provide a beacon of hope for our youth and establish a place where the residents of South Shore can truly enjoy the historical Jackson Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
64	<i>Jackson Park Highlands Association</i>	The area that has been selected for the construction of the OPC, with the exception of the football field and track, is seldom utilized by the residents and others. The sidewalks adjacent to this area are in disrepair, the park benches are broken, the field house requires significant rehabilitation and the general upkeep of the park leaves much to be desired. ...We believe that the proposed plans for the OPC will result in a safer, more usable, and better maintained Jackson Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
65	<i>Jackson Park Highlands Association</i>	One of the concerns raised by many individuals is the closing of a section of Cornell Drive. However, this roadway creates an adverse effect to the park and prevents visitors of the park from truly enjoying it. The potential danger and lack of safety caused by the traffic and drivers consistently exceeding the speed limit prevents individual park goers, bicyclists and pedestrians from comfortably utilizing this space.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
66	<i>Jackson Park Yacht Club</i>	We have experienced first hand the neglect, lack of services and investment provided in Jackson Park. We look forward to the improvements and revitalization of Jackson Park from the presence of the OPC.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
67	<i>JPAC</i>	Approximately 80% of our active voting members support the Obama Presidential Center being built in Jackson Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
68	JPAC	<p>The 106 study described the proposed site lines around the Obama Museum in Jackson and the proposed children's play area at Midway Eastbound and Stony Island as having adverse effects on the park historical importance. We disagree with these findings...</p> <p>Rather than a negative effect, this museum in the park will have a positive effect on the park, its historical significance, its landscape, and the safety of the park. The benefits of the Obama Museum far outweigh any site line issue and I urge all parties to arrive at a positive mitigation.</p> <p>A parks historical significance also depends on its MAINTENANCE. Without the money to maintain the historic park, it becomes broken, vandalized, damaged and historic features are altered irreparably until it loses its historic significance. This Olmsted Park was all of the above in 2010 and few visitors came to the park.</p>	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>The AOE details potential adverse effects to the Jackson Park Historic Landscape District and Midway Plaisance resulting from the alteration of the landscape from the federal undertakings, including the indirect effects of private action planned for Jackson Park and the Midway Plaisance consistent with Secretarial standards. Even assuming these actions might improve the overall use and safety of the park, this alteration still produces the adverse effects summarized in the AOE.</p> <p>The current level of maintenance of Jackson Park has not jeopardized its historic significance or eligibility for listing on the NRHP.</p>	N/A
69	JPAC	<p>...the study did not take into account the numerous changes in this Olmsted landscape since its 1972 historic designation.</p> <p>...A park is a living reflection of our constantly changing community.</p>	<p>The AOE reflects that parks change over time. Section 3.5.1 of the AOE notes that "As community needs have changed, alterations to the park have been necessary to sustain its purpose, but the park continues to retain historic integrity because the overall effect of previous alterations retained consistency with the original design principles." The description of Jackson Park states the AOE's reliance on the HPI (and its appendices) for historical context. Changes to Jackson Park and the Midway Plaisance since 1972 are described in detail such that contributing and non-contributing features can be identified throughout the historic district. The changes described range from small deviations in sections of roadway to dramatic examples like the 1970s Bob-o-link Meadow reclamation after filling of the lagoons for the Nike site and the 1980 rehabilitation of the Japanese Garden. Examples of more recent changes described include Yoko Ono's Sky Landing on the Wooded Island and the planting enhancements throughout Jackson Park by The Woodlawn Organization and the Army Corps of Engineers.</p>	Section 3.5.1 Section 3.5.2
70	JPAC	<p>The question I ask is how many of these changes I have listed had a 106 study of their effects on the park's historical significance?</p>	<p>The Section 106 process must be followed for any "project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those require a Federal permit, license or approval." Many projects in Jackson Park have been undertaken with no federal involvement and therefore the Section 106 process was not required.</p>	N/A
71	JPAC	<p>In regards to the adverse effect of a children's play area near Midway East and Stony Island on the Cheney bench, the report has got this wrong. The bench is damaged, unreadable, and the site of dangerous antisocial behavior due to its isolation. The activity of a children's play area would benefit the bench by increasing eyes on and attention on the bench and the flooded, muddy field.</p> <p>...This proposed wonderful children's play area also includes the plan to fix the drainage problems so the area is safe for our children and bench users. This plan also restores the historic walkways from the time of the World's Fair... This is a major benefit not a negative effect.</p>	<p>The final AOE reflects refinements in the proposed changes on the east end of the Midway Plaisance, avoiding an adverse effect on this historic property. The report text is revised to indicate that the addition of a path adjacent to the Memorial reestablishes the alignment of a missing historic route and increases historic patterns of connection to the Memorial.</p>	Section 3.5.2.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
72	<i>Jackson Park Advisory Council</i>	<p>...the other major benefit of this OPC plan - the partial closing of 6-lane Cornell Drive bisecting our park. Cars travel 45 to 50 miles per hour here. A child must cross 6 lanes of speeding traffic to reach their sports and recreation fields...</p> <p>The historic effects of closing Cornell can be easily mitigated with the replacement of the Olmsted buggy path.</p>	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>Text is revised to indicate the high speed and volume of traffic along Cornell Drive and to clarify the historic dimensions of the roadway. As designed by Olmsted in the 1890s, Cornell was a 50' wide, multilane road. It continues to be a principal organizing element for Jackson Park and contributes to the historic spatial organization of the park. Removal of the road and replacement with a narrower walking path alters the historic road network and changes the relationship between interconnected systems of pedestrian and vehicular circulation.</p>	<p>Section 3.5.1 Section 3.5.2</p>
73	<i>KLEO Community Family Life Center</i>	<p>Someone who is more concerned with the "disruption" of removing trees to replant more, over the removal of barriers to community investment, or is up in arms about the closing of Cornell Drive to create more accessible green space, or focuses on what they think was the desired feel of a park design from over 100 years ago over the real needs of living breathing Chicagoans, is a person who sees the world through a lens of privilege.</p> <p>The shift that will happen when they no longer have to leave their neighborhood to experience what kids north of Madison have every day will change how they can envision the trajectory of their lives in ways I can only imagine.</p>	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p>	<p>Section 1.1 Section 1.2 Section 5.1.2</p>
74	<i>Landmarks Illinois</i>	<p>Failure to Document Consideration of Avoidance of Adverse Effect.</p> <p>...agrees with the adverse effect findings stated above.</p> <p>We call for a series of meetings that would focus on: 1) avoidance; 2) minimization; and then, 3) mitigation. Section 4(f) of the U.S. Department of Transportation Act [1966] (discussed below) requires that avoidance measures be thoroughly investigated, but which remains largely unaddressed.</p>	<p>The FHWA in cooperation with coordinating agencies is following the Section 106 process as described in the regulations at 36 CFR 800. The third and current step of the Section 106 process assesses effects of the project on historic properties. The AOE documentation describes the efforts undertaken to avoid and minimize effects to historic properties, to date. It is appropriate for the Federal agencies to consider avoidance and minimization efforts early and throughout the Section 106 process to meet its obligation under Section 106 and other environmental laws. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During Step 4 of the Section 106 process, if adverse effects still remain to historic properties, the Federal agencies will continue their efforts to avoid, minimize, or mitigate the adverse effect. The Federal agencies remain open to any avoidance and minimization efforts proposed by the consulting parties that are within the Federal area of jurisdiction. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.</p> <p>Additional consulting party meetings will be held to discuss the revised Final AOE and resolution of any adverse effects.</p> <p>Section 4(f) of the U.S. Department of Transportation Act of 1966 only applies to USDOT agencies, including FHWA, and actions that convert Section 4(f) protected properties to a transportation use. Section 4(f), which only applies to FHWA's action for this project, is separate from the Section 106 process, which applies to all Federal agencies. The FHWA will complete the Section 4(f) process, which is not considered as part of the Section 106 process. The OPC site selection is not within the Federal jurisdiction and will not be considered in the Section 4(f) evaluation.</p>	<p>Section 5.0 Section 6.0</p>

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
75	Landmarks Illinois	<p>Eastern End of the Midway Plaisance</p> <p>While the Area of Potential Effect (APE) was extended to include the entire Midway as we had recommended in our January 5, 2018 letter, we do not agree that the eastern end of the Midway Plaisance should be offered for Urban Park Recreation and Recovery (UPARR) grant recreational land replacement. The intent of the UPARR recreation replacement should be to provide recreational space where it does not currently exist, not on existing park property. Reuse of an existing park greenspace is not replacement. Not only does this deny the opportunity to create new park land in an area underserved by existing passive and active green and/or recreational space, but causes an additional adverse effect on the eastern end of the Midway Plaisance. The Plaisance was intended to be an open, green, passive and scenic vista creating an axial connection between Jackson and Washington Parks. We recommend the UPARR recreation replacement be moved to another geographic area where little accessible parkland currently exists and is in most need, such as West Woodlawn, Parkway Gardens, Greater Grand Crossing or Chatham. The eastern end of the Plaisance should remain open and free of new landscape design and obstructions, as was intended in the 1909 Plan for Chicago.</p>	<p>The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3.</p> <p>The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p> <p>According to the 1995 UPARR Administration Guideline NPS-37, replacement facilities and programs developed on land already owned by the jurisdiction and/or already dedicated to recreation purposes are acceptable in a UPARR conversion provided that they adequately replace the recreation opportunity lost.</p>	Section 1.1.1.3
76	Landmarks Illinois	<p>As it relates to avoidance, [we] request that the following actions be considered and implemented. Midway Plaisance twin Roadways that buffer the Midway's connection into Jackson Park. The twin roadways on the north and south sides of the Midway Plaisance that connect into Jackson Park are a key original design feature of Frederick Law Olmsted's park circulation system. The current OPC Campus site plan calls for the elimination of the southern road along the Midway Plaisance east of Stony Island Avenue. We recommend the OPC campus be shifted south toward the Jackson Park track and field by the necessary measure to avoid elimination of this section of road that also flanks the Women's Garden and either retain the roadway as is, or hardscape using universal design principles to accommodate pedestrian and other individual active transportation modes (bicycle, scooter, skateboard, rollerblades, etc.)</p>	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p>	Section 1.1 Section 1.2 Section 5.1.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
77	Landmarks Illinois	<p>The Women's Garden</p> <p>This important Works Progress Administration (WPA) - era perennial garden, the first Chicago Park district woman-designed landscape, should be left intact, not destroyed and then recreated with alternative landscape features. Technology for water retention is advanced enough today that water runoff can be accommodated utilizing the design of the OPC Plaza and Entry Grove, the Forum Building, the Library Building, and the Program, Athletic and Activity center green roofs and permeable pavers. Should this treatment endangered archives, artifacts, or activities underneath, there is also planned green space such as the Woodland Walk, the Entry Garden, the Lagoon View Lawn, the Wetland Walk and the Great Lawn that provide ample water recapture and retention areas. Destroying the significant historic feature of the Women's Garden can be avoided.</p>	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>While the design changes related to the OPC are outside the scope of the federal agency authorities, the following information was provided by the City of Chicago that are relevant to recent changes to the OPC design: A previous version of the OPC plan for modifying this portion of Jackson Park did include an "alternate landscape feature" in the form of a circular pool, which was similar to an unbuilt circular water basin that was included in the Olmsted, Olmsted and Eliot 1895 Revised General Plan. The proposed design has since been modified in response to concerns that the completed May McAdams/Chicago Park District design ought to be recognized as the legitimate design legacy of the site. The team appreciated the comments we received that called attention to the history of the Women's Garden as it was not mentioned as a contributing element in the 1972 National Register of Historic Places Inventory-Nomination Form for Jackson Park.</p> <p>The current plan retains most of the iconic landscape features of the May McAdams design including the shape, size, and location of the central lawn encircled by a limestone wall and perennial plantings. The wall would be rebuilt incorporating the original limestone in the exact location, and at the same elevation, as the current wall. Modifications to the grading and the pathways between the central circular lawn and the larger network of Jackson Park circulation have been proposed to create accessible routes into the space (bringing the Women's Garden into compliance with the Americans with Disabilities Act) and to facilitate stormwater management.</p> <p>With respect to stormwater management concerns on the OPC site in general, the design approach has been to make stormwater management integral to the layout of program elements, and the landscape of Jackson Park. Rather than relying on single-purpose retention areas, many of the areas mentioned are already contributing to this system in the proposed plan. For instance, the Wetland Walk has been specifically designed to capture a portion of the necessary stormwater detention as well as provide park program. Likewise, the green roof of the Program Athletic and Activity Center contributes to the project's cohesive stormwater strategy as do the green roofs of the Forum and the Library, which are also providing publicly accessible park space and connectivity. Because so much of the landscape will be built on top of structures, the use of permeable paving would not have a significant effect on the stormwater management strategies for the project.</p> <p>The current proposal utilizes the Women's Garden unique location at a topographical low point, retaining the lawn's elevation and location while improving the perennial border's drainage and infiltration characteristics to help manage future storm events.</p>	Section 1.1 Section 1.2 Section 5.1.2
78	Landmarks Illinois	<p>Real estate speculation and displacement</p> <p>In our January 5, 2018 letter, looking to the recent example of The 606 trail on Chicago's northwest side, we noted the risk of real estate speculation that will invariably result in displacement and demolition. While The 606 is a valued and accessible amenity, it has caused documented displacement of low-income residents through speculative developments. As we previously stated, there is an opportunity to plan ahead to assure that the OPC does not have the same unintended impact. We strongly encourage that the city explore programs to ensure the preservation of the existing mixed-income community and create opportunities for its existing residents to remain and to invest, particularly relating to housing in the Woodlawn community. Programs, such as the creation of community land trusts or a housing preservation fund, which may curb displacement and encourage building rehabilitation over demolition should be prioritized.</p>	<p>As proposed, the undertaking will not require the demolition of any historic buildings and no residential or business relocations are required. Further, there are no reasonably foreseeable impacts that will result in the demolition of historic buildings.</p>	N/A

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
79	Landmarks Illinois	<p>Interpret Jackson Park's women's history through multimedia methods and on-site signage:</p> <ul style="list-style-type: none"> The Women's Garden, built in 1936 and designed by May McAdams, should not only be preserved (see avoidance section above), but interpreted with appropriate signage that notes its significance as the first woman-designed public landscape in the city, and that tells the story of McAdam's career. 	As the Section 106 process moves into the resolution of adverse effects stage, this suggestion will be taken into consideration as a potential mitigation item.	N/A
80	Landmarks Illinois	<ul style="list-style-type: none"> The Cheney-Goode Memorial, dedicated in 1932, should be given a prominent location, conserved and interpreted with appropriate signage. The Chicago Park District's website states, "The Cheney-Goode Memorial is one of Chicago's few early monuments dedicated to women who played a significant role in the city's history. It honors two accomplished women who lived on the city's South Side, Flora S. Cheney and Katherine H. Goode." Few people know this monument exists or the role these women played in Chicago and Illinois politics. 	As the Section 106 process moves into the resolution of adverse effects stage, this suggestion will be taken into consideration as a potential mitigation item.	N/A
81	Landmarks Illinois	<ul style="list-style-type: none"> The location of the Woman's Building from the World's Columbian Exposition of 1893 should be interpreted where appropriate at the OPC so that its prior existence on the site is understood. 	Suggested mitigation measures to adverse effects will be considered as part of the next step of the Section 106 process.	N/A
82	Landmarks Illinois	<p>Invest in, repair and maintain historic buildings and structures in Jackson Park, including:</p> <ul style="list-style-type: none"> Iowa Building comfort station in the northeast corner of Jackson Park at 56th Street. Darrow Bridge, constructed in 1880 and designed by Daniel Burnham and John Wellborn Root, built as the Columbia Bridge and dedicated by Mayor Richard J. Daley as the Clarence Darrow Memorial Bridge in 1957. 9th hole golf shelter, circa 1912, designed by the D.H. Burnham & Co. Cecil Partee golf shelter building, circa 1900. The English Comfort Station, 1936, designed by E.V. Buchsbaum. 	Suggested mitigation measures to adverse effects will be considered as part of the next step of the Section 106 process. Mitigation measures are eligible for FHWA federal-aid funding when the impacts are a result of a federally funded highway project and the proposed mitigation measures represent a reasonable public expenditure when weighed against other social, economic, and environmental values, and the benefit realized is commensurate with the proposed expenditure.	N/A
83	Landmarks Illinois	<p>1. The Chicago Park District and its consultants with the Army Corps of Engineers ensured that that 2013-initiated Great Lakes Fisheries and Ecosystem Restoration (GLFER) project met the Secretary of Interior Guidelines for Cultural Landscape Rehabilitation and balanced ecological needs with historic preservation goals. We previously understood that the GLFER project was still underway and to be completed by the fall of 2019 according to the Corps of Engineers. What is the status of this effort and has its completion been stalled due to the current OPC planning?</p>	The US Army Corps of Engineers will comply with its obligations under Section 408 of the Clean Water Act and Section 106 of the NHPA.	N/A

