

**City of Chicago Analysis of its Proposal Related to Jackson Park, Cook County,
Illinois under the Urban Parks and Recreation Recovery Act Program**

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Prepared by the City of Chicago

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1.0 Introduction

This document has been prepared by the City of Chicago in support of its request to replace recreational areas subject to the Urban Parks and Recreation Recovery (UPARR) Act within Jackson Park with new areas which will become subject to UPARR, if approved by the National Park Service (NPS). The City is submitting this document for NPS's consideration in accordance with UPARR and its implementing regulations.

The City submitted its request under UPARR to NPS in 2015. In the subsequent years, the City provided substantial additional information to NPS to facilitate the agency's review of the City's request, including information detailed in the reference section below, information developed in the course of the NEPA and NHPA Section 106 environmental and historic review processes, as well as information in an earlier version of this document submitted to NPS in December of 2019. This document incorporates information submitted to NPS previously in various forms as it relates to the factors to be considered under UPARR.

1.1 Background

In May 2018, the City of Chicago (City) approved plans for the construction of the Obama Presidential Center (OPC) on a 19.3-acre site in Jackson Park (the park) on the South Side of Chicago. Jackson Park is a large public park located on Lake Michigan and famous for hosting the 1893 World's Columbian Exposition. Jackson Park provides a wide variety of recreational opportunities and amenities. In the late 1970s and early 1980s, the City applied for and accepted two grants from the federal government via the UPARR program for specific projects to enhance and rehabilitate Jackson Park. The UPARR program was developed to encourage local governments to revitalize their parks and make long-term commitments to maintain them. By accepting the federal funds, the City committed to maintain public recreation within the UPARR-protected areas within Jackson Park or request approval from the Secretary of the Department of the Interior to convert parkland to a non-recreational use and provide substitute recreation elsewhere that meets UPARR requirements.

The NPS, which administers the UPARR program, has determined that construction of the OPC and related roadway improvements in Jackson Park would result in a partial conversion of parkland, triggering review under the UPARR Act and regulations. Specifically, NPS has determined that certain uses within the three buildings surrounding the public plaza on the OPC site (a 4.6-acre rectangular area including the building footprints and adjacent land) are non-recreational and therefore constitute a conversion under UPARR and that the use of 5.2 acres of parkland for roadway improvements is also a conversion. To compensate for these conversions, the City has proposed replacement recreation in the east end of the Midway Plaisance (5.2 acres) and within reclaimed roadways resulting from the closure and reconfiguration of existing roads within the park (11.1 acres).

In accordance with the applicable UPARR standards, Section 5.0 of this document explains the City's conclusion that the proposed replacement recreation property and opportunities are equivalent to the recreation lost to the OPC and roadway projects. To provide context for that conclusion, this report evaluates: (1) existing recreational opportunities and uses in Jackson Park overall; (2) existing recreational opportunities and uses that would be lost as a result of the roadway improvements and the OPC development; and (3) the proposed replacement property and associated recreational opportunities and uses that will be developed there, as well as other factors that NPS must consider under the UPARR regulations in making a decision on the City's proposal.

1.2 UPARR

1.2.1 Statutory and Regulatory Background

The UPARR program was established in 1978 to provide federal assistance for the rehabilitation of critically needed recreational facilities in economically distressed urban communities. The federal government stopped funding the program in 2002. While active, eligibility for UPARR funding required local jurisdictions to develop an NPS-approved recreation plan in accordance with UPARR Recovery Action Program (RAP) requirements. The UPARR regulations require recipients of UPARR grants to maintain UPARR-funded parks in public recreation use, unless NPS grants conversion approval. The requirements for conversion approval are detailed in 36 C.F.R. § 72.72(b). They include consideration of: (1) whether practical alternatives to the conversion have been evaluated; (2) whether the proposed conversion and replacement are in accord with the current local park and recreation RAP plan and/or equivalent recreation plans; (3) whether the proposal assures replacement opportunities of “reasonably equivalent usefulness and location”; (4) whether the remainder of the park remains recreationally viable; and (5) whether environmental requirements are satisfied. (A sixth factor, relating to state intergovernmental clearinghouses, is not relevant where, as in Illinois, a clearinghouse has not been established.)

1.2.2 UPARR Grants and Program Requirements at Jackson Park

The City received Federal funds in the amount of \$125,300 for Jackson Park in 1980 under UPARR Grant No. 17-CTY-1670-80-02. This was a pass-through “innovation” grant to the Woodlawn Organization to purchase and plant trees and shrubs; train neighborhood youth in tree planting and nurturing; and develop a program of community organized recreation to include support for community-based recreation awareness, anti-vandalism training, and park rehabilitation. The funds were intended to serve the community by organizing events and activities, including “sports, arts, cultural activities, park awareness programs, park management programs, and anti-vandalism education.” Arts and cultural programs were to be conducted “in cooperation with nearby available institutions.” The UPARR documentation associated with this grant characterized the community as having “a predominance of minority, low-to-moderate income families with a high concentration of youth and senior citizens.” The documentation also recognized that “[t]he area lack[ed]... recreational programs available in other areas of the city which hinder[ed] the redevelopment of the community.” According to the UPARR documentation, one of the goals of issuing this grant for Jackson Park was “neighborhood up-grading.”

In addition, Jackson Park received UPARR funding under Grant No. 17-CTY-1670-80-04 in 1982. A grant of \$135,870 was used to replace approximately 700 trees and shrubs and to restore approximately 7,000 sq. yd. of landscaped area. This grant was intended to improve the aesthetics of Jackson Park and to enhance informal recreational activities through improved landscaping. The boundary for Jackson Park in the grant agreements encompasses “the area between the south line of 56th Street and the north line of 67th Street lying between the east line of Stony Island Avenue and the water edge of lake Michigan, excluding the area occupied by the Museum of Science and Industry, the La Rabida [Children’s Hospital], and the roadways therein.” This area is referred to as the “Section 1010 boundary” (referring to the conversion provision in the law).

NPS must review and approve the City’s proposed partial conversion of parkland within Jackson Park, and the proposed replacement recreation property and opportunities. This submission documents the City’s formal request to convert UPARR property in Jackson Park and amend the original UPARR grant agreements. A revised Section 1010 boundary map would identify changes to the original area caused by

the proposed conversion and establish new areas dedicated as replacement recreation property (36 C.F.R. § 72.72[c]). Areas to be converted from recreational use will be removed from the existing Section 1010 boundary map and areas proposed as replacement recreation property will be added to a proposed revised Section 1010 boundary map. The existing Section 1010 boundaries are shown in Figure 1.



Figure 1: Existing Section 1010 Boundary

Prior to approving an amendment of the original UPARR grant agreements, the NPS must ensure that lost recreation properties and opportunities are replaced with sites and facilities of reasonably equivalent location and usefulness. This requires a comparison of the existing recreation opportunities and the proposed replacement recreation opportunities.

To distinguish between the diverse recreational opportunities provided in Jackson Park, we use the phrase "formal recreation" to refer to a structured individual or team activity that requires the use of special facilities, courses, fields, or equipment. "Informal recreation" refers to recreational activities that do not require facilities like sports fields or pavilions.

1.3 Municipal Consideration of and Approval of the Proposal to Locate the OPC in Jackson Park

After a nationwide and competitive search, the Foundation selected Chicago, and specifically Jackson Park, for the OPC. The Foundation proposed the project and its location to the City. After a thorough public process, as detailed below, the City approved the Foundation's proposal to locate the OPC in Jackson Park.

The process began in March 2014, when the Foundation issued its RFO. In December 2014, the Foundation selected the University of Chicago as one of the four finalists in its search for proposals to develop the OPC. The University of Chicago proposed constructing the OPC in one of three South Side parks: Jackson Park, Washington Park, or South Shore Cultural Center Park. The City and the Park District eliminated the South Shore Cultural Center Park from consideration as a potential location for the OPC, while strongly supporting the location of the OPC in either Jackson Park or Washington Park.

In January 2015, the Park District hosted community meetings with thousands of residents in Woodlawn and Washington Park to discuss the proposed use of approximately 20 acres in either Jackson Park or Washington Park as the site for the OPC. These meetings included presentations on the potential use of the park sites.

On February 11, 2015, the Park District's Board of Commissioners authorized the transfer of land in either park to the City of Chicago for use by the Foundation to build and operate the OPC. The meeting was open and members of the public submitted oral and written comments.

On March 9, 2015, the Chicago Plan Commission adopted resolutions finding that the transfer of land in either Jackson Park or Washington Park from the Park District to the City for the OPC was in conformance with the City's long-range planning objectives. On March 18, 2015, following a public meeting before a Joint Committee of three city council committees (Budget and Government Operations, Housing and Real Estate, and Special Events, Cultural Affairs and Recreation) at which public testimony was taken, the Chicago City Council unanimously approved an ordinance to accept land in either park from the Chicago Park District for the development of the OPC. A copy of the ordinance (# O2015-192) is published in the Journal of Proceedings of the City Council of the City of Chicago, March 18, 2015, pages 105095 through 105115.

On May 12, 2015, the Foundation announced that the University of Chicago proposal to locate the OPC in a park on the South Side of Chicago was the winning proposal, and in July 2016, the Obama Foundation announced that it had selected Jackson Park as the site of the OPC.

Over the next two years, the City and the Park District held or participated in over 50 meetings to discuss the OPC campus location, the design and uses of the proposed buildings, proposed roadway changes and proposed park improvements. There were over 6,000 total attendees at these various meetings, which ranged from two large gatherings at the McCormick Place Convention Center to a handful of area residents in building-specific discussions. During this period, the Foundation worked with the City and the Park District through an iterative process to refine the design of the campus. Among other developments, the Foundation proposed shifting the boundaries of the original site to the north and east to incorporate portions of the Midway Plaisance and Cornell Drive, and CDOT proposed closing these and two additional road segments within the park to reconnect fragmented park land and improve bicycle and pedestrian connectivity to the lagoons and lakefront.

Also during this period, the Park District initiated a community planning process to help comprehensively update a long-term vision for the future of Jackson Park and South Shore Cultural Center Park that culminated in the publication in 2018 of the South Lakefront Framework Plan. The OPC is one of a number of major improvements considered in the South Lakefront Framework Plan. The plan also considers the closure of four road segments in Jackson Park, and the construction of a variety of transportation improvements to mitigate the impacts of the road closures and improve multi-modal access to and

through the park—for example, through the widening of Lake Shore Drive and Stony Island Avenue and the construction of additional pedestrian underpasses, signalized crossings and pedestrian refuge islands.

On February 14, 2018, the Park District’s Board of Commissioners approved the vacation and dedication of parkland for the roadway changes and confirmed authorization to transfer the reconfigured OPC site in Jackson Park to the City. The meeting was open and members of the public were able to address the Board.

On May 17, 2018, the Plan Commission held a public hearing on the Foundation’s proposed planned development for the OPC site. The Plan Commission recommended approval of the OPC planned development and adopted the Department of Planning and Development’s staff report as its findings of fact. At the same meeting, the Plan Commission reviewed and unanimously approved the construction of the OPC under the Lake Michigan and Chicago Lakefront Protection Ordinance, Municipal Code of Chicago, § 16-4-010, et seq. (Lakefront Protection Ordinance), finding that the proposal complied with the applicable policies of the 1972 Lakefront Plan of Chicago and the purposes of the Lakefront Protection Ordinance, including (1) “to insure that the lakefront parks and the lake itself are devoted only to public purposes and to insure the integrity of and expand the quantity and quality of the lakefront parks,” and (2) “to promote and provide for pedestrian access to the lake and lakefront parks from and through areas adjacent thereto at regular intervals of one-fourth mile and additional places wherever possible, and to protect and enhance visits at these locations and wherever else possible.” *Id.* §§ 16-4-030(e), (g). The Plan Commission also reviewed and approved the City’s proposed roadway closures and transportation improvements in and adjacent to Jackson Park, and the Park District’s proposal to relocate the track and field under the Lakefront Protection Ordinance. More than 75 members of the public commented at the hearing on May 17.

On May 22, 2018, the City Council’s Committee on Zoning, Landmarks and Building Standards held a public meeting on the planned development ordinance for the OPC site and considered public testimony provided at this meeting. The Committee voted to recommend approval of the ordinance, and the full City Council did so in a 47-1 vote on May 23, 2018.

