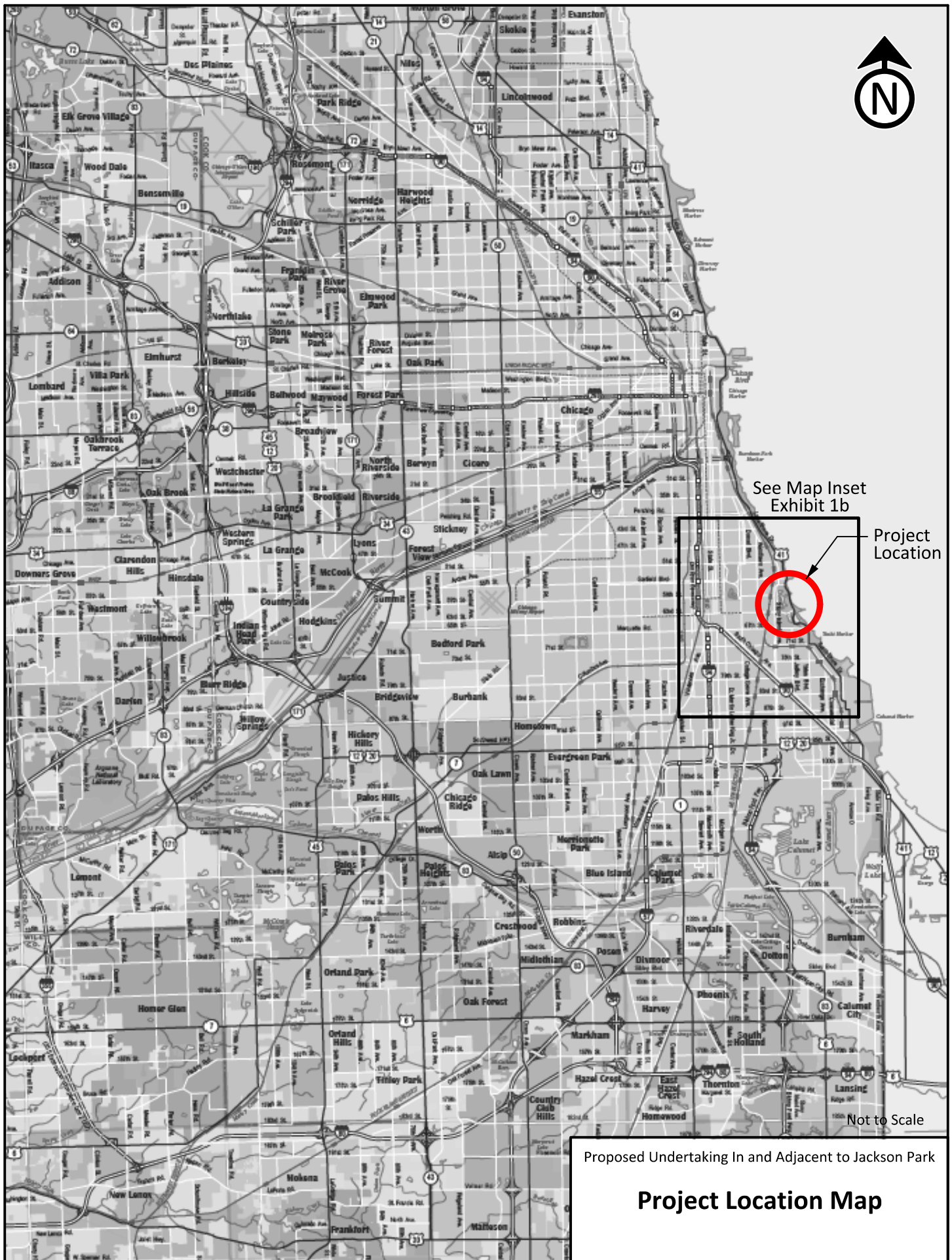


Appendix A – Exhibits and Tables



See Map Inset
Exhibit 1b

Project
Location

Not to Scale

Proposed Undertaking In and Adjacent to Jackson Park

Project Location Map



Location Map Inset

LEGEND

	Existing Right-of-Way		Section 404 Authorization (USACE Undertaking)
	Existing Park		Pr. GLFER Impacts (USACE Undertaking)
	OPC Site Structure		Pr. GLFER Replacement (USACE Undertaking)
	OPC Site Boundary		APE Sub-area I - Historic Architecture/Landscape
	UPARR Conversion (NPS Undertaking)		APE Sub-area II - Historic Architecture/Landscape
	UPARR Replacement (NPS Undertaking)		Listed (I)
	Pr. Roadway Imp.* (FHWA Undertaking)		Listed (HD)
	Pr. Ped/Bike Imp. (FHWA Undertaking)		Listed (MPL)
	Pr. Ped/Bike Underpass (FHWA Undertaking)		Eligible (I)
	Contributing Resource to CPBS HD		Eligible (HD)

NOTES

*Roadway widening also constitutes as a UPARR Conversion.
 **NRHP Status determinations approved by SHPO on July 10, 2018. The Assessment of Effects (AOE) evaluates both listed and eligible properties on the NRHP. Historic districts (HD) are evaluated as one property which considers effects to contributing resources and the district as a whole. Individual (I) properties, including those within historic districts, are evaluated for effects to their historic integrity.

HISTORIC PROPERTIES

01	Jackson Park Historic Landscape District and Midway Plaisance
06	Jackson Park Terrace Historic District (Eligible)
07	Hyde Park-Kenwood Historic District (Listed)
18	Hyde Park East Historic District (Eligible)
19	Bret Harte Elementary School
20	Windermere East Hotel/Apartments
21	Jackson Towers
22	Promontory Apartments
23	The Flamingo on the Lake
24	Jackson Shore Apartments
25	Shoreland Hotel
26	Promontory Point Historic District
27	Helstein House
28	Residence at 5812 S. Blackstone Avenue
29	Stein Building
30	Johnson House
31	Center for Continuing Education
32	Public Administration Building (Chapin Hall)
33	St. Paul's Universalist Church/Shankman Orthogenics School
34	University of Chicago Power Station
37	Chicago Park Boulevard System Historic District (Listed)
41	Frank Lillie House



MATCHLINE - SEE EXHIBIT 2b



MATCHLINE - SEE EXHIBIT 2a

HISTORIC PROPERTIES

- 01 Jackson Park Historic Landscape District and Midway Plaisance
- 02 Stony Island State Trust and Savings Bank
- 03 William Dexter Three-Flat
- 04 Island Terrace Apartment Building
- 05 Hyde Park Academy High School
- 08 South Shore Cultural Center Park
- 09 South Shore E. 67th Street Apartment Historic District (Eligible)
- 10 Residences at 6700 S. Crandon Avenue
- 11 Shoreline Apartments
- 12 Residences at 2201-2211 E. 67th Street
- 13 Leonard Graff House
- 14 Dr. Paul Schutz House
- 15 Morris N. Fox Three-Flat
- 16 Residences at 6701 S. Constance Avenue
- 17 Tower Court Apartments
- 35 E. 62nd Place Firehouse
- 36 Pridmore & Stanhope-designed Greystone
- 37 Chicago Park Boulevard System Historic District (Listed)
- 38 6450-6460 S. Stony Island Avenue
- 39 6516-6520 S. Stony Island Avenue
- 40 2015-2017 E. 67th Street/6700-6712 S. Chappel Avenue

LEGEND

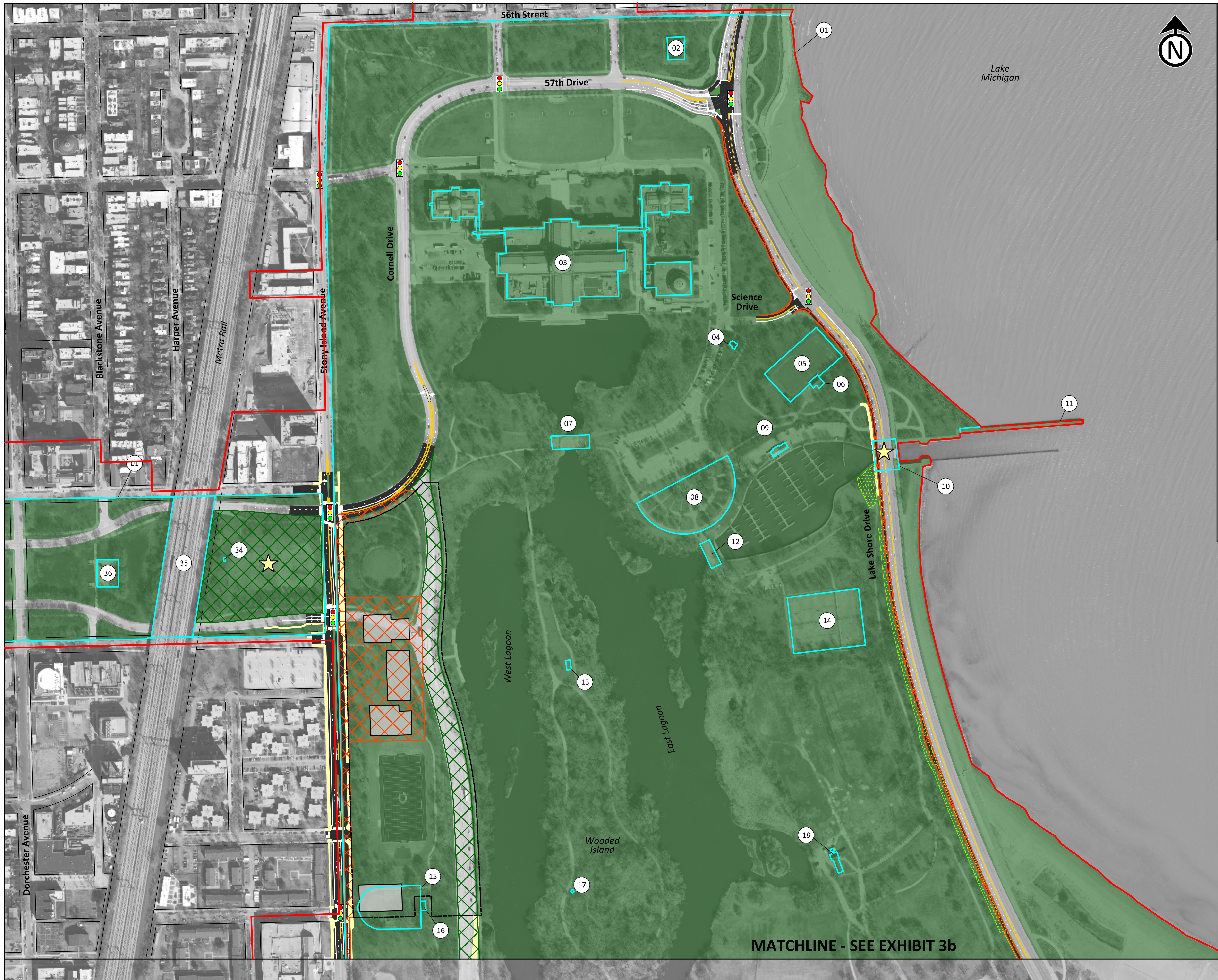
- | | | | |
|--|---|--|---|
| | Existing Right-of-Way | | Section 404 Authorization (USACE Undertaking) |
| | Existing Park | | Pr. GLFER Impacts (USACE Undertaking) |
| | OPC Site Structure | | Pr. GLFER Replacement (USACE Undertaking) |
| | OPC Site Boundary | | APE Sub-area I - Historic Architecture/Landscape |
| | UPARR Conversion (NPS Undertaking) | | APE Sub-area II - Historic Architecture/Landscape |
| | UPARR Replacement (NPS Undertaking) | | NRHP Status** |
| | Pr. Roadway Imp.* (FHWA Undertaking) | | Listed (I) |
| | Pr. Ped/Bike Imp. (FHWA Undertaking) | | Listed (HD) |
| | Pr. Ped/Bike Underpass (FHWA Undertaking) | | Listed (MPL) |
| | Contributing Resource to CPBS HD | | Eligible (I) |
| | | | Eligible (HD) |

NOTES

*Roadway widening also constitutes as a UPARR Conversion.
 **NRHP Status determinations approved by SHPO on July 10, 2018. The Assessment of Effects (AOE) evaluates both listed and eligible properties on the NRHP. Historic districts (HD) are evaluated as one property which considers effects to contributing resources and the district as a whole. Individual (I) properties, including those within historic districts, are evaluated for effects to their historic integrity.

Proposed Undertaking In and Adjacent to Jackson Park

Assessment of Effects Historic Properties



LEGEND	<ul style="list-style-type: none"> Existing Right-of-Way Existing Park OPC Site Structure OPC Site Boundary UPARR Conversion (NPS Undertaking) UPARR Replacement (NPS Undertaking) Pr. Roadway Imp.* (FHWA Undertaking) Pr. Ped/Bike Imp. (FHWA Undertaking) Contributing Resource Pr. Ped/Bike Underpass (FHWA Undertaking) Pr. GLFER Impacts (USACE Undertaking) Pr. GLFER Replacement (USACE Undertaking) Section 404 Authorization (USCAE Undertaking) CPBS Historic District Boundary
NOTES	<p>*Roadway widening also constitutes as a UPARR Conversion.</p> <p>**NRHP Status determinations, including contributing resources of the Jackson Park Historic Landscape District and Midway Plaisance, were approved by SHPO on July 10, 2018. The Assessment of Effects (AOE) evaluates both listed and eligible properties on the NRHP. Historic districts (HD) are evaluated as one property which considers effects to contributing resources and the district as a whole. Individual (I) properties, including those within historic districts, are evaluated for effects to their historic integrity.</p>
CONTRIBUTING RESOURCES	<ul style="list-style-type: none"> 01 Jackson Park and the Midway Plaisance Cultural Landscape (See Exhibit 3 for Referenced Cultural Landscape Features, [1-1 to 1-11]) 02 "New" Iowa Building 03 Museum of Science and Industry 04 Comfort Station 05 Bowling Green 06 Bowling Green Clubhouse 07 Clarence Darrow Bridge 08 Music Court 09 Museum Shores Yacht Clubhouse 10 59th Street Bridge 11 59th Street Pier 12 Music Court Bridge 13 Concrete Footing from Ho-o-den Repairs 14 Tennis Courts 15 Playground - Western Perimeter 16 English Comfort Station 17 Fire Hydrant 18 Combination Shelter Building/Comfort Station 34 <i>Cheney Goode Memorial</i> 35 ICRR Viaduct 36 <i>Thomas Masaryk Monument</i>

MATCHLINE - SEE EXHIBIT 3b

Proposed Undertaking In and Adjacent to Jackson Park

Assessment of Effects

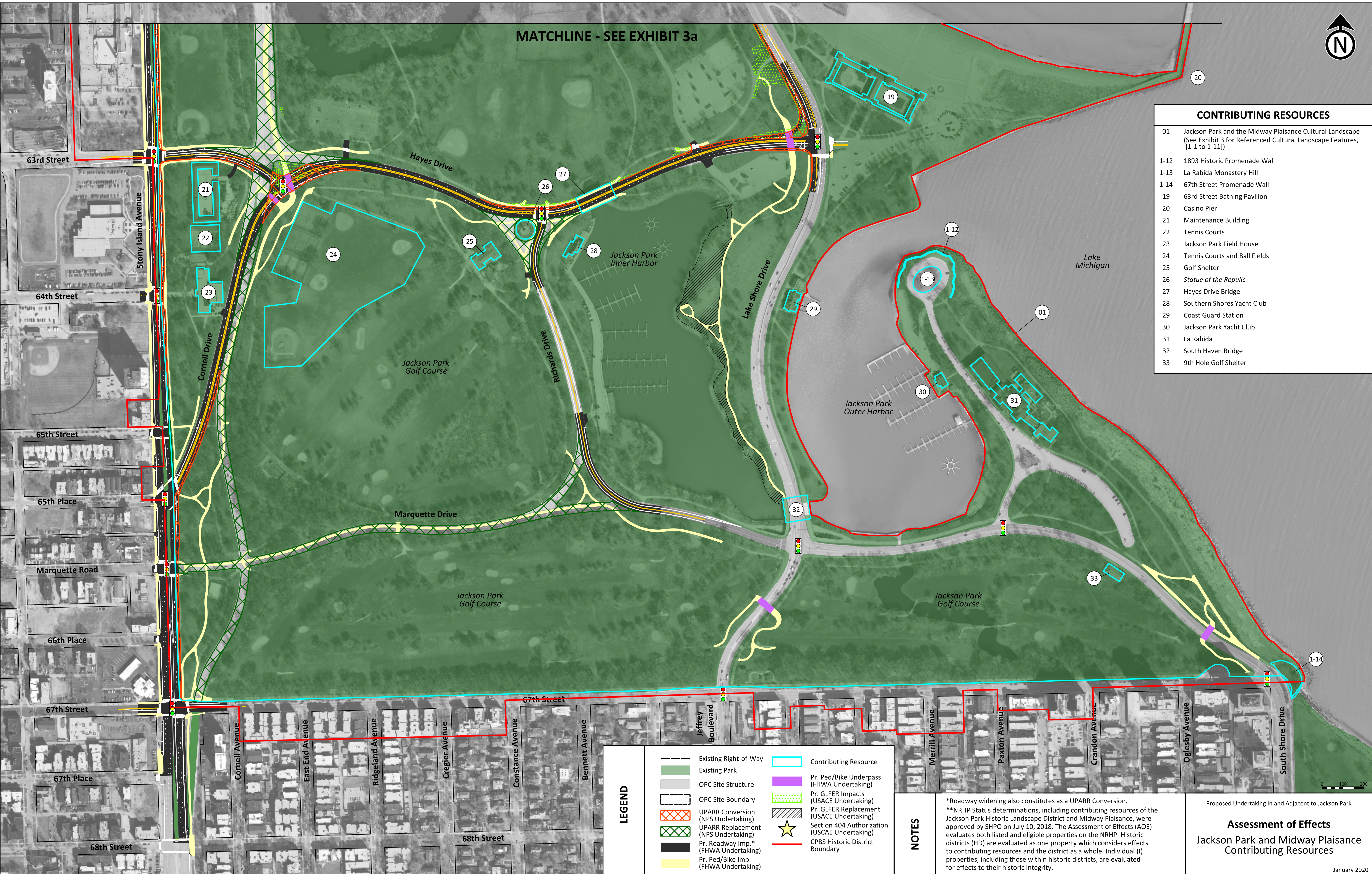
Jackson Park and Midway Plaisance Contributing Resources