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
84	Landmarks Illinois	2. It is still not clear if FHWA plans to conduct a Section 4(f) process for the OPC proposal, in coordination with a National Environmental Policy Act (NEPA) process. Such a review is required here. Often the outcomes of Section 4(f) have impact on Section 106 of the National Historic Preservation Act, and vice-versa. How will recommendations from 4(f) and NEPA studies be integrated with Section 106 outcomes?	FHWA will complete a Section 4(f) evaluation as required by the Section 4(f) regulations. Section 4(f) of the U.S. Department of Transportation Act of 1966, known as Section 4(f), provides for consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites during transportation project development. The law, now codified in 49 U.S.C. §303 and 23 U.S.C. §138, applies only to agencies within the U.S. Department of Transportation (U.S. DOT) and is implemented by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) through the regulations at 23 CFR Part 774. Like Section 4(f), Section 106 of the National Historic Preservation Act (NHPA) of 1966 also mandates consideration of a project's effect on historic sites. An important connection between the two statutes is that the Section 106 process is generally the method by which historic properties are identified that would be subject to consideration under Section 4(f). The results of the identification step under Section 106—including the eligibility of the resource for listing on the NRHP, the delineation of NRHP boundaries, and the identification of contributing and non-contributing elements within the boundary of a historic district—are a critical part of determining the applicability of Section 4(f).	N/A
85	Landmarks Illinois	While it has been continuously stated that the golf course project is a distinct and separate project from the OPC, the two projects will be equally benefitting from the same infrastructure changes, and it seems inconceivable that the planners of both projects are not in communication. What is the planned regulatory review for the golf course project, and when will these reviews take place as it relates to the timing of OPC's Section 106 and NEPA reviews?	The golf course consolidation/expansion proposal is independent from this undertaking and the associated Federal review process. The golf course consolidation/expansion proposal contained in the 2018 SLFP is not included as a "reasonably foreseeable action" because it is not completed or programmed (i.e., funding committed for the project construction) within the next two years. If any federal approval, funding, or permit is required for the golf course consolidation/expansion in the future, then Federal requirements (including Section 106) would be the responsibility of the relevant Federal agency. The approval of the undertaking described in the AOE does not force or require golf course consolidation/expansion and is therefore an independent project.	Section 3.8
86	Landmarks Illinois	We echo the serious concerns raised by the Advisory Council for Historic Preservation (ACHP) in its recently issued comments. Some of those comments raised questions regarding the meaningful nature of the process being implemented and the timeline moving forward. We believe that an inclusive and transparent process is of the upmost importance for the public and the successful development of the OPC. Consistent with the concerns raised by the ACHP we encourage at least three different sessions in the future on the adverse effects, one devoted solely to the issues of avoidance, a second to minimization, and a separate one related to mitigation.	Section 4.0 describes the consulting party and public involvement process that has been implemented to date for this undertaking and is consistent with the Section 106 requirements. More than 50 individuals and organizations have been accepted as Section 106 consulting parties to participate in the Section 106 process. All Section 106 documents have been made available for consulting parties and the public to review and comment upon. Three consulting party meetings have been held to date to inform consulting parties of the process, seek input on the project's Area of Potential Effects, historic properties within the APE, and the draft Assessment of Effects. Consulting party and public input has helped shape the Area of Potential Effect, and the Assessment of Effects has been revised based on consulting party and public input. A webinar will be held to describe how consulting party comments on the draft AOE were resolved, and the final AOE will be made available for a minimum of 30-days to review and object to effect determinations made by the Federal Agencies. Additional consulting party involvement will include resolving any adverse effects. The FHWA, as lead Agency for the purpose of NHPA, is following the Section 106 process as described in the regulations at 36 CFR 800 and is meeting or exceeding the requirements for involving consulting parties and the public.	Section 4.0
87	Landmarks Illinois	• While Cornell Drive was widened over the years, there has been a circuit drive around the park since its original Olmsted design. A minimization effort would be to retain some aspect of this historic road for vehicular traffic, such as narrowing the road. A mitigation effort could include memorializing the roadway alignment in an expanded pathway utilizing alternate hardscape material, to set it apart from the other new design features, and providing interpretive activities and signage about how people felt moving through and around Jackson Park. Through our conversations at Section 106 meetings with Black residents living near the park, few felt welcome, understood how to navigate or use the park, or felt they had access to its history (because of a lack of signage). These important stories could be told using interpretive methods.	Suggested mitigation measures to adverse effects will be considered as part of the next step of the Section 106 process.	N/A

Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park
Appendix F. Public Comments and Responses

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
88	<i>Landmarks Illinois</i>	<ul style="list-style-type: none"> Hayes Drive, and the southern portion of Cornell Drive that would remain open, will require appropriate traffic-calming measures so as to protect the expected experience of park-goers visiting the museum campus and the natural setting. Jersey barriers and high-speed traffic diminish the experience of being in Jackson Park. 	The design has been updated to eliminate a concrete barrier, and roadway geometry has been designed to encourage 30 MPH speeds. Pedestrian trails are provided on both sides of Hayes Drive, and crossings are proposed at all major intersections to allow for safe passage to and from destinations on either side of Hayes Drive in Jackson Park.	N/A
89	<i>Landmarks Illinois</i>	<ul style="list-style-type: none"> Existing historic resources should not be moved or locations altered for the proposed expansion of Hayes Drive, such as the Statue of the Republic which just celebrated the 100th anniversary of being its current location in 2018. The AOE report states of the proposed Hayes Drive and triangular road intersection reconfiguration, "the realignment will introduce visual elements that diminish the integrity the Statue of the Republic." This impact could be avoided by maintaining and redesigning the traffic circle, and keeping the Statue in situ. Traffic circles have been deployed by departments of transportation nationwide as more efficient for the flow of vehicles than stop lights. 	The proposed design does not physically impact the Statue of the Republic or the circular paths surrounding it. The proposed reconfiguration will improve pedestrian access to the Statue and integrate it with the adjacent park space. CDOT conducted an initial/preliminary review of a modern roundabout at this location and it was determined a single lane roundabout would not operate sufficiently and a multi-lane roundabout would have increased impacts based on footprint.	N/A
90	<i>Landmarks Illinois</i>	Lastly, there has been much reported in the press (as well as during the August 5th, 2019 meeting) relative to the start of construction at the OPC. The ongoing federal review process requires that no construction begin on the project as it remains subject to review - in essence, the whole point of engaging in a review process that would permit adverse effects to be avoided, minimized or otherwise mitigated. We would appreciate confirmation that no physical alterations to Jackson Park will be made for purposes of the construction and development of the OPC site (including all related roadwork) until the federal review processes have been completed, including Section 106, Section 4(f), and NEPA.	<p>The Federal agencies will comply with 36 CFR 800.1(c), which states the following:</p> <p>The agency official must complete the section 106 process "prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license." This does not prohibit agency official from conducting or authorizing nondestructive project planning activities before completing compliance with section 106, provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking's adverse effects on historic properties. The agency official shall ensure that the section 106 process is initiated early in the undertaking's planning, so that a broad range of alternatives may be considered during the planning process for the undertaking.</p>	N/A
91	<i>Midway Plaisance Advisory Council</i>	We are writing to you as members of the Midway Plaisance Advisory Council (MPAC) who fully support and endorse the location of the Obama Presidential Center in Jackson Park. This letter speaks specifically to our support for the City's recommendation to extend the Federal Urban Park and Recreation Recovery Act (UPARR) designation to the Midway Plaisance, east of the Metra tracks.	Your comment will be included in the project record.	Appendix F
92	<i>Museum of Science and Industry Chicago</i>	I am writing to express the Museum of Science and Industry's continued support for the Obama Presidential Center's Jackson Park location.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
93	<i>National Association for Olmsted Parks</i>	In light of these findings, [we] support the relocation of the OPC to a different location in Chicago that will not present such serious and demonstrable adverse effects to a nationally significant landscape and noteworthy legacy of Frederick Law Olmsted and the Olmsted Firm.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
94	<i>National Association for Olmsted Parks</i>	For a document that purports to be an assessment of effects to historic resources, Section 1.1 provides little historic context in explaining proposed actions and at times is adding highly subjective valuations to the proposed actions.	The AOE was revised to provide additional historic context and more detailed descriptions of the proposed federal actions and limits of each Federal agency's authority.	Section 1.0
95	<i>National Association for Olmsted Parks</i>	<p>The additional roadway closures will reduce the number of multilane roadways that currently divide Jackson Park to allow for a more continuous park.</p> <p>...sentence is deceptive and should be deleted from the report. This comment is deceptive and suggests that the OPC is “correcting” a historic design flaw in Jackson Park and the Midway Plaisance. The original carriage drives were narrower roads that were widened to accommodate automobile traffic. While the current multilane roads may “divide” Jackson park, the original roads did not “divide” the park—they were a circulation feature of the park. The historic drives helped to define the “continuous park.” Suggesting that the original park design was flawed that the roads and divided the park is not accurate. Maintaining the footprint of the original drives, reduced to their original width and alignment is appropriate.</p>	The sentence has been revised. See Section 1.1.1.2, which states that "The additional roadway closures will reduce the number of multilane roadways within the park."	Section 1.1.1.2
96	<i>National Association for Olmsted Parks</i>	<p>“The City proposes modifying the Eastern Midway to accommodate a combination of open space and a formal play area. In order to accomplish this project, the central area would reduce in size. ...[this]section should be clarified and historic design context provided. The “central area would reduce in size”—this appears to be a reference to the historic width of the central green space of the Midway Plaisance. This sentence is vague, however on page 29 the following text is provided detailing the adverse effect: Closure of the Midway Plaisance (South Roadway; eastbound) between Stony Island Avenue and Cornell Drive removes a historic circulation route. This roadway segment demonstrates a particularly strong expression of historic landscape character related to the design of the property....</p> <p>The Midway Plaisance is not a series of segmented parks, but rather a principal organizing and defined landform, bracketed by two roadways, defining the Chicago South Parks. Importantly, the Midway Plaisance establishes the principal axial approach to Jackson Park from Washington Park and the west. It is for this reason that the entire Midway Plaisance was added to the Area of Potential Effect at the request of the National Association for Olmsted Parks and other advocacy organizations.</p>	The text is augmented in the AOE to more clearly indicate that the Midway Plaisance is a basic organizing element within the South Park System. Historic design context was added to address how the undertaking would provide for a compatible while preserving and enhancing aspects of the space that convey its historical values.	Section 3.5.2.1.1 Section 3.5.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
97	<i>National Association for Olmsted Parks</i>	The... words “improve” and “improvements” should not be used within the context of proposed alterations to historic features that are being considered for demolition or significant change. Again, the report is using subjective language that suggests a favorable valuation of the proposed language. The words “change,” “alteration” or “removal” should replace “improve” and “improvement.”	Your comment will be included in the project record.	Appendix F
98	<i>National Association for Olmsted Parks</i>	<p>...views to Jackson Park do not contribute to the integrity of the properties’ setting due to the visual barrier of the ICRR viaduct and the properties’ substantial distance from Jackson Park. Though minimally visible within the properties’ distant viewsheds, the OPC Museum Building will not alter the setting of these historic properties.”</p> <p>The... section grossly disregards the axial relationship of the Midway Plaisance and Jackson Park, and ignores the inclusion of the entire Midway Plaisance as part of the APE and that views and vistas to and from Jackson park were a historic and original design decision. The Midway Plaisance is the axial connection between Washington Park and Jackson Park. To suggest that the current visual barrier of the ICRR is sufficient to minimize the historic design intent is inaccurate.</p>	<p>The AOE documents that the ICRR is a visual barrier and that the entire Midway Plaisance is designed as an axial connection between park elements, consistent with the NAOP perspective. The visual analysis has been augmented in Appendix D. The text is clarified in the AOE to place the nature of the obscured visual relationship between the Midway Plaisance and Jackson Park in the context of the designed spatial relationship.</p>	<p>Section 3.2.3 Section 3.5.2.3 Appendix D</p>
99	<i>National Association for Olmsted Parks</i>	<p>Suggesting the presence of the ICRR embankment minimizes the historic axial relationship between the Midway Plaisance and Jackson Park grossly misrepresents both the original design intent and the existing current condition of the site. The proposed OPC actions could irreparably damage any future opportunities to restore the historic design concept for the axial relationship, and will forever destroy the final axial connection to Jackson Park. ...the construction of the ICRR railway line should be listed within the historic context ...</p>	<p>Text in the AOE is revised to include the construction of the ICRR within the historic context. Additional information is described in the HPI, which provides historical context to the AOE. The AOE documents that the undertaking could fundamentally alter the designed connection between the Midway Plaisance and Jackson Park, consistent with the NAOP perspective. This is part of the basis for the finding of adverse effect. The AOE does not attempt to conflate the visual effect of the ICRR with a minimization of the axial spatial design of the park. Views and visual relationships are related though different from spatial patterns. The AOE does not speculate on future removal of the ICRR and the historic effect that it would have on the historic property that Olmsted designed through the 1890s with the ICRR as an existing condition.</p>	<p>Section 3.5.1 Section 3.5.2.2.1 Section 3.5.2.2</p>
100	<i>National Association for Olmsted Parks</i>	<p>...[we] continue to express ... opposition to the loss of historic park features.</p>	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>The FHWA, in coordination with NPS and USACE, have been committed to following the Section 106 process as described in the regulations at 36 CFR 800. The first two steps of the Section 106 process (initiation and identification of historic properties) have been completed. The third and current step, assesses effects of the project on historic properties, also serves to document any avoidance and minimization efforts the agency has undertaken to avoid and minimize effects to historic properties. It is appropriate for the Federal agencies to consider avoidance and minimization efforts early and throughout the Section 106 process to meet its obligation under Section 106 and other environmental laws. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During Step 4 of the Section 106 process, if adverse effects still remain to historic properties, the Federal agencies will continue their efforts to avoid, minimize, or mitigate the adverse effect. The Federal agencies remain open to any avoidance and minimization efforts proposed by the consulting parties that are within the Federal area of jurisdiction. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.</p>	<p>Section 1.1 Section 1.2 Section 5.1.2</p>

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
101	Network of Woodlawn	...there remains a concern that getting to the final effect will create not thoroughly addressed unforeseen problems that will impact areas outside the historic district. For example, commuters in an effort to avoid construction work may/will alter the paths to their various destinations. This could, conceivably, permanently alter traffic patterns/loads seriously impacting areas outside the Section 106 designated historic district – areas that are not designed to handle the change.	Traffic impacts during construction are not anticipated to produce any adverse effects on historic resources within the APE. A maintenance-of-traffic plan will be developed by the City to minimize congestion and diversion of traffic in areas outside the historic district.	N/A
102	Network of Woodlawn (SW Quadrant)	The current plan is seen as both an evolution and well deserved maintenance action. Past stodgy processes have stifled true intent of the quoted standard. Maintaining an esthetic past is not always in the best interests of what should be an ever evolving cultural landscape.	Your comment will be included in the project record.	Appendix F
103	Network of Woodlawn (NOW)	This letter of support for the placement of the play lot in Midway Plaisance East is being submitted... It is our position that the benefits of the OPC outweigh Olmsted's plan.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
104	Nichols Park Advisory Council	While we are of course delighted that the Obama Center will be built on the south side of Chicago, it is clear from the Section 106 Assessment of Effects that Jackson Park is the wrong location. We have believed this from the beginning, ever since Jackson Park was first nominated as the proposed site.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions. The City's decision-making process to approve the Foundation's selection of Jackson Park as the site for the OPC is discussed in Section 1.1.1.1.	Section 1.1.1.1
105	Nichols Park Advisory Council	We believe the disruption of the original Olmsted design, the proposed road closures necessitating the loss of additional slices off the east and west sides of the park, the sacrifice of from 500 to perhaps as many as 2,000 mature trees (estimates vary), the encroachment on the Midway, the potential exposure of the Paul Douglas Nature Sanctuary (aka Wooded Island) to substantially more human visitors, and the erection of a 23-story tower directly in the path of the North American migratory bird flyway are costs too great to tolerate when they are so unnecessary.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
106	Nichols Park Advisory Council	The proposed change to roadway patterns, at a minimum cost of \$175 million (based on current estimates which likely will be exceeded) will cause unnecessary damage to the Olmsted design, and cause huge traffic congestion on surrounding streets. Retaining the Olmsted traffic circulation design would help maintain the aesthetic integrity of Jackson Park, and would lead the way to reducing the proposed public expenditures.	The proposed undertaking will result in acceptable traffic performance on the roadway network in and surrounding Jackson Park. The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions. The impacts of roadway closures are further described in the revised AOE.	Section 1.1 Section 1.2 Section 5.1.2
107	Nichols Park Advisory Council	The proposed destruction of hundreds of mature trees to accomplish this project is in stark contrast to the claimed support, by those involved in the OPC project, of efforts to mitigate climate change. This is a further reason for the selection of a site that is not located within a landmarked historic park, and is outside of the migratory bird flyway.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions. The AOE discusses impacts to trees and the effects on historic properties.	Section 1.1.1 Section 3.5.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
108	<i>Nichols Park Advisory Council</i>	The size and scale of the proposed OPC tower would be grossly out of place within Jackson Park. This could be avoided by moving the OPC tower west of Stony Island, o/to a site neighboring (but not in) Washington Park.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>While the design decisions related to the OPC are outside the scope of the federal agencies' authority, the City of Chicago provided the following information regarding OPC design decisions: The Museum Building has been designed as part of an integrated campus setting along with the Forum, Library and Plaza. Removing the Museum Building away from the proposed site is not feasible, as it would not fulfill the planning objectives and vision of the Obama Foundation for development of a cohesive experience for visitors and local residents alike. In addition, moving the Museum Building further away from the Museum of Science and Industry—to which the OPC Museum Building will be linked by pedestrian pathways—detracts from the City of Chicago's stated goal in its 2012 Cultural Plan of fostering the development of a "Museum Campus South."</p>	Section 1.1 Section 1.2 Section 5.1.2
109	<i>Nichols Park Advisory Council</i>	The 'Cumulative Effects' analysis is woefully inadequate. This analysis claims to assess the impacts from 'reasonably foreseeable actions potentially affecting the same historic properties'. We assert that an unbiased analysis of the threats to the integrity of Jackson Park must include the proposed golf course consolidation/expansion. Combined, the OPC and golf course expansion would collectively shatter the integrity of Jackson Park. It is therefore necessary to include the golf course expansion along with the more benign alterations that were included in the analysis (e.g. the Osaka Garden)	The Cumulative Effects analysis is revised in the AOE to provide further description of the decision-making process for projects considered as reasonably foreseeable actions. The golf course consolidation/expansion proposal contained in the 2018 SLFP is not included as a "reasonably foreseeable action" because it is not completed or programmed (i.e., funding committed for the project construction) within the next two years. If any federal approval, funding, or permit is required for the golf course consolidation/expansion in the future, then Federal requirements (including Section 106) would be the responsibility of the relevant Federal agency. The approval of the undertaking described in the AOE does not force or require golf course consolidation/expansion and is therefore an independent project.	Section 3.8
110	<i>Nichols Park Advisory Council</i>	The construction of any structure on the eastern end of the Midway would be contrary to the Olmsted design for open space in this location. Moreover, it would be difficult for pre-teen children to get access to this site, because of its comparative remoteness from residential areas populated by young children. In addition, the use of the Midway as a UPARR replacement site would not add parkland, while there is a critical need to add parkland to underserved areas in the city. An alternative site should be found where play structures could be more readily accessible to residential areas, by creating or expanding a neighborhood park in an area that currently is underserved .	<p>The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3. The east end of the Midway Plaisance was among seven potential sites the City evaluated for UPARR replacement recreation. These included Harold Washington Park and five vacant sites between 57th Street and 71st Street. The City evaluated the sites according to key characteristics of the OPC conversion area, including sites that could offer the same quality of recreational opportunities within a mature landscape, walkability to Chicago's lakefront, and walkability to neighborhoods surrounding the OPC site. The City also considered anticipated cost, feasibility, and complexity of using the sites for UPARR replacement recreation. The vacant sites and Harold Washington Park were ruled out for UPARR-designated recreation because they lack all or most of the key characteristics and because they present feasibility concerns. In contrast, the east end of the Midway Plaisance exhibits each of the key characteristics. The Midway Plaisance is already integrated into the same park system as Jackson Park and affords recreation enhanced by its historic setting. The City also owns the Midway Plaisance (substantially limiting the risk of unforeseen complexities like environmental contamination). Accordingly, the City proposes the east end of the Midway Plaisance because of its proximity to the converted site and current ownership. See 36 CFR 72.72(b)(3).</p> <p>To replace lost recreational opportunities, the City proposes to reconfigure the east end of the Midway Plaisance to include a combination of open space and a formal play area. A concept plan of the proposed recreational changes within the east end of the Midway Plaisance is presented in Figure 3 of Appendix B. The western side of the lawn would be altered with the addition of a play area. The installation of a missing historic walk and tree patterns rehabilitate historic spatial organization, to a historically open character with corner plantings. The sunken grade of the lawn area would be modified to facilitate infiltration and drainage and to enhance use of the open field. There will be no alterations to the configuration of existing roadways or walking paths. The concept plan establishes a design envelope for the purpose of analyzing potential impacts to historic properties. Within these parameters, the City will make final design selections (such as specific playground equipment) with input from the public and in light of the historic nature of the Midway Plaisance, seeking to minimize any potential effects to historic resources, pathways, and plantings, to the extent possible. The schedule for public input for the final design will be announced by the City following completion of the Federal review process.</p>	Section 1.1.1.3 Appendix B