On October 11, 2018, the City Council’s Committee on Housing and Real Estate held a public meeting with testimony from members of the public and City officials on an “Operating Ordinance” for the OPC, allowing the City to accept title from the Park District to a 19.3-acre site in Jackson Park and to enter into agreements governing the Foundation’s use of the site. The Committee voted to recommend approval of the ordinance, and on October 31, 2018, the full City Council voted unanimously to approve the ordinance and agreements.

On October 25, 2018, the City Council’s Committee on Transportation and Public Way held a public meeting with testimony from members of the public and City officials on CDOT’s proposal to vacate and dedicate portions of the public way required to complete the OPC. The Committee voted unanimously to recommend adoption of the ordinance, and the full City Council did so on October 31, 2018.

The City’s decision to permit the construction and operation of the OPC in Jackson Park reflects the considered and deliberate judgment of local political institutions on the basis of significant input directly from the public served by these institutions; the unanimous or nearly-unanimous findings and conclusions of the City Council and Plan Commission were based on evidence supporting all related land use decisions for the OPC and included substantive reports, recommendations of staff and testimony regarding the appropriateness of siting the OPC in Jackson Park.

2.0 Jackson Park and Midway Plaisance: Existing Recreation Uses and Opportunities

This section describes existing recreation facilities and opportunities in Jackson Park and the Midway Plaisance generally, and within the 19.3-acre OPC site and proposed conversion areas in the park more specifically. The purpose of this section is to establish the baseline against which proposed changes to the park will be compared (in Section 3.0).

2.1 Jackson Park: Overview

Jackson Park is both an important regional public park and a historic property. The park has been listed twice on the National Register of Historic Places (NRHP): first, in 1972 as part of the “Jackson Park Historic Landscape District and Midway Plaisance,” and again in 2018 as a contributing feature to the “Chicago Park Boulevard System Historic District.” It is a 551.52-acre park that is generally bounded by 67th Street to the south, Stony Island Avenue to the west, 56th Street to the north and Lake Michigan to the east. The Chicago Department of Transportation (CDOT) owns the roadways within the park (from back-of-curb to back-of-curb). Aside from the 19.3 acres intended for the OPC which the City owns, the Chicago Park District (Park District) owns the remainder of Jackson Park. The entire park is included within the Section 1010 boundaries, excluding the existing roadways and the areas occupied by the Museum of Science and Industry and the La Rabida Children’s Hospital.

Primary vehicular access routes to Jackson Park include Lake Shore Drive (US Route 41) and Stony Island Avenue, which connect Jackson Park to the City’s Central Business District to the north and the Chicago Skyway (Interstate 90), a major expressway to the south. 57th Drive acts as a primary route carrying traffic from Lake Shore Drive to Cornell Drive, a six-lane principal arterial through Jackson Park. Collector roadways within the park include Hayes Drive and Marquette Drive. Visitors to Jackson Park can access both free and paid surface parking lots. Museum of Science and Industry visitors have access to an underground parking structure as well as nearby metered parking lots. Free street parking is primarily provided along Stony Island Avenue, Hayes Drive, and Marquette Drive. Existing bridges carry Lake Shore Drive over the 59th Street Harbor Inlet and Jackson Park Harbor as well as Hayes Drive over the northern portion of the Jackson Park Inner Harbor. A map of the existing roadway configuration, parking facilities, and roadway bridges appears below in Figure 2.



Figure 2: Jackson Park and South Shore Roadways, Parking, and Bridges

The Chicago Transit Authority (CTA) provides transit access to Jackson Park via local and express bus routes, and Metra provides access via the Metra Electric Railway line. The Metra Electric Railway line station is located just west of Jackson Park in the Midway Plaisance at 59th Street. The “Jeffery Jump” express bus line (J14) provides non-stop service from a stop at Jeffery Drive/67th Street to Columbus Drive/11th Street, just south of downtown. Nine other CTA routes provide access to, within, and surrounding the park.

Bicycle and pedestrian access and circulation facilities within the park are shown below in Figure 3. The Lakefront Trail, a regional trail within the City, is located east of Lake Shore Drive. Pedestrian underpasses at 57th Drive, 59th Street, 63rd Street, and Marquette Drive provide access between the park and lakeside. Other grade separated pedestrian facilities include the Music Court Bridge, the Clarence Darrow Bridge, and bridges to the north and south of the Wooded Island. The Clarence Darrow Bridge is currently closed to all traffic because of its poor condition. Several other trails and bicycle routes are available to provide circulation within the park. The park and surrounding roadway network include several at-grade crossings, both marked and unmarked.



Figure 3: Jackson Park and South Shore Pedestrian and Bicycle Facilities (2017 Base Map and Trails)

2.1.1 Existing Recreation Facilities

Jackson Park includes a variety of recreation areas that are open, public spaces. General areas of formal recreation within Jackson Park are highlighted below in Figure 4. Facilities for formal recreation include an 8-lane outdoor track, five soccer/football fields, two standard baseball diamonds, six softball/junior baseball diamonds, four basketball courts, twenty-four tennis courts (including four used as dog-friendly areas), two bowling greens, a dog park, and the Jackson Park Fieldhouse fitness center and gymnasium. The park also contains golf facilities, including a driving range, club house, and an 18-hole golf course.

With a shoreline along Lake Michigan, several water-based recreation opportunities are provided within Jackson Park, including beaches, marinas, and harbors. The park includes two public beaches along the Lake Michigan shoreline at 59th Street and 63rd Street, and three harbors. The 59th Street Harbor, Jackson Park Inner Harbor, and Jackson Park Outer Harbor provide over 365 boat slips. The Park District permits two private yacht clubs (the Jackson Park Yacht Club and the Southern Shore Yacht Club) to operate clubhouses and other facilities in Jackson Park's inner and outer harbors. Park users can also access the Lake Michigan Water Trail for non-motorized boating at the 63rd Street Beach and the Inner Harbor.



Figure 4: Formal Recreation Areas

Additional recreation amenities in Jackson Park include seven playgrounds, twelve picnic groves, two formal gardens, one community production garden, and three natural areas. The Iowa Building, located northeast of the Museum of Science and Industry, is a combination comfort/shelter station with a small open courtyard in the center. Picnic grove locations account for more than half of private event permitted spaces within the park.

Two private institutions currently occupy park space: the Museum of Science and Industry (21.21 acres) and La Rabida Children's Hospital (2.83 acres). The Section 1010 boundaries exclude these properties. The Museum of Science and Industry provides opportunities for visitors to explore and enjoy various art and science exhibitions. In addition, the park offers opportunities for informal recreation in a multitude of open spaces. Such recreation includes running, sitting, walking, picnicking, informal games that do not require special fields or facilities such as Frisbee, nature observation, and general play.

The public actively uses three natural areas located within Jackson Park: the Paul H. Douglas Nature Sanctuary, the Bobolink Meadow, and the 63rd Street Beach Dune for nature-based recreation activities

such as nature observation and walking. These areas and their different habitat types are key elements of public recreation at the park. The natural areas are shown below in Figure 5.¹



Figure 5: Jackson Park Natural Areas

The Paul H. Douglas Nature Sanctuary generally encompasses the Columbia Basin (south of the Museum of Science and Industry), the Wooded Island, habitat islands and the East and West Lagoons (located on the east and west sides of the Wooded Island). It is 57.62 acres in size and contains forest/woodland, riparian/water edge, and aquatic habitats. Within and surrounding the Wooded Island is a trail system for walkers and bicyclists connected by two bridges on the north and south ends of the island. Several overlooks surrounding the lagoons are present for visitors to enjoy views of the water, plants, and wildlife. The Garden of the Phoenix, also known as the Japanese Garden and formerly known as the Osaka Garden, is located on the northeastern side of the Wooded Island. The Garden of the Phoenix is home to a double pond surrounded by a trail system that traverses the pond by a moon bridge, as well as a shelter and the Torii Gate at its entrance.

The Bobolink Meadow is located along the eastern edge of the East Lagoon, adjacent to the Paul H. Douglas Nature Sanctuary. It is 5.39 acres in size and contains prairie/grassland habitat for wildlife and native plants. To the north of the Bobolink Meadow is Bobolink Woods, which provides separation between the meadow and park facilities (i.e., a parking lot and tennis courts). Informal recreational use of the meadow includes bird watching, walking, and nature study. The meadow includes a trail for pedestrians and an overlook to the East Lagoon at its southern end.

¹Chicago Park District (<https://www.chicagoparkdistrict.com/parks-facilities/jackson-park-natural-areas>).

The Jackson Park 63rd Street Beach Dune is located at the easternmost point of the 63rd Street Beach along Lake Michigan. It is 3.01 acres in size and includes freshwater lake shoreline and dune habitat for invertebrates, fishes, and potentially mudpuppies. Native dune grasses including marram grass, little bluestem grass, and prickly pear cactus are in the restored dune area as well as some pockets of the state endangered sea rocket. Waterfowl use this natural area during the migration seasons, and several species of shorebirds have been observed here, including the Tricolored Heron and the federally endangered Piping Plover.² In addition to the beach dune, the 63rd Street Beach includes the 63rd Street Bathing Pavilion, a playground, and public beach area. Access to the Lake Michigan Water Trail for non-motorized water recreation is located just west of the dune area.

2.1.2 Existing Recreation Uses and Opportunities

Jackson Park attracts visitors from all over the globe as well as regional and local patrons. The park provides ample opportunities for both formal and informal public recreation.

City and regional use of Jackson Park centers on facilities for golf, boating, baseball, and basketball. Users also enjoy amenities such as picnic groves, beaches, marinas, harbors, gardens, playgrounds, and athletic facilities. Open recreation spaces adjacent to formal recreation spaces allow for informal uses of the park such as sitting, walking, picnicking, birding, and playing. Jackson Park is a welcome respite to those visiting La Rabida Children's Hospital.

Jackson Park hosts a number of special events throughout the year. For example, the Chicago Half Marathon/5K begins and ends in Jackson Park. In 2019, the Chicago Half Marathon drew an estimated 18,000 participants. The Chosen Few Picnic & House Music Festival is held annually in Jackson Park to showcase Chicago music, attracting an estimated 30,000 people in 2019. Also in 2019, Jackson Park hosted the Golden Lady Triathlon, neighborhood picnics, family reunions, a hunger walk, and wedding photo shoots. The park also hosts the World Basketball Festival (estimated 5,250 in attendance in 2014) and Bike the Drive (estimated 20,000 in attendance in 2015).

Jackson Park also draws a large number of participants to regularly scheduled Park District programs. Data from 2016-2018 shows over 2,000 enrollees in Park District-sponsored programs, such as conditioning and fitness, flag football, junior football, teen leadership, baseball, basketball, early bird and extended day camps, sailing camp, track and field, arts programs, gymnastics, pickleball, table tennis, wellness, and senior and other special interest group recreation programs.

Nearby schools and neighborhood groups are frequent users of facilities in the park. While the Park District does not track these uses by activity, information from 2016-2018 shows that more than 30,000 people participated in activities by reserving space in the park, not including reservations for picnic groves. These organizations included such groups as the University of Chicago Track Club, the Hyde Park High School, Metro Baseball, World Soccer League, Chi City Ducks Football, Church Pentecost Soccer, and a police department basketball group. Picnic grove reservations from 2013-2017 show more than 500 reservations for families, churches, reunions, and many other types of groups.

In 2016, over 24,000 rounds of golf were played at the Jackson Park Golf Course, accounting for approximately 15% of golf rounds played in Chicago parks that year. Usage of the marinas within the park varies with marina occupancies ranging from approximately 40% (Jackson Park Inner Harbor) to over 80%

²Chicago Park District (<https://www.chicagoparkdistrict.com/parks-facilities>).

(Jackson Park Outer Harbor). Membership is not required to dock in the marinas. Yacht club members reside in various areas within the City limits, surrounding Illinois counties, and neighboring states.

In summary, Jackson Park is a substantial urban park with an array of amenities actively used by the public.

2.2 Jackson Park: Obama Presidential Center Site

The OPC site is located along the western edge of Jackson Park at its connection to the Midway Plaisance. It is 19.3 acres in size and is roughly bounded by the westbound lanes of the Midway Plaisance (North Midway Plaisance Drive) to the north, South Cornell Drive to the east, East 62nd Street (as extended) to the south, and South Stony Island Avenue to the west.