January 2020

MATCHLINE - SEE EXHIBIT 3a



CONTRIBUTING RESOURCES	
01	Jackson Park and the Midway Plaisance Cultural Landscape (See Exhibit 3 for Referenced Cultural Landscape Features, [1-1 to 1-11])
1-12	1893 Historic Promenade Wall
1-13	La Rabida Monastery Hill
1-14	67th Street Promenade Wall
19	63rd Street Bathing Pavilion
20	Casino Pier
21	Maintenance Building
22	Tennis Courts
23	Jackson Park Field House
24	Tennis Courts and Ball Fields
25	Golf Shelter
26	Statue of the Republic
27	Hayes Drive Bridge
28	Southern Shores Yacht Club
29	Coast Guard Station
30	Jackson Park Yacht Club
31	La Rabida
32	South Haven Bridge
33	9th Hole Golf Shelter



LEGEND			
	Existing Right-of-Way		Contributing Resource
	Existing Park		Pr. Ped/Bike Underpass (FHWA Undertaking)
	OPC Site Structure		Pr. GLFER Impacts (USACE Undertaking)
	OPC Site Boundary		Pr. GLFER Replacement (USACE Undertaking)
	UPARR Conversion (NPS Undertaking)		Section 404 Authorization (USCAE Undertaking)
	UPARR Replacement (NPS Undertaking)		CPBS Historic District Boundary
	Pr. Roadway Imp.* (FHWA Undertaking)		
	Pr. Ped/Bike Imp. (FHWA Undertaking)		

NOTES

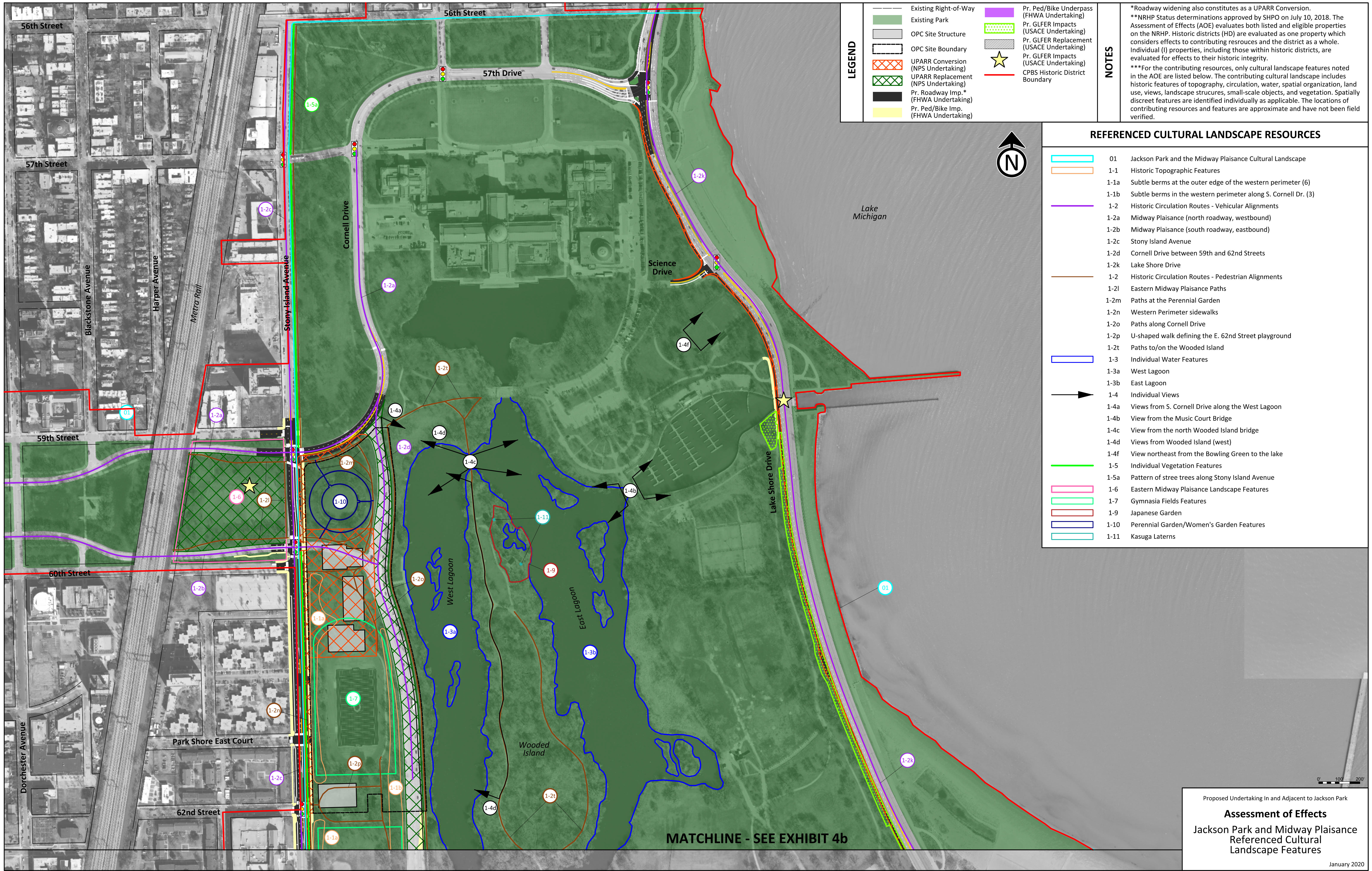
*Roadway widening also constitutes as a UPARR Conversion.

**NRHP Status determinations, including contributing resources of the Jackson Park Historic Landscape District and Midway Plaisance, were approved by SHPO on July 10, 2018. The Assessment of Effects (AOE) evaluates both listed and eligible properties on the NRHP. Historic districts (HD) are evaluated as one property which considers effects to contributing resources and the district as a whole. Individual (I) properties, including those within historic districts, are evaluated for effects to their historic integrity.

Proposed Undertaking In and Adjacent to Jackson Park

Assessment of Effects
Jackson Park and Midway Plaisance
Contributing Resources

January 2020



LEGEND

	Existing Right-of-Way		Pr. Ped/Bike Underpass (FHWA Undertaking)
	Existing Park		Pr. GLFER Impacts (USACE Undertaking)
	OPC Site Structure		Pr. GLFER Replacement (USACE Undertaking)
	OPC Site Boundary		Pr. GLFER Impacts (USACE Undertaking)
	UPARR Conversion (NPS Undertaking)		Pr. Ped/Bike Imp. (FHWA Undertaking)
	UPARR Replacement (NPS Undertaking)		CPBS Historic District Boundary
	Pr. Roadway Imp.* (FHWA Undertaking)		
	Pr. Ped/Bike Imp. (FHWA Undertaking)		

NOTES

*Roadway widening also constitutes as a UPARR Conversion.

**NRHP Status determinations approved by SHPO on July 10, 2018. The Assessment of Effects (AOE) evaluates both listed and eligible properties on the NRHP. Historic districts (HD) are evaluated as one property which considers effects to contributing resources and the district as a whole. Individual (I) properties, including those within historic districts, are evaluated for effects to their historic integrity.

***For the contributing resources, only cultural landscape features noted in the AOE are listed below. The contributing cultural landscape includes historic features of topography, circulation, water, spatial organization, land use, views, landscape structures, small-scale objects, and vegetation. Spatially discreet features are identified individually as applicable. The locations of contributing resources and features are approximate and have not been field verified.

REFERENCED CULTURAL LANDSCAPE RESOURCES

	01	Jackson Park and the Midway Plaisance Cultural Landscape
	1-1	Historic Topographic Features
	1-1a	Subtle berms at the outer edge of the western perimeter (6)
	1-1b	Subtle berms in the western perimeter along S. Cornell Dr. (3)
	1-2	Historic Circulation Routes - Vehicular Alignments
	1-2a	Midway Plaisance (north roadway, westbound)
	1-2b	Midway Plaisance (south roadway, eastbound)
	1-2c	Stony Island Avenue
	1-2d	Cornell Drive between 59th and 62nd Streets
	1-2k	Lake Shore Drive
	1-2	Historic Circulation Routes - Pedestrian Alignments
	1-2l	Eastern Midway Plaisance Paths
	1-2m	Paths at the Perennial Garden
	1-2n	Western Perimeter sidewalks
	1-2o	Paths along Cornell Drive
	1-2p	U-shaped walk defining the E. 62nd Street playground
	1-2t	Paths to/on the Wooded Island
	1-3	Individual Water Features
	1-3a	West Lagoon
	1-3b	East Lagoon
	1-4	Individual Views
	1-4a	Views from S. Cornell Drive along the West Lagoon
	1-4b	View from the Music Court Bridge
	1-4c	View from the north Wooded Island bridge
	1-4d	Views from Wooded Island (west)
	1-4f	View northeast from the Bowling Green to the lake
	1-5	Individual Vegetation Features
	1-5a	Pattern of stree trees along Stony Island Avenue
	1-6	Eastern Midway Plaisance Landscape Features
	1-7	Gymnasia Fields Features
	1-9	Japanese Garden
	1-10	Perennial Garden/Women's Garden Features
	1-11	Kasuga Laterns

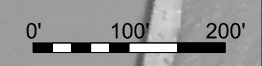
MATCHLINE - SEE EXHIBIT 4b

Proposed Undertaking In and Adjacent to Jackson Park

Assessment of Effects

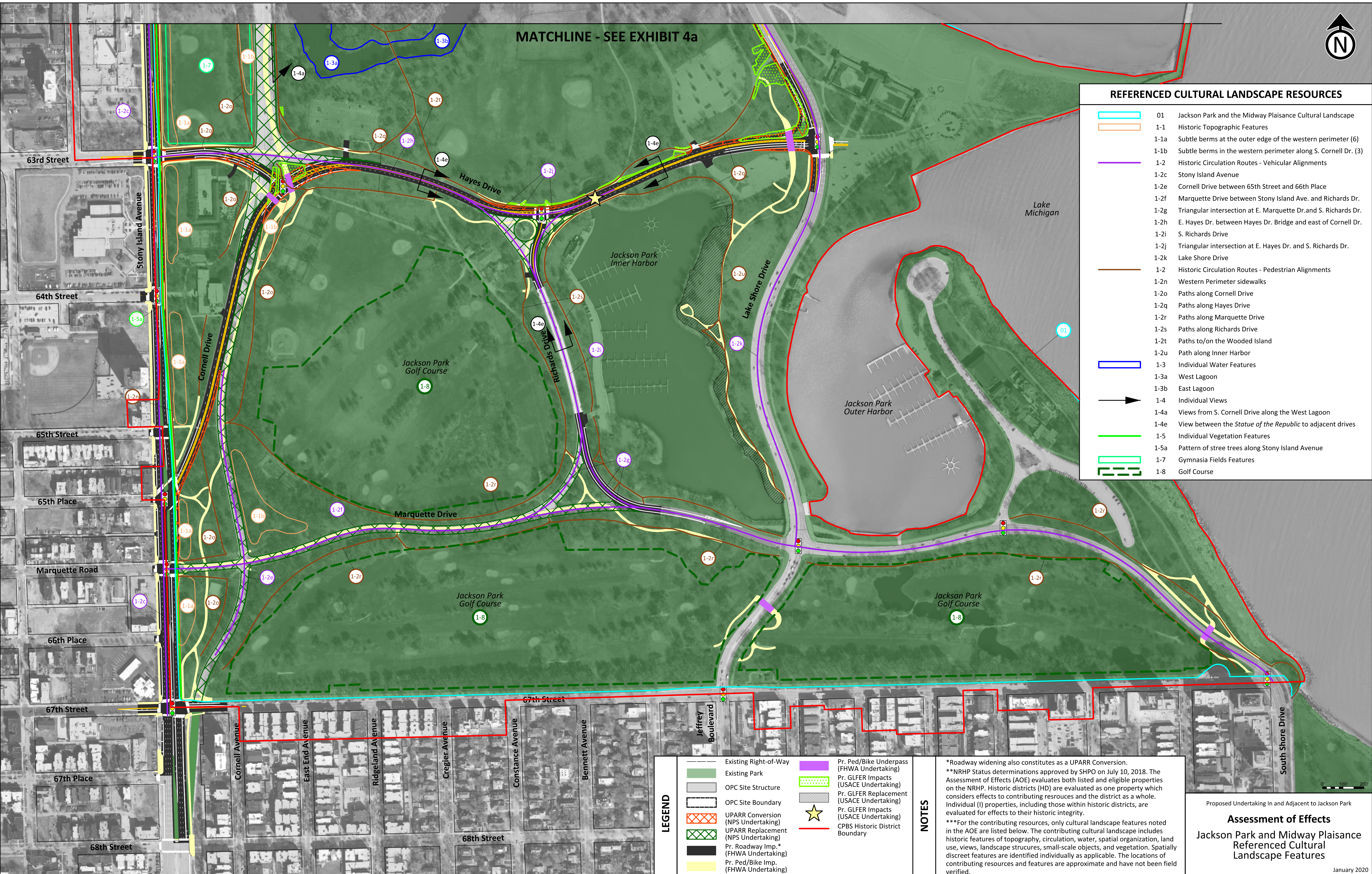
Jackson Park and Midway Plaisance Referenced Cultural Landscape Features

January 2020





MATCHLINE - SEE EXHIBIT 4a



REFERENCED CULTURAL LANDSCAPE RESOURCES

- ▬ 01 Jackson Park and the Midway Plaisance Cultural Landscape
- ▬ 1-1 Historic Topographic Features
- 1-1a Subtle berms at the outer edge of the western perimeter (6)
- 1-1b Subtle berms in the western perimeter along S. Cornell Dr. (3)
- ▬ 1-2 Historic Circulation Routes - Vehicular Alignments
- 1-2c Stony Island Avenue
- 1-2e Cornell Drive between 65th Street and 66th Place
- 1-2f Marquette Drive between Stony Island Ave. and Richards Dr.
- 1-2g Triangular intersection at E. Marquette Dr. and S. Richards Dr.
- 1-2h E. Hayes Dr. between Hayes Dr. Bridge and east of Cornell Dr.
- 1-2i S. Richards Drive
- 1-2j Triangular intersection at E. Hayes Dr. and S. Richards Dr.
- 1-2k Lake Shore Drive
- ▬ 1-2 Historic Circulation Routes - Pedestrian Alignments
- 1-2n Western Perimeter sidewalks
- 1-2o Paths along Cornell Drive
- 1-2q Paths along Hayes Drive
- 1-2r Paths along Marquette Drive
- 1-2s Paths along Richards Drive
- 1-2t Paths to/on the Wooded Island
- 1-2u Path along Inner Harbor
- ▬ 1-3 Individual Water Features
- 1-3a West Lagoon
- 1-3b East Lagoon
- ▬ 1-4 Individual Views
- 1-4a Views from S. Cornell Drive along the West Lagoon
- 1-4e View between the *Statue of the Republic* to adjacent drives
- ▬ 1-5 Individual Vegetation Features
- 1-5a Pattern of stree trees along Stony Island Avenue
- ▬ 1-7 Gymnasia Fields Features
- ▬ 1-8 Golf Course

LEGEND

 Existing Right-of-Way	 Pr. Ped/Bike Underpass (FHWA Undertaking)
 Existing Park	 Pr. GLFER Impacts (USACE Undertaking)
 OPC Site Structure	 Pr. GLFER Replacement (USACE Undertaking)
 OPC Site Boundary	 Pr. GLFER Impacts (USACE Undertaking)
 UPARR Conversion (NPS Undertaking)	 CPBS Historic District Boundary
 UPARR Replacement (NPS Undertaking)	
 Pr. Roadway Imp.* (FHWA Undertaking)	
 Pr. Ped/Bike Imp. (FHWA Undertaking)	

NOTES

*Roadway widening also constitutes as a UPARR Conversion.

**NRHP Status determinations approved by SHPO on July 10, 2018. The Assessment of Effects (AOE) evaluates both listed and eligible properties on the NRHP. Historic districts (HD) are evaluated as one property which considers effects to contributing resources and the district as a whole. Individual (I) properties, including those within historic districts, are evaluated for effects to their historic integrity.

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Proposed Undertaking In and Adjacent to Jackson Park

Assessment of Effects

Jackson Park and Midway Plaisance Referenced Cultural Landscape Features

January 2020

LEGEND	Existing Right-of-Way	☆ Section 404 Authorization (USACE Undertaking)
	Existing Park	Pr. GLFER Impacts (USACE Undertaking)
OPC Site Structure	Pr. GLFER Replacement (USACE Undertaking)	
OPC Site Boundary	APE Sub-area I - Historic Architecture/Landscape	
UPARR Conversion (NPS Undertaking)	APE Sub-area II - Historic Architecture/Landscape	
UPARR Replacement (NPS Undertaking)	NRHP Status**	
Pr. Roadway Imp.* (FHWA Undertaking)	Individually Listed NRHP	
Pr. Ped/Bike Imp. (FHWA Undertaking)	Listed as Contributing Resource NRHP District	
Pr. Ped/Bike Underpass (FHWA Undertaking)	Deemed Non-contributing Resource NRHP District	
	Deemed Contributing to a Proposed NRHP District by the 2018 HPI Report	

NOTES

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**NRHP Status determinations approved by SHPO on July 10, 2018. The Assessment of Effects (AOE) evaluates both listed and eligible properties on the NRHP. Historic districts (HD) are evaluated as one property which considers effects to contributing resources and the district as a whole. Individual (I) properties, including those within historic districts, are evaluated for effects to their historic integrity.