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
111	Nichols Park Advisory Council	Minimization and Mitigation of Effects (p. 51) fails to provide a cogent or meaningful strategy for 'avoidance, minimization, and mitigation'. The proposed mitigations are so toothless and ineffectual as to suggest a marked tendentiousness in their derivation. 'Avoidance' is not even discussed, as if there were no alternative to locating the OPC within Jackson Park.	<p>The FHWA, in coordination with NPS and USACE, is following the Section 106 process as described in the regulations at 36 CFR Part 800. The third and current step of the Section 106 process assesses effects of the project on historic properties. The AOE documentation describes the efforts undertaken to avoid and minimize effects to historic properties, to date. It is appropriate for the Federal agencies to consider avoidance and minimization efforts early and throughout the Section 106 process to meet its obligation under Section 106 and other environmental laws. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During Step 4 of the Section 106 process, if adverse effects still remain to historic properties, the Federal agencies will continue in their efforts to avoid, minimize, or mitigate the adverse effect. The Federal agencies remain open to any avoidance and minimization efforts proposed by the consulting parties that are within the Federal area of jurisdiction. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.</p> <p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p>	Section 5.0 Section 6.0
112	Nichols Park Advisory Council	the current attempt to destroy one landmark to build another is incredibly myopic. Undeniably, due to the magnitude of the adverse effects listed in the Section 106 assessment, no amount of "minimization" or "mitigation" will be sufficient to offset the damage to Jackson Park if the current OPC plans were to be followed.	<p>The Jackson Park Historic Landscape District and Midway Plaisance will still be listed in the NRHP if the proposed undertaking is implemented as described in the AOE. Further, as proposed, while the undertaking will cause an adverse effect to this historic property, it will not diminish or remove the overall integrity of the historic property in such a way that it will no longer qualify for NRHP listing. These conclusions are based on analysis by the Illinois Department of Transportation cultural resource staff, who meet the Secretary of Interiors professional qualification standards. The IDOT analysis is included in the final AOE in a memo dated 09/19/2019.</p> <p>During Step 4 of the Section 106 process, if adverse effects still remain to historic properties, alternatives to avoid, minimize, or mitigate adverse effects are further explored. The Federal Agencies remain open to any avoidance and minimization efforts proposed by the consulting parties, that is within the Federal Agencies' area of jurisdiction. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.</p>	Appendix F Section 6.0
113	The Neighborhood Network Alliance	[We] are in support of Jackson Park being home of Obama Presidential Center.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
114	Obama Foundation	The development of the OPC will respect, revitalize and foster a new appreciation for Olmsted's vision for the Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
115	Obama Foundation	In addition to respecting Olmsted's vision, the OPC will provide community benefits, recreational opportunities, and other improvements.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
116	Obama Foundation	The proposed OPC design reflects and has incorporated community feedback and concerns.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
117	Obama Foundation	The Foundation is committed to fair and robust discussion in negotiations to resolve effects to historic resources.	Your comment will be included in the project record.	Appendix F
118	Obama Foundation	The consultation leading to a Memorandum of Agreement represents a collaborative approach to achieving a procedural goal: consensus on the actions that the signatories to the Memorandum of Agreement agree to pursue in order to address the adverse effect. [We] will participate in this process in good faith, working with the City of Chicago, the federal agencies, other public and private entities and community organizations.	Your comment will be included in the project record.	Appendix F

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
119	Openlands	[we] strongly recommend that the National Park Service (NPS) and Federal Highway Administration (FHWA) conduct an Environmental Impact Statement (EIS) based solely on the results of the AOE.	Consistent with 36 CFR Part 800.8, the Federal agencies will include consideration of the undertaking's likely effects on historic properties in the determination of whether this undertaking is a "major Federal action significantly affecting the quality of the human environment," and therefore requires preparation of an environmental impact statement (EIS) under NEPA. A finding of adverse effect on historic properties does not necessarily require an EIS under NEPA.	N/A
120	Openlands	[we] understand that as part of the Section 106 process, avoidance and minimization precede mitigation both as policy and regulation. We note these strategies are cogently missing from both the NPS and FHWA actions as presented in the AOE. We recommend the report be revised to both include the definitions of avoidance, minimization and mitigation, as well as describe the linear progression to addressing adverse impacts by these means within the Section 106 process. We note that to date, both avoidance and minimization have been ignored with respect to the undertaking.	The federal agencies have considered avoidance and minimization efforts early and throughout the Section 106 process to meet their obligations under Section 106 and other environmental laws. The AOE documents any efforts undertaken to avoid and minimize effects to historic properties, to date. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During Step 4 of the Section 106 process, if adverse effects still remain to historic properties, FHWA in coordination with NPS and USACE will continue in their efforts to avoid, minimize, or mitigate adverse effects. The Federal agencies remain open to any avoidance and minimization efforts proposed by the consulting parties that is within the Federal area of jurisdiction. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.	Section 5.0 Section 6.0
121	Openlands	Furthermore, in section 1.2 and 1.3, the AOE presents a very clear and thorough explanation of the NPS and FHWA actions. As Federal Agencies, both the FHWA and the NPS may not be as well versed on the local issues, particularly a feasibility study by U3 Advisors that showed the alternative Washington Park location to be the least impactful and most preferential site. This analysis is completely ignored in terms of the policy and regulatory trajectory: avoidance, minimization, and mitigation.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
122	Openlands	Additionally, there is no reference to the 4(f) review within Section 5.0 of the AOE. [We] understand that the 4(f) process is a separate but intertwined element of the National Environmental Policy Act (NEPA), but we were surprised by this omission given Jackson Park's listed designation on the National Register of Historic Places. [We] understand that 4(f) is a substantive law and precludes project approval if there is a use of a historic site when a prudent and feasible avoidance alternative is available. Again, the operative word avoidance arises and yet is critically missing from Section 5.0. Moreover, since the Section 106 process cannot be completed until the 4(f) process is complete, delaying (or omitting the results) of the 4(f) process is problematic because it short-circuits the Section 106 process as well as the search for alternatives. Therefore, [we] recommend that a description of the 4(f) process to date, if not the results, be included as part of this AOE.	FHWA will complete a Section 4(f) evaluation as required by the Section 4(f) regulations. Section 4(f) of the U.S. Department of Transportation Act of 1966, known as Section 4(f), provides for consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites during transportation project development. The law, now codified in 49 U.S.C. §303 and 23 U.S.C. §138, applies only to agencies within the U.S. Department of Transportation (U.S. DOT) and is implemented by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) through the regulations at 23 CFR Part 774. Like Section 4(f), Section 106 of the National Historic Preservation Act (NHPA) of 1966 also mandates consideration of a project's effect on historic sites. An important connection between the two statutes is that the Section 106 process is generally the method by which historic properties are identified that would be subject to consideration under Section 4(f). The results of the identification step under Section 106—including the eligibility of the resource for listing on the NRHP, the delineation of NRHP boundaries, and the identification of contributing and non-contributing elements within the boundary of a historic district—are a critical part of determining the applicability of Section 4(f).	N/A

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
123	Openlands	As we have commented previously, it is important to recognize and note that both the FHWA and NPS actions and adverse impacts cited in the AOE would not occur but for the Obama Presidential Center (OPC) project. Worse, this statement appears to clear the way for the proposed golf course to be ignored altogether as part of this undertaking as an impact and/or adverse effect on the Park, yet not require an additional Section 106 review process in the future – despite the fact that both these projects share common costs and design elements as part of this review.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>The golf course consolidation/expansion proposal contained in the 2018 SLFP is not included as a "reasonably foreseeable action" because it is not completed or programmed (i.e., funding committed for the project construction) within the next two years. If any federal approval, funding, or permit is required for the golf course consolidation/expansion in the future, then Federal requirements (including Section 106) would be the responsibility of the relevant Federal agency. The approval of the undertaking described in the AOE does not force or require golf course consolidation/expansion and is therefore an independent project.</p> <p>The Cumulative Effects analysis is revised in the AOE to provide further description of the decision-making process for projects considered as reasonably foreseeable actions.</p>	Section 3.8
124	Openlands	Avoidance would include adjusting the location of the proposed OPC to fit within the current historic roadway configuration. Minimization would include explorations of traffic calming measures such as road narrowing, bumpouts, etc.... to reduce speed and increase safety while maintaining the current roadway alignments.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>The AOE documents any efforts undertaken to avoid and minimize effects to historic properties, to date. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During Step 4 of the Section 106 process, if adverse effects still remain to historic properties, FHWA in coordination with NPS and USACE will continue in their efforts to avoid, minimize, or mitigate adverse effects. The Federal agencies remain open to any avoidance and minimization efforts proposed by the consulting parties that is within the Federal area of jurisdiction. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.</p>	Section 5.0 Section 6.0
125	Openlands	<ul style="list-style-type: none"> That the AOE fails to acknowledge the hierarchy of roads present during the period of significance. This hierarchy was both an intentional design element and an invaluable tool to Olmsted as a means to provide varied park experiences. Unfortunately, past alterations to Jackson Park's roadway networks have eroded this experience. We recommend that the AOE reflect the further loss of the park-like scale of roads that are either eliminated altogether (Cornell, Marquette) or increased in width to become arterials (Hayes). If this road plan is fully implemented, there will be no remaining park-scale roads, arguably impacting and denying a valuable way to experience the park. 	The AOE documents that the intentional road hierarchy is diminished by the undertaking, consistent with this comment. This is part of the basis for the determination of adverse effect. For example, the AOE states, "... the construction of pedestrian-scale walks deviates from the 1895 design and the subsequent construction of the existing, interrelated vehicular and pedestrian circulation system including broad, tree-lined roadways that help to establish historic spatial organization." The AOE text is augmented to more clearly indicate the impact to the road hierarchy.	Section 3.5.2.1.1 Section 3.5.2.2 Section 3.5.2.3
126	Openlands	<ul style="list-style-type: none"> As highlighted above, the FHWA actions and adverse impacts cited in the AOE would not occur but for the Obama Presidential Center (OPC) project. 	<p>FHWA, in coordination with NPS and USACE, need for action is driven by the City of Chicago's decision to close roadways and the resulting traffic congestion that would result. The City has decided to close roads in part to accommodate the OPC and in part to improve park connectivity, and these decisions reside solely with the City of Chicago as local land use and management decisions.</p> <p>Additionally, the Federal agencies' need for action is driven by the City of Chicago's desire to improve bicycle and pedestrian access to and within Jackson Park. The Federal agencies' alternatives for addressing these transportation needs have the potential to effect historic properties, and those effects are fully evaluated in the Assessment of Effects, as required by Section 106.</p> <p>The effects of construction of the OPC in Jackson Park is included in the assessment of effects as an indirect and cumulative effect.</p>	Section 1.1

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
127	Openlands	<ul style="list-style-type: none"> The closure of Marquette Drive has no beneficial impact on the undertaking other than to more easily accommodate the proposed golf course renovation. As previously highlighted, the golf project is omitted as part of the undertaking. 	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>The closure of Marquette Drive is a long-standing recommendation from the South Lakefront Framework Plan and previous iterations of plans for Jackson Park. The closure allows for additional contiguous park space and a trail connection from Stony Island to Richards without interruption by vehicular roadways.</p> <p>The golf course consolidation/expansion proposal contained in the 2018 SLFP is not included as a "reasonably foreseeable action" because it is not completed or programmed (i.e., funding committed for the project construction) within the next two years. If any federal approval, funding, or permit is required for the golf course consolidation/expansion in the future, then Federal requirements (including Section 106) would be the responsibility of the relevant Federal agency. The approval of the undertaking described in the AOE does not force or require golf course consolidation/expansion and is therefore an independent project.</p> <p>The Cumulative Effects analysis is revised in the AOE to provide further description of the decision-making process for projects considered as reasonably foreseeable actions.</p>	Section 3.8
128	Openlands	<p>What is not mentioned is the fact that 350-400 mature trees will be removed to accommodate the roadway reconfigurations alone. While these trees will no doubt be replaced at some mathematical value, we note the following cumulative effects not discussed in the AOE: Replacement trees will likely not be replaced at an inch for inch diameter value, typical of CDOT projects. Assuming these trees have an average diameter of 12", CDOT would have to plant +/-2,250 trees at 2" diameter to replace these +/- 375.</p>	<p>The AOE discuss the impacts to trees and the effect on historic properties for all aspects of the undertaking, including the roadway reconfigurations.</p>	Section 3.5.2.1.1 Section 3.5.2.3
129	Openlands	<ul style="list-style-type: none"> While the AOE deals with historic impacts, [we] would like to point out that these landscapes are also functional. Mature trees not only have a different aesthetic, but also provide important functions in terms of climate change mitigation benefits that will not be recognized through immature trees. These include carbon sequestration, heat island mitigation, rainwater interception and flood reduction. 	<p>The AOE discusses the impacts to trees and the effect on historic properties for all aspects of the undertaking, including the roadway reconfigurations. The issues noted in the comment are not relevant to the Section 106 process evaluation of historic properties.</p> <p>This topic will be further addressed as part of the NEPA process.</p>	Section 3.5.2.1.1 Section 3.5.2.3

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
130	Openlands	<p>[We have] many issues with the replacement parkland associated with the NPS actions. First and foremost, it seems odd that the proposed replacement parkland as required by the Urban Park and Recreation Recovery (UPARR) grant agreement is slated for transfer to existing parkland. While Openlands is not an expert on UPARR Act grants, we note:</p> <ul style="list-style-type: none"> • The Chicago Park District is not pursuing an acre for acre allotment of replacement parkland for the entire 19.3 acres of the project despite numerous opportunities for such replacement within the adjacent neighborhoods. • The proposed UPARR replacement site at the eastern end of the Midway has not been approved by NPS. • That the proposed replacement parkland site both sits on an existing wetland and does not appear to have the support of the community. • As highlighted above, the NPS action and adverse impacts cited in the AOE would not occur but for the Obama Presidential Center (OPC) project. 	<p>NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p> <p>The UPARR regulations, at 36 CFR § 72.72, do not require an acre-for-acre replacement of land that is converted to non-recreation use. As proposed, the acreage for replacement recreation is larger than the acreage to be converted from recreation use. Of the 19.3-acre OPC site, 4.6 acres will be converted to non-recreation use; the remaining 14.7 acres will still be available for recreation. Roadway modifications will convert an additional 5.3 acres from recreation use. In total, approximately 9.9 acres will be removed from recreation use within the existing UPARR boundary. The replacement recreation is proposed to be located on the east end of the Midway Plaisance and on roadways within Jackson Park that will be closed to traffic and opened for recreation use. The total proposed replacement recreation will expand the UPARR boundary by adding approximately 16.1 acres of land for recreation use, compared to converted acreage of approximately 9.9 acres – resulting in a net enlargement of the UPARR boundary by approximately 6.2 acres.</p>	N/A
131	Openlands	<p>[We] recommend that a more robust visual analysis be conducted and the determination of effects be re-examined, especially for the areas immediately adjacent to the proposed OPC site including but not limited to the Wooded Island, the Jackson Park Terrace Historic District, The Hyde Park-Kenwood Historic District as well as regular intervals of the entire Midway Plaisance.</p>	<p>A supplemental visual analysis study is included in the revised AOE. This analysis was conducted for properties where the historic property structure has elevated levels above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall). The supplemental visual analysis study used a combination of drone photography and computer modeling to depict views from historic properties toward the OPC Museum from elevated views.</p>	<p>Section 3.1.2 Section 3.2.3 Appendix D</p>
132	Openlands	<p>As previously mentioned, an independent report by raSmith examines the original traffic study performed by Sam Schwarz Engineering. This report finds multiple inconsistencies and incongruities and requests further information for five separate assumptions. Additionally, the report contains seven other noteworthy points as well as an alternative conceptual plan for consideration. Given the cost over-runs with which the City currently faces, the traffic analysis should be re-examined by an independent firm and the pertinent AOE sections revised as necessary.</p>	<p>The effects of roadway closures on historic resources are described in the revised AOE.</p>	<p>Section 3.2.2</p>
133	Openlands	<p>Similarly, as previously indicated, there is no mention of the Golf Chicago effort to combine the Jackson Park course and the South Shore course into a single championship caliber golf course. At the very least, this effort should either be:</p> <ul style="list-style-type: none"> • Included within this undertaking given its direct relationship with the closure of Marquette Drive, or; • Listed with the other activities in Section 3.5.1 (Methodology) as an unrelated activity that are currently and reasonably foreseeable given its own impact on Jackson Park as a designated National Register of Historic Places. 	<p>The closure of Marquette Drive is a long-standing recommendation from the South Lakefront Framework Plan and previous iterations of plans for Jackson Park. The closure allows for additional contiguous park space and a trail connection from Stony Island to Richards without interruption by vehicular roadways.</p> <p>The golf course consolidation/expansion proposal contained in the 2018 SLFP is not included as a "reasonably foreseeable action" because it is not completed or programmed (i.e., funding committed for the project construction) within the next two years. If any federal approval, funding, or permit is required for the golf course consolidation/expansion in the future, then Federal requirements (including Section 106) would be the responsibility of the relevant Federal agency. The approval of the undertaking described in the AOE does not force or require golf course consolidation/expansion and is therefore an independent project.</p> <p>The Cumulative Effects analysis is revised in the AOE to provide further description of the decision-making process for projects considered as reasonably foreseeable actions.</p>	<p>Section 3.8</p>