2.2.1 Existing Recreation Facilities

The OPC site currently includes paths, an artificial turf field surrounded by a track, a playground, open space, an existing picnic grove, and a memorial garden area (known as the Perennial or Women's Garden). See Figure 6 below.

2.2.2 Existing Recreation Uses and Opportunities

The paths within the OPC site and the track are used for exercise, running, and walking, and the artificial turf field is used for playing football and soccer. The picnic grove within the footprint of the OPC site – grove 11 – can be reserved by applying for a permit and can also accommodate informal picnicking when not reserved. According to data compiled by the Park District, the grove is reserved periodically for use by family groups, school groups, neighborhood groups, and other organizations, though data for 2019 show no permits issued for the reservation of grove 11.

The Perennial or Women's Garden is used for gardening, aesthetic enjoyment, commemorations, and for sitting, walking, nature observation, meditation, gathering, and play.

The 62nd Street Playground is still in use, but the equipment is old and in need of replacement. In addition to providing an area for informal play, after school programs and day camps use the playground.

The track and field facility is used by various groups. The Park District does not keep information regarding the precise number of users or nature of the groups that use the facilities. However, the facility accommodates track practice and competition, football, soccer, pick-up games, running, walking, and other exercise.

Certain large public events use portions of the OPC site. For example, the Chicago Half Marathon traverses roadways surrounding the site.

The remainder of open space on the site is used for informal recreation activities that are not tracked by the Park District.



Figure 6: Current Uses Within OPC Site Boundary

Table 1 below summarizes existing uses on the OPC site.

Table 1: Current Opportunities and Uses on OPC Site

Recreation Facility/Area	Formal Uses	Informal Uses
Women's Garden (1.49 acres)	Gardening, commemorations	Sitting, walking, nature observation, aesthetic enjoyment, meditation, gathering, play
Track & Field	Track practice and competition, football practice and competition	Exercise, running, walking, pick-up games (football, soccer)
Picnic Grove (0.55 acres)	Picnicking (by reservation and with permit)	Walking, sitting, gathering, pick-up games (soccer, other), play, special events, picnicking (without reservation and permit)
62nd Street Playground (0.46 acres total, 0.35 acres within the OPC boundary)	After school programs, day camps	Play
Open Space (remainder of site acreage)	None	Walking, sitting, gathering, nature observation, pick-up games (soccer, other)

Table 2 below outlines specific recreation opportunities and uses currently within the 4.6-acre conversion area within the OPC site. Figure 7 below shows the proposed OPC conversion area in relation to existing recreation uses and opportunities.

Table 2: Recreation Uses and Opportunities Currently within the 4.6 Acre OPC Site Conversion Area

Recreation Facility/Area	Existing Formal Uses and Opportunities	Existing Informal Uses and Opportunities
A portion of the track & field	Track practice and competition, football practice and competition	Exercise, running, walking, pick-up games (football, soccer)
Picnic Grove (0.55 acres)	Picnicking (by reservation and with permit)	Walking, sitting, gathering, pick-up games (soccer, other), play, special events, picnicking (without reservation and permit)
Open Space (remainder of site acreage)	None	Walking, sitting, gathering nature observation, pick-up games (soccer, other)

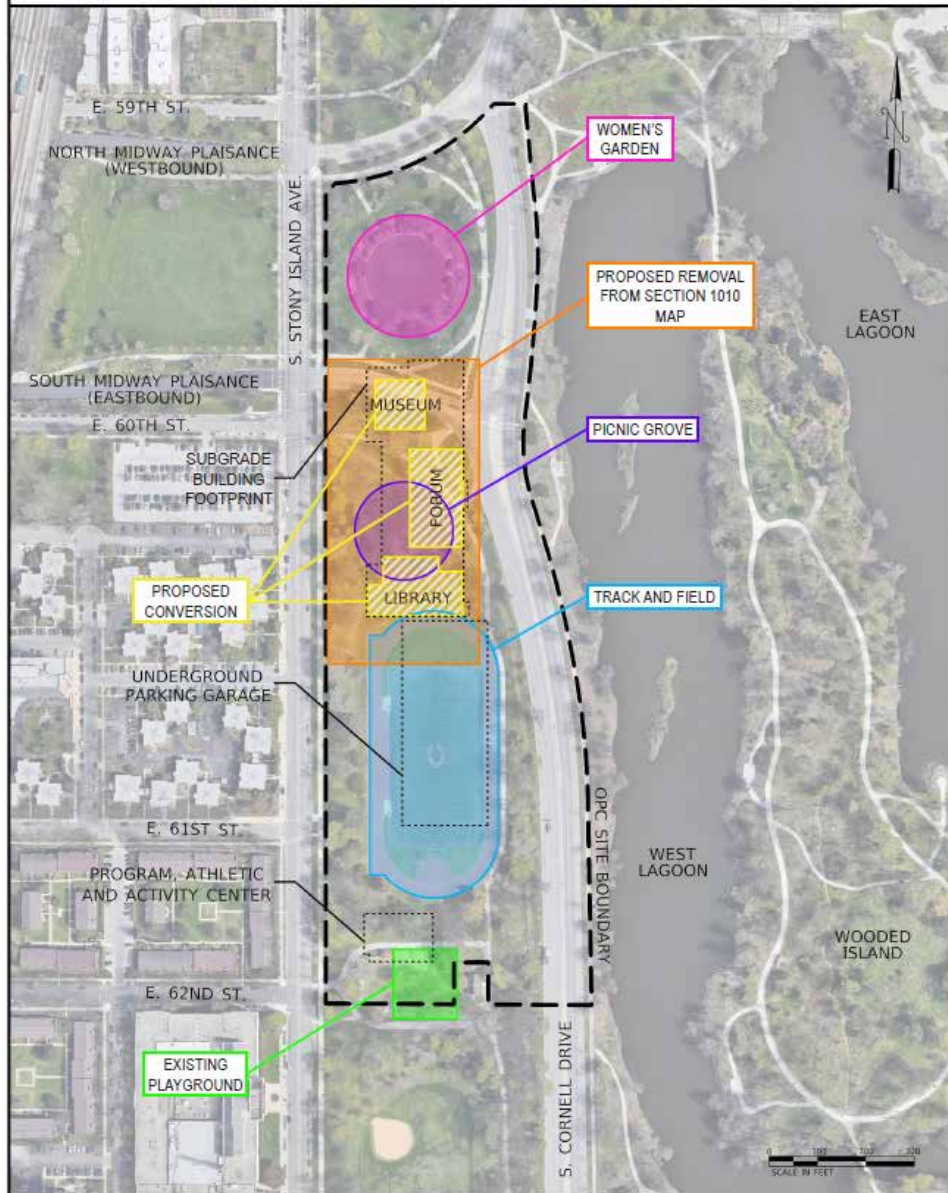


Figure 7: Current Recreation Uses within the 4.6-Acre OPC Site Conversion Area

2.3 Jackson Park: Parkland Intended for Roadway Improvements

The areas of Jackson Park that are currently parkland but that will be converted to roadways lie generally along the eastern edge of Stony Island Avenue, the western edge of Lake Shore Drive, and surrounding the proposed underpasses within Jackson Park. The intended additional roadway areas are generally 11 feet wide on the west side of Lake Shore Drive (63rd Street to 57th Drive) and 20 feet wide on the east side of Stony Island Avenue (67th Street to 59th Street). There are also planned roadway improvement areas along Hayes Drive, Cornell Drive, and North Midway Plaisance to accommodate realigned roadways and intersection improvements. The total conversion area along roadways and intersections is 5.2 acres. See Figure 8 below.



Figure 8: Conversion Areas along Roadways and Intersections

2.3.1 Existing Recreation Facilities

The roadway-related conversion areas consist of open space or landscaping, and a sidewalk within the Stony Island Avenue parkway.

2.3.2 Existing Recreation Uses and Opportunities

The conversion areas along roadways and intersections are listed in Table 3 below and consist of narrow strips of land with limited recreational uses and opportunities. These linear spaces mainly serve as a buffer between roadways and more active recreation areas. The sidewalk along Stony Island Avenue is used for walking, jogging, and biking. The linear space along the west side of Lake Shore Drive is not typically utilized by park visitors. There is, however, a north-south pathway in the area that is used for walking, jogging, and biking, but that recreation path is located outside the Lake Shore Drive conversion area.

Table 3: Recreation Uses and Opportunities within Conversion Areas Along Roadways and Intersections

Location of Roadway Work	Acreage Impacted	Existing Recreation Uses and Opportunities
Stony Island Avenue (67th Street to 59th Street)	2.4 Acres	Landscaped Buffer / Sidewalk
Lake Shore Drive (Hayes Drive to 57th Drive)	1.3 Acres	Landscaped buffer not intended for recreation

Location of Roadway Work	Acreage Impacted	Existing Recreation Uses and Opportunities
Hayes Drive / Cornell Drive / 63rd Street Intersection	0.7 Acres	Landscaped Buffer / Informal Recreation
Hayes Drive / Richards Drive intersection	0.1 Acres	Landscaped Buffer / Informal Recreation
Hayes Drive / Lake Shore Drive Intersection	0.2 Acres	Landscaped Buffer / Informal Recreation
Cornell Drive (65th Place to Hayes Drive)	0.2 Acres	Landscaped Buffer / Informal Recreation
North Midway Plaisance (Stony Island Avenue to Cornell Drive)	0.3 Acres	Landscaped Buffer / Informal Recreation

2.4 Midway Plaisance: Overview

The Midway Plaisance is an 83-acre park that is generally bounded by 60th Street to the south, Stony Island Avenue to the east, 59th Street to the north, and Cottage Grove Avenue to the west. See Figure 9. It is an open green space adjacent to Jackson Park and jointly listed with Jackson Park as a historic landscape district on the NRHP. The Jackson Park Historic Landscape District and Midway Plaisance was listed on the NRHP in 1972 for national and state significance in the areas of landscape architecture, architecture, science, sculpture, and urban planning. It was designed and constructed by Olmsted, Vaux & Co. in the 1870s and was used for the 1893 World’s Colombian Exposition. The initial vision for the Midway Plaisance included a canal that would connect Jackson Park to Washington Park, and the topography today reflects this early but abandoned vision. It was later redeveloped into parkland by Frederick Law Olmsted, Sr. The Midway is also a contributing feature to the Chicago Park Boulevard System Historic District, which was listed in the NRHP in 2018. In addition to open spaces, the Midway Plaisance contains formal features for athletic activities and trails. The Midway Plaisance did not receive funding from the UPARR program; therefore, it is not currently a UPARR site.



Figure 9: Midway Plaisance Property Boundary

The Midway Plaisance connects Washington Park to the west and Jackson Park to the east. Primary vehicular access routes to and through the Midway Plaisance include a network of connected principal arterials. Midway Plaisance Drive is a divided roadway through the Midway that begins in Jackson Park at Cornell Drive and ends in Washington Park at the Fountain of Time statue, where the divided roadway merges with Payne Drive/Morgan Drive. The two westbound lanes of the drive are on the north side of

the Midway (North Midway Plaisance Drive) and the two eastbound lanes are on the south side of the drive (South Midway Plaisance Drive). Payne Drive/Morgan Drive provides east-west access to the Jane Adams (I-90/I-94) Expressway and Cornell Drive provides north-south access to Stony Island Avenue and the Chicago Skyway (I-90). Woodlawn Avenue (a collector roadway) and Cottage Grove Avenue (a minor arterial) provide north-south access for local traffic to the Midway Plaisance.

Visitors to the Midway Plaisance can access free on-street parking along both sides of North and South Midway Plaisance Drive. Free on-street and metered parking is also provided on bordering and surrounding roadways to the park, including 59th Street, 60th Street, Ingleside Avenue, Ellis Avenue, University Avenue, Woodlawn Avenue, Dorchester Avenue, Blackstone Avenue, and Stony Island Avenue. The Metra Electric Railway crosses the park via an overpass viaduct.

The CTA provides a part-time transit service (Route 2) through the Midway Plaisance along 60th Street. Hyde Park bus routes (Routes 171, 172, and 192) circulate through the Midway Plaisance along Ellis Avenue, 60th Street, Dorchester Avenue, and 59th Street. Several bus routes operate along Stony Island Avenue to the east (Routes 6, 15, and 28) and Cottage Grove Avenue to the west (Route 4). The Metra Electric Railway provides daily access at the 59th Street station to downtown.