HISTORIC PROPERTIES	
A1	Jackson Park Historic Landscape District and Midway Plaisance
A2	Jackson Towers
A3	1700 E. 56th Street Condo Building
A4	Windermere East
A5	Wooded Isle Apartments
A6	Vista Homes
A7	1516-24 E. 59th St.
A28	Breckenridge Hall/Eleanor Club
A29	International House
A30	Kovler/Sunny Gymnasium*
A31	Frank Lillie House
A32	Wilder House
A33	Emmons Blaine Hall
A34	Ida Noyes Hall
A35	Belfield Hall
A36	Booth School of Business
A37	Chapin Hall
A38	St. Paul's Universalist Church/Shankman Orthogenics

— Chicago Park Boulevard System Historic District

*Determined NRHP not eligible in July 2018, are now considered Contributing properties/resources to the NRHP - Listed CPBS Historic District



MATCHLINE - SEE EXHIBIT 2b

Proposed Undertaking In and Adjacent to Jackson Park

HPI Addendum

Properties Contributing to the CPBS Historic District

January 2020



MATCHLINE - SEE EXHIBIT 2a

HISTORIC PROPERTIES

- A1 Jackson Park Historic Landscape District and Midway Plaisance
- A8 Hyde Park High School
- A9 6450-6460 S. Stony Island Avenue*
- A10 6516-6520 S. Stony Island Avenue*
- A11 1627-1641 E. 67th Street*
- A12 1643-1657 E. 67th Street*
- A13 1701-1705 E. 67th Street/6701-6709 S. East End Avenue*
- A14 1707-21 E. 67th Street*
- A15 6704-6712 S. Ridgeland Avenue/1725-1729 E. 67th Street*
- A16 1733-1745 E. 67th Street*
- A17 1747-1759 E. 67th Street*
- A18 Tower Court Apartments
- A19 2015-2017 E. 67th Street/6700-6712 S. Chappel Avenue*
- A20 6701 S. Chappel Avenue
- A21 2049-2051 E. 67th Street/6700-6702 S. Clyde Avenue*
- A22 2101-2111 E. 67th Street/6701-6717 S. Clyde Avenue*
- A23 2125-2127 E. 67th Street/6700-6716 S. Merrill Avenue
- A24 2139-2141 E. 67th Street/6701-6711 S. Merrill Avenue
- A25 2201-2211 E. 67th Street
- A26 Shoreline Apartments
- A27 Residences at 6700 S. Crandon Avenue

*Determined NRHP not eligible in July 2018, are now considered Contributing properties/resources to the NRHP - Listed CPBS Historic District

LEGEND			
	Existing Right-of-Way		Section 404 Authorization (USACE Undertaking)
	Existing Park		Pr. GLFER Impacts (USACE Undertaking)
	OPC Site Structure		Pr. GLFER Replacement (USACE Undertaking)
	OPC Site Boundary		APE Sub-area I - Historic Architecture/Landscape
	UPARR Conversion (NPS Undertaking)		APE Sub-area II - Historic Architecture/Landscape
	UPARR Replacement (NPS Undertaking)		NRHP Status**
	Pr. Roadway Imp.* (FHWA Undertaking)		Individually Listed NRHP
	Pr. Ped/Bike Imp. (FHWA Undertaking)		Listed as Contributing Resource NRHP District
	Pr. Ped/Bike Underpass (FHWA Undertaking)		Deemed Non-contributing Resource NRHP District
			Deemed Contributing to a Proposed NRHP District by the 2018 HPI Report

NOTES

*Roadway widening also constitutes as a UPARR Conversion.

**NRHP Status determinations approved by SHPO on July 10, 2018. The Assessment of Effects (AOE) evaluates both listed and eligible properties on the NRHP. Historic districts (HD) are evaluated as one property which considers effects to contributing resources and the district as a whole. Individual (I) properties, including those within historic districts, are evaluated for effects to their historic integrity.

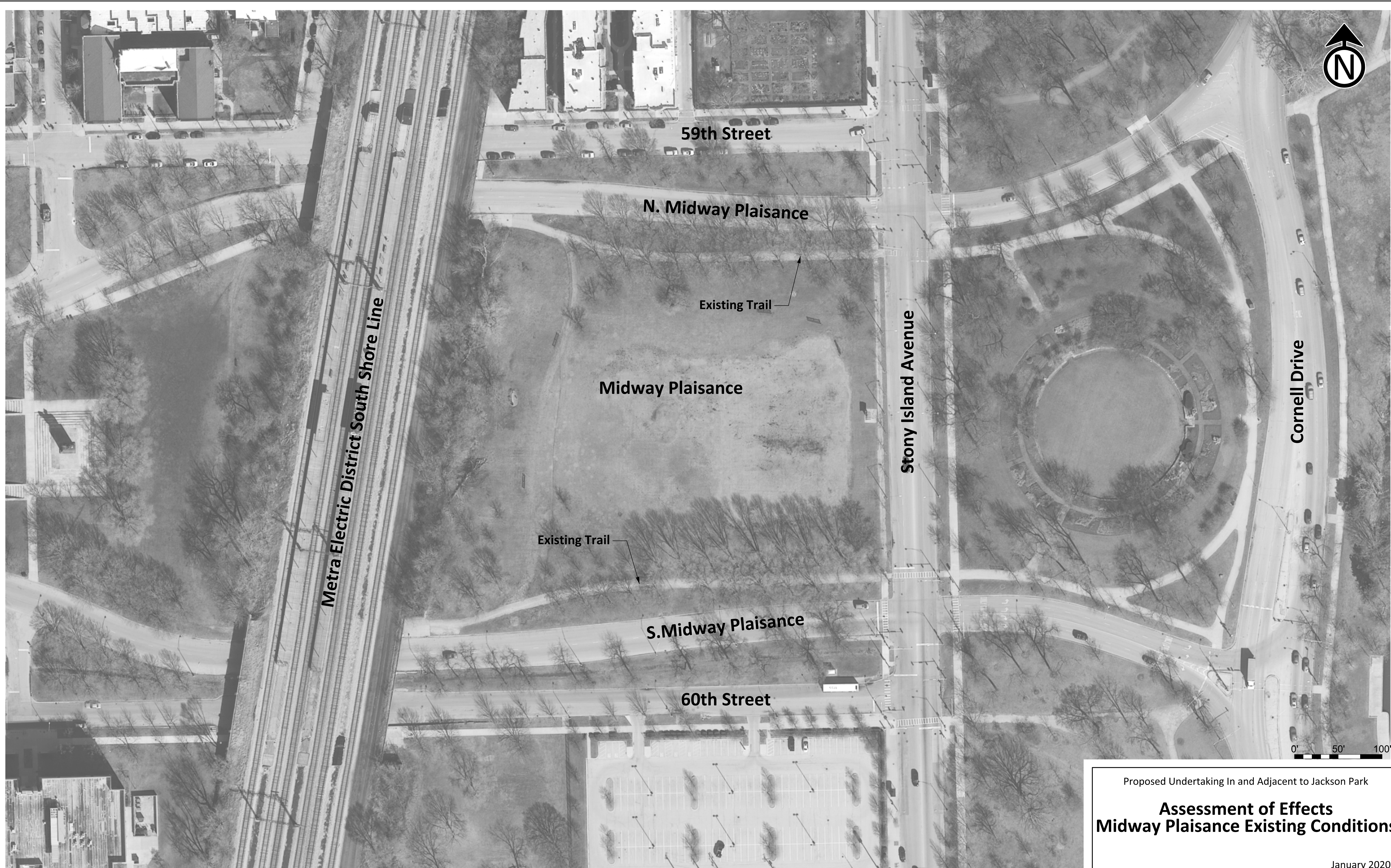
Proposed Undertaking In and Adjacent to Jackson Park

HPI Addendum

Properties Contributing to the CPBS Historic District

January 2020

Exhibit 5b



Proposed Undertaking In and Adjacent to Jackson Park

Assessment of Effects Midway Plaisance Existing Conditions

January 2020

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum



Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A1	-	Jackson Park/Midway Plaisance	Park/ Recreation	-	I and II	Listed JP Midway Historic Landscape District NRHP/ Contributing Resource CPBS NRHP HD	
A2	5555 S. Everett	Jackson Towers	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century Revivals/Spanish Revival	I	Eligible (Individually) [2018]/Listed as Contributing Resource CPBS NRHP HD/Deemed Contributing to a Proposed NRHP District [2018]	
A3	1700 E. 56th Street	1700 E. 56th Condo Building	Building/ Domestic/ Multiple dwelling	Modern Movement/ Modernistic	I	Deemed Contributing to a Proposed NRHP District [2018]/ Non Contributing Resource CPBS NRHP District	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum




Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A4	1642-60 E. 56th Street	Windermere East	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century Revivals/Neo-Classical Revival	I	Listed Individually/Contributing Resource CPBS NRHP HD/Deemed Contributing to a Proposed NRHP District [2018]	
A5	5736-42 S. Stony Island Avenue	Wooded Isle Apartments	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century Revivals/Neo-Classical Revival	I	Listed as Contributing Resource Hyde Park Kenwood NRHP District/Contributing Resource CPBS NRHP HD	
A6	5830-44 S. Stony Island Avenue	Vista Homes Apartments	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century Revivals/Neo-Classical Revival	I	Listed as Contributing Resource Hyde Park Kenwood NRHP District/Contributing Resource CPBS NRHP HD	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum


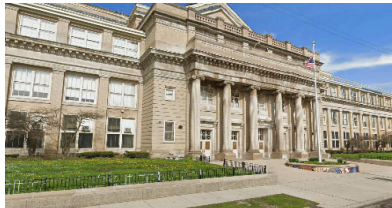

Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A7	1516-24 E. 59th St.	-	Building/ Domestic/ Multiple dwelling	Tudor Revival	I	Listed as Contributing Resource Hyde Park Kenwood NRHP District/Contributing Resource CPBS NRHP HD	
A8	6220 S. Stony Island Avenue	Hyde Park High School	Building/ Education/ Secondary School	Late 19th & Early 20th Century Revivals/ Beaux Arts	I	Listed as Contributing Resource CPBS NRHP HD/Deemed Individually Eligible NRHP [2018]	
A9	6450-60 S. Stony Island Avenue*	-	Building/ Domestic/ Multiple dwelling; Commerce/ Trade/ Specialty stores	Late 19th & Early 20th Century Revivals/ Classical Revival	II	Listed as Contributing Resource CPBS NRHP HD	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum




Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A10	6516-20 S. Stony Island Avenue*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements	I	Listed as Contributing Resource CPBS NRHP HD	
A11	1627-41 E. 67th Street*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements	I	Listed as Contributing Resource CPBS NRHP HD	
A12	1643-57 E. 67th St.*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements	I	Listed as Contributing Resource CPBS NRHP HD	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum




Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A13	1701-05 E. 67th St./6701-09 S. East End Ave.*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements		Listed as Contributing Resource CPBS NRHP HD	
A14	1707-21 E. 67th St.*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements		Listed as Contributing Resource CPBS NRHP HD	
A15	6704-12 S. Ridgeland Ave./1725-29 E. 67th St.*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements		Listed as Contributing Resource CPBS NRHP HD	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum




Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A16	1733-45 E. 67th St.*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements	I	Listed as Contributing Resource CPBS NRHP HD	
A17	1747-59 E. 67th St.*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century Revivals	I	Listed as Contributing Resource CPBS NRHP HD	
A18	1801-1811 E. 67th St.	Tower Court Apartments	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century Revivals/ Tudor Revival	I	Listed as Contributing Resource CPBS NRHP HD/Deemed Contributing to a Proposed NRHP District [2018]	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum




Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A19	2015-17 E. 67th St./6700-12 S. Chappel Ave.*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements	I	Listed as Contributing Resource CPBS NRHP HD	
A20	6701 S. Chappel Ave.	-	Building/ Domestic/ Single dwelling	Modern Movement/ Modernistic	I	Deemed Non Contributing Resource CPBS NRHP HD	
A21	2049-51 E. 67th St./6700-02 S. Clyde Ave.*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements	I	Listed as Contributing Resource CPBS NRHP HD	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum




Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A22	2101-11 E. 67th St./6701-17 S. Clyde Ave.*	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements	I	Listed as Contributing Resource CPBS NRHP HD	
A23	2125-27 E. 67th St./6700-16 S. Merrill Ave.	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century Revivals	I	Listed as Contributing Resource CPBS NRHP HD/Deemed Contributing to a Proposed NRHP District [2018]	
A24	2139-41 E. 67th/6701-11 S. Merrill Ave.	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century American Movements/ Craftsman	I	Listed as Contributing Resource CPBS NRHP HD/Deemed Contributing to a Proposed NRHP District [2018]	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum




Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A25	2201-11 E. 67th St.	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century Revivals	I	Eligible (Individually) [2018]/Listed as Contributing Resource CPBS NRHP HD/Deemed Contributing to a Proposed NRHP District [2018]	
A26	2231 E. 67th St.	Shoreline Apartments	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century Revivals/Late Gothic Revival	I	Listed Individually/Contributing Resource CPBS NRHP HD/Deemed Contributing to a Proposed NRHP District [2018]	
A27	6700 S. Crandon	-	Building/ Domestic/ Multiple dwelling	Late 19th & Early 20th Century Revivals/ Renaissance Revival	I	Eligible (Individually) [2018]/Listed as Contributing Resource CPBS NRHP HD/Deemed Contributing to a Proposed NRHP District [2018]	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum




Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A28	1442-1450 E. 59th St.	Breckenridge Hall/Eleanor Club	Education/ College Dormitory	Late 19 th & Early 20 th Century Revivals/ Colonial Revival	II	Listed as Contributing Resource Hyde Park Kenwood NRHP District/Contributing Resource CPBS NRHP HD	
A29	1350-1414 E. 59th St.	International House	Education/ College Dormitory	Late 19 th & Early 20 th Century Revivals/ Collegiate Gothic	II	Listed as Contributing Resource Hyde Park Kenwood NRHP District/Contributing Resource CPBS NRHP HD	
A30	5823 S. Kenwood Ave.*	Kovler/Sunny Gymnasium	Recreation and Culture/ Gymnasium	Contemporary interpretation of Collegiate Gothic	II	Contributing Resource CPBS NRHP HD	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum




Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A31	5801 S. Kenwood Ave.	Frank Lillie House	Domestic/ Single Dwelling/ Residence	Late 19th & Early 20th Century Revivals/ Colonial Revival	II	Listed Individually NRHP/ Listed as Contributing Resource Hyde Park Kenwood NRHP HD/ Listed as NHL	
A32	5811 S. Kenwood Ave.	Wilder House	Domestic/ Single Dwelling/ Residence	Late 19th & Early 20th Century Revivals/ Colonial Revival	II	Listed as Contributing Resource Hyde Park Kenwood NRHP District/Contributing Resource CPBS NRHP HD	
A33	1362 E. 59th St.	Emmons Blaine Hall	Education/ school	Late 19 th & Early 20 th Century Revivals/ Collegiate Gothic	II	Listed as Contributing Resource Hyde Park Kenwood NRHP District/Contributing Resource CPBS NRHP HD	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum




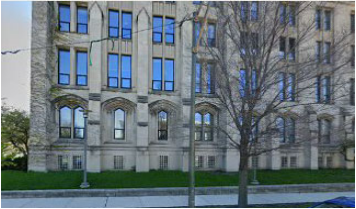

Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A34	1212 E. 59th St.	Ida Noyes Hall	Education/ College/ University	Late 19 th & Early 20 th Century Revivals/ Collegiate Gothic	II	Listed as Contributing Resource Hyde Park Kenwood NRHP District/Contributing Resource CPBS NRHP HD	
A35	5815 S. Kimbark	Belfield Hall	Education/ school	Late 19 th & Early 20 th Century Revivals/ Collegiate Gothic	II	Listed as Contributing Resource Hyde Park Kenwood NRHP District/Contributing Resource CPBS NRHP HD	
A36	5807 S. Woodlawn	Booth School of Business	Education/University	Contemporary	II	Deemed Non Contributing Resource CPBS NRHP HD	

Table 1
Survey Data Summary Table - HPI Addendum

Section 106 - Historic Properties Identification
Federal Undertakings In and Adjacent to Jackson Park

Survey Data Summary Table - HPI Addendum

Survey ID	Address	Name	Property Type	Style/Form	APE	NRHP Status	Photograph
A37	1313-15 E. 60th St.	Chapin Hall	Education/School	Late 19th & Early 20th Century Revivals/Collegiate Gothic	II	Listed as Contributing Resource CPBS NRHP HD	
A38	1365-75 E. 60th St.	St. Paul's Universalist Church/Shankman Orthogenics School	Church	Late 19th & Early 20th Century Revivals/Georgian Revival	II	Listed as Contributing Resource CPBS NRHP HD	

*Determined NRHP not eligible in July 2018, now deemed Contributing to CPBS Historic District