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
134	Openlands	<p>What is striking about this graphic is the six buckets associated with the NEPA process, all of which are directly related to the proposed undertaking in ways that have not been sufficiently addressed or studied with any modicum of diligence. The Section 106 process reveals adverse impacts on Jackson Park as a historic resource. While noise and traffic have been somewhat addressed within the AOE, our comments indicate that a deeper examination should not only be explored but is necessary. Moreover, the proposed OPC tower will be located approximately .10 mile from arguably one of the City's most beloved destination for bird watching on the Wooded Island. The recently installed GLFER restoration project increases habitat, but a deeper understanding of the undertaking's impacts on these wildlife and habitat areas are not well understood. Similarly, the air and water quality impacts from the undertaking are also not well understood. We know that stormwater must be addressed on-site as part of the City of Chicago requirements. We also know that the proposed redesign of the historic Women's Garden serves solely as a stormwater retention area for the OPC site to meet the City requirements.</p> <p>Simultaneously, as the recently updated Bulletin 70 indicates, Chicago is currently experiencing increasingly larger storm events. How will the undertaking and the proposed stormwater strategies serve to deal with the increasing amounts of precipitation? Finally, there has been much discussion regarding the undertaking and its effects on the socioeconomics of the adjacent communities. Many local community groups seek a Community Benefits Agreement (CBA) while other meetings address gentrification. Rents in the area are already becoming unaffordable for some who have long suffered a lack of investment.</p>	<p>The Section 106 process requires assessment of effects to historic properties. The topics noted in the comment are not related to effects to historic properties.</p>	N/A
135	Openlands	<p>...it is imperative that the avoidance and minimization alternatives other than mitigation be explored so that the impacts to this historic and officially recognized park are fully minimized to the extent possible.</p>	<p>The AOE addresses avoidance and minimization efforts for both the direct federal undertaking and indirectly related private actions such as development of the OPC. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.</p> <p>The FHWA, in coordination with NPS and USACE, has considered avoidance and minimization efforts early and throughout the Section 106 process to meet its obligations under Section 106 and other environmental laws. The AOE documents any avoidance and minimization efforts undertaken to avoid and minimize effects to historic properties, to date. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During the next step of the Section 106 process, if adverse effects still remain to historic properties, alternatives to avoid, minimize, or mitigate adverse effects will be further explored. The Federal agencies remains open to any avoidance and minimization efforts proposed by the consulting parties, that are within the Federal area of jurisdiction.</p>	<p>Section 5.0 Section 6.0</p>
136	Preservation Chicago	<p>With the Section 106 process, the first goal should be to avoid any adverse effects. If avoidance is not possible, the second default is to minimize adverse effects. Finally, if minimization is not possible, the path of last resort is to mitigate the adverse effects of a development. This AOE report is focused exclusively on mitigation, openly bypassing avoidance and minimization.</p> <p>Section 5.0 (Pages 51-52) of the report's attempt at "efforts made to minimize or avoid impacts" reads more like minimization and mitigation at best.</p> <p>The AOE report's conclusion in Section 6.0 (Page 53-54) focuses yet again on mitigation – with no mention of minimization or avoidance.</p>	<p>The AOE addresses avoidance and minimization efforts for both the direct federal undertaking and indirectly related private actions such as development of the OPC. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.</p> <p>The FHWA, in coordination with NPS and USACE, has considered avoidance and minimization efforts early and throughout the Section 106 process to meet its obligations under Section 106 and other environmental laws. The AOE documents any avoidance and minimization efforts undertaken to avoid and minimize effects to historic properties, to date. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During the next step of the Section 106 process, if adverse effects still remain to historic properties, alternatives to avoid, minimize, or mitigate adverse effects will be further explored. The Federal agencies remain open to any avoidance and minimization efforts proposed by the consulting parties, that are within the federal agencies' jurisdiction.</p>	<p>Section 5.0 Section 6.0</p>

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
137	Preservation Chicago	Within the study area, there are seven historic districts and 29 historic individual properties that are listed or are eligible for listing on the National Register of Historic Places. A viable, suitable and acceptable avoidance option would be to move the OPC to private land near Washington Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions. The City's decision-making process to approve the Foundation's selection of Jackson Park as the site for the OPC is discussed in Section 1.1.1.1. Further discussion of avoidance for the City actions and Federal actions are provided in Section 5.0.	Section 1.1 Section 1.2 Section 5.1.2
138	Preservation Chicago	After 125 years of continued maintenance and care of the historic integrity of Jackson (Park), avoidance seems like the most logical action to take in addressing the adverse effects on this historic area. We should continue this legacy of great stewardship by focusing instead on avoidance, preservation and restoration of existing features.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
139	Preservation Chicago	This is not one small adverse effect on a large park, but a substantial and large adverse effect on Jackson Park. This development on the parkland that will have a devastating effect on the entire landscape. Historic properties can be modified to meet the needs of the 21st Century, but this heavy-handed destruction is not how it should be accomplished. Avoidance and minimization strategies can guide a plan that will bring jobs and economic growth to the South Side without destroying a historic asset in the process. If we were in a completely land-locked area, that would be one issue. However, no one has made the claim recently that there is a shortage of vacant land in and around Woodlawn on which an extraordinary Obama Presidential Center can be built without destroying Jackson Park.	The Jackson Park Historic Landscape District and Midway Plaisance will still be listed in the NRHP if the proposed undertaking is implemented as described in the AOE. Further, as proposed, while the undertaking will cause an adverse effect to this historic property, it will not sufficiently diminish or remove the overall integrity of the historic property in such a way that it will no longer qualify for NRHP listing. These conclusions are based on analysis by the Illinois Department of Transportation cultural resource staff, who meet the Secretary of Interiors professional qualification standards. The IDOT analysis is included in the final AOE in a memo dated 09/19/2019. The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 3.5 Appendix E
140	Preservation Chicago	It is important that as we review the adverse effects of the proposed Obama Presidential Center, we also consider the looming Tiger Woods PGA golf course proposed by merging the South Shore and Jackson Park golf courses. When Tiger Woods was in town in August 2019, he said he decided to take action on this site because President Obama asked him to. The connection of these two developments and their potential effect on Jackson Park would be undeniably devastating to the historic integrity of Jackson Park and Frederick Law Olmsted's vision for this internationally renowned landscape, and they should be considered cumulatively. One may even consider that between these two proposed projects, Olmsted's vision for Jackson Park may be completely changed and perhaps obliterated.	The golf course consolidation/expansion proposal contained in the 2018 SLFP is not included as a "reasonably foreseeable action" because it is not completed or programmed (i.e., funding committed for the project construction) within the next two years. If any federal approval, funding, or permit is required for the golf course consolidation/expansion in the future, then Federal requirements (including Section 106) would be the responsibility of the relevant Federal agency. The approval of the undertaking described in the AOE does not force or require golf course consolidation/expansion and is therefore an independent project. The Jackson Park Historic Landscape District and Midway Plaisance will continue to be listed in the NRHP if the proposed undertaking is implemented as described in the AOE. While the proposed undertaking will have an adverse effect to Jackson Park Historic Landscape District and Midway Plaisance, the Illinois Department of Transportation cultural resource staff, who meet the Secretary of Interior's professional qualification standards, reviewed the continued NRHP eligibility of the historic district in light of the effect determination and concluded that the proposed changes will not sufficiently diminish or remove the overall integrity of the historic district in such a way that it would no longer qualify for NRHP listing (See Appendix E: IDOT Memorandum). This has been clarified in the revised AOE. The Cumulative Effects analysis in the AOE is revised to provide further description of the decision-making process for projects considered as reasonably foreseeable actions. Based on the decision-making project for future projects described, the proposed golf course is not a "reasonably foreseeable" cumulative action.	Section 3.8 Appendix E

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
141	Preservation Chicago	There are many significant flaws in the traffic assumptions utilized in the AOE. An analysis of the CDOT traffic analysis study was conducted by Patrick E. Hawley in May 2018 and noted several significant flaws in the data assumptions. Traffic along major roadways and past nearby historic properties and districts is an important area of study, and these assumptions need to be as precise and accurate as possible. Relying on poor data in the City's analysis of traffic impacts in Woodlawn does not do justice to the people who live, work and play in the area, and it does not do justice to the historic landscapes and properties that have been a physical anchor in the Woodlawn community for more than 100 years.	With respect to impacts on historic landscapes and properties, traffic increases on certain roadways (including the Dan Ryan Expressway, State Street, ML King Drive, Cottage Grove Ave, Woodlawn Ave, Midway Plaisance (WB), 63rd Street, and 67th Street) will not require additional roadway expansion or changes to the roadway configurations. Existing capacity on these roads will operate at an acceptable level of service even with the additional traffic from the closed roadways; therefore, there are no direct impacts from the redistributed traffic on these roads. Any adjacent historic properties next to these roadways would see only modest additional traffic increases. Because the increases in traffic are modest, the changes in traffic patterns would not introduce visual, atmospheric, or audible elements that diminish the integrity of any historic properties, if present. In order for a change in traffic noise to be perceptible to the human ear, traffic would need to be doubled. The largest traffic increase (on roads not requiring additional capacity) is a 31% increase on 67th Street. Without physical changes to the roadway there are no indirect visual impacts to historic properties and the modest traffic increases do not result in perceptible noise or atmospheric changes to adjacent historic properties.	Section 3.2.1 Section 3.2.2
142	Preservation Chicago	While the City of Chicago and the State of Illinois are facing considerable budget crises, this does not seem like the best time to be investing public money to meet the requests of a private development which is already proposed to be given the park land at no cost. The estimated costs to make all of these changes – including the widening of Lake Shore Drive, the widening of Stony Island Avenue and the closure of large sections of Cornell Drive -- are substantial and a burden that the city and state should not bear at this time.	Your comment will be included in the project record.	Appendix F
143	Preservation Chicago	<p>The Urban Park and Recreation Recovery (UPARR) program requires that every acre of lost parkland in Jackson Park be replaced. While the primary replacement park location on the Midway Plaisance is problematic on its own, the calculation of total lost acreage is also flawed.</p> <p>Section 1.1.1.3 (Page 3) of report indicates that the public library roof will include picnicking space to make up for picnicking areas being lost with the proposed OPC construction. When will this area be open and free to the public for use? Will it replace hour-for-hour the recreational uses that are proposed to be lost?</p>	<p>NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p> <p>The UPARR regulations, at 36 CFR § 72.72, do not require an acre-for-acre replacement of land that is converted to non-recreation use. As proposed, the acreage for replacement recreation is larger than the acreage to be converted from recreation use. Of the 19.3-acre OPC site, 4.6 acres will be converted to non-recreation use; the remaining 14.7 acres will still be available for recreation. Roadway modifications will convert an additional 5.3 acres from recreation use. In total, approximately 9.9 acres will be removed from recreation use within the existing UPARR boundary. The replacement recreation is proposed to be located on the east end of the Midway Plaisance and on roadways within Jackson Park that will be closed to traffic and opened for recreation use. The total proposed replacement recreation will expand the UPARR boundary by adding approximately 16.1 acres of land for recreation use, compared to converted acreage of approximately 9.9 acres – resulting in a net enlargement of the UPARR boundary by approximately 6.2 acres.</p> <p>PD 1409 and the Use Agreement considered together provide legal certainty concerning the siting, uses, design, and public accessibility of the OPC in its historic setting. The provisions of the Use Agreement in particular detail the public's continued access at customary park and museum hours to the open and interior spaces of the OPC.</p>	N/A

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
144	<i>Preservation Chicago</i>	<p>There are informal recreational areas currently existing at Jackson Park mentioned on page 3 of the AOE which will be lost if the OPC is constructed as proposed. Will the opportunities for informal recreational use around the proposed Obama Presidential Center be available for free to the public for the same number of hours and days as the current space, or will they be forever open and free except when private events and limited hours of operation prohibit it?</p> <p>Section 1.1.1.3 (Page 4) of the report addresses the planned Program, Athletic and Activity Center: When will this space be open and free for the general public to use? How often will it be leased out for private use or used for OPC activities? Will this be a one-for-one replacement of lost recreational space in Jackson Park?</p>	<p>These issues will be further addressed in the context of NPS's evaluation under UPARR and, as appropriate, in the NEPA process. The Use Agreement in place between the City and the Foundation addresses the public access requirements of the OPC.</p>	N/A
145	<i>Preservation Chicago</i>	<p>Section 1.1.1.3 (Page 4) details plans to replace lost parkland in Jackson Park with redevelopment of the Eastern Midway area. Following the UPARR standards for replacement parks, how is developing a park on land that is already dedicated open space an acceptable replacement? Page 24 of the report further addresses the negative effect using this dedicated open space for replacement park will have on the Midway Plaisance: "The requirement that equivalent recreation opportunities are provided within the replacement area would modify the historic character of the Midway Plaisance east of the railroad embankment and viaduct with the addition of physical features for a play area."</p> <p>The Midway Plaisance is a distinctive feature of this unified park system designed by Olmsted connecting Jackson Park with the larger Midway Plaisance to the west and to Washington Park beyond. This is one cohesive design that should not be disturbed or altered.</p>	<p>These issues will be further addressed in the context of NPS's evaluation under UPARR. The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p> <p>With respect to your comment that "This is one cohesive design that should not be disturbed or altered," the final AOE reflects refinements in the proposed changes on the east end of the Midway Plaisance, avoiding an adverse effect on this historic property.</p>	Section 3.5.2.2 Section 5.2.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
146	Preservation Chicago	Counting vacated roads in the park as replacement parks is an additional assault to an objective effort to comply with the UPARR requirements. Those roads as roads contribute to the park itself. Pulling up pavement, adding some surfaces and grass and calling it replacement park is an affront to the integrity of the UPARR requirements.	<p>The AOE assesses the effects of the road closures and pavement removal.</p> <p>The UPARR program does not evaluate replacement property using fair market value or an acre-for-acre ratio. NPS will approve a conversion only upon conditions that “ensure the provision of adequate recreation properties and opportunities of reasonably equivalent location and usefulness.” 54 U.S.C. § 200507.</p> <p>These issues will be addressed in the context of NPS's evaluation under UPARR. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p> <p>The UPARR regulations, at 36 CFR § 72.72, do not require an acre-for-acre replacement of land that is converted to non-recreation use. As proposed, the acreage for replacement recreation is larger than the acreage to be converted from recreation use. Of the 19.3-acre OPC site, 4.6 acres will be converted to non-recreation use; the remaining 14.7 acres will still be available for recreation. Roadway modifications will convert an additional 5.3 acres from recreation use. In total, approximately 9.9 acres will be removed from recreation use within the existing UPARR boundary. The replacement recreation is proposed to be located on the east end of the Midway Plaisance and on roadways within Jackson Park that will be closed to traffic and opened for recreation use. The total proposed replacement recreation will expand the UPARR boundary by adding approximately 16.1 acres of land for recreation use, compared to converted acreage of approximately 9.9 acres – resulting in a net enlargement of the UPARR boundary by approximately 6.2 acres.</p>	N/A
147	Preservation Chicago	While Section 1.2 (Page 5) of the report routinely talks of “improvements” to the roadway system to benefit the proposed OPC, we think it is more appropriate to call it “significantly altering a historic landscape and roadway system.” These road alterations will negatively and permanently effect the historic integrity of Jackson Park, and the City of Chicago should instead focus on avoidance as a strategy to address those negative impacts.	<p>The AOE incorporates both concepts of alterations of roadways and improvements to other roadways as appropriate. How roadway changes result in alterations of historic landscape and the roadway system is explained in the discussion of effects on Jackson Park and the Midway Plaisance rather than in the introductory section describing the undertaking. The nature of adverse effects from roadway improvements is are part of the basis for the finding of adverse effect.</p> <p>The FHWA, in coordination with NPS and USACE, is following the Section 106 process as described in the regulations at 36 CFR Part 800. The third and current step of the Section 106 process assesses effects of the project on historic properties. The AOE documentation describes the efforts undertaken to avoid and minimize effects to historic properties, to date. It is appropriate for the Federal Agencies to consider avoidance and minimization efforts early and throughout the Section 106 process to meet their obligation under Section 106 and other environmental laws. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During Step 4 of the Section 106 process, if adverse effects still remain to historic properties, the Federal Agencies will continue in their efforts to avoid, minimize, or mitigate the adverse effect. The Federal Agencies remain open to any avoidance and minimization efforts proposed by the consulting parties that are within the Federal Agencies' area of jurisdiction. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.</p>	Section 3.5.2.1.1 Section 5.0 Section 6.0
148	Preservation Chicago	The closure of the portion of Cornell Drive north of Hayes Drive is reviewed on Page 27 of the AOE report. “For the removed portion of Cornell Drive north of Hayes Drive, the new walk approximates the existing road alignment near the West Lagoon and connects to the walk proposed as part of the OPC development.” While the report finds this solution acceptable, it does not acknowledge the value of the vehicular access that Olmsted intended nor does it acknowledge the limiting factor for people with accessibility limitations who can best access the views of the park from a vehicle. A narrower Cornell Drive (pre-1960s conditions) with improved pedestrian and bicycle access would be the ideal compromise here.	<p>The AOE text is adjusted to clarify the impact of the undertaking on the historic vehicular system.</p> <p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p>	Sections 3.5.2.1.1, 3.5.2.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
149	Preservation Chicago	Shutting down roads may “prioritize pedestrians over vehicles as well as internal circulation with the historic property over commuter traffic through the property,” but it will substantially impair the historic character of the park and makes the park less accessible to people with disabilities who can best tour the park from a motorized vehicle. It is possible to narrow roadways and add design elements to slow traffic that do not mean cutting whole arteries out of a historic park design.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>Consideration of roadway changes was part of the process of evaluating the proposed OPC site plan. Closures of the eastbound Midway Plaisance and Cornell Drive between 63rd Street and 59th Street are necessary to accommodate development of the project. The additional roadway closures will reduce the number of multilane roads that currently divide Jackson Park. The City has also proposed improvements to the roadway, pedestrian, and bicyclist network to address the changes in travel patterns that arise from the proposed roadway closures and to improve public safety, access and circulation throughout the park.</p>	Section 1.1 Section 1.2 Section 5.1.2
150	Preservation Chicago	It is essential that a proper above-ground-level analysis of the Obama Presidential Center’s impact is conducted to gain a complete perspective on the adverse effects of this proposed development.	A supplemental visual analysis study has been included in the revised AOE. This analysis was conducted for properties where the historic property structure has elevated levels above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall). The supplemental visual analysis study utilized a combination of drone photography and computer modeling to depict views from historic properties toward the OPC Museum from elevated views.	Section 3.1.2 Section 3.2.3 Appendix D
151	Preservation Chicago	The AOE report notes that the Women’s Garden built in 1936-1937 and designed by May McAdams “will be replaced.” Replacement of historic character after it is destroyed should be the last-resort strategy if nothing else works. This destruction and replacement is unacceptable. Avoidance and minimization should be thoroughly vetted first. While we fully support universally accessible design, there has to be a better way to improve accessibility in this garden feature without completely destroying it. The garden is not being destroyed to improve accessibility. It’s being destroyed to accommodate the OPC which is then placating some critics by touting a universally accessible redesign.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>While the design decisions related to the OPC are outside the scope of the federal agencies’ jurisdiction, the following information regarding recent changes to the OPC site design was provided by the City of Chicago. A previous version of the OPC plan for modifying this portion of Jackson Park included an “alternate landscape feature” in the form of a circular pool, which was similar to an unbuilt circular water basin that was included in the Olmsted, Olmsted and Eliot 1895 Revised General Plan. The proposed design has since been modified in response to concerns that the completed May McAdams/Chicago Park District design ought to be recognized as the legitimate design legacy of the site. The OPC design team appreciated the comments it received that called attention to the history of the Women’s Garden, which was not mentioned as a contributing element in the 1972 National Register of Historic Places Inventory-Nomination Form for Jackson Park.</p> <p>The current plan retains most of the iconic landscape features of the May McAdams design including the shape, size, and location of the central lawn encircled by a limestone wall and perennial plantings. The wall would be rebuilt incorporating the original limestone in the exact location, and at the same elevation, as the current wall. Modifications to the grading and the pathways between the central circular lawn and the larger network of Jackson Park circulation have been proposed to create accessible routes into the space (bringing the Women’s Garden into compliance with the Americans with Disabilities Act) and to facilitate stormwater management.</p> <p>The report text is revised to augment the history and clarify the effects, which include alteration of historic physical features as well as the impact on the direct association of the garden to its legacy of female designers.</p>	N/A
152	Preservation Chicago	It is estimated that 408 trees will or already have been removed to make the OPC possible, with another 350-400 trees coming down for the proposed road reconfigurations. Looking at the cumulative effect of the OPC and a Tiger Woods golf course, it is estimated that an additional 2,000 trees will be felled for the golf course. In total, nearly 3,000 trees will be lost in a nationally significant historic park. That kind of deforestation is unacceptable.	<p>The impacts to trees and the effects on historic properties are addressed in the AOE.</p> <p>The golf course consolidation/expansion proposal contained in the 2018 SLFP is not included as a "reasonably foreseeable action" because it is not completed or programmed (i.e., funding committed for the project construction) within the next two years. If any federal approval, funding, or permit is required for the golf course consolidation/expansion in the future, then Federal requirements (including Section 106) would be the responsibility of the relevant Federal agency. The approval of the undertaking described in the AOE does not force or require golf course consolidation/expansion and is therefore an independent project.</p>	Section 3.5.2.1.1 Section 3.5.2
153	Preservation Chicago	The traffic impacts and view shed impacts of the proposed Obama Presidential Center also need more thorough research and assessment.	Traffic impacts are further discussed in the revised AOE. A supplemental visual analysis study is included in the revised AOE. This analysis was conducted for properties where the historic property structure has elevated levels above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall). The supplemental visual analysis study used a combination of drone photography and computer modeling to depict views from historic properties toward the OPC Museum from elevated views.	Section 3.1.2 Section 3.2.2 Section 3.2.3 Appendix D