2.4.1 Existing Recreation Facilities

Recreation facilities within the Midway Plaisance include a warming hut and temporary soccer/football fields within the center of the Midway Plaisance between Cottage Grove Avenue and Dorchester Avenue. An ice skating rink is located between Ellis Avenue and Woodlawn Avenue. The remainder of the Midway Plaisance is open space that includes the University of Chicago's Winter Garden, trails, and monuments. Adjacent to, but outside the limits of the Midway Plaisance, are several facilities for the University of Chicago to the north and south. The adjacent University facilities draw students and visitors to the Midway Plaisance.

In 1999, the Chicago Park District, in coordination with the University of Chicago and local community members produced a conceptual plan for future improvements to the Midway Plaisance. The Midway Plaisance Master Plan was published in 2000.³ The Midway Plaisance Advisory Council (MPAC) is a local community group that monitors the park, represents the community, and advises the Park District.

2.4.2 Existing Recreation Uses and Opportunities

Overall, the Midway Plaisance affords opportunities for walking and biking, informal recreation, as well as formal athletic activities such as soccer, football, and ice skating. Several paths and sidewalks are provided within and adjacent to the Midway Plaisance to provide access to facilities and the surrounding University of Chicago campus buildings. According to Chicago's *Streets for Cycling 2020*, bicycle routes are envisioned along North and South Midway Plaisance Drive to connect to future routes along Stony Island Avenue and Best Drive. Pedestrian and bicycle bridges cross the Midway Plaisance along Ellis Avenue, Woodlawn Avenue, and Dorchester Avenue. The east end of the Midway Plaisance – the area the City has proposed as replacement property under UPARR – consists primarily of an open lawn lined with trees, as shown in Figures 10 and 11 below. No organized Park District programs take place in this area and the Park District does not take reservations for use of this space. This part of the park has two mixed-use trails and a sidewalk. Within the open space are park benches, trees, an informational kiosk, the Cheney Goode Memorial, and

³ Available on the Midway Plaisance Advisory Council (MPAC) website, <http://midwaypac.org/visit-the-park/history>

the 0.436-acre sunken lawn. The westernmost portion of the lawn area has an elevated landscape containing dense plantings and trees that provide screening of the Metra Electric Railway. The open space allows for informal recreation such as pick-up games, walking, gathering, or open play. Sidewalks provide opportunities for walking and biking.



Figure 10: Midway Plaisance with Eastern Midway Plaisance Identified



Figure 11: Eastern Midway Plaisance

3.0 Jackson Park & East Midway Plaisance: Changes to Recreation Uses and Opportunities

This section describes the changes to recreation uses and opportunities in Jackson Park and the Midway Plaisance resulting from the construction of the OPC and associated roadway changes.

3.1 Jackson Park: Overview

As described in more detail below, the construction of the OPC and associated roadway changes will result in the reconfiguration of recreation uses within Jackson Park. The OPC will displace an existing track and field currently occupying a large part of the OPC site. The Park District will construct a new track and field on adjacent parkland, which is currently the site of two baseball fields. One of these baseball fields will be relocated within the park, but the other will not be replaced. If demand warrants, the Park District would consider adding an additional diamond in the community.

3.2 Jackson Park: Obama Presidential Center Site

Figure 12 below shows the proposed 4.6-acre conversion area within the OPC site. See Figure 7 above for a depiction of existing recreational facilities within the OPC site. The conversion area includes three buildings that will not uniformly qualify as public recreation under UPARR together with certain adjacent land. Although the adjacent land includes a portion of a public plaza and other publicly-accessible recreational space, the City included this additional area for ease of administration – a simple, four-sided conversion “box” rather than a complicated shape that traces each building’s footprint. Certain recreation facilities will be affected to varying degrees, as described above. Those facilities are (1) the track and field, (2) open space, (3) the picnic grove, (4) the Perennial or Women’s Garden, and (5) the 62nd Street Playground. This section considers whether recreational opportunities will be lost, reconfigured, or gained on the OPC site.



Figure 12: Planned Changes to UPARR Designation without Road Improvements

3.2.1 Opportunities Lost in OPC Conversion Area

Of the five recreational elements within the OPC site listed above, three are wholly or partially located within the 4.6-acre conversion area: (1) the existing track and field; (2) open recreation space, including existing trails used for biking or walking; and (3) a picnic grove. The box outlined in orange on Figure 7, above depicts the proposed conversion area. The conversion area does not include the Perennial or Women's Garden or the 62nd Street Playground.

3.2.2 Opportunities Reconfigured

This section describes the City's plans to reconfigure recreational resources that will be affected by the OPC construction within the park, including on the OPC site itself.

Track: The construction of the OPC will displace the track and field facility currently occupying a large part of the OPC site. Although most of the track and field facility lies south of the OPC conversion area, a small portion of the track falls within the 4.6-acre conversion box drawn around the plaza buildings. The City and the Park District approved a plan to replace this facility two years ago at the same time as the City approved the site plan for the OPC. In May 2018, the Chicago Plan Commission approved the construction of a new track and field on adjacent parkland to the immediate south of its current location under the Lake Michigan and Chicago Lakefront Protection Ordinance, finding that the project was in compliance with the applicable policies of the Lakefront Plan of Chicago and the purposes of the Lakefront Protection Ordinance. The track and field replacement project will change the existing configuration of recreational resources along the western edge of the park, but it will enhance existing park opportunities. The existing track and field facility is reaching the end of its useful life, and its replacement will provide a state-of-the-

art recreational amenity for the community. The new track will be an eight-lane, 400-meter, rubber surface track built in accordance with Illinois High School Association regulations. It will include a long jump pit and high jump area, and will surround a multi-purpose artificial turf field that can provide for a range of field sports, including soccer, football and lacrosse. Unlike the existing track and field facility, the new facility will include a grandstand and sports field lights to accommodate evening events. Upon commencement of construction of the OPC, the track and field will be temporarily inaccessible until the replacement facility is constructed.

Open Space: Opportunities for informal recreation (sitting, walking, gathering, pick-up games, play) will continue to exist on the OPC site as well as in new landscaped areas made available by the closure of certain roads on the site, as discussed below.

Picnic Grove: Several picnicking opportunities will be available across the larger OPC site. Those areas include: the Community Grove, Lagoon View Lawn, the Great Lawn, and the Lagoon Grove among other spaces. There will be a minimum of one acre of informal picnicking space collectively within these spaces.

Women's Garden: The construction of the OPC will require the temporary removal of the Perennial or Women's Garden, but the Foundation will reconstruct the garden with improved accessibility. The accessibility improvements include removing steps currently surrounding the garden and introducing new accessible paths around the perimeter and down to the garden bowl. The restored garden will replicate key historic features of the space, including the original garden's dimensions, shape, aesthetics, feeling, plant beds, and plant types. The symmetrical triangular path intersections at the east side of the space that define the transition from the Midway Plaisance to Jackson Park will be replaced with asymmetrical paths. The symmetrical layout of concentric rings of planting beds and paths will be replaced with a series of asymmetrical winding paths, gathering spaces, stormwater catchment areas, and plant beds.

62nd Street Playground: The construction of the OPC will permanently remove the 62nd Street Playground, but the Foundation will construct a new playground to the immediate northwest of the current location, with an enlarged footprint and all new equipment, including custom-made experiential and exploratory play features. The proximity of the new playground to the Program, Athletic, and Activity Center will also allow for more coordinated indoor/outdoor recreation programs.

3.2.3 Opportunities Gained

This section describes how the OPC project will add recreational opportunities within Jackson Park.

The OPC site currently includes parts of two roadways: Cornell Drive and Midway Plaisance Drive South. The proposed development will remove these roadways to better connect the park to the lakefront and other local South Side institutions. Cornell Drive will be replaced with a wide promenade.

The campus will include four buildings: three (the Museum Building, the Library Building, and the Forum Building) will be grouped together around a public plaza on the north half of the site, and a fourth (the Program, Athletic, and Activity Center) will be located near the southwest corner of the site. The Museum Building will house exhibitions and public spaces such as a top floor that will offer views of Lake Michigan and the South Side of Chicago. The three plaza-centered buildings are connected underground and will front an open plaza which will provide opportunities for free public events, including informal and planned gatherings. The Forum and Library buildings will be constructed into the landscape. The Forum Building will contain meeting spaces for performances, programming, and public functions, as well as a restaurant. The Library Building will contain a branch of the Chicago Public Library and a special public reading room

that will feature a specially curated collection of books that have been of importance to President and Mrs. Obama. The roof of the Forum Building will include publicly accessible outdoor space for informal gatherings. The roof of the Library Building will feature a fruit and vegetable garden for local grade school programs and community members, and a hardscape gathering area for cultural offerings and group activities, including informal gathering and picnicking. The Program, Athletic, and Activity Center will provide space for public activities and opportunities for programming partnerships with local organizations. It is intended to be a gymnasium-type building that will be used for various types of active recreation from basketball to yoga. It may also be used for hosting large-scale indoor events. The OPC site will include a playground that will be equipped with a wide variety of experiential and exploratory play opportunities, including custom-made experiential play features. The proximity of this playground to the Program, Athletic, and Activity Center will allow for coordinated indoor/outdoor recreation programs. The OPC site will also include an area called the “Great Lawn.” It is intended to be a large, gently sloped, wide-open grassy area for all types of recreation. It will have a plateau area called the “Lagoon View Lawn” that will provide picnic opportunities as will a Community Grove (at the high point of the Lagoon View Lawn) and a Lagoon Grove (at the terminus of the slope of the Great Lawn). The sloped area is designed to be a sledding hill in winter. The OPC site will also include a nature trail and other multi-use paths leading to and around the Great Lawn. The path will go through the wooded area.

The Foundation engaged in a lengthy process, in consultation with the City, to design the OPC to be integrated into and complementary of Jackson Park and the surrounding area from the perspective of landscape ecology. Drivers of the design were considerations of stormwater, tree and soil biology, biodiversity, bird habitat, and pollinators. The design principles are documented in *OPC – Reinforcing Landscape Ecology* which is submitted with this document.

Most of the OPC site will remain subject to UPARR restrictions (14.7 of 19.3 acres). The Program, Athletic, and Activity Center will provide a new opportunity for public recreational programs and uses and does not constitute a conversion under UPARR. Neither the new playground nor the Program, Athletic, and Activity Center will be located within the 4.6-acre conversion area; therefore, each will remain UPARR-protected public recreational land.

3.2.4 Summary of Opportunities Lost, Reconfigured, and Gained Within 4.6-Acre Conversion Footprint on the OPC Site

Table 4 below describes each recreation area or facility and how it is impacted by the proposed 4.6-acre conversion within the OPC site.

Table 4: 4.6-acre Conversion Area: Recreation Opportunities Impact Summary

Recreation Facility or Area	Changes	UPARR Effect
Open space	Conversion of informal recreation space within the 4.6-acre carve-out area includes footprints of the campus buildings, adjacent land and driveways.	Lost and replaced outside of the current UPARR boundary.
Track and Field	A corner of the existing track and field is under the footprint of a planned (non-recreational) OPC building.	Partially lost. The existing track would be temporarily inaccessible until the replacement track is constructed.

Recreation Facility or Area	Changes	UPARR Effect
Picnic Grove	Park users would still be able to utilize the OPC site and other parts of Jackson Park for picnic activities. Informal picnicking would be available throughout the Lagoon View Lawn, Community Grove, Lagoon Grove, Great Lawn, and other green areas of the OPC Site including within the playground, on the roof of the Forum building, in the Women’s Garden, etc.	Lost.

3.3 Jackson Park: Sites of Roadway Improvements and Closures

The City’s plan includes transportation improvements to the roadway network. Two types of changes are proposed: closures, and improvements to existing roadways to mitigate traffic congestion and improve non-motorized transit in the park as a result of the roadway closures. The improvements principally involve widening existing roads within Jackson Park. These areas are generally used as buffer areas along existing roads and as informal recreation spaces. Under UPARR, new roadway areas within the Section 1010 boundary are a loss of recreation opportunity, while road closures recaptured for recreation are a gain to recreation. Planned changes are depicted in Figure 13 below.



Figure 13: Planned Changes to UPARR Designation after Roadway Improvements

The closure of two roadway segments (Cornell Drive and North Midway Plaisance Drive) will create a cohesive campus for the OPC and integrate the campus with the rest of Jackson Park. Other roadway closures will ease pedestrian access and enhance overall recreational use of the park without interruptions of busy roadways. The roadway improvements are needed to accommodate traffic changes from the road closures, enhance safety, and improve pedestrian and bicyclist use of the park.