Appendix B – Figures



Design Development Site Plan
Obama Presidential Center

PROPOSED EXCISION FROM SECTION 1010 MAP ASSOCIATED WITH TRAFFIC IMPROVEMENT MEASURES



LEGEND

Proposed Excision from Section 1010 Map

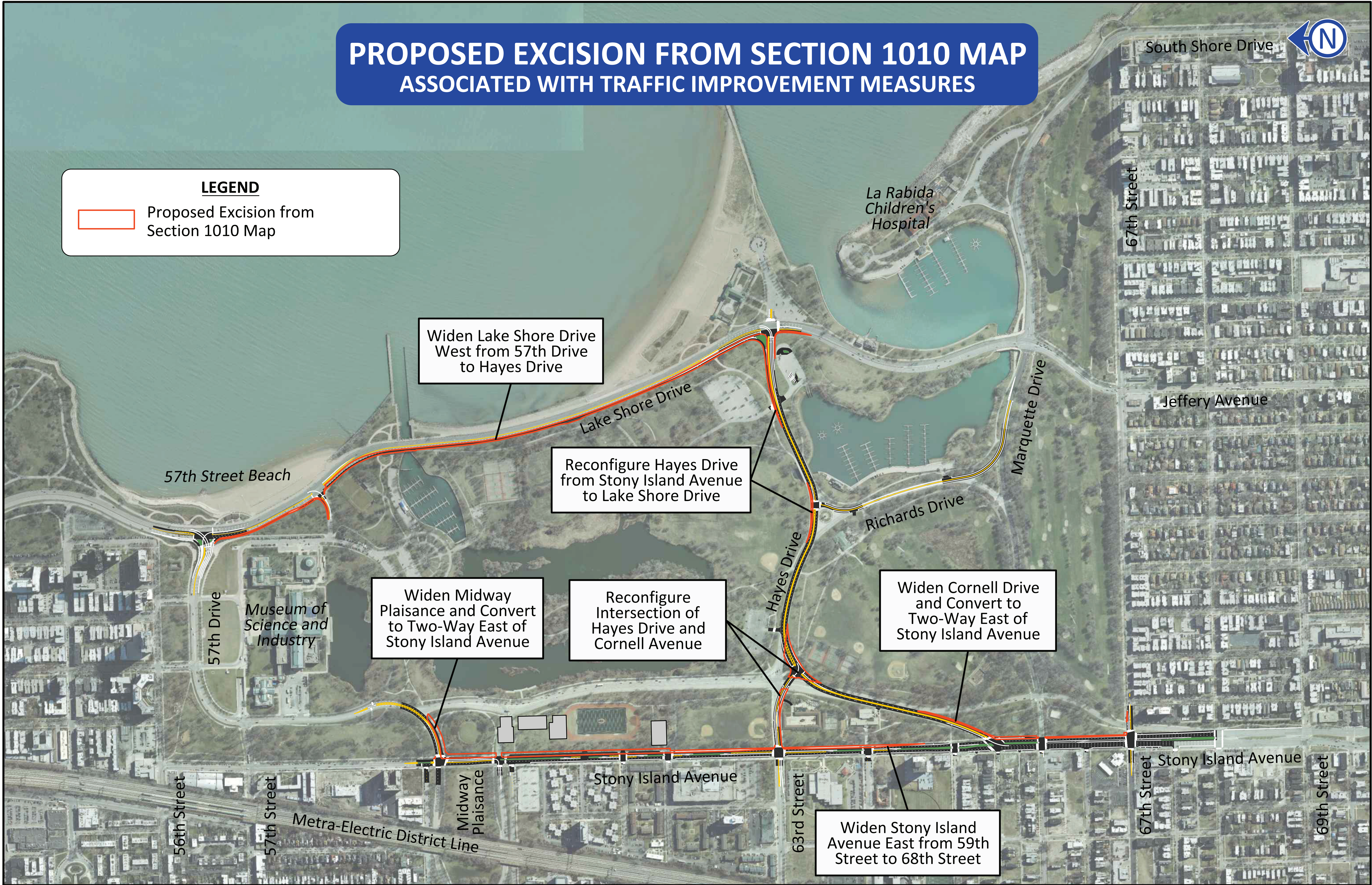


Figure 1b

ROADWAYS PLANNED FOR CLOSURE WITHIN JACKSON PARK

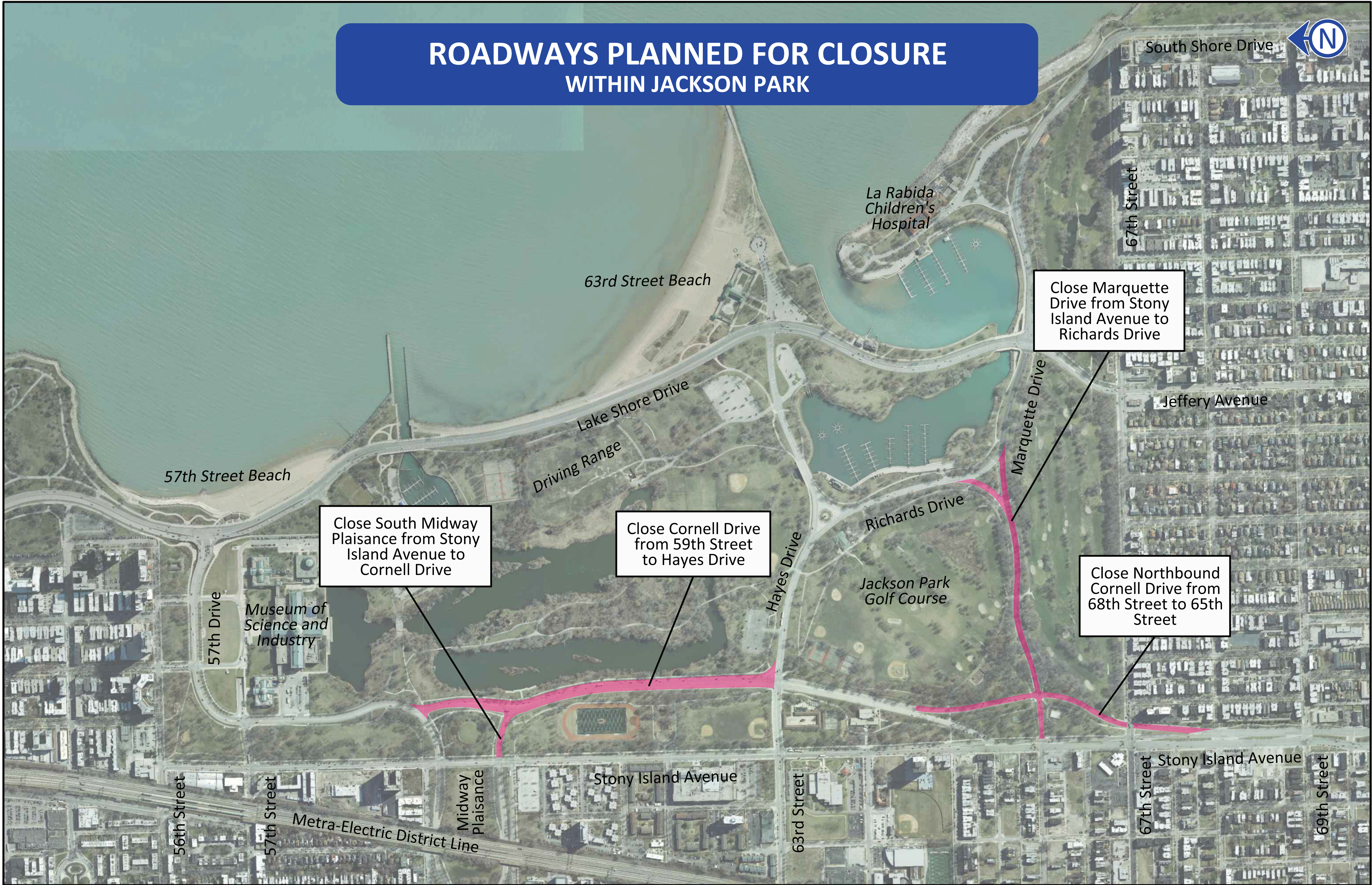


Figure 2



PLAY AREA



OPEN SPACE



OPEN SPACE



OPEN SPACE



PLAY AREA



PLAY AREA



NATURE PLAY





- Parks
- School Grounds
- ★ Sites for Consideration
- Community Areas



Figure 4

Appendix C – Photos

List of Photos

Existing Conditions Photos – Historic Properties

Photo 1: View from southwest corner of Jackson Park looking northeast (May 2018)

Photo 2: View from north of Jackson Park looking south (May 2018)

Photo 3: View from northwest corner of Jackson Park looking southeast toward OPC site, NPS conversion area

Photo 4: View from west of Lake Shore Drive, north of Science Drive, looking north

Photo 5: View from west of Lake Shore Drive, north of 63rd Street underpass, looking north

Photo 6: View of Hayes Drive at Cornell Drive, looking east

Photo 7: View from northbound Stony Island Avenue, north of 67th Street, looking north

Photo 8: View from northbound Stony Island Avenue, north of 63rd Street, looking north

Photo 9: View from northbound Stony Island Avenue, south of 60th Street, looking north

Photo 10: View west from S. Stony Island Avenue towards Stony Island Trust & Savings Bank (Stony Island Arts Bank)

Photo 11: View northeast from Stony Island Trust & Savings Bank (Stony Island Arts Bank) towards S. Stony Island Avenue and Jackson Park Western Perimeter

Photo 12: View southwest from Jackson Park Western Perimeter to William Dexter Three-Flat

Photo 13: View east from William Dexter Three-Flat toward Jackson Park Western Perimeter

Photo 14: View southwest from Jackson Park Western Perimeter to Island Terrace Apartment Building

Photo 15: View northeast from Island Terrace Apartment Building toward Jackson Park Western Perimeter

Photo 16: View southwest from Jackson Park Western Perimeter (just south of site of undertaking) to Hyde Park High School

Photo 17: View northeast toward site of undertaking from Hyde Park Academy High School

Photo 18: View west from Jackson Park, just west of running track, towards proposed Jackson Park Terrace Historic District

Photo 19: View northeast from proposed Jackson Park Terrace towards Jackson Park running track/ historic open-air gymnasium area

Photo 20: View northeast from Midway Plaisance towards the southeast part of Hyde Park-Kenwood Historic District (showing 1516-1534 E. 59th Street and Vista Homes Apartments)

Photo 21: View of northeast part of Hyde Park-Kenwood Historic District towards Midway Plaisance and Jackson Park Western Perimeter (Perennial Garden is shown on the left, center.)

Photo 22: View northwest from Midway Plaisance towards the Hyde Park-Kenwood Historic District along S. Harper Avenue (west of ICRR viaduct)

Photo 23: View of Hyde Park-Kenwood Historic District looking south along S. Harper Avenue towards Midway Plaisance with ICRR viaduct on left

Photo 24: View of Hyde Park-Kenwood Historic District looking east along E. 56th Street towards ICRR viaduct (1441-1449 E. 56th is shown on the right, front.)

Existing Conditions Photos – Historic Properties

Jackson Park Historic Landscape District and Midway Plaisance



Photo 1: View from southwest corner of Jackson Park looking northeast (May 2018)



Photo 2: View from north of Jackson Park looking south (May 2018)



Photo 3: View from northwest corner of Jackson Park looking southeast toward OPC site, NPS conversion area



Photo 4: View from west of Lake Shore Drive, north of Science Drive, looking north



Photo 5: View from west of Lake Shore Drive, north of 63rd Street underpass, looking north



Photo 6: View of Hayes Drive at Cornell Drive, looking east



Photo 7: View from northbound Stony Island Avenue, north of 67th Street, looking north



Photo 8: View from northbound Stony Island Avenue, north of 63rd Street, looking north



Photo 9: View from northbound Stony Island Avenue, south of 60th Street, looking north

Stony Island State Trust and Savings Bank (Stony Island Arts Bank)



Photo 10: View west from S. Stony Island Avenue towards Stony Island Trust & Savings Bank (Stony Island Arts Bank)

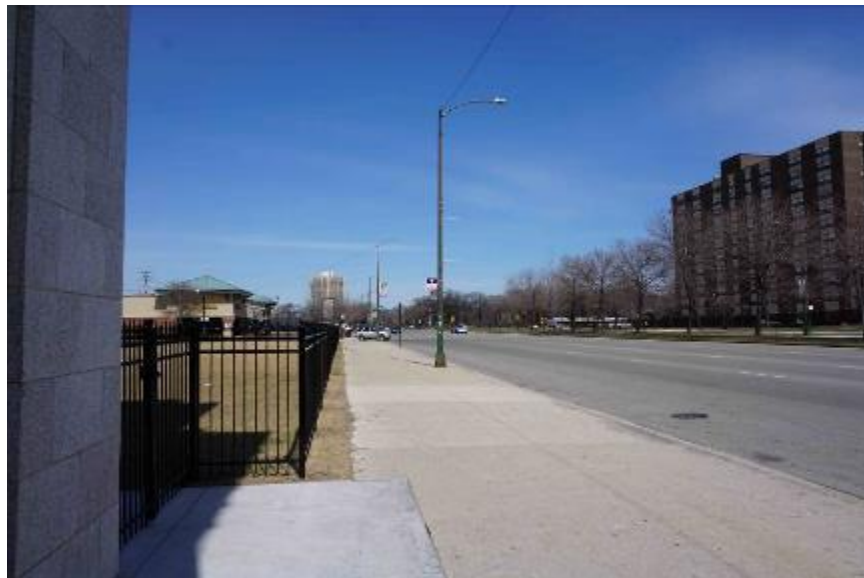


Photo 11: View northeast from Stony Island Trust & Savings Bank (Stony Island Arts Bank) towards S. Stony Island Avenue and Jackson Park Western Perimeter

William Dexter Three-Flat



Photo 12: View southwest from Jackson Park Western Perimeter to William Dexter Three-Flat



Photo 13: View east from William Dexter Three-Flat toward Jackson Park Western Perimeter

Island Terrace Apartment Building



Photo 14: View southwest from Jackson Park Western Perimeter to Island Terrace Apartment Building



Photo 15: View northeast from Island Terrace Apartment Building toward Jackson Park Western Perimeter

Hyde Park Academy High School



Photo 16: View southwest from Jackson Park Western Perimeter (just south of site of undertaking) to Hyde Park High School



Photo 17: View northeast toward site of undertaking from Hyde Park Academy High School

Jackson Park Terrace Historic District



Photo 18: View west from Jackson Park, just west of running track, towards proposed Jackson Park Terrace Historic District



Photo 19: View northeast from proposed Jackson Park Terrace towards Jackson Park running track/ historic open-air gymnasium area

Hyde Park/Kenwood Historic District



Photo 20: View northeast from Midway Plaisance towards the southeast part of Hyde Park-Kenwood Historic District (showing 1516-1534 E. 59th Street and Vista Homes Apartments)



Photo 21: View of northeast part of Hyde Park-Kenwood Historic District towards Midway Plaisance and Jackson Park Western Perimeter (Perennial Garden is shown on the left, center.)



Photo 22: View northwest from Midway Plaisance towards the Hyde Park-Kenwood Historic District along S. Harper Avenue (west of ICRR viaduct)



Photo 23: View of Hyde Park-Kenwood Historic District looking south along S. Harper Avenue towards Midway Plaisance with ICRR viaduct on left



Photo 24: View of Hyde Park-Kenwood Historic District looking east along E. 56th Street towards ICRR viaduct (1441-1449 E. 56th is shown on the right, front.)

Appendix D – Visual Impact Analysis

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- Photo 3: Streetview simulation from the North Lagoon Bridge looking west toward the OPC Museum building
- Photo 4: Streetview simulation from the Wooded Island outlook looking northwest toward the OPC Museum building
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- Photo 13: Streetview simulation from Center for Continuing Education, Chapin Hall, St. Paul's Universalist Church (S. Midway Plaisance/S. Kenwood Avenue) east towards the OPC Museum building
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- Photo 19: Streetview simulation from South Shore Cultural Center Park (northwest corner)/South Shore E. 67th Street Historic District toward the OPC Museum building (Not Visible at street level)
- Photo 20: Streetview simulation from South Shore E. 67th Street Historic District at E. 67th Street/Paxton Avenue toward the OPC Museum building (Not Visible at street level)

- Photo 21: Streetview simulation from South Shore Cultural Center Park (southwest corner) at S. South Shore Drive/71st Street toward the OPC Museum building (Not Visible at street level)
- Photo 22: Streetview simulation from Leonard Graff house/ Paul Schutz House at E. 67th Street/Euclid Avenue toward the OPC Museum building (Not Visible at street level)
- Photo 23: Streetview simulation from Morris N. Fox Three-Flat, Residence at 6701 S. Constance Avenue, and Tower Court Apartments from E. 67th Street/Constance Avenue toward the OPC Museum building (Not Visible at street level)
- Photo 24: Streetview simulation from Helstein House, 5812 S. Blackstone Avenue southeast towards the OPC Museum building
- Photo 25: Streetview simulation from Stein Building southeast towards the OPC Museum building
- Photo 26: Streetview simulation from Johnson House southeast towards the OPC Museum building
- Photo 27: Streetview simulation from University of Chicago Power Station east towards the OPC Museum building (Not Visible from streetview)
- Photo 28: Streetview simulation from 62nd Street Firehouse east towards the OPC Museum building
- Photo 29: Streetview simulation from 6243 S. Woodlawn Avenue Greystone east towards the OPC Museum building (Not Visible from streetview)
- Photo 30: Streetview simulation from Midway Plaisance and Dorchester Avenue, looking east towards the OPC Museum building

Exhibit D-2 - Visual Impact Analysis, Elevated Rendering Viewpoints

- Location 1: Quadrangle House Apartments/Condos
- Location 2: Oglesby Towers
- Location 3: Shoreline Apartments/6700 S. Crandon Ave.
- Location 4: William Dexter Three Flat
- Location 5: Island Terrace Apartments
- Location 6: 1516-34 E. 59th Street
- Location 7: Vista Homes
- Location 8: -
- Location 9: Windermere East Hotel/Apts.
- Location 10: 1700 E. 56th Street
- Location 11: Jackson Towers



LEGEND	
	Existing Right-of-Way
	Existing Park
	OPC Site Structure
	OPC Site Boundary
	UPARR Conversion (NPS Undertaking)
	UPARR Replacement (NPS Undertaking)
	Pr. Roadway Imp.* (FHWA Undertaking)
	Pr. Ped/Bike Imp. (FHWA Undertaking)
	Pr. Ped/Bike Underpass (FHWA Undertaking)
	Pr. GLFER Impacts (USACE Undertaking)
	Pr. GLFER Replacement (USACE Undertaking)
	Section 404 Authorization (USACE Undertaking)
	# APE Sub-area I - Historic Architecture/Landscape
	# APE Sub-area II - Historic Architecture/Landscape
	NRHP Status**
	Listed (I)
	Listed (HD)
	Listed (MPL)
	Eligible (I)
	Eligible (HD)

NOTES

*Roadway widening also constitutes as a UPARR Conversion.

**NRHP Status determinations approved by SHPO on July 10, 2018. The Assessment of Effects (AOE) evaluates both listed and eligible properties on the NRHP. Historic districts (HD) are evaluated as one property which considers effects to contributing resources and the district as a whole. Individual (I) properties, including those within historic districts, are evaluated for effects to their historic integrity.