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
154	<i>Rosalie Villas Homeowners Association</i>	<p>The AOE Report is thorough and clearly written as the culmination of a long and complex process. We have no recommendations for additions or revisions to the methodology or scope of work, nor believe there is any need to extend the review period to redo report content. Our review appropriately required revisiting earlier documents, notably the Historic Properties Inventory and the AOE appendix, to fully understand the limits of the review, methodology used, and criteria applied to the conclusions reached. Toward that end, the linked references to information from earlier stages of the review process were extremely helpful.</p> <p>Within the narrow scope of the review, the findings are consistent with the applied methodology and understandable. The description of the responsibilities for actions and approvals associated with the undertaking, and the steps that follow on from the Consulting Party review are useful in understanding how the final recommendations leading to the Memo of Agreement will be developed and finalized. We would like to thank the staff who created the report for their work to create a thoughtfully organized and informative report.</p>	Your comment will be included in the project record.	Appendix F
155	<i>Rosalie Villas Homeowners Association</i>	We submit this letter from the position that the Obama Presidential Center should be sited in Jackson Park: to honor our first African-American President , as an extension of Chicago's 100-year tradition of siting major cultural institutions in its parks where they are broadly accessible to citizens and tourists alike, and to be an economic and social catalyst to the South Side's underserved neighborhoods.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
156	<i>Rosalie Villas Homeowners Association</i>	Additionally, we concur with the City recommendation to designate the east end of the Midway Plaisance as a replacement recreation area by amendment to the original UPARR agreement.	Your comment will be included in the project record.	Appendix F
157	<i>Rosalie Villas Homeowners Association</i>	Minimization options put forward for the OPC Site Development reflect the work of a talented architectural team that is both knowledgeable and respectful of Olmsted's design philosophy. They have thoughtfully designed modern buildings and climate change-appropriate landscaping to harmonize and blend with the historic landscape and in some instances offer remedies to poor design decisions that adversely affected Olmsted's designs over recent decades. The OPC minimization strategies also offer solutions that while seemingly detract from historic integrity on one hand offer opportunities on the other including reattaching the western perimeter to the rest of the park and creating both a museum campus environs with the Museum of Science and Industry and eliminating highway volume vehicular traffic through the heart of the park.	Your comment will be included in the project record.	Appendix F

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
158	Rosalie Villas Homeowners Association	In addition to minimization options, we would suggest considering mitigation options that focus on educating visitors, particularly children, about the history of our wonderful South Side parks through a permanent exhibit in the Museum. Dr. Louise Bernard, Director of the Museum, has talked about the museum telling the story of the interwoven fabric of American History, the Civil Rights Movement, and the Obama family's journey. Why not consider a similar museum exhibit that traces the parks' history in relation to the history of the City and the South Side? What better way to honor the Olmsted legacy long after the last tree he planted stands no more?	As the Section 106 process moves into the resolution of adverse effects stage, this suggestion will be taken into consideration as a potential mitigation item.	N/A
159	Rosalie Villas Homeowners Association	Another possible educational option might include access to the digital model of the Columbian Exposition developed by Dr. Lisa Snyder at UCLA's Institute for Digital Research and Teaching. Developed over the past 20 years through the digitization of maps and photos, the model allows the viewer to walk through the Fair and into some of its buildings. Perhaps the segment of that model that corresponds with the OPC site could be developed to show the layers of change that have occurred in that one area of Jackson Park. During the World's Fair, the area was the site of the Horticultural Building, one of the largest on the fairgrounds, at 250' wide (wider than the Museum tower is tall), 997' long, and 113' high at its tallest point. The building extended on a north-south axis from 60th Street to 62nd Street, covering in one building the major part of the OPC site.	As the Section 106 process moves into the resolution of adverse effects stage, this suggestion will be taken into consideration as a potential mitigation item.	N/A
160	Save the Midway	We agree with many of your findings regarding Jackson and Midway Parks and the Women's/Perennial Garden, i.e., that these areas would suffer adverse effects if the current plans are allowed to move forward as proposed.	Your comment will be included in the project record.	Appendix F
161	Save the Midway	[we find] it unacceptable that the City's UPARR conversion plan could jeopardize the Midway's NRHP listing. [we] believe it is necessary and achievable for NPS and FHWA to protect the historic integrity of the Midway and Jackson Park in the course of this undertaking.	The Jackson Park Historic Landscape District and Midway Plaisance will continue to be listed in the NRHP if the proposed undertaking is implemented as described in the AOE. While the proposed undertaking will have an adverse effect to Jackson Park Historic Landscape District and Midway Plaisance, the Illinois Department of Transportation cultural resource staff, who meet the Secretary of Interior's professional qualification standards, reviewed the continued NRHP eligibility of the historic district in light of the effect determination and concluded that the proposed changes will not sufficiently diminish or remove the overall integrity of the historic district in such a way that it would no longer qualify for NRHP listing (See Appendix E: IDOT Memorandum). This has been clarified in the revised AOE.	Section 3.5.2.1 Appendix E
162	Save the Midway	To avoid any adverse effect to the east section of the Midway, the City should remove the playground and the UPARR designation from the plan for the east section, and leave the east section as primarily an open flexible meadow as designed by F. L. Olmsted in his Study of Design for the Midway Plaisance—Alternative, 1894 (Olmsted Archives, NPS).	The final AOE reflects refinements in the proposed changes on the east end of the Midway Plaisance, avoiding an adverse effect on this historic property. The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.	Section 1.1.1.3

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
163	Save the Midway	The City should work with local community organizations to create new parkland on empty lots or other City owned property within the area to provide more neighborhood parks. We note that the City's targeted area on the Midway is near other current and planned play areas and would thus be redundant. Such redundancy would not be the case in some neighborhoods close to the Midway.	<p>The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3. The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p> <p>The UPARR program does not evaluate replacement property using fair market value or an acre-for-acre ratio. NPS will approve a conversion only upon conditions that "ensure the provision of adequate recreation properties and opportunities of reasonably equivalent location and usefulness." 54 U.S.C. § 200507.</p>	Section 1.1.1.3
164	Save the Midway	The City should place the UPARR designation on the new parks and playground.	The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3. As noted above, NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72. Land approved by NPS for recreation under UPARR will be added to the Section 1010 boundary map and will become subject to the requirements of the statute.	Section 1.1.1.3
165	Save the Midway	The City's current plans, as noted in your report, destroy the historical significance of the Midway as part of Olmsted's South Park System primarily by destroying its integrity as an open meadow with flexible use.	The Jackson Park Historic Landscape District and Midway Plaisance will continue to be listed in the NRHP if the proposed undertaking is implemented as described in the AOE. While the proposed undertaking will have an adverse effect to Jackson Park Historic Landscape District and Midway Plaisance, the Illinois Department of Transportation cultural resource staff, who meet the Secretary of Interior's professional qualification standards, reviewed the continued NRHP eligibility of the historic district in light of the effect determination and concluded that the proposed changes will not sufficiently diminish or remove the overall integrity of the historic district in such a way that it would no longer qualify for NRHP listing (See Appendix E: IDOT Memorandum). This has been clarified in the revised AOE.	Section 3.5.2.1 Appendix E
166	Save the Midway	Building fences, pouring concrete, and re-landscaping seeks to fulfill its UPARR obligations via a loophole: rather than truly creating new parkland to compensate for play areas lost to OPC, it plans to claim it has created new parkland by adding formal structures that will destroy the historic nature of the eastern panel of the Midway.	<p>The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3. The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements.</p> <p>The UPARR program does not evaluate replacement property using fair market value or an acre-for-acre ratio. NPS will approve a conversion only upon conditions that "ensure the provision of adequate recreation properties and opportunities of reasonably equivalent location and usefulness." 54 U.S.C. § 200507.</p> <p>These issues will be addressed in the context of NPS's evaluation under UPARR. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p>	Section 1.1.1.3
167	Save the Midway	To destroy the integrity of a park (Midway) on the National Register of Historic Places to avoid creating new parkland in a City short on green spaces but rich in empty lots is offensive. That such a plan was done without community input—most especially—without the prior consultation of the local park advisory council would seem to violate the very reason the City of Chicago was forced in 1982 by a federal consent decree to create local park councils.	<p>The Jackson Park Historic Landscape District and Midway Plaisance will continue to be listed in the NRHP if the proposed undertaking is implemented as described in the AOE. While the proposed undertaking will have an adverse effect to Jackson Park Historic Landscape District and Midway Plaisance, the Illinois Department of Transportation cultural resource staff, who meet the Secretary of Interior's professional qualification standards, reviewed the continued NRHP eligibility of the historic district in light of the effect determination and concluded that the proposed changes will not sufficiently diminish or remove the overall integrity of the historic district in such a way that it would no longer qualify for NRHP listing (See Appendix E: IDOT Memorandum). This has been clarified in the revised AOE.</p> <p>The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3.</p>	Section 1.1.1.3 Appendix E

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
168	<i>Save the Midway</i>	The AOE report implies that filling in a natural occurring wetland on the Midway is an improvement. We challenge this conclusion and ask that this action also be categorized as an adverse effect. Our suggestions to avoid the adverse effects on the Midway are as follows: Expand the area of the Midway by reopening the embankment underpass according to the original Olmsted plan and take no measures in the plans for the space that would preclude such a restoration. The City should not fill in the space of the ephemeral wetland but should rather enhance it. It should be respected as an ecological resource that promoted the richness of flora and fauna of the entire area. We suggest any future plans for the space respond to the natural environment and to enhance it.	These issues will be addressed in the context of NPS's evaluation under UPARR and, as appropriate, in the NEPA process. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.	N/A
169	<i>Save the Midway</i>	WOMENS GARDEN: ...it was designed in 1936 by a noted female landscape designer, May E. McAdams. Any "expansion" of this park, any change to its current footprint, any destruction of the trees and plants is therefore a destruction of a historical design and would in essence erase the work of a woman, Ms. McAdams, by Michael Van Valkenburgh, a man. We find such plans therefore not only to be an adverse effect not fully articulated in the AOE, but also deeply offensive. We note further that removing the Women's Perennial Garden from its status as public parkland and conveying it to a private foundation threatens to alter its historical significance. We request that the achievements of both women and women's history be respected and that the site remain separate public parkland and retain the original landscape design. If this is not possible, then we request that the current landscaping be completely respected and remain intact. We suggest that the City add a ramp and some walkways around the current garden as required to make it ADA accessible.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>While the design decisions related to the OPC are outside the scope of the federal agencies' jurisdiction, the following information regarding recent changes to the OPC site design was provided by the City of Chicago. A previous version of the OPC plan for modifying this portion of Jackson Park included an "alternate landscape feature" in the form of a circular pool, which was similar to an unbuilt circular water basin that was included in the Olmsted, Olmsted and Eliot 1895 Revised General Plan. The proposed design has since been modified in response to concerns that the completed May McAdams/Chicago Park District design ought to be recognized as the legitimate design legacy of the site. The OPC design team appreciated the comments it received that called attention to the history of the Women's Garden, which was not mentioned as a contributing element in the 1972 National Register of Historic Places Inventory-Nomination Form for Jackson Park.</p> <p>The current plan retains most of the iconic landscape features of the May McAdams design including the shape, size, and location of the central lawn encircled by a limestone wall and perennial plantings. The wall would be rebuilt incorporating the original limestone in the exact location, and at the same elevation, as the current wall. Modifications to the grading and the pathways between the central circular lawn and the larger network of Jackson Park circulation have been proposed to create accessible routes into the space (bringing the Women's Garden into compliance with the Americans with Disabilities Act) and to facilitate stormwater management.</p> <p>The report text is revised to augment the history and clarify the effects, which include alteration of historic physical features as well as the impact on the direct association of the garden to its legacy of female designers.</p>	Section 3.5.2.2 Section 3.5.2.3
170	<i>South Shore Works</i>	This letter comes to underscore support for the erection of the Obama Presidential Center in Jackson Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
171	<i>South Shore Chamber, Inc.</i>	This is letter serves as an expression of support for the Obama Foundation and its plans to build the Obama Presidential Center in Jackson Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
172	<i>The YMCA</i>	The South Side YMCA supports the Obama Presidential Center because it will complement our mission with more programs and resources for the children, youth and families.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
173	<i>South Side Neighbors For Hope</i>	We were founded to advocate for our south side parks and communities, with our current focus on advocating for the Obama Presidential Center in Jackson Park.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
174	<i>South Side Neighbors For Hope</i>	We note below many modifications that have already been made to Jackson Park that obviously detract from Olmsted's design, most notably the current six-lane "highway" that is Cornell Ave, which was originally designed as a carriage road for horse-drawn buggies. We also would like to point out modifications to other notable Olmsted designs, such as the recent elimination of vehicular traffic from Central Park in New York City as well as the massive expansion of the Metropolitan Museum of Art.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
175	<i>South Side Neighbors For Hope</i>	We acknowledge the conclusion that there will be one adverse effect on Jackson Park, stemming from the alteration from the historical nature of Frederick Law Olmsted's design. We state, in the strongest of terms, that the benefits that the OPC provide to Jackson park and our communities easily outweigh the noted adverse effect.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
176	<i>South Side Neighbors For Hope</i>	Have the City, the NPS, and the FHWA applied Criterion C consistently at all Historic Properties since enactment of the National Historic Preservation Act of 1966? Specifically, please explain the apparent divergent interpretation of Criterion C associated with approved changes in the Hyde Park-Kenwood Historic District. This Historic District has been physically and culturally altered by the construction of modern glass and steel residential high-rise buildings that are completely out of character with the historic stone and frame single family homes that once characterized the Hyde Park-Kenwood Historic District. Despite this obvious break with historical style and function, and the subsequent change in population density and traffic congestion, the AOE determined that "the addition of contemporary structures has not diminished the historic district's integrity of setting."	Please note that only federal funded, assisted, or permitted activities are required to comply with Section 106 of the National Historic Preservation Act of 1966, and as such, activities or projects funded in the Hyde Park-Kenwood Historic District that occurred without Federal assistance did not require review under Section 106. Most of the post-1978 structures within the boundaries of the Hyde Park Kenwood Historic District are not glass and steel residential high rises as stated in the comment. The majority of the buildings that date from 1979 to 2019 are University of Chicago properties representing a broad range of architectural styles, designs, materials, and heights. In addition, the historic district is not just made up of frame and stone single family homes as suggested in the comment. The historic properties include hundreds of apartment buildings and University structures of various styles, materials, and heights.	N/A
177	<i>South Side Neighbors For Hope</i>	Page 2, Section, 1.1 In the spirit of cooperation and transparency, the CCDPD voluntarily allowed the Section 106 review to include City of Chicago actions that do not require federal evaluation. How would the conclusions of the AOE change if only the required federal actions were considered?	Federal actions considered as part of the undertaking include the NPS's authority under UPARR and the FHWA's authority under the Federal-aid Highway Program. City actions include the decision to allow for the construction of the OPC in Jackson Park, to close roadways in Jackson Park, and to propose recreation changes. The City actions do not require any federal authorizations, and therefore, are not required to be evaluated under federal procedures (i.e. Section 106 of the NHPA, NEPA, etc.). The City actions are being considered as part of this undertaking as a result of their relationship to the Federal actions. See Section 3.4.	Section 1.1 Section 3.4
178	<i>South Side Neighbors For Hope</i>	Page 3, Section 1.1.1.3 The text states that the undertaking will include a minimum of 1 acre of picnic space. Please clarify whether this is a change from current acreage.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions. While the design decisions related to the OPC are outside the scope of the federal agency authorities, the following information was provided by the City of Chicago. The developed OPC site will include at least one acre of picnic area, which will exceed the area of the existing picnic grove on the site today.	Section 1.1.1.3