Table 5 below lists the roadways that will be closed and landscaped into parkland.

Table 5: Roadway Closures

Location	Acreage
Cornell Drive (62nd Street to 59th Street)	3.3 acres
Cornell Drive (67th Street to 62nd Street)	4.1 Acres
Cornell Drive (N Midway Plaisance to OPC Site boundary)	0.1 Acre
Hayes Drive (Stony Island Avenue to Lake Shore Drive)	0.5 Acre
Richards Drive (Hayes Drive to Marquette Drive)	1.0 Acres
Marquette Drive (Stony Island Avenue to Richards Drive)	2.0 Acres

Table 6 below lists the roadways that will be widened or improved.

Table 6: Roadway Improvements

Location	Need	Acreage Impacted
Stony Island Avenue (67th Street to 59th Street)	Widen Stony Island Avenue	2.4 Acres
Lake Shore Drive (Hayes Drive to 57th Drive)	Widen Lake Shore Drive	1.3 Acres
Hayes Drive / Cornell Drive / 63rd Street Intersection	Intersection Reconfiguration	0.7 Acres
Hayes Drive / Richards Drive Intersection	Intersection Reconfiguration	0.1 Acres
Hayes Drive / Lake Shore Drive Intersection	Intersection Reconfiguration	0.2 Acres
Cornell Drive (65th Place to Hayes Drive)	Convert roadway to two-way	0.2 Acres
North Midway Plaisance (Stony Island Avenue to Cornell Drive)	Convert roadway to two-way	0.3 Acres

Figure 14 below depicts the overall roadway changes.

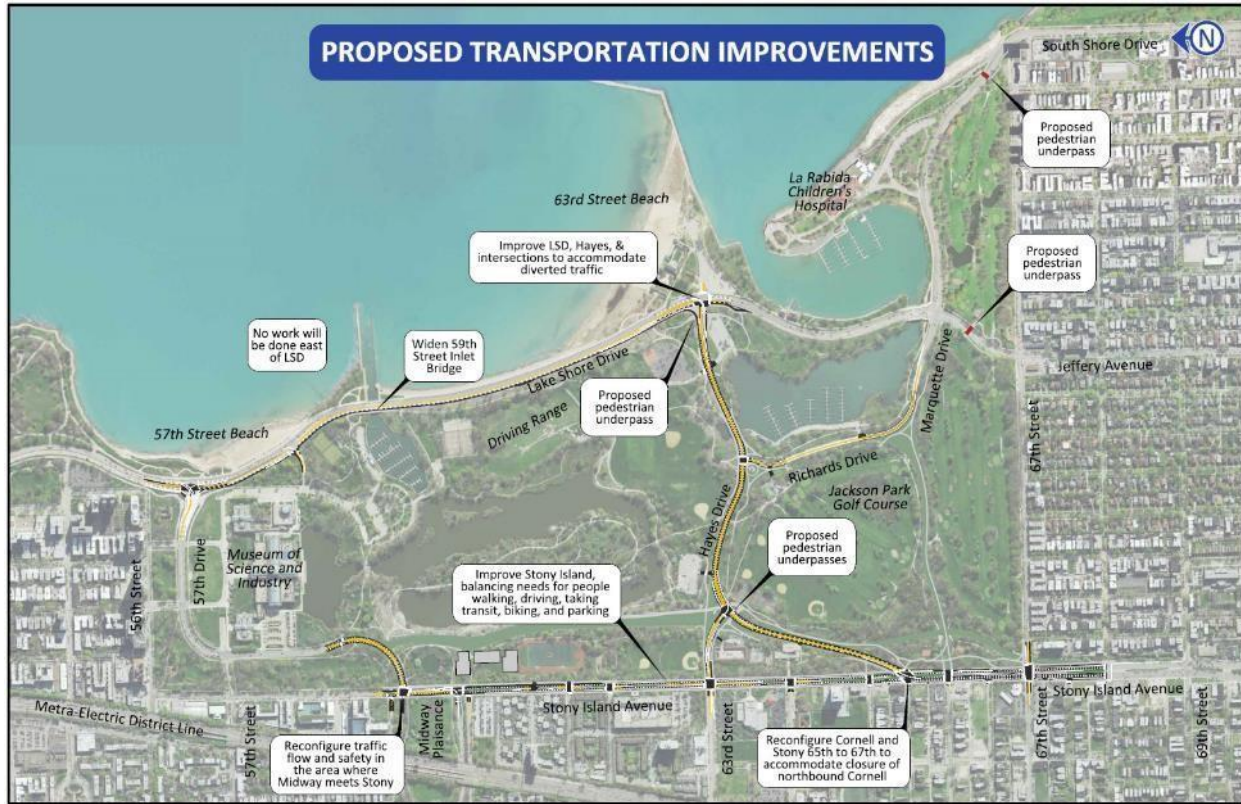


Figure 14: Planned Transportation Improvements

3.3.1 Opportunities Lost

The planned roadway changes, depicted in Figure 13 above and described in Table 7 below, may have negligible adverse effects on various open park spaces used for informal recreation as well as a sidewalk along Stony Island Avenue used for walking, jogging, and biking. The park spaces that would be lost to roadway improvements are linear, narrow and mainly serve as buffer space between roadways and more functional recreation areas nearby. The conversion of these areas to transportation use will not prevent park users from continuing to use the adjacent open areas of the park for informal recreation. Overall, the Chicago Park District does not expect any impact on the use of existing open spaces and has worked closely with CDOT to reconfigure pathways and open space following construction.

Table 7: Summary of UPARR Conversion after Roadway Improvements

Recreation Facility or Area	Anticipated Impacts	Lost Recreation
Informal recreation / roadway buffer	5.2 acres would be lost due to roadway improvements	Informal recreation / roadway buffer areas

3.3.2 Opportunities Gained

As part of the OPC site development, the City intends to close certain roadways within Jackson Park and convert those roadways into open space. The City proposes to add these new areas of open space to the new Section 1010 boundary to provide replacement recreation opportunities. These changes are depicted in Figure 15 below.



Figure 15: Proposed Additions to Section 1010 Map

Tables 8 and 9 below highlight all areas within Jackson Park where existing roadways will be converted to park space (which totals 11.1 acres), entirely offsetting the recreational acreage lost to other roadway work and the OPC building footprints within the conversion area. The new recreation area east of Stony Island Avenue will predominantly include new informal recreation space, but will also include new pathways, sidewalks, and underpasses that are incorporated in the roadway improvements. The City intends for the roadway closures to improve park cohesiveness through better connected parkland, to provide opportunities for expanded multi-use trails within the park, and improve pedestrian and bicycle safety and accessibility as a result of an expanded trail system. As summarized in the tables below, this added area will provide similar, but improved recreation opportunities compared to the open space areas lost due to roadway improvements. Opportunities include informal recreation trails and multi-use recreation opportunities.

Table 8: Roadway Closures and Conversions to UPARR Designated Land within OPC Site Boundary

Location	Acreage	Recreation
Cornell Drive (62nd Street to 59th Street)	3.4 Acres	Informal Recreation / New Trail

Table 9: Roadway Closures and Conversions to UPARR Designated Land outside OPC Site Boundary

Location	Acreage	Recreation
Cornell Drive (67th Street to 62nd Street)	4.1 Acres	Informal Recreation
Cornell Drive (N Midway Plaisance to OPC Site boundary)	0.1 Acre	Informal Recreation
Hayes Drive (Stony Island Avenue to Lake Shore Drive)	0.5 Acre	Informal Recreation / Extension of Existing Trail
Richards Drive (Hayes Drive to Marquette Drive)	1.0 Acre	Informal Recreation
Marquette Drive (Stony Island Avenue to Richards Drive)	2.0 Acres	Informal Recreation / New Trail

Specifically, the planned paths build upon the existing network, which has a focus on trips along and to the Lakefront Trail. Continuous east/west corridors aligned with 59th Street, 63rd Street, and Marquette Drive are planned, in accordance with the Chicago Streets for Cycling Plan 2020, between Stony Island Avenue and the Lakefront Trail. A new north/south path, generally aligned along the vacated Cornell Drive, will connect these east/west corridors and provide additional access to the Lakefront Trail.

Five new underpasses will provide safer and more comfortable access for users by physically separating pedestrian and vehicular traffic. The combination of new paths and underpasses will allow users to enter at the far southwest corner of Jackson Park and travel all the way to the northeast corner without having to cross a road at grade. Additional access improvements along Stony Island Avenue to improve access to Jackson Park include two new traffic signals with marked crosswalks and new pedestrian refuge islands, and spot improvements including new pedestrian refuge island and curb extensions to reduce crossing distances.

3.4 East End of Midway Plaisance

The City proposes to dedicate acreage as replacement recreation property on the east end of the Midway Plaisance between Stony Island Avenue and the Metra Electric Railway. This area is approximately 5.2 acres in size and lies just west of Jackson Park. See Figure 9 above. The Section 1010 boundary would be modified to include this replacement recreation area, making the property subject to federal UPARR restrictions governing public recreation use.

In order for the NPS to approve this acreage as replacement, the replacement area must provide recreational opportunities that are reasonably equivalent to lost recreational opportunities in the conversion area. The City's proposal includes three principal elements: a new play area, improved open space, and rehabilitated walkways. See Figure 16 below.

First, the City proposes to install a new play area on the western side of the open lawn. It is anticipated that the new play area will feature inclusive play facilities as well as nature play facilities. Examples of nature play facilities include tree sundials, mud kitchens, and log steppers. Inclusive play facilities are designed for children with a wide range of disabilities. Examples include activity tables, swings, slide mounds, and quiet spaces. The height of the play equipment in the new play area will not exceed 20 feet. Final decisions on playground equipment will be made through a public process. See Figure 17 below for illustrations of the types of play facilities that may be included.

Second, the City proposes to improve drainage on the site (as indicated in Figure 16 below) to provide functional recreation opportunities for the community. The site currently contains a 0.436-acre sunken lawn with poor drainage that frequently floods and interferes with recreational use of the site. The City proposes to enhance use of the open field through installation of a stormwater drainage system. The resulting open space on the site would accommodate a variety of activities, such as dog-walking, picnicking, and soccer practices and games. The open space area would be the size of one junior soccer field (approximately 30 by 50 yards).

Third, the City proposes to install a missing historic walk and restore historic tree patterns on the site with the goal of rehabilitating historic spatial organization to a historically open character with corner plantings. There will be no alterations to the configuration of existing roadways or walking paths.

The concept plan establishes a design envelope. The City and Park District 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 and Park District following completion of the Federal review process.



Existing Layout



Proposed Layout

Figure 16: Existing and Proposed Conceptual Recreation Replacement Opportunities, East End of Midway



Figure 17: Proposed Conceptual Recreation Replacement Opportunities on the East End of the Midway

3.4.1 Opportunities Lost

The new play area would result in the loss of some open recreation space where new structural features are added. Recreation opportunities in this area are informal recreation in an open green space and include pick-up games, walking, gathering, or open play, in addition to sidewalks for walking and biking.

3.4.2 Opportunities Reconfigured

Recreational opportunities will be reconfigured on the site. In addition, the provision of play facilities will reconfigure informal recreation opportunities by creating more formal facilities intended primarily for children.

3.4.3 Opportunities Gained

The City proposes to improve the recreational utility of the east end of Midway Plaisance to replace lost recreational opportunities within the existing Section 1010 boundary. The City proposes the addition of various play features and improvements in landscaping to make the area more appealing for recreation.

3.5 Comparison of Proposed Revisions to UPARR Boundary

In summary, the City's proposed actions will result in a net enlargement of the Section 1010 boundary. Adding acreage from closed roadways within Jackson Park plus the east end of the Midway Plaisance will result in a net gain of approximately 6.6 acres. See Table 10 and Figure 18 below.