PHOTO LOCATIONS	
01	Museum of Science and Industry
02	Music Court Bridge
03	North Lagoon Bridge
04	Wooded Island Outlook
05	Statue of the Republic
06	Stony Island State Trust and Savings Bank
07	William Dexter Three-Flat
08	Marquette Road & Stony Island Avenue
09	63rd Street & Stony Island Avenue
10	Hyde Park Academy High School
11	Jackson Park Terrace Historic District
12	59th Street & Stony Island Avenue
13	Center for Continuing Education/Chapin Hall
14	Promontory Point Historic District
15	Bret Harte Elementary School
16	Jackson Towers
17	Promontory Apartments
18	Shoreland Hotel
19	South Shore E. 67th Street Historic District (South Shore Cultural Center Park)
20	South Shore E. 67th Street Historic District (E. 67th/Paxton Avenue)
21	71st Street and South Shore Drive
22	67th Street/ Euclid Avenue (Leonard Graff House/Paul Schutz House)
23	67th Street/Constance Avenue (Morris N. Fox Three-Flat, Residence at 6701 S. Constance Avenue., Tower Court Apts.)
24	Helstein House/Residence at 5812 S. Blackstone Avenue
25	Stein Building
26	Johnson House
27	University of Chicago Power Station
28	E. 62nd Place Firehouse
29	Pridmore & Stanhope-designed Greystone
30	Dorchester Avenue (Midway Plaisance)

Visual Impact Analysis – OPC Museum Building

***Computer modeling and Google Earth Imagery were used to produce this analysis.*

Jackson Park Historic Landscape District and Midway Plaisance

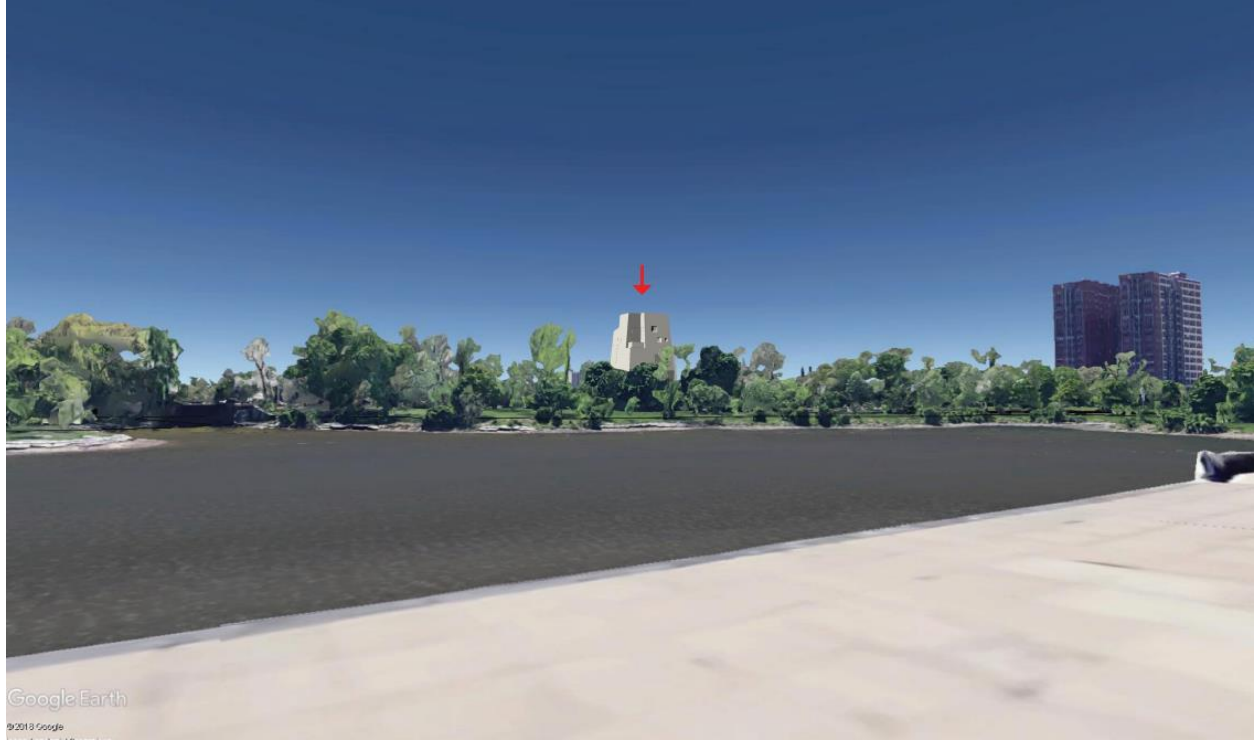


Photo 1: Streetview simulation from south of the Museum of Science and Industry (Columbia Basin) looking southwest toward the OPC Museum building



Photo 2: Streetview simulation from Music Court Bridge looking west toward the OPC Museum building



Photo 3: Streetview simulation from the North Lagoon Bridge looking west toward the OPC Museum building



Photo 4: Streetview simulation from the Wooded Island outlook looking northwest toward the OPC Museum building



Photo 5: Streetview simulation from the Statue of the Republic looking northwest toward the OPC Museum building (Not Visible at street level)

Stony Island State Trust and Savings Bank (Stony Island Arts Bank)



Photo 6: Streetview simulation from Stony Island Trust & Savings Bank (Stony Island Arts Bank) north towards S. Stony Island Avenue and the OPC Museum building

William Dexter Three-Flat



Photo 7: Streetview simulation from William Dexter Three-Flat northeast towards the OPC Museum building (Not Visible at street level)

Island Terrace Apartment Building



Photo 8: Streetview simulation from Marquette Drive/Stony Island Avenue (South of Island Terrace Apartment Building) north towards the OPC Museum building



Photo 9: Streetview simulation from 63rd Street/Stony Island Avenue (North of Island Terrace Apartment Building) north towards the OPC Museum building

Hyde Park Academy High School



Photo 10: Streetview simulation from Hyde Park Academy High School north towards the OPC Museum building

Jackson Park Terrace Historic District



Photo 11: Streetview simulation from Jackson Park Terrace Historic District at E. 62nd Street/Stony Island Avenue toward the OPC Museum building

Hyde Park/Kenwood Historic District



Photo 12: Streetview simulation from Hyde Park/Kenwood Historic District (59th Street/Stony Island Avenue) southeast towards the OPC Museum building

Center for Continuing Education/Public Administration Building/St. Paul's
Universalist Church/Shankman Orthogenics School



Photo 13: Streetview simulation from Center for Continuing Education, Chapin Hall, St. Paul's Universalist Church (S. Midway Plaisance/S. Kenwood Avenue) east towards the OPC Museum building

Promontory Point Historic District



Photo 14: Streetview simulation from Promontory Point Historic District southwest towards the OPC Museum building

Hyde Park East Historic District



Photo 15: Streetview simulation from 56th Street/Stony Island Avenue (Bret Harte Elementary School, Hyde Park East Historic District) southeast towards the OPC Museum building



Photo 16: Streetview simulation from 56th Street/Everett Avenue (Jackson Towers, Hyde Park East Historic District) southwest towards the OPC Museum building (Not visible from street level)



Photo 17: Streetview simulation from Promontory Apartments (Hyde Park East Historic District) and the Flamingo on the Lake southwest towards the OPC Museum building (Not visible from street level)



Photo 18: Streetview simulation from Jackson Shore Apartments, Shoreland Hotel (Hyde Park East Historic District) southwest towards the OPC Museum building (Not visible from street level)

South Shore E. 67th Street Apartment Historic District



Photo 19: Streetview simulation from South Shore Cultural Center Park (northwest corner)/South Shore E. 67th Street Historic District toward the OPC Museum building (Not Visible at street level)



Photo 20: Streetview simulation from South Shore E. 67th Street Historic District at E. 67th Street/Paxton Avenue toward the OPC Museum building (Not Visible at street level)

South Shore Cultural Center Park



Photo 21: Streetview simulation from South Shore Cultural Center Park (southwest corner) at S. South Shore Drive/71st Street toward the OPC Museum building (Not Visible at street level)

Leonard Graff House/ Dr. Paul Schutz House



Photo 22: Streetview simulation from Leonard Graff house/ Paul Schutz House at E. 67th Street/Euclid Avenue toward the OPC Museum building (Not Visible at street level)

Morris N. Fox Three-Flat/ Residences at 6701 S. Constance Avenue/ Tower Court Apartments

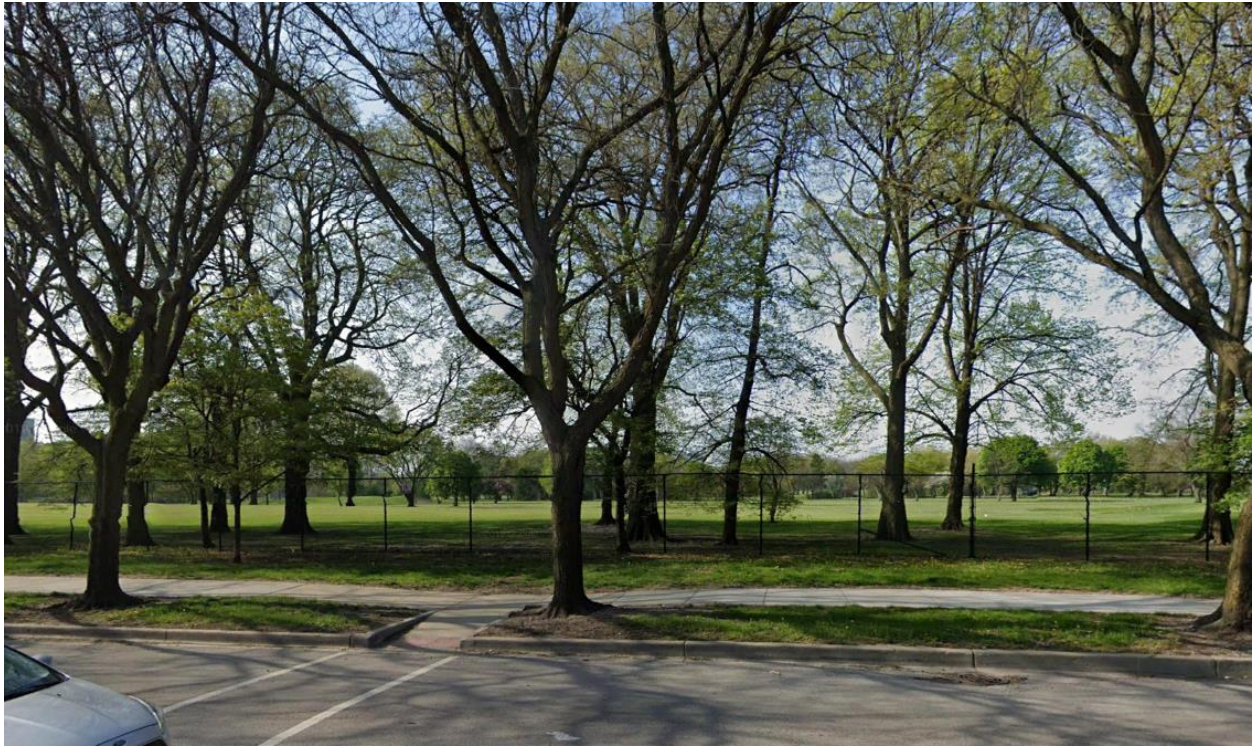


Photo 23: Streetview simulation from Morris N. Fox Three-Flat, Residence at 6701 S. Constance Avenue, and Tower Court Apartments from E. 67th Street/Constance Avenue toward the OPC Museum building (Not Visible at street level)

Helstein House/ Residence at 5812 S. Blackstone Avenue



Photo 24: Streetview simulation from Helstein House, 5812 S. Blackstone Avenue southeast towards the OPC Museum building

Stein Building



Photo 25: Streetview simulation from Stein Building southeast towards the OPC Museum building

Johnson House



Photo 26: Streetview simulation from Johnson House southeast towards the OPC Museum building

University of Chicago Power Station



Photo 27: Streetview simulation from University of Chicago Power Station east towards the OPC Museum building (Not Visible from streetview)

E. 62nd Place Firehouse



Photo 28: Streetview simulation from 62nd Street Firehouse east towards the OPC Museum building

Pridmore & Stanhope-designed Greystone



Photo 29: Streetview simulation from 6243 S. Woodlawn Avenue Greystone east towards the OPC Museum building (Not Visible from streetview)



Photo 30: Streetview simulation from Midway Plaisance and Dorchester Avenue, looking east towards the OPC Museum building



LEGEND		Photolog Number (Appendix D)	
[Green Line]	Existing Right-of-Way	[Yellow Dashed Box]	APE Sub-area I - Historic Architecture/Landscape
[Grey Box]	Existing Park	[Orange Dashed Box]	APE Sub-area II - Historic Architecture/Landscape
[Red Box]	OPC Site Structure		
[Black Box]	OPC Site Boundary		
[Red X]	UPARR Conversion (NPS Undertaking)		
[Green X]	UPARR Replacement (NPS Undertaking)		
[Black Line]	Pr. Roadway Imp.* (FHWA Undertaking)	[Red Box]	NRHP Status** Listed (I)
[Yellow Line]	Pr. Ped/Bike Imp. (FHWA Undertaking)	[White Box]	Listed (HD)
[Purple Line]	Pr. Ped/Bike Underpass (FHWA Undertaking)	[Green Box]	Listed (MPL)
[Green Dotted Box]	Pr. GLFER Impacts (USACE Undertaking)	[Blue Box]	Eligible (I)
[Grey Dotted Box]	Pr. GLFER Replacement (USACE Undertaking)	[White Box]	Eligible (HD)
[Yellow Star]	Section 404 Authorization (USACE Undertaking)		

NOTES

*Roadway widening also constitutes as a UPARR Conversion.

**NRHP Status determinations approved by SHPO on July 10, 2018. The Assessment of Effects (AOE) evaluates both listed and eligible properties on the NRHP. Historic districts (HD) are evaluated as one property which considers effects to contributing resources and the district as a whole. Individual (I) properties, including those within historic districts, are evaluated for effects to their historic integrity.

***The elevated viewshed analysis is conducted for properties where (1) the views of Jackson Park contribute to the historic integrity of the property and (2) the historic property structure has elevated levels above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall). The elevated visual analysis study utilizes a combination of drone photography and computer modeling to depict views from historic properties toward the OPC Museum.

PHOTO LOCATIONS	
01	Quadrangle House Apartments/Condos
02	Oglesby Towers
03	Shoreline Apartments/6700 Crandon Avenue
04	William Dexter Three-Flat
05	Island Terrace Apartments
06	1561-34 E. 59th Street
07	Vista Homes
09	Windermere East Hotel/Apartments
10	1700 E. 56th Street
11	Jackson Towers