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
179	South Side Neighbors For Hope	Page 3, Section 1.1.1.3 Please confirm that there will be no net loss of area in the Perennial/Women’s Garden.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions. While the design decisions related to the OPC are outside the scope of the federal agency authorities, the following information was provided by the City of Chicago. Confirmed: there will be no net loss of area.	Section 1.1.1.3 Section 3.4 Section 3.5.2.3
180	South Side Neighbors For Hope	Page 4, Section 1.1.1.3 Was the area proposed for road closure originally envisioned as multi-lane roads in Olmsted’s plan?	The 1890s Olmsted plans indicate that Cornell Drive (approx. 50’) and the Midway Plaisance (South Roadway, eastbound; approx. 40’) as wide multilane roads. The roads were largely implemented as designed. Refinement of the then uncompleted south part of Jackson Park with the 1905 General Plan included the design of Marquette Drive as a what appears to be a relatively wide (approx. 32’ to 36’) two-lane road, which would have accommodated parking at the edge. More information on the historic road system is provided in the HPI Appendix F.	Section 3.5.2.2
181	South Side Neighbors For Hope	Page 14, Section 3.1.2 Has any major undertaking in a Historic District in Chicago been determined to have “no adverse effect?” Given the broad and subjective definition of “effect,” and the requirement that any single effect be interpreted as the undertaking having an adverse effect, it seems that a finding of adverse effect is inevitable. Please provide counterexamples to this assumption.	The FHWA, in cooperation with coordinating agencies, has applied the criteria of adverse effect consistent with the Section 106 regulations in 36 CFR 800 for the proposed undertaking. We are unaware of any past federal undertakings that are in any way comparable to the proposed undertaking.	N/A
182	South Side Neighbors For Hope	Since 1972, when the Park was listed as Historic, golf courses have been added; the Japanese Garden has been rebuilt and expanded more than once; MSI has added two new wings and an underground parking lot; underpasses and beaches have been updated; LaRabida outpatient facility has been constructed; and numerous other alterations to the “historic” park have been made. The AOE states that “the majority” all these previous projects were “consistent with original design principles.” Please clarify whether any of these projects required federal review? Were AOE’s prepared? How does the current undertaking differ substantively from these previous major construction projects that were approved in the park?	The FHWA, in cooperation with coordinating agencies, has applied the criteria of adverse effect consistent with the Section 106 regulations in 36 CFR 800 for the proposed undertaking. We are unaware of any past federal undertakings that are in any way comparable to the proposed undertaking. Please note that only federal funded, assisted, or permitted activities are required to comply with Section 106 of the National Historic Preservation Act of 1966, and as such, activities or projects funded in Jackson Park that occurred without Federal assistance did not require review under Section 106.	N/A
183	South Side Neighbors For Hope	Page 22, Section 3.3.2.1 The text states that the undertaking diminishes the historic property’s integrity...” Please describe specifically how the undertaking differs from these previously constructed projects in its degree of “consistency with original design principles.” For example, how is an underground parking lot and 4-lane street consistent with the original design idea focused on scenery and recreation? Please clarify whether the determination of adverse effect was reached using consistent interpretation of effects among these other projects.	The AOE describes how development of an underground facility or reduction of street width could provide the appearance of “green space” and nevertheless change the character of the historic landscape in ways that contribute to the determination of adverse effect. The AOE addresses effects of potential changes of an identified undertaking to the existing characteristics that contribute to the significance of the historic property. By definition, contributing resources have integrity in spite of past changes, or else they would be considered non-contributing resources. The AOE accounts for the current integrity of the property but does not assess or compare previous projects. As explained in the HPI and noted in the AOE, Jackson Park and the Midway Plaisance have evolved as a public park since the nineteenth century. Some changes have been compatible with the original design and implementation of the park through the period of significance (e.g. plantings through the GLFER project), while other changes likely diminished aspects of the property’s integrity at the time (e.g. development of a skating rink on the Midway Plaisance beginning in the 1990s and removal of the triangular intersection at Marquette Drive and La Rabida around 1980).	Section 3.3.2.1 Section 3.5.1 Section 3.5.2.3

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
184	<i>South Side Neighbors For Hope</i>	Page 32, The text quotes an 1894 letter from Olmsted stating that the MSI was to be the only building considered a “dominating object of interest” in the park. The HPI quotes Olmsted, Olmsted & Eliot’s 1895 Revised General Plan for Jackson Park Plan as including “three principal elements of the scenery” for Jackson Park, “the Lake,” “the Lagoons,” and “the Fields.” Please revise the AOE to indicate that neither the Lake, the Lagoons, nor the Fields would be adversely affected by the undertaking.	Text of the AOE is changed to clarify how the proposed undertaking affects the major, designed areas of Jackson Park including the museum grounds and perimeter that were intended by Olmsted to frame and contrast with the three principal elements of scenery (lake shore, fields, and lagoons). The AOE describes impacts to specific contributing features located throughout the park.	Sections 3.5.2.1.1, 3.5.2.3
185	<i>The Cultural Landscape Foundation</i>	We were, however, surprised when, at a meeting of consulting parties on August 5, 2019, a representative of the city stated that the location of the Obama Presidential Center “is not something that would change.” Given that the undertaking, as defined, includes “the construction of the Obama Presidential Center in Jackson Park” (AOE, p. 2), as well as related road closures, we hope that the city’s remarks do not indicate an intention to place prior restrictions on statutory requirements that direct consulting parties to seek ways to avoid, minimize, or mitigate the undertaking’s adverse effects.”	The undertaking as described by the AOE encompasses more than the Federal actions. The City of Chicago is the authority for making local land use and management decisions, including deciding to locate OPC in Jackson Park and close roadways under its jurisdiction. The decision to locate OPC in Jackson Park and close roadways is not subject to Federal approval by NPS, FHWA, or USACE; neither are the design decisions associated with OPC. The Federal agencies continue to have an obligation to consider ways to avoid, minimize, and mitigate the effects of the Federal actions. Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions. A detailed discussion regarding avoidance and minimization efforts for the City, NPS, FHWA, and USACE Actions has been provided in Chapter 5.0 of the revised AOE.	Section 5.0
186	<i>The Cultural Landscape Foundation</i>	Effects on the Midway Plaisance, listed in the NRHP in 1972, are not fully assessed, because detailed plans that would directly affect that historic designed landscape, pursuant to the proposed federal action, have not yet materialized.	The design for the Midway Plaisance is sufficiently mature for purposes of the NPS’s action under UPARR and for purposes of assessment of effects.	N/A
187	<i>The Cultural Landscape Foundation</i>	Effects on Washington Park, listed in the NRHP in 2004, are not assessed, because no analysis of such effects was undertaken in the AOE (see TCLF’s initial request for such an analysis in our correspondence dated January 3, 2018; “Expanding the APE to Include the Entire South Park System”).	Section 106 regulations define the APE as the ‘geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.’ Regulations also require agency officials, namely, the FHWA, NPS, and USACE for this undertaking, to determine and document the APE delineation in consultation with the SHPO. The delineation of the APE boundary was discussed with Consulting Parties and the public during the December 1, 2017 Consulting Party Kick-off meeting. Comments regarding the APE boundary were collected and modifications to the APE boundary were adjusted, as appropriate. Both the archaeological and historic architecture APE boundaries were coordinated and concurred with by the IL SHPO. The delineation of the APE is discussed in the Historic Properties Inventory (HPI) and summarized in the AOE. Washington Park is located approximately one mile west of Jackson Park. While it is part of the historic South Parks System, it is independently and individually listed on the NRHP. Washington Park is also a contributing resource to the Chicago Park Boulevard System Historic District, and effects were assessed on the entirety of that historic district. Due to its distance from the undertaking, Washington Park will not experience any direct or indirect effects as a result of the undertaking and therefore, was excluded from the APE boundary. Additional requests for expanding the APE to surrounding neighborhoods that may experience impacts due to traffic or socio-economic factors (i.e. displacements, increased rents, impacts to low-income residents) were also received. Traffic impacts are addressed in the revised AOE. Socio-economic impacts, and cumulative impacts, that are the result of a federal action are addressed through the environmental analysis required by the National Environmental Policy Act (NEPA) and not through the Section 106 process. Therefore, it is not necessary to modify the APE to address potential socio-economic impacts.	Section 2.1 Appendix E
188	<i>The Cultural Landscape Foundation</i>	The visual and spatial effects of the undertaking are not fully assessed, because the requisite visual analyses related to the undertaking were not completed.	A supplemental visual analysis study has been included in the revised AOE. This analysis was conducted for properties where the historic property structure has elevated levels above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall). The supplemental visual analysis study utilized a combination of drone photography and computer modeling to depict views from historic properties toward the OPC Museum from elevated views.	Section 3.1.2 Section 3.2.3 Appendix D
189	<i>The Cultural Landscape Foundation</i>	The AOE’s overall analysis of effects should be reorganized and expanded so as to delineate individual effects on character-defining features of the historic designed landscapes, thus enabling a clearer, more detailed statement of specific adverse effects that are to be avoided, minimized, or mitigated.	The discussion of adverse effect to the cultural landscape is augmented to include a separate section (3.5.2.1.1 Summary of the Adverse Effect to the Cultural Landscape) that is organized by character-defining landscape features and refers to each contributing feature of the cultural landscape relevant to the determination of adverse effect. The new section is directly related to the following section (3.5.2.2 Effect to the Cultural Landscape from Federal Actions) which is organized by federal action.	Section 3.5.2.1.1 Section 3.5.2.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
190	<i>The Cultural Landscape Foundation</i>	A. The AOE states (p. 4) that “the future public process regarding the changes on the Eastern Midway will carefully consider the historic nature of the Midway Plaisance and seek to minimize any potential effects to historic properties, pathways, and plantings, to the extent possible.” That passage indicates that effects of the undertaking cannot be fully assessed at this time, because the specific plans to modify the Eastern Midway in order to create recreational space for a conversion under the UPARR Program, pursuant to the undertaking, have not yet materialized. We believe that any effects to the Midway Plaisance deriving from the undertaking should be fully assessed in the current AOE.	The design plans for the Midway Plaisance are sufficiently mature for purposes of the NPS's action under UPARR and for purposes of assessing effects.	N/A
191	<i>The Cultural Landscape Foundation</i>	As signatory consulting parties, the National Park Service and the Advisory Council on Historic Preservation should be fully availed of those [Midway] plans before the AOE is finalized - all the more so because the Eastern midway is intrinsically linked to both Jackson and Washington parks (see below) and would appear to be an inapposite location for recreational activity.	The design plans for the Midway Plaisance are sufficiently mature for purposes of the NPS's action under UPARR and for purposes of assessing effects.	N/A
192	<i>The Cultural Landscape Foundation</i>	[We] stated in an earlier correspondence to the City of Chicago, of the three tracts of land today known as Washington Park, the Midway Plaisance, and Jackson Park were conceived and designed as a single park. The report to the South Park Commission by Olmsted, Vaux & Co., submitted in March 1871, refers, in fact, to the whole of the bounded area as “The Chicago South Park,” which it then describes as comprising an “Upper Division,” a “Midway Division,” and a “Lower or Lagoon Division.” As such, Chicago’s South Park System is today the only intact park system designed by Olmsted and Vaux outside the State of New York. In failing to analyze potential effects on Washington Park, listed in the NRHP in 2004, the current AOE fails to recognize the essential unity of the three parks. We therefore urge the City of Chicago to provide a full assessment of the potential cumulative and indirect effects of the undertaking on Washington Park, without which the AOE must be regarded as incomplete.	<p>Section 106 regulations define the APE as the 'geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.' Regulations also require agency officials, namely, the FHWA, NPS, and USACE, for this undertaking, to determine and document the APE delineation in consultation with the SHPO. The delineation of the APE boundary was discussed with Consulting Parties and the public during the December 1, 2017 Consulting Party Kick-off meeting. Comments regarding the APE boundary were collected and modifications to the APE boundary were adjusted, as appropriate. Both the archaeological and historic architecture APE boundaries were coordinated and concurred with by the IL SHPO. The delineation of the APE is discussed in the Historic Properties Inventory (HPI) and summarized in the AOE.</p> <p>Washington Park is located approximately one mile west of Jackson Park. While it is part of the historic South Parks System, it is independently and individually listed on the NRHP. Washington Park is also a contributing resource to the Chicago Park Boulevard Historic District, and effects were assessed on the entirety of that historic district. Due to its distance from the undertaking, Washington Park will not experience any direct or indirect effects as a result of the undertaking and therefore, was excluded from the APE boundary. Additional requests for expanding the APE to surrounding neighborhoods that may experience impacts due to traffic or socio-economic factors (i.e. displacements, increased rents, impacts to low-income residents) were also received. Traffic impacts are addressed in the revised AOE. Socio-economic impacts, and cumulative impacts, that are the result of a federal action are addressed through the environmental analysis required by the National Environmental Policy Act (NEPA) and not through the Section 106 process. Therefore, it is not necessary to modify the APE to address potential socio-economic impacts.</p>	Section 2.1 Appendix E

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
193	<i>The Cultural Landscape Foundation</i>	<p>With regard to the visual impact of planned OPC structures, the AOE states (p. 15) that “the ability to capture viewpoints from above-ground level (i.e. upper-levels of a multi-story building) is not available, however, possible views of the OPC Museum Building from elevated viewpoints are noted, as applicable, for historic properties.” The precise meaning of the phrase “not available” in that passage is unclear. In fact, relatively inexpensive (i.e., licensed for less than \$1,000) off-the-shelf software (e.g., TerrSet Geospatial Monitoring and Modeling Software) enabling such analyses has long been widely available. When asked, at a public meeting of consulting parties on August 5, 2019, why the proper visual analyses had not been conducted, a representative of the City of Chicago responded that the city does not have the technology. We believe the city should acquire the technology and conduct a proper above-ground-level visibility analysis of potential effects on all historic properties and districts within a one-half-mile radius of the location of planned OPC structures. Absent those analyses, the AOE is incomplete because the potential adverse effects on such designated resources cannot be fully assessed.</p>	<p>A supplemental visual analysis study has been included in the revised AOE. This analysis was conducted for properties where the historic property structure has elevated levels above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall). The supplemental visual analysis study utilized a combination of drone photography and computer modeling to depict views from historic properties toward the OPC Museum from elevated views.</p>	<p>Section 3.1.2 Section 3.2.3 Appendix D</p>
194	<i>The Cultural Landscape Foundation</i>	<p>In the section titled “Effect Determination,” the AOE states (p. 22) that “primary physical changes that are concentrated in the western perimeter of Jackson Park and the eastern Midway Plaisance impact adjacent park areas including the Lagoons, Fields, and Lake Shore.” But the AOE later states, in the section titled “Minimization and Mitigation of Effects” (p. 51), that “The project footprint has been developed to affect a relatively small area of the total acreage of the historic property (approximately three percent).” Both statements cannot be true. One can say that the project footprint was developed with the intention to affect a relatively small area of the historic property, and that despite that intention, the AOE has concluded that a much larger portion of historic properties would nonetheless be impacted. This important distinction underscores the fact that the stated efforts to minimize the impact of the OPC during the design phase, so as to affect only approximately three percent of Jackson park, were not successful, as the AOE otherwise makes clear.</p>	<p>The text is revised to clarify that OPC Site Development concentrates primary physical changes within its footprint while acknowledging the associated proposed actions have impacts beyond that footprint.</p>	<p>Sections 3.5.2.1.1, 3.5.2.3, 5.2</p>