Table 10 below provides a comparison of the proposed boundary revisions and recreational changes.⁴

Table 10: UPARR Conversion Summary

Summary of Conversion	Conversion Area
Conversion from recreation use to roadway use (Table 3)	-5.2 Acres
Conversion from roadway use to recreation use, within OPC site boundary (Table 8)	+3.3 Acres
Removal from Section 1010 map associated with the OPC	-4.6 Acres
Conversion from roadway use to recreation use, outside OPC site boundary (Table 9)	+7.7 Acres
Provision of replacement recreation improvements to the east end of Midway Plaisance	+5.2 Acres
Net Addition of Space for Recreational Use	+6.5 Acres



Figure 18: Proposed Section 1010 Map

⁴A negative number represents a loss of acreage for recreation use; a positive number represents a gain in acreage for recreation use.

4.0 Analysis of UPARR Conversion Regulatory Requirements

In this section, the City addresses the UPARR regulatory factors in 36 C.F.R. § 72.72(b): (1) whether practical alternatives to the conversion have been evaluated; (2) whether the proposed conversion and replacement are in accord with the current recreation plans; (3) whether the proposal assures replacement opportunities of “reasonably equivalent usefulness and location”; (4) whether the remainder of the park remains recreationally viable; and (5) whether environmental requirements are satisfied. As to factor 5, those requirements are being met in a comprehensive administrative process being conducted by NPS and other federal agencies. A sixth factor, relating to state intergovernmental clearinghouses, is not relevant where, as in Illinois, a clearinghouse has not been established.

4.1 Regulatory Factor 1: City Analysis of Alternatives

4.1.1 UPARR Alternatives Analysis: City’s Consideration of Practical Alternatives to Conversion

UPARR requires an applicant for a conversion of recreational parkland to non-recreational uses to evaluate all practical alternatives to the conversion (36 CFR 72.72[b][1]). The City performed its evaluation of alternatives to the proposed conversion against the backdrop of its objectives and its role. For the following reasons, the City determined that there is no practical alternative to locating the OPC in Jackson Park that would meet the City’s objectives.

4.1.1.1 City Objective: Locate the OPC in a park on the South Side of Chicago in the community where the former President lived and worked, and invest in that community and enhance its recreational and cultural resources

The Foundation conducted a lengthy selection process for the future home of the OPC and ultimately narrowed the field of proposed sites from around the country to Jackson Park or Washington Park, with Jackson Park ultimately making the most sense in light of the long-term public benefits.

The principal reason the Foundation selected Chicago for the OPC is its connection to the former President and First Lady. Michelle Obama grew up in the South Shore neighborhood. The former President began his career as a community organizer on the South Side of Chicago in 1985. Before winning election to the United States Senate in 2004, former President Obama represented South Side neighborhoods stretching from Hyde Park-Kenwood through South Shore in the Illinois Senate from 1997 to 2004. The former President also taught at the University of Chicago Law School and lived with his family in the Hyde Park-Kenwood community. The South Side is the appropriate place for the OPC, and the neighboring community areas (Hyde Park, Woodlawn, Washington Park, and South Shore) have the deepest connection to the former President and First Lady. Among many other themes, the presidential museum will explore the historical connection of our nation’s first African American President and First Lady to the city of Chicago.

The University of Chicago, whose proposal was selected by the Foundation, proposed three regional parks in this vicinity for the OPC: Jackson Park, Washington Park and South Shore Cultural Center Park. The City and the Park District enthusiastically embraced the location of the OPC in either Jackson Park or Washington Park, while eliminating the South Shore Cultural Center Park from consideration as a potential

location due to its much smaller size (70.84 acres) and the anticipated adverse impact to the historic South Shore Cultural Center, which occupies a substantial portion of the park.

Washington Park, like Jackson Park, is a UPARR-assisted and Olmsted-designed park. Thus, it is not a better option than Jackson Park for the OPC in this analysis and would not have avoided a conversion of UPARR-assisted parkland. Although a portion of the proposed Washington Park site included non-park land located across the street from the park, the main part of the site consisted of approximately 21 acres in Washington Park.

There are a number of smaller parks in the Hyde Park/Woodlawn/Washington Park/South Shore community areas, but all of these parks are scaled and designed for a circumscribed local area and a far smaller population than the larger target audience for regional parks like Jackson Park. Neighborhood parks are not large enough to host the OPC, and they are not appropriate for a cultural institution intended to draw visitors from the Chicago region and elsewhere.

4.1.1.2 City Objective: Build upon the City's history of placing museums in public parks as a way of enhancing both the recreational and cultural experiences of visitors

A non-park (public or private) location for the OPC campus would not have advanced the City's historic practice of, and policies promoting, the placement of important cultural institutions in regional public parks – a practice fully expressed in Daniel Burnham and Edward Bennett's 1909 Plan of Chicago, which advocated building great public institutions, such as the Field Museum, in parks along Chicago's lakefront. Echoing Burnham and Bennett, the 1972 Lake Front Plan of Chicago (Policy No. 4) recommends siting major cultural institutions "within the lakeshore parks" and other "large park locations," and advocates "[s]trengthen[ing] the regional aspect of the lakeshore parks" (p. 19). Jackson Park, like Lincoln Park, is a lakeshore regional park – and just as the Lincoln Park Zoo, the Chicago History Museum and the Peggy Notebaert Nature Museum in Lincoln Park have welcomed visitors from throughout Chicago and beyond, the OPC will be a local, national, and even global cultural destination and a source of civic pride. The beauty of Jackson Park will frame and elevate the OPC, and the OPC will encourage greater use and enjoyment of the park and lakefront. The relationship between parks and museums is mutually beneficial, and one with a strong underlying public purpose. It is the City's belief that public park settings impress upon privately operated museums a public identity, and that locating the OPC in Jackson Park will underscore the vital role the OPC will play in the public life of Chicago.

In addition, the Jackson Park location will generate momentum for the development of a "Museum Campus South," one of the initiatives identified in the Chicago Cultural Plan of 2012, which has the goal of connecting major institutions on the South Side and creating new opportunities for collaboration and growth. The close proximity of the OPC to the Museum of Science and Industry, the University of Chicago (and its Oriental Institute Museum, Smart Museum of Art, Logan Center Gallery, and Arts Incubator), the DuSable Museum of African American Art, and other cultural institutions will help establish the Hyde Park/Woodlawn/Washington Park/South Shore area as a site of cultural tourism and create direct and indirect economic development benefits for the area.

The City's power to permit private institutions to construct and operate museums in public parks is derived from the Illinois Park District Aquarium and Museum Act (Museum Act), which was first adopted in 1893 and was most recently amended in 2015 to apply to presidential centers. The Museum Act recognizes that these institutions "serve valuable public purposes, including, but not limited to, furthering human knowledge and understanding, educating and inspiring the public, and expanding recreational and cultural

resources and opportunities.” 70 ILCS 1290/1. Unlike private museums on private land, museums in public parks are subject to the Museum Act’s free admission and public access requirements. The museums in the City’s parks occupy public land free of charge, but in exchange they cede their independence to a large measure of public control. Throughout its history Chicago has recognized the importance of culture and recreation, *and the combination of the two*, to the physical and mental well-being of its residents and the status of the City on the national and international stage.

The OPC proposal follows in this tradition. It is expected that the OPC, like the Museum of Science and Industry and the other museums in Chicago’s parks, will be a permanent addition to Chicago’s cultural landscape. Like the other museums, it will be subject to the statutory restrictions and requirements in the Museum Act. The Museum Act requires museums in parks to provide free admission to all Illinois residents at least 52 days out of the year and to all Illinois school children accompanied by a teacher. The OPC will also be subject to the Lakefront Protection Ordinance and PD 1409, which controls the size and layout of the buildings on the OPC site, the design of the buildings, the landscaping of the site, and the categories of permitted uses. The approved Use Agreement between the City and the Foundation requires the Foundation to construct the OPC buildings at its own expense and, upon completion, transfer ownership of the structures and other site improvements to the City at no charge. The Use Agreement makes clear that the Foundation may use the site only for the OPC and related events; that the Foundation must provide public access to the OPC buildings essentially to the same extent as all other Chicago parkland museums; and that the open space surrounding the OPC buildings must generally remain open to the public during regular Chicago Park District hours. The Foundation also must provide the City with an annual report on the OPC’s operations and, with representatives from the City, form an Advisory Operations Committee to address ongoing operational issues related to the OPC and to adjacent and nearby areas in Jackson Park. These contractual ownership and control provisions allow the people’s representatives in City government to ensure that the OPC provides the benefits promised by the Foundation.

4.1.1.3 Alternatives Summary

As a result of these requirements and restrictions, the proposed conversion of parkland is limited to a rectangular area of 4.6 acres within the overall 19.3-acre site to be occupied by the OPC. The City has proposed the 4.6-acre rectangle for practical administration and oversight of UPARR responsibilities by the City and NPS. This mirrors what was done with the Museum of Science and Industry – the footprint of which was excluded from the original UPARR grants.

Thus, in light of the City’s objectives, there are no practical alternatives to the proposed conversion. The City sees the OPC as a historic opportunity, one that will reshape its cultural landscape and benefit its residents for generations, and so the City Council approved the Foundation’s proposal subject to restrictions that preserve public control and enhance public recreation within Jackson Park. The OPC site is and will remain publicly owned and controlled and will remain devoted to public purposes. By locating the OPC in Jackson Park, Chicagoans are guaranteed an institution that will remain devoted to public purposes in perpetuity. A private museum on non-park land would not serve the public interest in an equivalent manner.

Finally, concerning the conversion of strips of parkland along certain roadways as part of the traffic improvements, no practical alternatives offer a meaningful reduction in conversion. To begin, if the traffic improvements were not made at all, vehicular mobility within the park would be seriously compromised, degrading the recreation experience within the park and contributing to safety concerns. As a result, the

FHWA studied eleven alternatives in detail before carrying forward Alternative 9B in light of the need for suitable Levels of Service and increased bicycle/pedestrian safety and access. The FHWA's 4(f) analysis also demonstrates there is not a better alternative. In addition, the roadway work in and around Jackson Park will result in a net gain in parkland due to road closures and conversions.

4.1.2 UPARR Alternatives Analysis: City's Consideration of Alternatives to Replacement Recreation

The City evaluated alternatives to using the east end of the Midway Plaisance as the location for replacement recreation. The UPARR regulations and the specific characteristics of the OPC site were used to frame consideration of various vacant parcels in the Hyde Park, Woodlawn, Washington Park, and South Shore community areas to determine the most suitable replacement site. UPARR regulations require that the replacement site cannot already be subject to UPARR requirements, must be in a location reasonably equivalent to the conversion area (so that it serves the same community), and must provide recreational opportunities that are reasonably equivalent to those available in the conversion area.

In identifying and evaluating UPARR replacement alternatives, the City considered that Jackson Park is a regional park that serves the nearby communities of Hyde Park, Woodlawn, Washington Park, and South Shore, as well as the City of Chicago as a whole. It is listed on the NRHP and was designed by renowned landscape architect Frederick Law Olmsted. The City recognizes that UPARR does not require replacement recreation that has equivalent or similar historic status or character, nor does it prevent the City from considering this factor. The City believes that recreation in historic spaces can enhance the experience for its citizens and attributes value to that element. As a result, the City preferred to consider replacement opportunities that provide a similar context. The proposed conversion area is located in the northwestern portion of Jackson Park, on the western boundary. Given its location, the proposed conversion area is readily available for recreation use by members of the general public who live north and west of Jackson Park and by students of nearby schools that rely on Jackson Park for sports programming.

Given these characteristics of Jackson Park and the conversion area, the assessment of alternative replacement properties considered types of uses, NRHP designation, Olmsted-designed landscapes, walkability to Chicago's lakefront, and walkability to the surrounding neighborhoods, since these are all attributes of the recreation to be converted in Jackson Park. The City and the Park District also considered the cost, feasibility, and complexity of using alternative sites for UPARR replacement.

The City and the Park District identified seven potential replacement sites that are not currently UPARR designated areas, including the eastern portion of the Midway Plaisance, Harold Washington Park, and five vacant sites located between 57th and 71st Streets.

The five vacant sites between 57th Street and 71st Street are listed in Table 11 below.