Location 1
Approx. 68' AGL
BEFORE



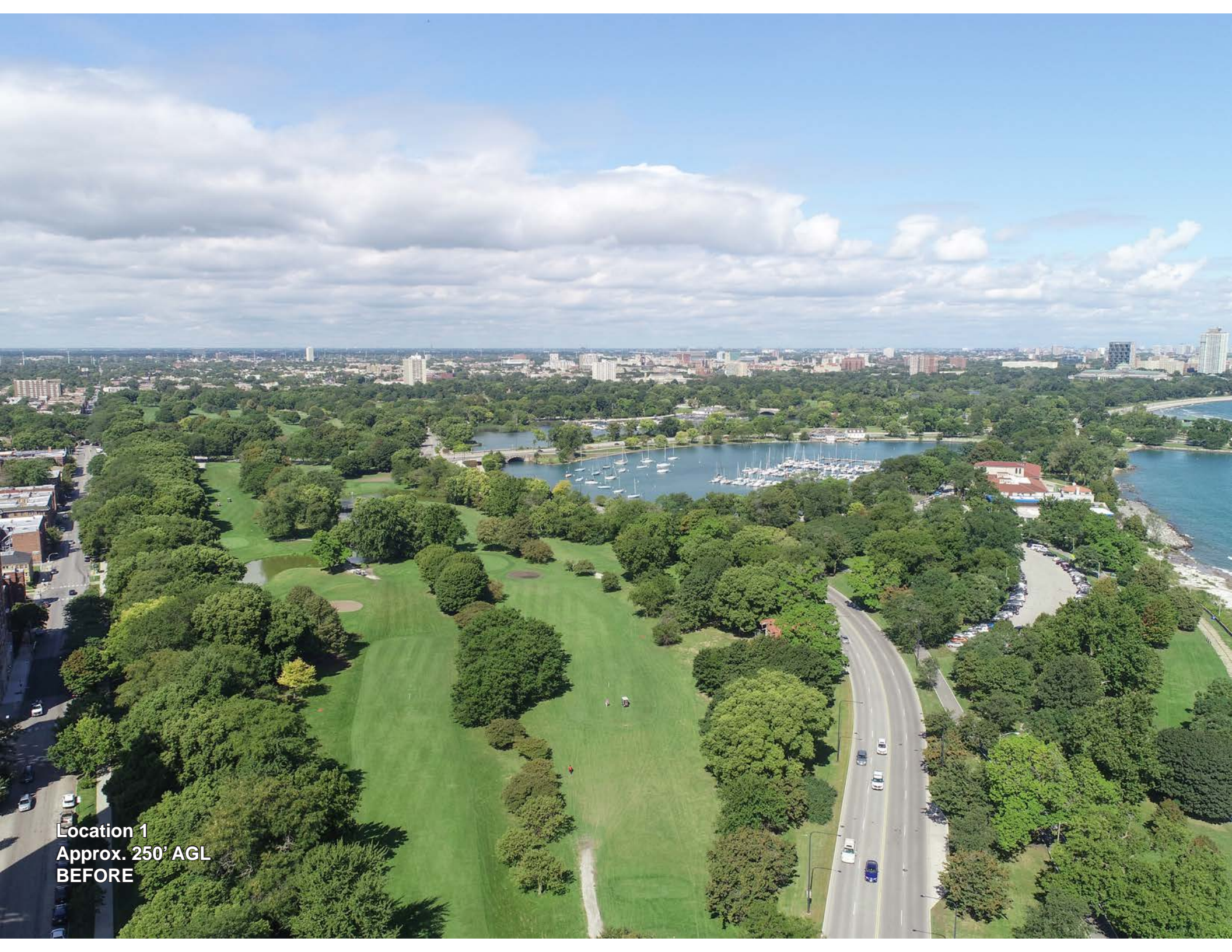
Location 1
Approx. 68' AGL
AFTER



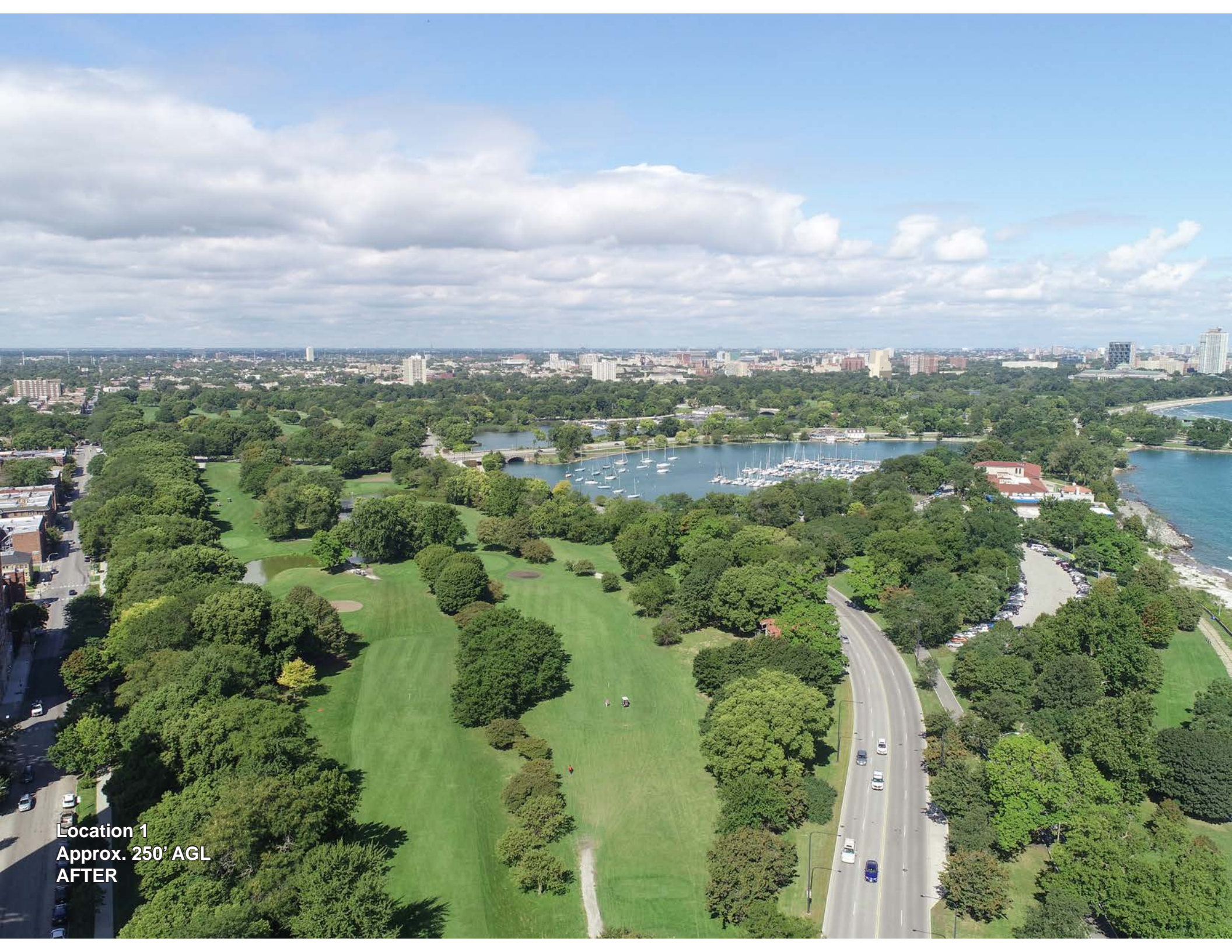
Location 1
Approx. 135' AGL
BEFORE



Location 1
Approx. 135' AGL
AFTER



Location 1
Approx. 250' AGL
BEFORE



Location 1
Approx. 250' AGL
AFTER



Location 2
Approx. 80' AGL
BEFORE



Location 2
Approx. 80' AGL
AFTER



Location 2
Approx. 120' AGL
BEFORE



Location 2
Approx. 120' AGL
AFTER



Location 2
Approx. 235' AGL
BEFORE



Location 2
Approx. 235' AGL
AFTER



Location 3
Approx. 80' AGL
BEFORE



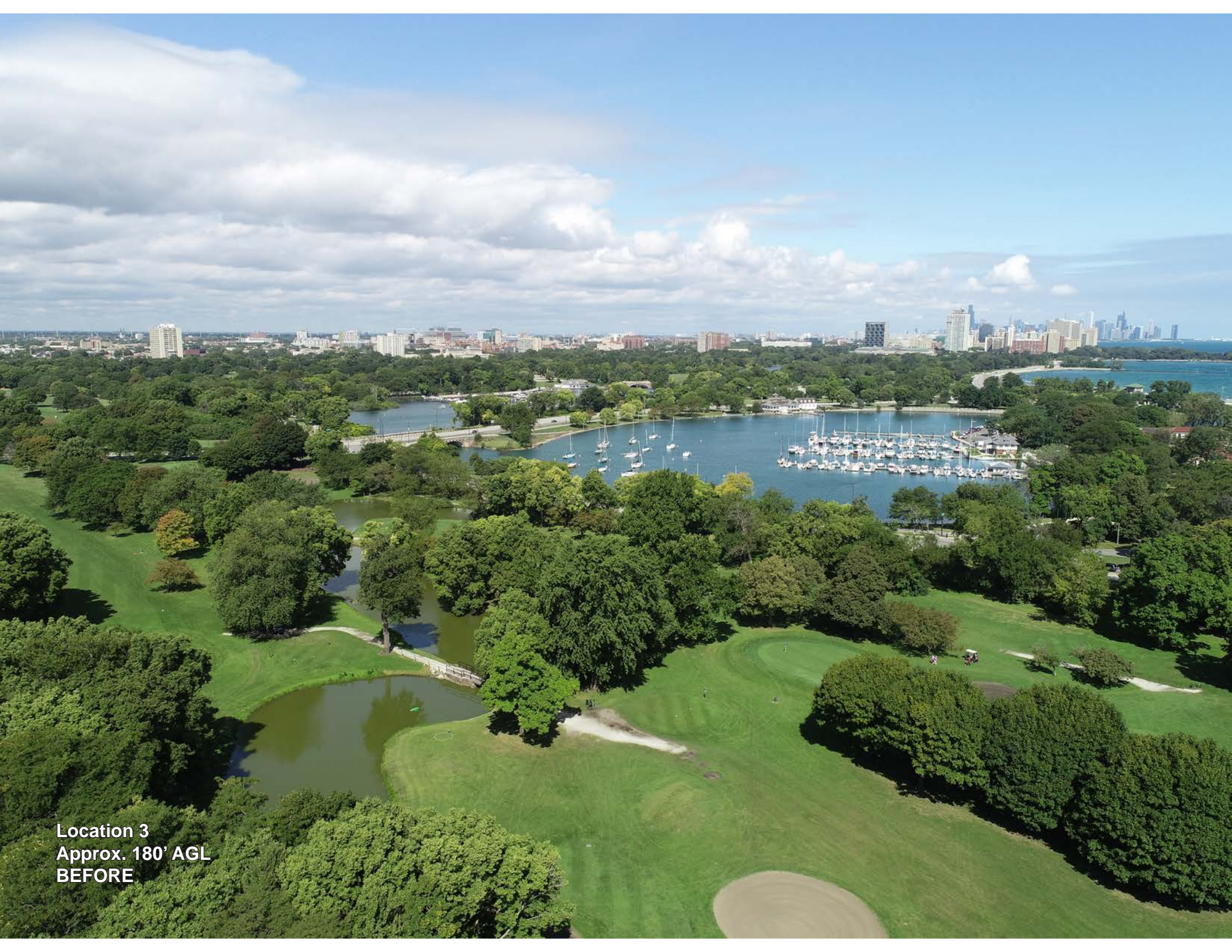
Location 3
Approx. 80' AGL
AFTER



Location 3
Approx. 90' AGL
BEFORE



Location 3
Approx. 90' AGL
AFTER



Location 3
Approx. 180' AGL
BEFORE



Location 3
Approx. 180' AGL
AFTER



Location 4
Approx. 65' AGL
BEFORE



BEHIND

Location 4
Approx. 65' AGL
AFTER



Location 5
Approx. 85' AGL
BEFORE



Location 5
Approx. 85' AGL
AFTER



Location 5
Approx. 100' AGL
BEFORE



Location 5
Approx. 100' AGL
AFTER



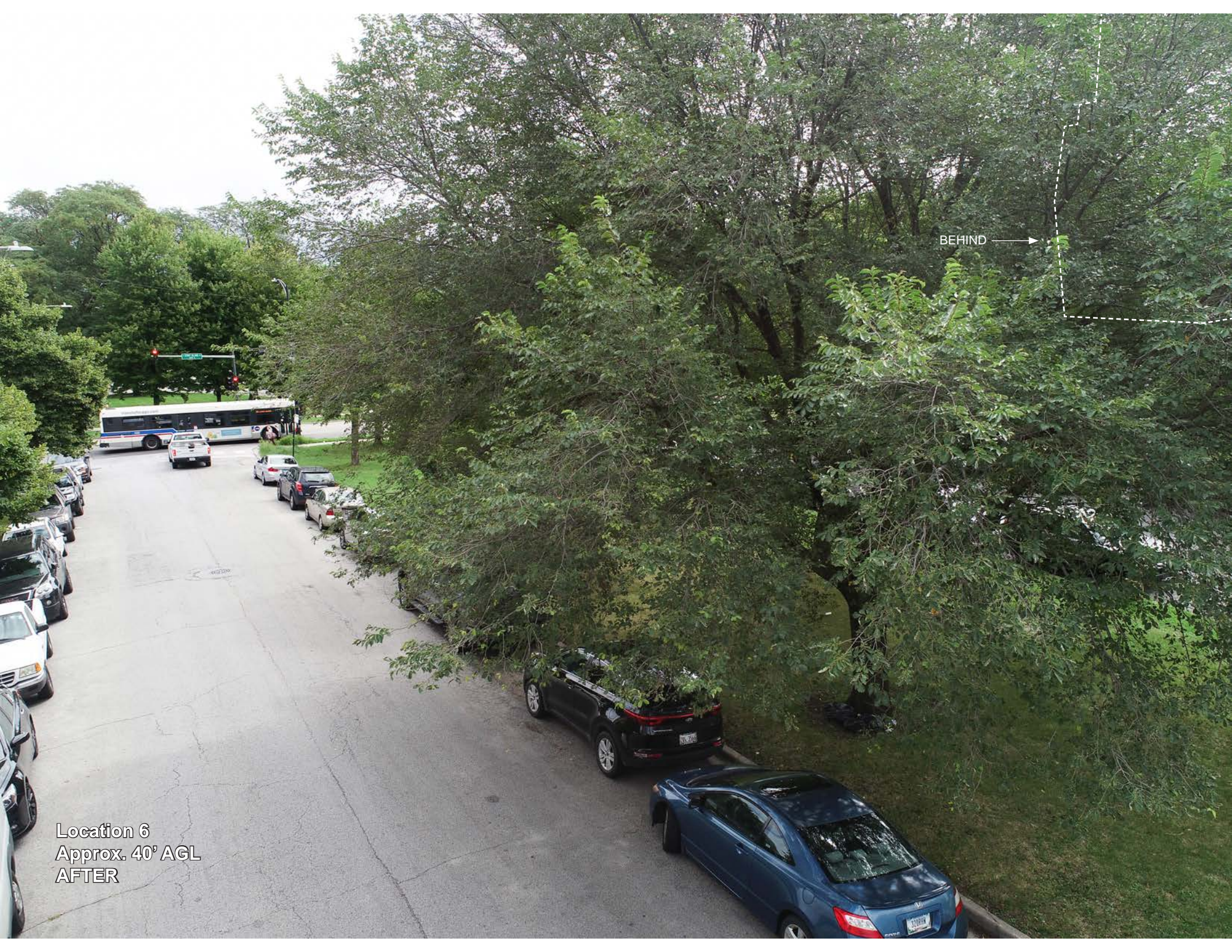
Location 5
Approx. 205' AGL
BEFORE



Location 5
Approx. 205' AGL
AFTER



Location 6
Approx. 40' AGL
BEFORE



BEHIND →

Location 6
Approx. 40' AGL
AFTER



Location 6
Approx. 60' AGL
BEFORE



Location 6
Approx. 60' AGL
AFTER



Location 7
Approx. 90' AGL
BEFORE



Location 7
Approx. 90' AGL
AFTER



Location 7
Approx. 100' AGL
BEFORE



Location 7
Approx. 100' AGL
AFTER



Location 7
Approx. 200' AGL
BEFORE



Location 7
Approx. 200' AGL
AFTER



Location 9
Approx. 120' AGL
BEFORE



Location 9
Approx. 120' AGL
AFTER



Location 9
Approx. 175' AGL
BEFORE



Location 9
Approx. 175' AGL
AFTER



Location 10
Approx. 95' AGL
BEFORE



Location 10
Approx. 95' AGL
AFTER



Location 10
Approx. 195' AGL
BEFORE



Location 10
Approx. 195' AGL
AFTER



Location 10
Approx. 390' AGL
BEFORE



Location 10
Approx. 390' AGL
AFTER



Location 11
Approx. 85° AGL
BEFORE



Location 11
Approx. 85° AGL
AFTER



Location 11
Approx. 125° AGL
BEFORE



Location 11
Approx. 125° AGL
AFTER



Location 11
Approx. 250' AGL
BEFORE



Location 11
Approx. 250' AGL
AFTER

Appendix E – Agency Correspondence

Section 106 Initiation Letter – SHPO
November 1, 2017



U.S. Department
of Transportation

**Federal Highway
Administration**

Illinois Division

November 1, 2017

3250 Executive Park Dr.
Springfield, IL 62703
(217) 492-4640
www.fhwa.dot.gov/ildiv

In Reply Refer To:
HPER-IL

Dr. Rachel Leibowitz
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
Springfield, IL 62701-1512

Subject: Cooperating Agency Request and Initiating Section 106 Process
OPC Mobility Improvements to Support the South Lakefront Frame Plan
Cook County, Illinois

Dear Dr. Leibowitz:

The Federal Highway Administration (FHWA), in cooperation with the Illinois Department of Transportation (IDOT), the City of Chicago's Department of Transportation, City of Chicago Department of Planning and Development and the Chicago Park District, is initiating an Environmental Assessment (EA) for the Obama Presidential Center Mobility Improvements to Support the South Lakefront Framework Plan project. The project is located within Jackson Park, which is generally bordered by 67th Street, Stony Island Avenue, 56th Street and Lake Michigan in the City of Chicago. (Please see enclosed Study Area Map).

Initiation of Section 106 Process

Because this project is considered an undertaking and has the potential to affect historic properties, we are initiating the Section 106 process in accordance with 36 CFR 800.3(c). Enclosed is a list of potential consulting parties identified by the City of Chicago and FHWA to whom we have sent invitations to become consulting parties for this project. Please review the list and notify FHWA or the City of Chicago if you are aware of other potential consulting parties. Enclosed are exhibits depicting the draft Area of Potential Effects for architectural as well as archaeological resources.

Cooperating Agency

In accordance with 40 CFR 1501.6 of the Council on Environmental Quality's (CEQ) Regulations for implementing the procedural provisions of the National Environmental Policy Act, FHWA is required to invite agencies with jurisdiction by law or with special expertise with respect to environmental issues to be cooperating agencies.

We propose that your agency's role in the development of the above project should include the following as they relate to your area of expertise or jurisdiction by law:

- provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be carried forward, and the methodologies and level of detail required in the alternatives analysis; and
- participate in coordination meetings and joint field reviews, as appropriate.

To consider your agency as a cooperating agency, FHWA and IDOT must receive a response from your agency no later than November 30, 2017. If your agency declines to be a cooperating agency, please indicate the reason for declining this request and provide a copy to CEQ pursuant to 40 CFR 1501.6(c).

Background:

The South Lakefront Framework Plan, originally authorized in 1999 by the Chicago Park District, includes three parks: Jackson Park, Washington Park and South Shore Cultural Center. The purpose of the Framework Plan was to “define the changing needs of these parks, to provide a plan to enhance each of the park’s commitments to serving the neighboring communities and to preserve the intended historic character.” Many of the improvements planned for in the 1999 Framework Plan have been completed; however, today other changes are proposed, including the Obama Presidential Center. These future improvements call for a Jackson Park and South Shore Park update to the South Lakefront Framework Plan as well as an evaluation of the existing transportation network to support these future improvements. This project, which includes the development of the Obama Presidential Center, aims to reduce the effects of vehicular traffic within Jackson Park by consolidating roadways and improving circulation for all modes of travel.

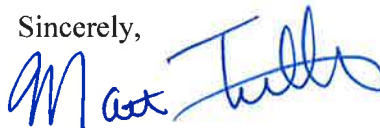
Jackson Park is bordered by heavily travelled arterial roadways including South Lake Shore Drive (US Route 41) to the east, Stony Island Avenue to the west, and 67th Street to the south. Within the park, 57th Street carries east-west traffic from South Lake Shore Drive to the Museum of Science and Industry campus. South of the Museum, 57th Street becomes Cornell Drive and carries north-south traffic from the Museum toward park recreational facilities. Collector roadways within the park include Hayes Drive and Marquette Drive. The Lakefront Trail parallels the east side of South Lake Shore Drive and serves recreational users, commuters, and tourists. The proposed improvements consist of roadway closures to accommodate future facilities within Jackson Park and the improvements to the remaining roadway network to carry diverted traffic. Roadway improvements will likely require bridge widening of the North Inlet Bridge (or 59th Street Inlet Bridge) along South Lake Shore Drive. Pedestrian and bicyclist improvements will improve accessibility to and circulation within the park and lakefront.

Jackson Park is a 547-acre park that is listed on the National Register of Historic Places. All land within the limits of Jackson Park is protected under Section 4(f) of the Department of Transportation Act of 1966 and under Section 106 of the National Historic Preservation Act of 1966.

If you have any questions or would like to discuss in more detail the project or our agencies’ respective roles and responsibilities during the preparation of this EA, please contact Matt Fuller, FHWA Environmental Programs Engineer at (217) 492-4625 or Abby Monroe, Coordinating Planner at (312) 744-9416.

Thank you for your cooperation and interest in this project.