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195	<i>The Cultural Landscape Foundation</i>	Likewise, the AOE states (p. 23) that “New materials with modern functions differ from historic materials at a scale and intent that does not conform to the Secretary of the Interior’s Standards. Integrity of workmanship is obscured by changes to the integrity of park design, the addition of new features and materials, and by the removal and alteration of historic fabric that relates to material integrity.” Despite this clearly stated conclusion that the building materials introduced by the OPC would constitute an adverse effect on the historic property, the AOE later states, again in the section titled “Minimization and Mitigation of Effects” (pp. 51–52), that “the orientation, location, and materials of the Museum Building have been developed with attention to views from the historic property and the skyline surrounding.” The statements are, again, at odds, and the text should be rewritten to note that here, too, efforts to minimize or mitigate effects, with regard to materials, were unsuccessful.	A minimization effort is supplemental and does not necessarily resolve potential changes that contribute to the finding of adverse effect. The text is revised to clarify minimization measures.	Sections 3.5.2.1.1, 3.5.2.3, 5.2
196	<i>The Cultural Landscape Foundation</i>	We strongly suggest that the AOE’s analysis of effects be reorganized and expanded so as to delineate individual, categorical effects on character-defining features of the historic designed landscapes of Jackson Park, the Midway Plaisance, Washington Park, and other designated historic resources. As in the original effects assessment, the Secretary of the Interior’s Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes should continue to serve as a baseline of analysis. The overall aim is a clearer, more detailed statement of specific adverse effects that are to be avoided, minimized, or mitigated—one that is more comprehensible to consulting parties and the public, and that can be easily converted to a tabular matrix.	The discussion of adverse effect to the cultural landscape is augmented to include a separate section (3.5.2.1.1 Summary of the Adverse Effect to the Cultural Landscape) that is organized by character-defining landscape characteristic and refers to each contributing feature of the cultural landscape relevant to the determination of adverse effect. The new section is directly related to the following section (3.5.2.2 Effect to the Cultural Landscape from Federal Actions) which is organized by federal action.	Section 3.5.2.1.1 Section 3.5.2.2
197	<i>The University of Chicago</i>	Many of the proposed changes in Jackson Park will enhance community members’ ability to enjoy the park, by improving access and increasing the opportunities for active recreation.	Your comment will be included in the project record.	Appendix F
198	<i>Vista Garage Building Cooperative Board</i>	This letter speaks specifically to support for the City’s recommendation to extend the Federal Urban Park and Recreation Recovery Act (UPARR) designation to the Midway Plaisance, east of the Metra tracks.	Your comment will be included in the project record.	Appendix F
199	<i>Vista Garage Building Cooperative Board</i>	The Vista Garage is located immediately east of the Metra tracks and behind the Vista Homes and Midway Apartments multiunit residential buildings. The Garage has parking below grade and serves as a barometer for the water table in the area north of the section of the Midway Plaisance in question –the garage has two sump pumps, but still experiences regular ground water seepage.	This comment is not relevant to the evaluation of effects on historic properties.	N/A

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
200	Vista Garage Building Cooperative Board	We support maintaining the Midway Plaisance east of the Metra tracks as an as an open park and passive recreation facility. But any improvements to this part of the Plaisance will require addressing the standing water that gathers on this property for much of the year. We encourage careful consideration of drainage, groundwater and sewer capacity in the area. It was mentioned at the MPAC meeting on August 21 that the low spot “simply be filled and force the water into the sewers”. Such a simple fix may not be effective in solving this persistent water problem. To understand the natural water movement that follows the path of the Midway, a hydrology study of the area is recommended.	The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements. In addition, the City’s proposal to fill a wetland on the east end of the Midway Plaisance is a discharge of fill material requiring authorization by the USACE under Section 404 of the Clean Water Act (33 USC 1251 et seq.).	N/A
201	Vista Homes Building Corporation	A key aspect of Olmsted’s landscape philosophy was a democratic perspective: he designed parks and their road- and pathways in ways that were meant to make them as accessible as possible to all people. Widening Stony Island Avenue and closing off of Cornell, will actually make the parks less accessible to the people in the neighborhood. For residents on the Southside—whether they will be driving or as pedestrians trying to cross a much busier and wider Stony Island—accessing the park will be much more difficult.	Accessibility is a central design element to all transportation improvements proposed in and around Jackson Park, which will include new ADA compliant ramps with tactile warnings, the installation of Accessible Pedestrian Signals (APS) at all traffic signals, and new sidewalks and pathways designed at ADA compliant slopes and cross slopes. The proposed roadway closures were presented and discussed with the public during the planning process for the South Lakefront Framework Plan (SLFP). With the roadway closures, the Chicago Park District anticipates improved park cohesiveness through better connected parkland; opportunities for expanded multi-use trails within the park; and improved accessibility within the park as a result of this increased trail system.	N/A
202	Vista Homes Building Corporation	We are concerned about the adequacy of the traffic studies that have been done. From our experience living on Stony Island, we fear that the traffic jams will be frequent and severe and will thus create a barrier to the park and its accessibility. We note as one recent example, when Uber held a private event at the Museum of Science and Industry, Stony Island was completely overwhelmed and this happened while Cornell Drive was still open. Traffic jams will certainly serve as a barrier to park usage; this is an adverse effect of the historical nature of the park.	The AOE is revised to include additional information regarding the effects of road closures. The proposed roadway improvements are designed to ameliorate any potential adverse traffic effects and are focused on multiple roadways to provide resiliency in the network.	Section 3.2.2
203	Vista Homes Building Corporation	Consider adding more pedestrian underpasses for local Hyde Park and Woodlawn residents	Pedestrian underpasses are a key element of the proposed improvements in Jackson Park. They are used in combination with other improvements such as curb extensions, pedestrian refuge islands, high visibility crosswalk markings, and pedestrian countdown signals that aim to improve pedestrian access, comfort, and safety for residents from Hyde Park and Woodlawn aiming to access Jackson Park.	N/A
204	Vista Homes Building Corporation	Consider not closing Cornell entirely, but only some of its lanes	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2

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205	Vista Homes Building Corporation	...residents are concerned with the City's plans for the Midway and would argue that the AOE report does not go far enough in reporting the damage to the Midway. Many of us believe that the City should honor UPARR and the City ordinance that promised replacement parkland to create new, replacement parkland and not to destroy the open, meadow nature of the Midway. We realize that it may be difficult for those simply driving by on Stony Island to appreciate the quiet beauty and elegance of the open meadow as Olmsted designed it, but as residents, we have experienced this firsthand and wish to maintain it for posterity. We encourage anyone who wishes to pour concrete and build fences on the eastern panel of the Midway to go onto the park and look east in various seasons and times of the day to appreciate the park fully.	The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3. The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements.	Section 1.1.1.3
206	Vista Homes Building Corporation	We note further that Olmsted designed the three parks—Jackson, Washington and the Midway Plaisance—as a park system. The size and location of the high-rise museum tower will destroy the eastern vistas and views from the Midway and will serve to sever the visual coherence of the three parks.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions. A supplemental visual analysis study has been included in the revised AOE. This analysis was conducted for properties where the historic property structure has elevated levels above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall). The supplemental visual analysis study utilized a combination of drone photography and computer modeling to depict views from historic properties toward the OPC Museum from elevated views. The Jackson Park Historic Landscape District and Midway Plaisance will continue to be listed in the NRHP if the proposed undertaking is implemented as described in the AOE. While the proposed undertaking will have an adverse effect to Jackson Park Historic Landscape District and Midway Plaisance, the Illinois Department of Transportation cultural resource staff, who meet the Secretary of Interior's professional qualification standards, reviewed the continued NRHP eligibility of the historic district in light of the effect determination and concluded that the proposed changes will not sufficiently diminish or remove the overall integrity of the historic district in such a way that it would no longer qualify for NRHP listing (See Appendix E: IDOT Memorandum). This has been clarified in the revised AOE. Washington Park is located approximately one mile west of Jackson Park. While it is part of the historic South Parks System, it is independently and individually listed on the NRHP, as opposed to jointly listed with Jackson Park and the Midway Plaisance. Due to its distance from the undertaking, Washington Park will not experience any direct or indirect effects as a result of the undertaking and therefore, was excluded from the APE boundary.	Section 2.1 Section 3.1.2 Section 3.2.3 Section 3.5.2.1 Appendix D
207	Vista Homes Building Corporation	To honor the true spirit of UPARR, create new parkland entirely in the Woodlawn neighborhood, large areas of which do not have public parks.	The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3. The final design process for replacement recreation on the east end of the Midway Plaisance will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity. The UPARR program does not evaluate replacement property using fair market value or an acre-for-acre ratio. NPS will approve a conversion only upon conditions that "ensure the provision of adequate recreation properties and opportunities of reasonably equivalent location and usefulness." 54 U.S.C. § 200507.	Section 1.1.1.3
208	Vista Homes Building Corporation	To avoid further damage to the Midway's historic status, place the proposed playground initiatives next to the skating rink on the Midway. According to the AOE, this area has already suffered an adverse effect.	The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements.	N/A
209	Vista Homes Building Corporation	Rather than seeking to eliminate the ephemeral wetland of this section, enhance it by creating a year- round pond in one corner.	The final design process will be conducted in coordination with the public by the City of Chicago and the Chicago Park District, which indicate they will do so in accordance with any applicable municipal requirements.	N/A

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
210	<i>Vista Homes Building Corporation</i>	Reduce the height of the tower and move it south, away from the site lines of the Midway.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>The Federal agencies have no authority to require design changes related to the OPC because they are not a part of the undertaking as defined in Section 106 and its implementing regulations at 36 CFR Part 800.</p>	Section 1.1 Section 1.2 Section 5.1.2
211	<i>Vista Homes Building Corporation</i>	<p>Finally, we note that the AOE seems to focus upon the utilitarian aspect of the Women’s/Perennial Garden and only refers to the loss of historical materials should the OPC plans proceed. We note, however, that there would be additional historical losses that have not been documented in your report. This garden was designed in 1936 by noted landscape architect, May McAdam, the park district’s first female landscape architect. The location is further noteworthy because it resides on the location of the Women’s Pavilion of the 1893 World’s Fair, a pavilion that was designed by Sophia Hayden, the only woman who designed a building at the World’s Fair and the first woman to graduate from the architecture program at MIT. We are concerned that the accomplishments of women, May McAdam and Sophia Hayden, will be destroyed by using this park as a staging area for the OPC construction and then by the subsequent plans to “enlarge” it and combine it with the larger OPC campus. It is our understanding that McAdam’s 1936 designs are still intact but will be wiped out by the new plans.</p> <p>Respect the design and legacy of noted women designers; keep the current [Women’s Garden] design of the park; and keep it as a separate park.</p>	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>While the design decisions related to the OPC are outside the scope of the federal agencies’ jurisdiction, the City of Chicago provided the following information regarding recent changes to the OPC design. A previous version of the OPC plan for modifying this portion of Jackson Park included an “alternate landscape feature” in the form of a circular pool, which was similar to an unbuilt circular water basin that was included in the Olmsted, Olmsted and Eliot 1895 Revised General Plan. The proposed design has since been modified in response to concerns that the completed May McAdams/Chicago Park District design ought to be recognized as the legitimate design legacy of the site. The OPC design team appreciated the comments it received that called attention to the history of the Women’s Garden, which was not mentioned as a contributing element in the 1972 National Register of Historic Places Inventory-Nomination Form for Jackson Park.</p> <p>The current plan retains most of the iconic landscape features of the May McAdams design including the shape, size, and location of the central lawn encircled by a limestone wall and perennial plantings. The wall would be rebuilt incorporating the original limestone in the exact location, and at the same elevation, as the current wall. Modifications to the grading and the pathways between the central circular lawn and the larger network of Jackson Park circulation have been proposed to create accessible routes into the space (bringing the Women’s Garden into compliance with the Americans with Disabilities Act) and to facilitate stormwater management.</p> <p>The report text is revised to augment the history and clarify the effects, which include alteration of historic physical features as well as the impact on the direct association of the garden to its legacy of female designers.</p>	Section 3.5.2
212	<i>Vista Homes Building Corporation</i>	Stage the construction site on property [other than the Women’s Garden] that is not historically significant or intact.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park and approving where construction staging occurs. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions. The Federal agencies have no authority to require design changes related to the OPC.</p> <p>While the design decisions related to the OPC are outside the scope of the federal agencies’ jurisdiction, the City of Chicago provided the following information regarding recent changes to the OPC design. A previous version of the OPC plan for modifying this portion of Jackson Park included an “alternate landscape feature” in the form of a circular pool, which was similar to an unbuilt circular water basin that was included in the Olmsted, Olmsted and Eliot 1895 Revised General Plan. The proposed design has since been modified in response to concerns that the completed May McAdams/Chicago Park District design ought to be recognized as the legitimate design legacy of the site. The OPC design team appreciated the comments it received that called attention to the history of the Women’s Garden, which was not mentioned as a contributing element in the 1972 National Register of Historic Places Inventory-Nomination Form for Jackson Park.</p> <p>The current plan retains most of the iconic landscape features of the May McAdams design including the shape, size, and location of the central lawn encircled by a limestone wall and perennial plantings. The wall would be rebuilt incorporating the original limestone in the exact location, and at the same elevation, as the current wall. Modifications to the grading and the pathways between the central circular lawn and the larger network of Jackson Park circulation have been proposed to create accessible routes into the space (bringing the Women’s Garden into compliance with the Americans with Disabilities Act) and to facilitate stormwater management.</p>	Section 3.5.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
213	<i>DuSable Museum of African American History</i>	We cannot allow this project, this mission, to be diminished, discounted or devalued any more than we can allow our communities be similarly treated from this point forward.	Your comment will be included in the project record.	Appendix F
214	<i>DuSable Museum of African American History</i>	It is unclear why the Area of Potential Effect (APE) was confined only to Jackson Park and the Midway Plaisance. There's not much logic in cutting off the analysis at Washington Park because it is part of the same historic South Park system consisting of Jackson Park, the Midway Plaisance AND Washington Park. Washington Park is itself a Registered Historic District, which is a National Register of Historic Places listing.	<p>Section 106 regulations define the APE as the "geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist." Regulations also require agency officials, namely, the NPS and FHWA for this undertaking, to determine and document the APE delineation in consultation with the SHPO. The delineation of the APE boundary was discussed with Consulting Parties and the public during the December 1, 2017 Consulting Party Kick-off meeting. Comments regarding the APE boundary were collected and modifications to the APE boundary were made, as appropriate. Both the archaeological and historic architecture APE boundaries were coordinated and agreed upon with the IL SHPO. The delineation of the APE is discussed in the Historic Properties Inventory (HPI) and summarized in the AOE.</p> <p>Washington Park is located approximately one mile west of Jackson Park. While it is part of the historic South Parks System, it is independently and individually listed on the NRHP, as opposed to jointly listed with Jackson Park and the Midway Plaisance. Both the historic properties are contributing resources to the Chicago Park Boulevard Historic District. Due to its distance from the undertaking, Washington Park will not experience any direct or indirect effects as a result of the undertaking and therefore, was excluded from the APE boundary. Additional requests for expanding the APE to surrounding neighborhoods that may experience impacts due to traffic or socio-economic factors (i.e. displacements, increased rents, impacts to low-income residents) were also received. Traffic impacts are addressed in the revised AOE. Socio-economic impacts, and cumulative impacts, that are the result of a federal action are addressed through the environmental analysis required by the National Environmental Policy Act (NEPA) and not through the Section 106 process. Therefore, it is not necessary to modify the APE to address potential socio-economic impacts.</p>	Section 2.1
215	<i>DuSable Museum of African American History</i>	As it now stands, because the APE is so limited, the Museum of Science and Industry – by an overwhelming margin – will be the de facto beneficiary of increased tourism traffic as a result of the OPC. That is rather unfair to the other wonderful institutions in the area, and detrimentally affects the economic interest of the entire area because we will be unable to capture that spending once capacity at those institutions is reached. Whereas, if there is thoughtful planning and marketing of ALL of the neighborhoods, we can all reap the benefits of the economic engine that is the OPC. Properly handled, the expanded APE can act as not only a mitigation opportunity for the Jackson Park site, but another basis for infrastructure improvements that have been sorely needed at the western section of the South Park system for many years.	<p>Please see response to Comment No. 214 regarding the process for defining the APE.</p> <p>Mitigation will be considered in the next stage of the Section 106 process.</p>	Section 2.1 Section 6.0