Table 11: Vacant Sites between 57th Street and 71st Street

Site Name	Proximate to Proposed Conversion Area	Of Similar Quality to the Proposed Conversion Area					
		Informal Recreation	NRHP Status	Olmsted Design	Walk to Lakefront	Walk to Hyde Park	Walk to Woodlawn
57th & Perry	No	Currently Vacant	No	No	No	Yes	Yes
67th & Champlain	No	Currently Vacant	No	No	No	No	Yes
61st & State	No	Currently Vacant	No	No	No	No	Yes
71st & Harper	No	Currently Vacant	No	No	No	No	No
60th & Calumet	No	Currently Vacant	No	No	No	Yes	Yes

The east end of the Midway Plaisance lies directly across the street from the proposed OPC conversion area, making it the most logical choice in terms of proximity and the most effective in serving the same community. The Midway Plaisance site is also unique in its integration with the same park system as Jackson Park, designed by Fredrick Law Olmsted. Like the proposed conversion area, the Midway Plaisance site is well suited to diverse forms of recreation because it includes open spaces, wooded areas, space for recreation equipment, space for memorial reflection (Cheney Goode Memorial), as well as walking paths and benches.

Harold Washington Park is located north of Jackson Park between E. 53rd Street, E. Hyde Park Boulevard, and west of Lake Shore Drive, approximately 1 mile from the proposed conversion area. It primarily serves the Hyde Park Community. Recreation amenities currently present within Harold Washington Park include tennis courts, a playground, two picnic groves, model yacht basin, volleyball courts, game tables, comfort station, and an art sculpture.

The five vacant sites and Harold Washington Park were ruled out as potential replacement properties. With respect to Harold Washington Park, it is not close to the conversion area, is not an Olmsted-designed landscape, and does not have NRHP status. The vacant sites suffer from the same deficiencies. In addition, the City owns only a portion of four of the vacant sites and would need to acquire land to assemble viable park sites. The City recently acquired the site at 61st and State, but still needs to vacate alleys to fully assemble the site. The City would also need to assess and remediate any environmental conditions at these vacant sites prior to preparing them for park status. In contrast, the City owns the Midway Plaisance, substantially limiting risk of unforeseen environmental or other onsite conditions requiring remedial measures. Finally, in the City's view, the selected site on the east end of the Midway Plaisance is not fulfilling its potential as a recreational area and the community has long advocated for improvements. Presently, the Park District receives numerous complaints from residents about lack of usable space on the eastern end of the Midway Plaisance due to excess wet conditions. At community meetings with the Midway Plaisance Park Advisory Council in March and October of 2018 and August of 2019, while some residents favored leaving the space as is, the majority of residents shared how they might use this space

if it weren't wet most of the time, including holding soccer practice, walking dogs and picnicking – to name a few.

After considering the issues described above, the City and the Park District determined that the Midway Plaisance best meets the required criteria under UPARR and is the most feasible and prudent site to improve and select as a UPARR replacement property. Its proximity, availability to the same community, and likeness in relevant characteristics to the proposed conversion area best meet the needs identified for NPS action under UPARR to provide reasonably equivalent use and location for recreation opportunities in comparison to the other sites considered. See 36 CFR 72.72(a).

4.2 Regulatory Factor 2: Consistency with Current Recreation Plans

Several documents inform the design and stewardship of Jackson Park, including the Chicago Park District's 2012 Strategic Plan and 2016 update, the 1999 Framework Plan for Jackson Park and South Shore Cultural Center and its 2018 update – the South Lakefront Framework Plan (SLFP)⁵ – and the 1972 Lake Front Plan of Chicago, which continues to inform decision-making under the Lakefront Protection Ordinance. The City has reviewed these documents and concluded that the OPC is consistent with the long-term plans for the City's parks and Jackson Park specifically.

The proposal is consistent with the Chicago Park District's strategic plan, which was released in 2012 and updated in 2016. The 2012 plan articulates four core values that focus on (1) bringing children and families into Chicago parks; (2) prioritizing quality in park programs and providing excellent and affordable recreation; (3) renewing infrastructure and leveraging partnerships that produce new parks and facilities; and (4) supporting innovation and welcoming new ideas. The 2016 update to the strategic plan pivots from prescriptive goals to high level ideas and direction. Among other things, the 2016 update includes the goal of "increas[ing] access and exposure to culture and the arts." The placement of the OPC in Jackson Park furthers this goal and is also in accord with the City's history of museums in parks. The closure of South Cornell Drive will connect more children and families to the park by providing better and safer access to the lakeshore and east side of Jackson Park from the Hyde Park and Woodlawn neighborhoods on the west. The City's and the Chicago Park District's collaboration with the Foundation is a partnership that will provide new or improved facilities that visitors can enjoy, such as picnic facilities, a sledding hill, expanded and improved playground and play areas, better accessibility to the Women's Garden, landscaping, nature exploration and play areas and trails, opportunities for unstructured activity like Frisbee or football and informal recreation, and infrastructure and opportunities for athletics and fitness activities.

The proposal is consistent with the South Lakefront Framework Plan, which seeks to promote a balance of activity and nature and make Chicago's parks safe, comfortable, and accessible for everyone. The purpose of the SLFP was to develop a vision for the future of Jackson Park and South Shore Park. The public process started in June 2017 and included several rounds of public meetings to develop and refine concepts. A final preferred concept (based on public input) was presented to the Chicago Park District Board of Commissioners in April 2018. The SLFP provides eleven guiding principles for the South Lakefront area (including Jackson Park). For example, the plan calls for "serv[ing] the local community through a balance of diverse programmatic spaces—active to contemplative, athletics to arts." The OPC will provide a mix of all these uses, and the Museum and its resources will help to achieve the SLFP's goal to "reinvigorate [Jackson Park] as a global attraction with cultural destinations and historically significant

⁵*South Lakefront Framework Plan*. Chicago Park District, 2018.

landscapes.” Closing South Cornell Drive will “strengthen connections within the park and with the community through improved programming, access, and engagement” and “celebrate and reconnect with the water.” The green roof designs of several of the OPC campus buildings will “integrate buildings and landscapes to shape beautiful parks that provide an enhanced quality of life for their users.” A key tenet of the SLFP is to “continue to promote spaces that connect with nature,” which the green roofs, landscaping, paths, nature play area, lawn, nature trail, and picnic areas on the OPC campus will do. Importantly, the SLFP incorporates the OPC and the proposed roadway changes, and these were discussed throughout the SLFP community process.

In addition to the active planning documents discussed above, the proposal is consistent with the City’s 1980 and 1991 RAP plans, which the City developed specifically for the UPARR program. The 1980 RAP plan discusses the history of museums in Chicago’s parks and the importance of expanding cultural opportunities and diverse types of indoor and outdoor recreation. One of the five goals in the City’s 1980 RAP plan is to expand “cultural opportunities throughout Chicago” by increasing “private support for the arts and for institutions of culture and learning.” The OPC fits squarely within this stated planning goal. The OPC is also consistent with the 1991 RAP, which stressed “promoting interagency and public/private collaborations” to “improve the availability and quality of programs” and improving existing landscapes, creating new landscaped areas, and rehabilitating existing amenities.

Finally, the City has determined that the Midway Plaisance replacement site is consistent with the 2000 Midway Plaisance Master Plan,⁶ which envisioned improvements on the eastern end of the Midway, including a formal fountain and garden and sledding slope. Elsewhere on the Midway Plaisance, the Plan anticipated a children’s garden playground. This vision has not been implemented, but using the area as replacement property for UPARR provides the opportunity to improve the eastern end of the Midway consistent with the community’s original vision while also taking into account current community preferences. The City’s proposal is consistent with the Midway Plaisance Master Plan in that it provides an enhanced area for informal recreation and opportunities for children to enjoy new playground features. A sledding slope, originally envisioned for the eastern Midway Plaisance, will be an element of the OPC site itself.

4.3 Regulatory Factor 3: Equivalence of Proposed Replacement Recreation With Lost Recreation

The applicable regulations in 36 C.F.R. 72.72(b)(3) articulate criteria to frame the consideration of equivalence: (i) evaluation of recreation “resources and opportunities” served by existing facilities as compared to the types of recreation needs that would be served by the substitute property; and (ii) evaluation of the location of the site – while generally it should serve “the same community(ies) or area as the converted site,” there is administrative flexibility. Building on the detailed information provided in Sections 1.0 – 4.0 of this document regarding opportunities lost and gained, this analysis considers how the replacement recreation is “reasonably equivalent” to the recreation “resources and opportunities” that now exist and that would be lost due to the conversion.

As described above, the OPC conversion footprint (4.6 acres) and the traffic conversion areas include five recreational features: a track and field, a picnic grove, open areas, sidewalks, and buffer areas along roadways. The conversion of this acreage will result in the loss of formal recreational opportunities (such

⁶ Available at <http://midwaypac.org/wp-content/uploads/2017/03/Midway-Plaisance-Chicago-Park-District-Framework-Plan-2000.pdf>.

as track and field practice and competition, football games, and scheduled special events in the larger open spaces) and informal recreational opportunities (such as exercising, pick-up games, sitting, walking, nature observation, and picnicking).

This section describes how the proposed replacements in the footprint of the closed roadway alignments and on the east end of Midway Plaisance present reasonably equivalent recreation opportunities.

The proposed replacement is equivalent or in excess of requirements in that it affords enhanced opportunity for informal recreation as well as for formal recreation.

4.3.1 Equivalency of Replacement Recreation for Losses to Roadway Improvements

With respect to the losses to recreational areas caused by roadway improvements, as described in Section 3.3 above, 11.1 acres of existing roadways will be closed and redeveloped as parkland for informal recreation use in Jackson Park and included within the UPARR Section 1010 boundary. This new parkland will offset the losses occasioned by the roadway improvements which impact linear spaces that serve as a buffer to roadways and, in the case of a strip of land along Stony Island Avenue, a sidewalk. This new parkland will include new and improved paths, underpasses, and other safety elements to provide greater access and connectivity for recreation users in Jackson Park. The additional UPARR land resulting from the roadway changes will offer more user-friendly space and enhanced recreation opportunities as compared to the linear spaces that will be lost to roadway improvements. The closure of South Cornell Drive between the OPC site and the West Lagoon will provide an expansive area of parkland insulated from traffic, and new sidewalks will offer improved opportunities for pedestrians and runners. Continuous east/west corridors aligned with 59th Street, 63rd Street, and Marquette Drive are planned, in accordance with the Chicago Streets for Cycling Plan 2020, between Stony Island Avenue and the Lakefront Trail. A new north/south path, generally aligned along the vacated segments of Cornell Drive, will connect these east/west corridors and provide additional access to the Lakefront Trail.

Table 12 below summarizes the roadway closures and replacement recreation.

Table 12: Summary of Roadways Closures and Replacement Recreation

Location	Acreage	Recreation
Cornell Drive (62nd Street to 59th Street)	3.3 Acres	Informal Recreation / New Trail
Cornell Drive (67th Street to 62nd Street)	4.1 Acres	Informal Recreation
Cornell Drive (N Midway Plaisance to OPC Site boundary)	0.1 Acre	Informal Recreation
Hayes Drive (Stony Island Avenue to Lake Shore Drive)	0.5 Acre	Informal Recreation / Extension of Existing Trail
Richards Drive (Hayes Drive to Marquette Drive)	1.0 Acre	Informal Recreation
Marquette Drive (Stony Island Avenue to Richards Drive)	2.0 Acres	Informal Recreation / New Trail

In summary, the new parkland and enhancement of the roadway and pedestrian/bicycle trail network in Jackson Park are more than “reasonably equivalent” to the recreation lost by virtue of roadway improvements.

4.3.2 Equivalency of Replacement Recreation for Losses to Conversion at the OPC Site

As explained above, the City proposes to provide replacement recreation opportunities on the east end of the Midway Plaisance, an area that is 5.2 acres in size, to compensate for the loss of recreation opportunities within the 4.6-acre conversion area on the OPC site. Existing opportunities include picnicking, walking, exercise, pick-up games, scheduled events, and nature observations. The construction of the OPC will also result in the temporary loss of activities at the track and field.

The City proposes modifying the proposed replacement area on the east end of the Midway Plaisance to accommodate a combination of open space and play facilities. The installation of a missing historic walk and corner tree plantings would recreate the historic spatial organization of the Midway Plaisance. The sunken grade of the lawn area would be modified to facilitate infiltration and drainage and to enhance use of the open field. The new playground may include both nature play facilities (such as tree sundials, mud kitchens, and log steppers) and inclusive play facilities (such as activity tables, swings, slide mounds, and quiet spaces). The proposed improvements to the Midway replacement site would allow public use of the entire site for informal activities (such as walking, sitting on the lawn, and strolling on sidewalks) and formal recreation (such as organized sporting events). Improvements on the Midway property will offset the loss on the OPC site of formal recreation space, picnicking space, and play areas.