Sincerely,










Matt Fuller
Environmental Programs Engineer



DRAFT

0' 400' 800'

- | | | | |
|---|--------------|---|---------------------------|
|  | Study Limits |  | Lakefront Trail |
|  | Parkland |  | Other Paths |
|  | Structures |  | Existing Traffic Signal |
| | |  | Obama Presidential Center |

OPC Mobility Improvements to Support the SLFP

Study Area Map

October 2017

OPC Mobility Improvements to Support the SLFP

Consulting Parties

October 31, 2017

By-rights
Illinois State Historic Preservation Officer (SHPO)
Illinois Department of Transportation
City of Chicago
Ho Chunk Nation
Miami Tribe of Oklahoma
Peoria Tribe of Indians of Oklahoma
Potawatomi-Citizen Nation
Potawatomi – Forest County
Potawatomi-Hannahville Indian Community
Potawatomi-Pokagon Band of Potawatomi
Potawatomi – Prairie Band
Sac and Fox Tribe of the Mississippi in Iowa
Sac and Fox Nation of Missouri
Sac and Fox Nation of Oklahoma
Invited
U.S. Army Corps of Engineers - Chicago District
National Park Service
Advisory Council on Historic Preservation (ACHP)
Illinois State Geological Survey
Illinois Natural Resources Conservation Service
Illinois Department of Agriculture, Bureau of Land and Water Resources
Chicago Park District
Illinois Archaeological Survey
Landmarks Illinois
Friends of the Parks
Chicago Historical Society
Jackson Park Advisory Council
South Shore Cultural Center Advisory Council
Midway Plaisance Advisory Council
Hyde Park Historical Society
Preservation Chicago
National Association for Olmsted Parks
University of Chicago
Obama Foundation
Chicago Transit Authority
Hyde Park-Kenwood Community Conference

Jackson Park Watch
Museum of Science and Industry
Alderman Hairston
1Woodlawn
Network of Woodlawn
Metra
Jackson Park Highlands
Openlands
The Promontory Point Conservancy
Community Task Force for Promontory Point
Save the Midway
Save Jackson Park



Note:
 Jackson Park, Midway Plaisance,
 and South Shore Cultural Center
 Park are all individually listed on the
 NRHP. A nomination of Burnham Park
 for the NRHP is in progress.

DRAFT

LEGEND	Existing Right-of-Way	Area of Potential Effects Archaeological	NRHP Properties	Historic District
	Parkland	Existing Bridge	Chicago Landmark	40+ year Building
			Potential Building Foundations	OPC Site Footprint

South Lakefront Framework Plan Update

**Area of Potential Effects
 Archaeological**

October 2017



Note:
 Jackson Park, Midway Plaisance,
 and South Shore Cultural Center
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DRAFT

LEGEND

- Existing Right-of-Way
- Parkland
- Existing Bridge
- Area of Potential Effects
Historic Architecture/
Landscape
- NRHP Properties
- Chicago Landmark
- Potential Building
Foundations
- Historic District
- 40+ year Building
- OPC Site Footprint

South Lakefront Framework Plan Update

**Area of Potential Effects
 Historic Architecture/Landscape**

October 2017

Section 106 Invitation Letter – ACHP
November 1, 2017



U.S. Department
of Transportation
**Federal Highway
Administration**

Illinois Division

November 1, 2017

3250 Executive Park Dr.
Springfield, IL 62703
(217) 492-4640
www.fhwa.dot.gov/ildiv

In Reply Refer To:
HPER-IL

Mr. Reid Nelson, Director
Office of Federal Agency Programs
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

Subject: Invitation to participate in Section 106 consultation and as a cooperating agency
Obama Presidential Center Mobility Improvements to Support the South
Lakefront Framework Plan
Cook County, Illinois

Dear Mr. Nelson:

The Federal Highway Administration (FHWA), in cooperation with the Illinois Department of Transportation (IDOT), the City of Chicago's Departments of Transportation, City of Chicago Department of Planning and Development and the Chicago Park District, is initiating an Environmental Assessment (EA) for the Obama Presidential Center Mobility Improvements to Support the South Lakefront Framework Plan project. The project is located within Jackson Park, which is generally bordered by 67th Street, Stony Island Avenue, 56th Street and Lake Michigan in the City of Chicago. (Please see enclosed Study Area Map).

Initiation of Section 106 Process

Because this project is considered an undertaking and has the potential to affect historic properties, we are initiating the Section 106 process in accordance with 36 CFR 800.3(c). The FHWA is inviting the Advisory Council on Historic Preservation to participate in consultation because the project may involve substantial public controversy related to historic preservation issues. Enclosed is a list of potential consulting parties identified by the City of Chicago and FHWA to whom we have sent invitations to become consulting parties for this project. Enclosed are exhibits depicting the draft Area of Potential Effects for architectural as well as archaeological resources.

Cooperating Agency

In accordance with 40 CFR 1501.6 of the Council on Environmental Quality's (CEQ) Regulations for implementing the procedural provisions of the National Environmental Policy Act, FHWA is required to invite agencies with jurisdiction by law or with special expertise with respect to environmental issues to be cooperating agencies.

We propose that your agency's role in the development of the above project should include the following as they relate to your area of expertise or jurisdiction by law:

- provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be carried forward, and the methodologies and level of detail required in the alternatives analysis; and
- participate in coordination meetings and joint field reviews, as appropriate.

To consider your agency as a cooperating agency, FHWA and IDOT must receive a response from your agency no later than November 30, 2017. If your agency declines to be a cooperating agency, please indicate the reason for declining this request and provide a copy to CEQ pursuant to 40 CFR 1501.6(c).

Background:

The South Lakefront Framework Plan, originally authorized in 1999 by the Chicago Park District, includes three parks: Jackson Park, Washington Park and South Shore Cultural Center. The purpose of the Framework Plan was to “define the changing needs of these parks, to provide a plan to enhance each of the park’s commitments to serving the neighboring communities and to preserve the intended historic character.” Many of the improvements planned for in the 1999 Framework Plan have been completed, however, today other changes are proposed, including the Obama Presidential Center. These future improvements call for a Jackson Park and South Shore Park update to the South Lakefront Framework Plan as well as an evaluation of the existing transportation network to support these future improvements. This project, which includes the development of the Obama Presidential Center, aims to reduce the effects of vehicular traffic within Jackson Park by consolidating roadways and improving circulation for all modes of travel.

Jackson Park is bordered by heavily travelled arterial roadways including South Lake Shore Drive (US Route 41) to the east, Stony Island Avenue to the west, and 67th Street to the south. Within the park, 57th Street carries east-west traffic from South Lake Shore Drive to the Museum of Science and Industry campus. South of the Museum, 57th Street becomes Cornell Drive and carries north-south traffic from the Museum toward park recreational facilities. Collector roadways within the park include Hayes Drive and Marquette Drive. The Lakefront Trail parallels the east side of South Lake Shore Drive and serves recreational users, commuters, and tourists. The proposed improvements consist of roadway closures to accommodate future facilities within Jackson Park and the improvements to the remaining roadway network to carry diverted traffic. Roadway improvements will likely require bridge widening of the North Inlet Bridge (or 59th Street Inlet Bridge) along South Lake Shore Drive. Pedestrian and bicyclist improvements will improve accessibility to and circulation within the park and lakefront.

Jackson Park is a 547-acre park that is listed on the National Register of Historic Places. All land within the limits of Jackson Park is protected under Section 4(f) of the Department of Transportation Act of 1966 and under Section 106 of the National Historic Preservation Act of 1966.

If you have any questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EA, please contact Matt Fuller, FHWA Environmental Programs Engineer at (217) 492-4625 or Abby Monroe, Coordinating Planner at (312) 744-9416.

Thank you for your cooperation and interest in this project.

Sincerely,








A handwritten signature in blue ink that reads "Matt Fuller". The signature is written in a cursive style with a large, stylized "M" and "F".

Matt Fuller
Environmental Programs Engineer



DRAFT

0' 400' 800'

- | | | | |
|---|--------------|---|---------------------------|
|  | Study Limits |  | Lakefront Trail |
|  | Parkland |  | Other Paths |
|  | Structures |  | Existing Traffic Signal |
| | |  | Obama Presidential Center |

OPC Mobility Improvements to Support the SLFP

Study Area Map

October 2017

OPC Mobility Improvements to Support the SLFP

Consulting Parties

October 31, 2017











By-rights
Illinois State Historic Preservation Officer (SHPO)
Illinois Department of Transportation
City of Chicago
Ho Chunk Nation
Miami Tribe of Oklahoma
Peoria Tribe of Indians of Oklahoma
Potawatomi-Citizen Nation
Potawatomi – Forest County
Potawatomi-Hannahville Indian Community
Potawatomi-Pokagon Band of Potawatomi
Potawatomi – Prairie Band
Sac and Fox Tribe of the Mississippi in Iowa
Sac and Fox Nation of Missouri
Sac and Fox Nation of Oklahoma
Invited
U.S. Army Corps of Engineers - Chicago District
National Park Service
Advisory Council on Historic Preservation (ACHP)
Illinois State Geological Survey
Illinois Natural Resources Conservation Service
Illinois Department of Agriculture, Bureau of Land and Water Resources
Chicago Park District
Illinois Archaeological Survey
Landmarks Illinois
Friends of the Parks
Chicago Historical Society
Jackson Park Advisory Council
South Shore Cultural Center Advisory Council
Midway Plaisance Advisory Council
Hyde Park Historical Society
Preservation Chicago
National Association for Olmsted Parks
University of Chicago
Obama Foundation
Chicago Transit Authority
Hyde Park-Kenwood Community Conference

Jackson Park Watch
Museum of Science and Industry
Alderman Hairston
1Woodlawn
Network of Woodlawn
Metra
Jackson Park Highlands
Openlands
The Promontory Point Conservancy
Community Task Force for Promontory Point
Save the Midway
Save Jackson Park



Note:
 Jackson Park, Midway Plaisance,
 and South Shore Cultural Center
 Park are all individually listed on the
 NRHP. A nomination of Burnham Park
 for the NRHP is in progress.

DRAFT

LEGEND	 Existing Right-of-Way	 Area of Potential Effects Archaeological	 NRHP Properties	 Historic District
	 Parkland	 Existing Bridge	 Chicago Landmark	 40+ year Building
			 Potential Building Foundations	 OPC Site Footprint

South Lakefront Framework Plan Update

**Area of Potential Effects
 Archaeological**



Note:
 Jackson Park, Midway Plaisance,
 and South Shore Cultural Center
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 NRHP. A nomination of Burnham Park
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DRAFT

LEGEND

- Existing Right-of-Way
- Parkland
- Existing Bridge
- Area of Potential Effects
- Historic Architecture/
Landscape
- NRHP Properties
- Chicago Landmark
- Potential Building
Foundations
- Historic District
- 40+ year Building
- OPC Site Footprint

South Lakefront Framework Plan Update

**Area of Potential Effects
 Historic Architecture/Landscape**

October 2017

SHPO Concurrence – Archaeological Report
March 28, 2018



Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

RECEIVED
MAR 16 2018

Preservation Services

March 16, 2018

Cook County
Chicago
Jackson Park
South Lakefront Framework Plan & Obama Presidential Center
Section #17-B7203-00-Es
IDOT Sequence #20908
ISAS Log #17080
SHPO Log #021081017

IHPA REVIEW

H/A _____
w/AC *Amor, elegant*
AR _____
File _____

FEDERAL – SECTION 106 UNDERTAKING

Archaeological Resource Identification

Dr. Rachel Leibowitz
Deputy State Historic Preservation Officer
Illinois Department of Natural Resources
Office of Land Management
Illinois State Historic Preservation Office
1 Natural Resources Way
Springfield, IL 62702



Dear Dr. Leibowitz:

In continuing consultation with your office, the Federal Highway Administration (FHWA), the National Park Service, the City of Chicago, and the Obama Presidential Foundation, the Illinois Department of Transportation (IDOT) has completed a survey of archaeological resources within the limits of the approved Area of Potential Effects (APE) for archaeology.

Enclosed are copies of the survey report completed by Illinois State Archaeological Survey personnel concerning archaeological resources potentially impacted by the above referenced undertaking. No archaeological sites were identified that warrant consideration for the National Register of Historic Places (NRHP).

In coordination with the above referenced parties, IDOT requests concurrence from the State Historic Preservation Officer (SHPO) in our determination that no archaeological resources within the archaeological APE are eligible for the NRHP. If no comments in writing are received within 30 days, IDOT will assume that the SHPO has no objections to this determination.

Sincerely,

Brad H. Koldehoff, RPA
Cultural Resources Unit
Bureau of Design & Environment

CONCUR

By: 3-28-18
Deputy State Historic Preservation Officer

Date: Rachel Leibowitz

SHPO Concurrence – Historic Properties Identification Report
July 10, 2018



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
www.dnr.illinois.gov

Bruce Rauner, Governor
Wayne A. Rosenthal, Director

FAX (217) 524-7525

Cook County

Chicago

New Construction of The Obama Presidential Center

Area Bounded by Stony Island Ave. and Cornell Dr., South of 60th St.

"Section 106 Historic Properties Identification Report"

CDOT-B-7-203, IDOT-Sec:-17-B7203-00-ES

SHPO Log #021081017

July 10, 2018

Brad Koldehoff

Illinois Department of Transportation

Bureau of Design and Environment

2300 S. Dirksen Parkway

Springfield, IL 62764

Dear Mr. Koldehoff:

Thank you for submitting the revised draft of the "Section 106 Historic Properties Identification Report for Federal Undertakings In and Adjacent to Jackson Park, Cook County, Illinois," dated May 17, 2018 and received in hard copy at our office on June 6, 2018. Our comments are required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties."

Staff has reviewed the revised draft document and its appendices and appreciates the work that went into this revision. The State Historic Preservation Office (SHPO) concurs with the revised period of significance of 1875-1968, as stated on page 111. SHPO also agrees with the authors' suggestion that, in future, additional areas of significance, at the local level, should be included in a revised National Register of Historic Places (NRHP) nomination of Jackson Park and the Midway Plaisance. Under Criterion A, these proposed areas of significance are: African-American History, Entertainment/Recreation, and Social History. If the 1972 nomination form is to be revised at some point in future, then SHPO also recommends consideration of other historical events and corresponding areas of significance, including Community Planning and Development, and Politics/Government. Jackson Park and the Midway Plaisance already are designated as significant for their landscape architecture, and the park includes contributing architectural resources under Criterion C.

Staff enjoyed reading the revised survey report and the inventory data included within the appendices, and appreciates the reconsideration of resources to be included as individually eligible or contributing to the historic districts that are already designated, or to historic districts proposed for future designation. In particular, SHPO concurs with the determination that the elevated Illinois Central railway line and its related viaducts and bridges are eligible for listing in the NRHP, either individually as a linear resource of structures under Criterion A for Transportation; or as contributing resources to the various historic districts through which it passes, creating a distinct physical and visual landmark.

SHPO concurs with the identification of potential new historic districts within "APE Sub-area I" as summarized in Section 4.2 of this report, including an East Hyde Park Historic District and a South Shore Historic District. SHPO also suggests consideration of a Woodlawn Historic District that would include, among other resources, the buildings identified in Section 4.2.2 as being individually eligible, as well as the Jackson Park Terrace complex developed by The Woodlawn Organization (TWO) and designed by Whitley-Whitley Architects and Planners. Its construction date of 1974 does not mean that the complex cannot be nominated until 2024, when it is fifty years old, as stated on page 118; SHPO has determined the Jackson Park Terrace complex to be eligible for listing on the NRHP. Even with its later date, the Jackson Park Terrace complex can be included as contributing to a potential Woodlawn Historic District, if a nomination to the NRHP were to be prepared today, without needing to meet Criteria Consideration G for buildings less than fifty years old. However, SHPO staff believes that the complex can easily meet that criterion consideration requirement for a potential individual nomination today, under both Criterion C for Architecture and Criterion A for Community Planning and Development, because Jackson Park Terrace is an outstanding example of innovative and successful local planning, development, and design efforts by a community organization acting to best serve the needs of its residents.

SHPO concurs with the identification of resources within "APE Sub-area II" as summarized in Section 4.3 of this report, including properties to be added as contributing to a revised NRHP nomination form for the Hyde Park-Kenwood Historic District, which was prepared in 1972 (Sections 4.3.1.1 through 4.3.1.4 and corresponding tables in appendices). SHPO also concurs with properties identified as eligible in "APE Sub-area II-B (South of E. 60th Street), which currently are not listed in the NRHP (Sections 4.3.2.1 through 4.3.2.6).

SHPO concurs with the survey methodology, as stated on page 123, to utilize a "40-year rule" for consideration of eligible resources, with the potential to include resources constructed before or during 1978. Again, it is important to note that resources less than 50 years of age can be included as contributing to a historic district in a nomination form. SHPO staff can further discuss this distinction with any preparer of a future NRHP nomination or revision, or one may consult National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*, Section VII, "How to Apply the Criteria Considerations."

Many thanks for giving our office the opportunity to comment on this revised draft report. If you have any questions, please contact me at (217) 785-5031 or rachel.leibowitz@illinois.gov.

Sincerely,



Rachel Leibowitz, Ph.D.
Deputy State Historic
Preservation Officer

c: Daniel Burke, Chicago Department of Transportation
Eleanor Gorski, City of Chicago, Illinois
John Sadler, Chicago Department of Transportation
William Raffensperger, Illinois Department of Transportation

FHWA Lead Agency Letter – Section 106
July 31, 2018



U.S. Department
of Transportation

**Federal Highway
Administration**

Illinois Division

July 31, 2018

3250 Executive Park Dr.
Springfield, IL 62703
(217) 492-4640
www.fhwa.dot.gov/ildiv

In Reply Refer To:
HDA-IL

Mr. Wayne Rosenthal
State Historic Preservation Officer
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702-1271

Subject: Obama Presidential Center- Mobility Improvements to Support the
South Lakefront Framework Plan
City of Chicago, Cook County, Illinois

Dear Mr. Rosenthal:

Per agreement with the National Park Service (NPS) and the United States Army Corps of Engineers (USACE), the Federal Highway Administration (FHWA) will serve as the “Lead Federal agency” for the Section 106 process for the subject undertaking.