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
216	<i>DuSable Museum of African American History</i>	Washington Park should be brought within in the APE for other reasons, including exponential increases in vehicular and pedestrian traffic from the projected 750,000-plus annual visitors to the OPC site, which will not be coming solely, or maybe even predominantly, from South Lake Shore Drive or US-41. A large percentage of vehicular traffic will be approaching from the west, via the I-90/94 Dan Ryan Expressway or the 55th Street-Garfield Boulevard corridor. In fact, encouraging traffic along Garfield Boulevard, which already functions as a gateway to the Hyde Park neighborhood and the University of Chicago, will have the positive effect of drawing activity, investment and development into the neighborhoods west of the expressway, along the route from Midway Airport. Therefore, it will be necessary to perform a Traffic Impact Study of the Washington Park area to determine the effects of OPC visitor traffic.	Please see response to Comment No. 214 regarding the process for defining the APE. With respect to impacts on historic landscapes and properties, traffic increases on certain roadways (including the Dan Ryan Expressway, State Street, ML King Drive, Cottage Grove Ave, Woodlawn Ave, Midway Plaisance (WB), 63rd Street, and 67th Street) will not require additional roadway expansion or changes to the roadway configurations. Existing capacity on these roads will operate at an acceptable level of service even with the additional traffic from the closed roadways; therefore, there are no direct impacts from the redistributed traffic on these roads. Any adjacent historic properties next to these roadways would see only modest additional traffic increases. Because the increases in traffic are modest, the changes in traffic patterns would not introduce visual, atmospheric, or audible elements that diminish the integrity of any historic properties, if present. In order for a change in traffic noise to be perceptible to the human ear, traffic would need to be doubled. The largest traffic increase (on roads not requiring additional capacity) is a 31% increase on 67th Street. Without physical changes to the roadway there are no indirect visual impacts to historic properties and the modest traffic increases do not result in perceptible noise or atmospheric changes to adjacent historic properties.	Various
217	<i>DuSable Museum of African American History</i>	Providing parking at the western end of the Midway would likewise create a secondary "landing pad" for OPC visitors, thereby mitigating negative effects of parking on the OPC site, creating parking and a secondary point of arrival not only for the OPC but for the expanding south side arts and culture district which will grow along with the DuSable's expansion into the Burnham Roundhouse and the structures to its south.	The effect of the undertaking on parking was not identified as an effect to historic properties under Section 106. Impacts to parking will be addressed as part of the NEPA process.	N/A
218	<i>DuSable Museum of African American History</i>	The DuSable Museum of African American History, as a Section 106 Consulting Party, recommends that the Obama Presidential Center be allowed to continue construction in Jackson Park...	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.	Section 1.1 Section 1.2 Section 5.1.2
219	<i>Jackson Park Watch</i>	We appreciate that the AOE report (Section 1) defines the undertaking under review expansively, that is to say, realistically, in light of the fact that the separate actions of both the Federal Highway Administration (FHWA) and National Park Service (NPS) are the result of and are inextricably tied to the City's actions. We think it essential that this realistic definition of the undertaking under review be adopted and continued throughout the remainder of the Section 106 review, the 4(f) review, and the National Environmental Protection Act (NEPA) review as well.	This definition of the undertaking will continue to be used throughout the remainder of the Section 106 review. Section 4(f) and NEPA include different legal and regulatory requirements and the Federal agencies, as appropriate, will comply with those respective requirements.	N/A
220	<i>Jackson Park Watch</i>	We note that the City has adopted and promoted the proposal for the OPC developed by the Obama Foundation along with its demand for road closures and realignments without allowing any open public review or consideration of alternative road designs.	The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions. The City's municipal approval process provided an opportunity to avoid adverse effects and included 11 public hearings and over 50 community meetings as further described in Section 5.1. The FHWA alternatives analysis (available on the project website, www.tinyURL.com/JPIImprovements) considered a wide range of proposed improvements to meet the FHWA's purpose and need, while avoiding or minimizing impacts to historic properties and other resources. Minimization measures considered and incorporated by the City, FHWA, and private parties are described in Section 5.2.	Section 5.1 Section 5.2

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
221	<i>Jackson Park Watch</i>	We also note that the City's proposal to use the eastern portion of the Midway as acreage for a replacement recreation opportunity to meet the City's obligations to the National Park Service under the UPARR program is speculative and has not been endorsed by the National Park Service.	<p>The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3. The UPARR program does not evaluate replacement property using fair market value or an acre-for-acre ratio. NPS will approve a conversion only upon conditions that "ensure the provision of adequate recreation properties and opportunities of reasonably equivalent location and usefulness." 54 U.S.C. § 200507.</p> <p>These issues will be addressed in the context of NPS's evaluation under UPARR. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p>	Section 1.1.1.3
222	<i>Jackson Park Watch</i>	We also agree with the comments of the Advisory Council for Historic Preservation (ACHP), dated August 22, 2019, that the adverse effects are even greater than has been set forth in the AOE report, and that all of the adverse effects should be fully and accurately identified and documented so that the complete picture on adverse effects can be understood, and so that principles of avoidance and minimization can be properly applied.	The discussion of adverse effect on the cultural landscape is augmented to include a separate section (3.5.2.1.1 Summary of the Adverse Effect to the Cultural Landscape) that is organized by character-defining landscape characteristic and refers to each contributing feature of the cultural landscape relevant to the determination of adverse effect. The new section is directly related to the following section (3.5.2.2 Effect to the Cultural Landscape from Federal Actions) which is organized by federal action.	Section 3.5.2.1 Section 3.5.2.2
223	<i>Jackson Park Watch</i>	<p>The draft AOE report utilizes incorrect assumptions about the impact of traffic and parking diversions on these properties as a result of the road changes required by the OPC design. In Section 3.1.2, p. 15, the report asserts that the major north-south roadways "will not experience perceptible changes in traffic. Traffic volumes are not anticipated to be largely dispersed to lesser volume roadways through historic districts." This implausible and awkwardly worded conclusion is based on the Traffic Impact Study conducted for the City by Sam Schwartz Engineering and released on February 2018.</p> <p>...The AOE report's determination of "No Effect" on historic residences along/by that street should be reexamined and corrected for the final version of the AOE report. Similarly, the assertion in Section 3.1.3 on page 17 that the neighborhood roadway network north and south of Jackson Park and the Midway Plaisance will "only experience minor traffic increases that will not be perceptible" lacks credibility and should be reexamined and corrected. The entire issue of traffic diversions throughout the area should be revisited to allow for a thorough assessment of effects on historic structures and areas - and avoid increased traffic problems in an area that already experiences frequent traffic overload.</p>	<p>With respect to impacts to historic landscapes and properties, traffic increases on certain roadways (including the Dan Ryan Expressway, State Street, ML King Drive, Cottage Grove Ave, Woodlawn Ave, Midway Plaisance (WB), 63rd Street, and 67th Street) will not require additional roadway expansion or changes to the roadway configurations. Existing capacity on these roads will operate at an acceptable level of service even with the additional traffic from the closed roadways; therefore, there are no direct impacts from the redistributed traffic on these roads. Any adjacent historic properties next to these roadways would see only modest additional traffic increases. Because the increases in traffic are modest, the changes in traffic patterns would not introduce visual, atmospheric, or audible elements that diminish the integrity of any historic properties, if present. In order for a change in traffic noise to be perceptible to the human ear, traffic would need to be doubled. The largest traffic increase (on roads not requiring additional capacity) is a 31% increase on 67th Street. Without physical changes to the roadway there are no indirect visual impacts to historic properties and the modest traffic increases do not result in perceptible noise or atmospheric changes to adjacent historic properties.</p> <p>Traffic impacts reflected in the AOE were projected using standard methodologies and forecasting approaches. The Chicago Metropolitan Agency for Planning (CMAP) assisted with the development of future traffic volumes based on their standard in-house travel demand model.</p>	Section 3.1.2 Section 3.2.2
224	<i>Jackson Park Watch</i>	The loss of existing on-street parking and the impact of expanded visitor parking along the streets adjacent to Jackson Park has not been addressed in the draft AOE report.	<p>The effect of the undertaking on parking was not identified as an effect to historic properties under Section 106.</p> <p>Impacts to parking will be addressed as part of the NEPA process.</p>	N/A

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
225	<i>Jackson Park Watch</i>	As noted by the ACHP, the City and FHWA have inexplicably failed to conduct a proper above-ground-level analysis of the visual impact of the OPC museum tower on the surrounding properties, neighborhoods and historic districts despite the ready availability of relatively inexpensive technology; see Section 3.1.2, p. 15. That omission should be corrected in the final version of the AOE report.	A supplemental visual analysis study has been included in the revised AOE. This analysis was conducted for properties where the historic property structure has elevated levels above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall). The supplemental visual analysis study utilized a combination of drone photography and computer modeling to depict views from historic properties toward the OPC Museum from elevated views.	Section 3.1.2 Section 3.2.3 Appendix D
226	<i>Jackson Park Watch</i>	The increased traffic will assuredly increase the amount of traffic noise to which the residents will be subjected.	The Traffic Noise Analysis demonstrated that there is a less than 3 dBA increase in noise over the analysis period, which is not perceptible to the human ear. The revised AOE addresses this topic.	Section 3.1.2 Section 3.2.1
227	<i>Jackson Park Watch</i>	Similarly, the assessment of the Hyde Park-Kenwood Historic District in Section 3.4.6 should be reviewed and corrected. It is illogical and disingenuous to apply a single criteria and “No Effect” assessment to all parts of the large Hyde Park-Kenwood Historic District, an area that is more than a mile square, when one well-defined portion of the district – the area east of the ICRR Viaduct and Embankment – is adjacent to and will be immediately and directly impacted by the undertaking in ways that the rest of the historic district will not. ...The necessary and proper approach is to consider that impacted segment, that fronting on 59th Street and Stony Island Avenue, separately.	Since the Hyde Park Historic District is so large, the assessment considered the location within the district in closest proximity to the project. This analysis specifically addresses the properties fronting onto E. 59 th Street, and S. Stony Island Avenue as suggested.	Section 3.7.5
228	<i>Jackson Park Watch</i>	The proposed reconfiguration of the roadway connections between the Midway Plaisance, Stony Island, and Cornell Drive into a new pattern with several forced extremely sharp turns will cause confusion, consternation and accidents.	The effects of reconfiguring roadway connections on historic properties is addressed in the AOE. The roadway design will be consistent with state of the practice roadway standards for the City of Chicago in order to address safety and other issues.	Section 3.2.2 Section 3.5.2
229	<i>Jackson Park Watch</i>	We also note for correction a misstatement on p. 43 of the draft AOE report of the boundaries of the HPK Historic District. It is bounded roughly by 59th St. on the south and by 47th St. on the north.	The text has been corrected as requested.	Section 3.7.5
230	<i>Jackson Park Watch</i>	Section 4(f) provides that the FHWA cannot approve an action that would use land from a significant public park, recreation area, wildlife or waterfowl refuge, or historic site unless there is no feasible and prudent alternative to the use of that land and unless the decision about the proposed FHWA action includes consideration of all possible alternatives to minimize harm to the property resulting from use. A 4(f) review is required to determine whether that is the case.	Section 4(f) of the U.S. Department of Transportation Act of 1966 only applies to USDOT agencies, including FHWA, and actions that convert Section 4(f) protected properties to a transportation use. Section 4(f), which will be completed by FHWA and applies only to FHWA's action for this project, is separate from the Section 106 process, which applies to all Federal agencies. The OPC site selection is not a transportation project and will not be considered in the Section 4(f) evaluation.	N/A
231	<i>Jackson Park Watch</i>	The City's proposals for recreational changes and parkland replacement (Section 1.1.1.3) are ill- conceived and, as the AOE report determines (Sections 3.3.2.2, p. 24 and 3.3.2.3, pp. 30-33), would have an adverse effect on Jackson Park and on the Midway Plaisance.	The City's decision-making process to select the east end of the Midway Plaisance as a site for replacement recreation is discussed in Section 1.1.1.3.	Section 1.1.1.3

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
232	Jackson Park Watch	With regard to the requirements for replacement parkland under the terms of the Urban Parks and Recreation Recovery Act of 1978, we note that the National Park Service has not yet approved the City's proposals for either the OPC campus or the Midway Plaisance. We also note that the UPARR legislation (Section 72.72.b.3.ii) does not require that the replacement parkland be located at the same site...	<p>NEPA and NHPA require federal agencies to assess the environmental effects of proposed actions <i>prior</i> to making decisions. See 54 USC § 306108; 40 CFR § 1500.1(b). Accordingly, the NEPA and Section 106 review processes must be completed before NPS can take final action regarding the proposed UPARR conversion.</p> <p>The UPARR program does not evaluate replacement property using fair market value or an acre-for-acre ratio. NPS will approve a conversion only upon conditions that “ensure the provision of adequate recreation properties and opportunities of reasonably equivalent location and usefulness.” 54 U.S.C. § 200507. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p> <p>These issues will be further addressed in the context of NPS's evaluation under UPARR and, as appropriate, in the NEPA process.</p>	Section 1.1.1.3
233	Jackson Park Watch	An unspecified amount of vacated roadway should not count as recreational replacement parkland. Claiming that the 5+ acres at the east end of the Midway Plaisance is proper replacement parkland for the park space lost to the OPC should be disallowed on several grounds. If the current OPC plan to build in Jackson Park proceeds, the City should provide actual replacement parkland equivalent to the entire 19.3 acre site.	<p>The UPARR program does not evaluate replacement property using fair market value or an acre-for-acre ratio. NPS will approve a conversion only upon conditions that “ensure the provision of adequate recreation properties and opportunities of reasonably equivalent location and usefulness.” 54 U.S.C. § 200507.</p> <p>These issues will be further addressed in the context of NPS's evaluation under UPARR and, as appropriate, in the NEPA process. NPS will evaluate the proposed replacement site to ensure compliance with the regulatory requirements of 36 CFR § 72.72, pursuant to which the proposed replacement must be administered by the same political jurisdiction, must meet existing recreation needs, and must provide equivalent recreation opportunities to those that were lost (but need not be the same recreation opportunity). Per 36 CFR § 72.72, the proposed replacement may be either new or existing parkland and need not be adjacent to or close to the lost recreation opportunity.</p> <p>The UPARR regulations, at 36 CFR § 72.72, do not require an acre-for-acre replacement of land that is converted to non-recreation use. As proposed, the acreage for replacement recreation is larger than the acreage to be converted from recreation use. Of the 19.3-acre OPC site, 4.6 acres will be converted to non-recreation use; the remaining 14.7 acres will still be available for recreation. Roadway modifications will convert an additional 5.3 acres from recreation use. In total, approximately 9.9 acres will be removed from recreation use within the existing UPARR boundary. The replacement recreation is proposed to be located on the east end of the Midway Plaisance and on roadways within Jackson Park that will be closed to traffic and opened for recreation use. The total proposed replacement recreation will expand the UPARR boundary by adding approximately 16.1 acres of land for recreation use, compared to converted acreage of approximately 9.9 acres – resulting in a net enlargement of the UPARR boundary by approximately 6.2 acres.</p>	Section 1.1.1.3
234	Jackson Park Watch	Comments from the ACHP are important because they affirm our concerns regarding the absence of proper consideration of avoidance and minimization to remedy the adverse effects documented by the AOE report. All of this suggests that these steps are being ignored so as to implement a predetermined result insisted upon by the applicants. Such a process violates Section 106.	<p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, this Section 106 process evaluates not only the direct effects to historic properties from the Federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p> <p>FHWA, in coordination with NPS and USACE, is committed to following the Section 106 process as described in the regulations at 36 CFR 800. The first two steps of the Section 106 process (initiation and identification of historic properties) have been completed. The third and current step, assessing effects of the project on historic properties, also serves to document any avoidance and minimization efforts the agency has undertaken to avoid and minimize effects to historic properties. It is appropriate for the Federal agencies to consider avoidance and minimization efforts early and throughout the Section 106 process to meet its obligation under Section 106 and other environmental laws. Documenting those avoidance and minimization efforts in the AOE communicates to the public and consulting parties the steps already considered to reduce effects to historic properties. During Step 4 of the Section 106 process, if adverse effects still remain to historic properties, the Federal agencies will continue their efforts to avoid, minimize, or mitigate the adverse effect. The Federal agencies remain open to any avoidance and minimization efforts proposed by the consulting parties that are within the Federal agencies' area of jurisdiction. The revised AOE provides an expanded discussion of the avoidance and minimization measures taken as part of the undertaking.</p>	Section 5.0 Section 6.0
235	Jackson Park Watch	Just as there is a critical need for a legitimate and complete 4(f) review, there is a critical need for a proper NEPA review and a full Environmental Impact Study (EIS). The magnitude of the project, the already documented adverse effects, and the critical policy considerations and legal requirements all mandate that an EIS be performed.	Consistent with 36 CFR 800.8, the Federal agencies will include consideration of the undertaking's likely effects on historic properties in the determination of whether this undertaking is a “major Federal action significantly affecting the quality of the human environment,” and therefore requires preparation of an environmental impact statement (EIS) under NEPA. A finding of adverse effect on a historic property does not necessarily require an EIS under NEPA.	N/A

Comment Number	Affiliation	Comment	Final Response	AOE Section Reference
236	<i>Jackson Park Watch</i>	Importantly, the recent significant rise in Lake Michigan water levels, an increase that the U.S. Army Corps of Engineers has predicted will continue, calls into questions the viability of some key elements of the undertaking. For example, plans call for an underground parking garage on the site of the Obama Presidential Center. Both the OPC and underground parking garage are to be situated adjacent to the western edge of the West Lagoon in Jackson Park. Due to the high water level in Lake Michigan, Jackson Park is already experiencing flooding in multiple locations. Construction of an underground parking garage in this location would require creation of what is called a “bathtub,” as was done for the parking garage at the Museum of Science and Industry, constructed in 1999 at a cost of \$57 million.	Your comment is noted and will be included in the project record.	Appendix F
237	<i>Jackson Park Watch</i>	We have seen the results of the attempt to truncate the definition of the undertaking into unrealistic segments in the deeply flawed NEPA documents developed by the City, FHWA, and IDOT in 2018. These documents pretend that the City’s action – the plans for the OPC and the roadway closures it demands – is completely disconnected from the current Section 106 and NEPA reviews rather than being the trigger for them. They disingenuously assert that the proper procedure is to assume that the OPC is built and the road closures are in place and to conduct the Section 106 and NEPA reviews as if that construction were complete, resulting in the fanciful proposal that the proper “baseline” for review is the completed project.	<p>The FHWA is the lead Federal agency for the Section 106 process and the National Park Service is the lead for the NEPA process. The environmental document being prepared for this project is an "Environmental Assessment" and it has not yet been released for public review and comment.</p> <p>The City of Chicago is the authority for making local land use and management decisions, including authorizing the construction of the OPC in Jackson Park. The decision to locate the OPC in Jackson Park is not subject to Federal approval by NPS, FHWA, or USACE; however, the Section 106 and NEPA processes evaluate not only the direct effects to historic properties from the federal actions, but also the indirect effects of private and City actions (including the OPC and road closures) and additional reasonably foreseeable actions.</p>	N/A
238	<i>Jackson Park Watch</i>	The ACHP has identified flaws in the content of the AOE report relating its failures to provide complete detail relative to the adverse effects. It has also identified flaws relative to the Section 106 process to date, flaws that were evident in the timing and conduct of the August 5 meeting. We echo these sentiments, and believe that there needs to be a much more thorough, detailed and procedurally proper process, with significantly more time allowed to actually prepare the reports, more fully and accurately identify the adverse effects, and then review and discuss them. The failure to address these issues will allow a flawed and incomplete process to continue.	The AOE has been revised to provide additional detail regarding the adverse effects and to respond to comments from Consulting Parties. The FHWA, in coordination with NPS and USACE, has complied with all procedural requirements for the Section 106 process as described in the regulations at 36 CFR Part 800. The Federal agencies will continue to comply with all procedural requirements for the remainder of the Section 106 process.	N/A