Given the location of the Midway replacement site in the immediate vicinity of the OPC conversion site, both areas will serve the same or similar communities. The physical attributes of the replacement and conversion sites are very similar -- i.e., generally open or landscaped spaces that allow for formal and informal recreation activities. In the City’s view, the Midway replacement site offers a generally equivalent recreational experience to the OPC conversion area in that they both include open space for strolling, running, picnicking, pick-up games, and other informal recreation opportunities, as well as built recreation facilities for organized activities. In addition, the eastern end of the Midway, as renovated, will provide enhanced opportunities for children with the creation of play facilities.

While the Midway Plaisance plans do not include the construction of a more formal facility like the track and field, that facility and the formal recreation opportunities that it provides will only be temporarily lost as it is re-constructed in Jackson Park. Further, the plans for the Midway Plaisance, as described above, include space large enough for soccer games and other pick-up team sports. Thus, under the City’s proposal there will be no loss of public recreation opportunity as the replacement is “reasonably equivalent” to existing opportunities at both the OPC site and sites along the areas of roadway improvements.

4.4 Regulatory Factor 4: Viability of the Remainder of Jackson Park

Jackson Park is a large urban park spanning more than 550 acres. The OPC site is 19.3 acres and, of that, 4.6 acres will be removed from the Section 1010 boundary. Together with the proposed traffic conversion (5.2 acres), a total of only 9.8 acres will be removed from UPARR restrictions throughout Jackson Park. As analyzed above, the conversion will have little to no impact on the remainder of the park except to provide enhanced recreational opportunities and connectivity in Jackson Park as described above and in the City’s various submissions to date.

5.0 Summary

Jackson Park is acknowledged as a vital community asset providing both formal and informal recreation opportunities. As a recipient of UPARR grant funds, the City must retain recreation uses within the existing Section 1010 boundary. Any conversions from recreation to non-recreation uses within the park require NPS review.

As a result of constructing the OPC, there would be a partial conversion of recreation use. To compensate for this conversion, the City proposes replacement UPARR land and amenities in the east end of the Midway Plaisance. In addition, the City proposes to close roadways within Jackson Park and utilize these areas as additional replacement land to offset conversions for road improvements.

As established above, the City's proposal satisfies the applicable regulatory requirements for the proposed partial conversion within Jackson Park.

6.0 References, Resources, and Supporting Documents

Document/Information Collections

Federal Review of Jackson Park Improvements, City of Chicago Department of Planning and Development, https://www.cityofchicago.org/city/en/depts/dcd/supp_info/jackson-park-improvements.html

Obama Presidential Center, Office of the Mayor, City of Chicago, https://www.cityofchicago.org/city/en/depts/mayor/supp_info/obama-presidential-center.html

City Planning Documents

Chicago Park District 2012 Strategic Plan and 2016 Update:
<https://www.chicagoparkdistrict.com/about-us/strategic-plan>

2018 South Lakefront Framework Plan, Chicago Park District, <https://southlakefrontplan.com/>

1999 South Lakefront Framework Plan (*submitted to NPS with this document*)

1972 Lake Front Plan of Chicago (*submitted to NPS with this document*)

Midway Plaisance - Chicago Park District Framework Plan in 2000:
<http://midwaypac.org/wp-content/uploads/2017/03/Midway-Plaisance-Chicago-Park-District-Framework-Plan-2000.pdf>

1999 Midway Plaisance Master Plan <http://midwaypac.org/visit-the-park/history>

City of Chicago Cultural Plan 2012,
https://www.chicago.gov/city/en/depts/dca/supp_info/cultural_plan.html

Chicago Streets for Cycling Plan 2020:
<https://www.chicago.gov/content/dam/city/depts/cdot/bike/general/ChicagoStreetsforCycling2020.pdf>

March 9, 2015, Chicago Plan Commission Resolutions finding that transfer of land in either Jackson Park or Washington Park from the Chicago Park District to the City for the OPC is in conformance with long-range planning objectives/Transcript (*submitted to NPS with this document*)

March 11, 2015, City Council Joint Committee: Budget and Government Operations, Housing and Real Estate, and Special Events, Cultural Affairs and Recreation, vote recommending passage of ordinance authorizing City to acquire land in Washington Park or Jackson Park for Obama Presidential Center /Transcript of Meeting (*submitted to NPS with this document*)

March 18, 2015, City Council adoption of Ordinance # O2015-192 authorizing execution of Intergovernmental Agreement with Chicago Park District regarding transfer of land in either Washington Park or Jackson Park for Obama Presidential Center (Journal of Proceedings of the City Council of the City of Chicago, March 18, 2015, pages 105095 through 105115:

<http://www.chicityclerk.com/legislation-records/journals-and-reports>) (*submitted to NPS with this document*)

February 14, 2018, Recommendation and Final Action, Park District Board of Commissioners (Recommendation to Accept Approximately 8 Acres of Property Within Jackson (Andrew) Park From The City Of Chicago And To Transfer Approximately 6 Acres Of Park District Property Located Within Jackson (Andrew) Park To The City Of Chicago) (*submitted to NPS with this document*)

February 14, 2018, Chicago Park District Meeting Minutes recording approval of Recommendation to Accept Approximately 8 Acres of Property Within Jackson (Andrew) Park From The City Of Chicago And To Transfer Approximately 6 Acres Of Park District Property Located Within Jackson (Andrew) Park To The City Of Chicago) (*submitted to NPS with this document*)

May 17, 2018, Chicago Plan Commission resolution recommending approval of the application of The Barack Obama Foundation to rezone the OPC site to a Planned Development, including report to the Chicago Plan Commission from the Department of Planning and Development/Transcript of Meeting (*submitted to NPS with this document*)

May 17, 2018, Chicago Plan Commission resolution approving application of The Barack Obama Foundation to construct the OPC in Jackson Park under the Lake Michigan and Chicago Lakefront Protection Ordinance, Municipal Code of Chicago, § 16-4-010, et seq., including report to the Chicago Plan Commission from the Department of Planning and Development /Transcript of Meeting (*submitted to NPS with this document*)

May 17, 2018, Chicago Plan Commission resolution approving application of Chicago Park District to construct new track and field facility in Jackson Park under the Lake Michigan and Chicago Lakefront Protection Ordinance, Municipal Code of Chicago, § 16-4-010, et seq., including report to the Chicago Plan Commission from the Department of Planning and Development /Transcript of Meeting (*submitted to NPS with this document*)

May 17, 2018, Chicago Plan Commission resolution approving application of Chicago Department of Transportation to construct roadway, bicycle and pedestrian improvements in Jackson Park under the Lake Michigan and Chicago Lakefront Protection Ordinance, Municipal Code of Chicago, § 16-4-010, et seq., including report to the Chicago Plan Commission from the Department of Planning and Development /Transcript of Meeting (*submitted to NPS with this document*)

May 22, 2018, City Council Committee on Zoning, Landmarks and Building Standards vote recommending passage of the Planned Development for the OPC site/Transcript of Meeting (*submitted to NPS with this document*)

May 23, 2018, City Council adoption of Ordinance #S020 18-123 approving Planned Development for OPC site (Journal of Proceedings of the City Council of the City of Chicago, May 23, 2018, at pages 77185 through 77214, <http://www.chicityclerk.com/legislation-records/journals-and-reports>) (*submitted to NPS with this document*)

October 11, 2018, City Council Committee on Housing and Real Estate vote recommending passage of "Operating Ordinance" for the OPC, allowing the City to accept title from the Park District to a 19.3-acre

site in Jackson Park and to enter into agreements governing the Foundation's use of the site/Transcript of Meeting (*submitted to NPS with this document*)

October 25, 2018, City Council Committee on Transportation and Public Way vote recommending passage of ordinance approving proposal to vacate and dedicate portions of the public way required to complete the OPC /Transcript of Meeting (*submitted to NPS with this document*)

October 31, 2018, City Council adoption of Ordinance #SO2018-7136 authorizing the City's acquisition of the OPC site from the Park District and execution of a Use Agreement and related transaction documents governing the construction and operation of the OPC (Journal of Proceedings of the City Council of the City of Chicago, October 31, 2018, at pages 85875 through 86986, http://chicityclerk.s3.amazonaws.com/s3fs-public/document_uploads/journals-proceedings/2018/2018_10_31_VI.pdf.) (*submitted to NPS with this document*)

October 31, 2018, City Council adoption of Ordinance #S02018-7018 approving proposal to vacate and dedicate portions of the public way required to complete the OPC. (Journal of Proceedings of the City Council of the City of Chicago, October 31, 2018, at pages 85987 through 86004, http://chicityclerk.s3.amazonaws.com/s3fs-public/document_uploads/journals-proceedings/2018/2018_10_31_VI.pdf.) (*submitted to NPS with this document*)

OPC Documents

Obama Presidential Center: Reinforcing Landscape Ecology
<https://www.obama.org/updates/park-before-after/>

Obama Presidential Center: Shade Study:
https://www.chicago.gov/content/dam/city/depts/dcd/supp_info/jackson/OPC-Shadow-Study.pdf

NPS Documents

UPARR Grant No. 17-CTY-1670-80-02 –
https://www.chicago.gov/content/dam/city/depts/dcd/supp_info/jackson/UPARR.pdf

UPARR Grant No. 17-CTY-1670-80-04 -
https://www.chicago.gov/content/dam/city/depts/dcd/supp_info/jackson/UPARR.pdf

Submissions to NPS by the City (partial list)

December 5, 2018 – UPARR Conversion Proposal Concerning Jackson Park, Chicago, IL (Additional Information)

§ Exhibits:

- Proposed Section 1010 Boundary Map
- OPC Site Plan (Submitted to NPS in May 2018)
- OPC Site Plan (Submitted to NPS in November 2018)
- Alta Survey of OPC Site Topography
- OPC Use Agreement with the City of Chicago
- UPARR Mitigation Program Scenarios for East Midway Plaisance

- Revised Map 5B: Proposed Additions to Section 1010 Map within Jackson Park
- Wetland Delineation Report from the Current Draft Environmental Assessment
- Detailed Maps of Proposed Roadway Conversions
- Existing Recreation within OPC Site + Conversion Proposal
- Existing Recreation Facilities within Jackson Park (A, B)
- Copy of the South Lakefront Framework Plan Update (Completed in 2018)
- Chicago Park District Assessment of Existing 62nd Street Playground (Completed in 2014)

October 30, 2018 – UPARR Conversion Proposal Concerning Jackson Park, Chicago, IL

§ Enclosures:

- Summary of UPARR Mitigation Site Analysis of Options
- Map 1 Current Section 1010 Map
- Map 2A Obama Presidential Center Buildings
- Map 2B Proposed Excision From Section 1010 Map Associated with the Obama Presidential Center
- Map 3 Proposed Excision From Section 1010 Map Associated with Traffic Improvement Measures
- Map 4 Proposed Addition to Section 1010 Map for Mitigation Area on Midway Plaisance
- Map 5A Roadways Planned for Closure Within Jackson Park
- Map 5B Proposed Addition to Section 1010 Map for Mitigation Areas Within Jackson Park
- Map 6 Proposed New Section 1010 Map
- Map 7 Other Planned Changes Within Jackson Park

January 25, 2018 – letter to Emily Ferguson, State and Local Assistance Program, National Park Service re: Obama Presidential Center and Roadway Improvements, Jackson Park, Chicago, IL

§ Exhibits:

- Map of Project site boundaries overlaid on aerial photo depicting current conditions
- Exhibit summarizing existing versus new acreage of parkland resulting from the roadway improvements
- Rendering of final proposed configuration of Project buildings and relocated track and field
- Plaza-level plans with the intended uses in each building color-coded
- Narrative of proposed uses within the Project buildings
- Planned Development zoning application for the OPC filed with the City of Chicago
- Floor plans and sections of the OPC

May 22, 2015 – letter to Cameron Sholly, Midwest Region Direct, National Park Service, re: Barack Obama Presidential Library and Museum Project in Chicago

§ Attachments:

- Washington Park Map with Outline of Project
- Jackson Park Map with Outline of Project
- UPARR Grant Documents
- Museums in the Park Report
- Historical Census Data
- MetroPulse Community Data Snapshot – Woodlawn
- MetroPulse Community Data Snapshot – Washington Park
- Anderson Economic Group Study