The NPS, USACE, and FHWA each have a project or activity that would require Federal approval as part of the undertaking:

NPS – proposed conversion of parkland to non-recreational use under the Urban Parks Recreation and Recovery Program and the replacement of land converted to non-recreational use.

FHWA – proposed Federal-aid Highway Program funding for construction of roadway and bicycle/pedestrian improvements in and around Jackson Park.

USACE – (1) potential Section 404 permit required under the Clean Water Act and (2) proposed modifications to the Great Lakes Fishery & Ecosystem Restoration project.

The FHWA initiated the Section 106 process in a letter dated November 1, 2017, to the Illinois State Historic Preservation Officer (SHPO) and invited consulting parties.

The Area of Potential Effects (APE) was developed in consultation with the Illinois SHPO and we offered an opportunity for consulting parties and the public to provide input on the APE. The APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE considered the scale and nature of this undertaking, including each project or activity that would require a Federal approval.

The FHWA has completed the “identification of historic properties” step of the Section 106 process. A draft “Historic Properties Inventory” report was prepared and comments sought from consulting parties and the public. Based on input received, a final report was sent to the Illinois SHPO and concurrence was received on July 10, 2018. We are working on the assessment of effects report which we will share with all consulting parties and make available to the public for comment.

Thank you for your continued assistance on this project and please contact Matt Fuller (matt.fuller@dot.gov) should you have any questions.

Sincerely,



Catherine A. Batey
Division Administrator

Enclosure



U.S. Department
of Transportation
**Federal Highway
Administration**

Illinois Division

July 31, 2018

3250 Executive Park Dr.
Springfield, IL 62703
(217) 492-4640
www.fhwa.dot.gov/ildiv

In Reply Refer To:
HDA-IL

Mr. Reid Nelson
Advisory Council on Historic Preservation
401 F. Street NW, Suite 308
Washington, DC 20001-2637

Subject: Obama Presidential Center- Mobility Improvements to Support the
South Lakefront Framework Plan
City of Chicago, Cook County, Illinois

Dear Mr. Rosenthal:

Per agreement with the National Park Service (NPS) and the United States Army Corps of Engineers (USACE), the Federal Highway Administration (FHWA) will serve as the “Lead Federal agency” for the Section 106 process for the subject undertaking.

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Thank you for your continued assistance on this project and please contact Matt Fuller (matt.fuller@dot.gov) should you have any questions.

Sincerely,



Catherine A. Batey
Division Administrator

Enclosure

SHPO Concurrence – Archaeological Memorandum
September 2018



U.S. Department
of Transportation
**Federal Highway
Administration**

Illinois Division

September 24, 2018

3250 Executive Park Dr.
Springfield, IL 62703
(217) 492-4640
www.fhwa.dot.gov/ildiv

In Reply Refer To:
HDA-IL

Reid J. Nelson, Director
Office of Federal Agency Programs
Advisory Council on Historic Preservation
401 F. Street NW, Suite 308
Washington, DC 20001-2637

SUBJECT: Federal Actions in and Adjacent to Jackson Park, Chicago, Cook County, Illinois
ACHP-Connect: #012213

Dear Mr. Nelson:

The Federal Highway Administration (FHWA) has determined that the archaeological sites identified in Jackson Park as part of the subject undertaking are not eligible for the National Register of Historic Places (NRHP) under criteria A, B, C, or D. This determination was made in consultation with the Illinois State Historic Preservation Officer, the Illinois Department of Transportation (IDOT), and the National Park Service. Therefore, it is not necessary to revise the Historic Property Inventory which was finalized in July 2018. The City of Chicago, the project's sponsor, will post the materials supporting our determination to the project website, which will be available to consulting parties and the public. We are enclosing that documentation with this letter.

Our review of the eligibility of the archaeological sites was prompted by your letter dated August 21, 2018, which contained information from The Cultural Landscape Foundation (TCLF). The TCLF sent us additional information by e-mail on August 22, 2018, which we also considered. We asked the qualified staff at IDOT to evaluate the archaeological sites under NRHP criteria A, B, and C. The IDOT concluded that the archaeological sites are not eligible for the NRHP under any criteria in a letter dated September 11, 2018 and supported by a memorandum dated September 5, 2018, from the Illinois State Archaeological Survey. The IDOT coordinated these findings with the Illinois State Historic Preservation Officer and received concurrence on September 12, 2018.

In your letter, you also identified tree clearing activity that the City of Chicago recently completed within Jackson Park. We will provide a response to that issue in a separate letter.

Should you have any questions regarding this response, please contact Matt Fuller by e-mail (Matt.Fuller@dot.gov) or by phone (217-492-4625).

Sincerely,

Catherine A. Batey
Division Administrator

Enclosure

ecc: Ms. Justine Sydello, Deputy Secretary, IDOT
 Mr. Omer Osman, Deputy Secretary, IDOT
 Ms. Erin Aleman, Director, Office of Planning and Programming, IDOT
 Mr. Paul Loete, Director of Office of Highways and Project Implementation, IDOT
 Ms. Maureen Kastl, Bureau of Local Roads and Streets, IDOT
 Mr. Jack Elston Bureau of Design & Environment, IDOT
 Mr. Anthony Quigley, Region 1 Engineer, IDOT
 Mr. Brad Koldehoff, IDOT
 Ms. Becky Roman, IDOT
 Mr. William Raffensperger, Bureau of Design & Environment, IDOT
 Mr. Joel Lynch, NPS (Joel_Lynch@nps.gov)
 Ms. Morgan Elmer, NPS (morgan_elmer@nps.gov)
 Ms. Lee Terzis, NPS (Lee_Terzis@nps.gov)
 Dr. Scott Craver, The Cultural Landscape Foundation (scott@tclf.org)
 Ms. Juanita Irizarry, IrizarryJ@fotp.org
 Ms. Margaret Schmid, mschmidchicago@verizon.net
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 Ms. Lisa DiChiera, ldichiera@landmarks.org
 Mr. Ward Miller, wmiller@perservationchicago.org

idl: Glenn Fulkerson, Jon-Paul Kohler, Mike Smart, Stevenson, Piland (J), Qudus, Byars, Fuller,
 Meghan Jones, David Clarke.

ORIGINATOR: SMF

LOCATION IN E FILE: \\FHWSPIWFS010VH.ad.dot.gov\Electronic_FileRoom\CH12 - Projects\Cook County\NEPA - Obama Presidential Center and South Lake Front Plan



United States Department of the Interior

National Park Service
1849 C Street NW
Washington, DC 20240

IN REPLY REFER TO:

September 24, 2018

Matthew Fuller
Environmental Programs Engineer
Federal Highway Administration
3250 Executive Park Drive
Springfield, IL 62703

SUBJECT: Federal Actions in and Adjacent to Jackson Park, Chicago, Cook County, Illinois

Dear Mr. Fuller:

The National Park Service has reviewed the historic property inventory for archeological sites completed in July 2018 by the Illinois Department of Transportation (IDOT) as part of the subject undertaking in Jackson Park. Our office has also reviewed the subsequent IDOT submittal to further evaluate the sites under Criteria A, B and C for eligibility to the National Register of Historic Places (National Register), as requested in a letter from the Advisory Council on Historic Preservation to the Federal Highway Administration (ACHPCConnect: 012213).

We concur with the IDOT determination that none of the sites identified in Jackson Park within the area of potential effect are eligible for the National Register under Criteria A, B, C, or D.

Sincerely,

Joel Lynch



Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

RECEIVED
SEP 11 2018

Preservation Services

September 11, 2018

Cook County
Chicago
Jackson Park
South Lakefront Framework Plan & Obama Presidential Center
Section #17-B7203-00-Es
IDOT Sequence #20908
ISAS Log #17080
SHPO Log #021081017

IHPA REVIEW

H/A _____
AC Carrie Jax 9/11/18
AR _____
File _____

Archaeological Resource Identification & National Register Eligibility

Dr. Rachel Leibowitz
Deputy State Historic Preservation Officer
Illinois Department of Natural Resources
Office of Land Management
Illinois State Historic Preservation Office
1 Natural Resources Way
Springfield, IL 62702

Dear Dr. Leibowitz:

In continuing consultation with the Federal Highway Administration (FHWA), National Park Service, Illinois State Historic Preservation Officer (SHPO), City of Chicago, and the Obama Presidential Foundation, the Illinois Department of Transportation (IDOT) completed a study of archaeological resources within the limits of the Area of Potential Effects (APE) for archaeology for the above referenced undertaking.

The study was completed by the Illinois State Archaeological Survey (ISAS) and identified seven sites that do not warrant consideration for the National Register of Historic Places (NRHP). The ISAS analysis of NRHP eligibility focused on Criterion D, as is typical of archaeological resource assessments. The SHPO concurred March 28, 2018 with the IDOT determination that none of the sites were NRHP eligible (see attached letter).

In an August 8, 2018 letter, a consulting party to the above referenced undertaking, The Cultural Landscape Foundation, contacted the Advisory Council on Historic Preservation (ACHP) proposing that the archaeological sites should be evaluated under other NRHP Criteria, in addition to Criterion D. Accordingly, the attached memo was completed by ISAS. It documents their analysis of the seven site areas within the APE. They conclude that none of the sites are eligible

in terms of NRHP Criteria A, B, or C in addition to their original recommendation, not eligible under Criterion D.

IDOT concurs with the results of their analysis because the artifacts and deposits identified within the APE lack integrity. The fragmentary, mixed, and translocated nature of the deposits not only compromises their information potential but also their integrity of association. While Jackson Park is listed on NRHP, the archaeological artifacts and deposits identified within the APE do not convey or contribute to the significance of Jackson Park.

Therefore, the archaeological resources identified within the archaeological APE lack integrity and thus are not eligible for the NRHP under Criteria A, B, C, and D.

In coordination with the FHWA, IDOT requests concurrence from the SHPO in our determination that no archaeological resources within the archaeological APE are eligible for the NRHP. If no comments in writing are received within 30 days, IDOT will assume that the SHPO has no objections to this determination.

Sincerely,



Brad H. Koldehoff, RPA
Cultural Resources Unit
Bureau of Design & Environment

CONCUR

By: Robert F. Appelman
Deputy State Historic Preservation Officer

Date: 9-12-18

Central Offices

23 Stadium Dr. • Champaign, IL 61820

T 217-244-4244 • F 217-244-7458

www.isas.illinois.edu

Memorandum

To: Brad Koldehoff**From:** Duane Esarey and Thomas Loebel**Date:** 5 Sept 2018**RE:** Supplemental National Register Information and Evaluation of NRHP Criteria A, B, and C for Archaeological Resources Identified within the Area of Potential Effects (APE) of the Obama Presidential Center Mobility Improvements to Support the South Lakefront Framework Plan (SLFP), Jackson Park, Cook County, Illinois. IDOT Sequence #20908

Summary of National Register Recommendations

The Illinois State Archaeological Survey (ISAS) conducted archival research and field investigations within the APE delineated for potential impacts to archaeological resources (Figure 1). Three previously identified and four newly identified sites (Figure 2) were evaluated for their National Register of Historic Places (NRHP) eligibility, focusing on Criterion D (see Tolmie and Branstner 2018). None of the archaeological resources documented at these sites within the APE were recommended eligible for NRHP under Criterion D.

This memo supplements the original ISAS report (Tolmie and Branstner 2018) by documenting our analysis of the archaeological resources at these seven site areas within the APE for their eligibility in terms of NRHP Criteria A, B, and C. In sum, none of the site areas warrant NRHP consideration, and we find no basis to recommend further work within the APE as it is currently defined.

Project Background

Jackson Park was listed on the NRHP on December 15, 1972 (reference 72001565) as part of the 623-acre Jackson Park Historic Landscape District and Midway Plaisance (thus including Jackson Park, Washington Park, and the Midway Plaisance) in recognition of its national and state levels of historic significance in the areas of architecture, landscape architecture, science, sculpture, and urban planning.

This NRHP designation acknowledges the District as the setting for the World's Columbian Exposition of 1893 and notes the persisting landscape features designed by Frederick Law Olmstead, America's foundational landscape architect, as well as being the setting for works of a number of other famous American architects.

The acknowledged importance of the Midway Plaisance further relates to the “Plan of Chicago” by Daniel Hudson Burnham, as well as being the site of the tallest and most signature feature of the Columbian Exposition (the “Chicago Wheel” built by George Washington Gale Ferris). Further notable components of this historic landscape include the Midway Studios, Frank Lloyd Wright’s Robie House, the University of Chicago campus, Lorado Taft’s Fountain of Time, and other architectural and sculptural works throughout the three areas of the district (NRHP Inventory nomination 72001565).

Our current evaluation is limited to the resources that may be impacted within the Section 106 defined APE for archaeological resources. The APE comprises 23.08 acres within Jackson Park and approximately 16.48 linear km (10.22 linear miles) primarily coincident with existing roadways (linear km/miles recorded here include distances along both sides of all affected roadways). Along roadways, proposed construction limits extend between 6 m and 106 m (20 ft and 350 ft) beyond existing road centerlines. The total APE covers 62.04 acres (approximately 10% of the Jackson Park Historic Landscape District), most of it along existing highway right-of-ways. Much of the impact is limited to the top two feet of soil.

The draft *Section 106 Historic Properties Identification Report for Federal Undertakings in and Adjacent to Jackson Park Cook County, Illinois* (FHWA 2017) has undertaken a more intensive analysis of historic contexts of the historic district and the APE regarding Criteria A and C. Evaluating the district and APE in question within relevant historic contexts, and under the guidance of National Park Service Bulletins #15, 18, and 24 (Shrimpton, ed. 2002; Derry, et al. 1985; and Keller and Keller, respectively), the report concluded that Jackson Park and the Midway Plaisance “generally retain a high level of historic integrity” within a period of significance of 1875-1968 (FHWA 2017:3, 104-108, 111-112, Appendix F) and thereby meet Criteria A and C. Multiple additional features were recommended as qualifying as contributing properties to the Jackson Park and Midway Plaisance Historic District.

Principles of NRHP Evaluation Using Archaeological Evidence

ISAS’s *Archaeological Properties Identification Report*_(Tolmie and Branstner 2018) provided a detailed discussion of the archaeological methods, areas of investigations, and evaluated the results in terms of significance under Criteria D. This document revisits and evaluates earlier recommendations as they relate to NRHP Criterion A, B, and C.

Potential property listings on the National Register of Historic Place can be evaluated under four criteria, termed A through D. National Park Service Bulletins #15 and 36 (Shrimpton 2002 and Little, et al. 2000) acknowledge the challenges of assessing the significance of archaeological properties within criteria outside of Criteria D. Criterion D eligibility and significance, the most commonly considered criteria of significance for archaeological sites, can certainly be considerably enhanced by association with historic contexts. However, aspects or qualities of archaeological integrity are critical in

determining whether an archaeological site can convey or illustrate otherwise significant historic contexts. Archaeological integrity relates to intact contexts able to yield information, associations, and convey importance. It is notably import that the archaeological evidence encountered during the ISAS investigations of the 62-acre APE revealed that deposits lack the critical *in situ* integrity that would allow them to potentially provide new or additional information or understanding of the periods of significance of the Jackson Park Historic Landscape District.

Of course, associations with historic events or trends (Criterion A), an important person (Criterion B), or distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic value, or represent a significant and distinguished entity (Criterion C), remain important values whether or not they are articulated through the attributes of Criterion D eligibility. But Little, et al. note (2000:22),

“the use of Criteria A, B, and C for archeological sites is appropriate in limited circumstances and *has never been supported as a universal application of the criteria*. However, it is important to consider the applicability of criteria other than D when evaluating archeological properties.” (emphasis added)

In identifying NRHP significant archaeological properties, as elsewhere, their usefulness in contributing to listing under Criteria A, B, or C turn heavily on the question of archaeological integrity. NRHP Criterion D significance that might be enhanced by considerations of Criteria A, B, and C historic contexts is dependent on research designs requiring archaeological integrity. The eligibility of the site based on its ability or probability to yield information *derived from the site’s actual physical material* (Shrimpton 2002:21, emphasis added) also sets a baseline condition for utilization of archaeology to evaluate Criteria A, B, or C significance under NRHP guidelines. While disassociated and decontextualized artifacts that can serve as symbols or memorabilia that could be considered evocative of Criteria A, B, or C significance could be argued, they do not inherently constitute archaeological evidence capable of providing data or insights not already obtainable through historic sources. Such decontextualized objects are not considered significant resources, and their extraction as mere memorabilia does not constitute acceptable Section 106 mandated cultural resource management.

Evaluation and Recommendations:

The fragmented materials discovered during the ISAS investigations represent detritus associated with fair and post-fair demolition and debris removal, garbage disposal practices, land leveling, filling, and landscape modification events of the Jackson Park area in the later 1800s and early 1900s. They represent remnants of what are essentially episodes of demolition and landfill.

While 9,841 artifacts may seem like an astonishingly large amount, examination of the data in Tolmie and Branstner (2018) clarifies the associations and nature of data that the

overall assemblage is capable of generating concerning the history of Jackson Park. Approximately 60% (n=5,763) of the materials recovered are non-diagnostic in nature (coal, slag, cinder, unidentified flat glass, metal), of recent origin (plastic, aluminum, container glass), and/or of limited interpretive value (nails, brick, mortar, concrete). Less than 15% of the assemblage (n=1,437) represents debris diagnostic of any particular period of Park History, in some cases relating to the World's Fair (1,430 staff fragments, 6 graphite arc lamp fragments, 1 fragment of stained glass). Approximately 25% of the artifacts (n=2,400) consist largely of mixed and redeposited incinerated fragments of hotelware and faunal remains that can be more directly tied to a known source of activity relating to Park history (Engle Incinerator operation). However, all of these materials are derived from mixed and disturbed contexts – rendering them disassociated and decontextualized.

The Historic Properties Identification Report (FHWA 2018) concludes that historical contexts developed therein support Jackson Park Historic Landscape District and Midway Plaisance eligibility under NRHP Criteria A and C. Criterion A significance (“associated with events that have made a significant contribution to the broad patterns of our history”), as it can be specifically expressed through an archaeological site, would require the ability to be further developed through a research design putting archaeological contexts of the site retaining integrity to work in conveying that significance. Merely finding artifacts from the period(s) of significance does not qualify the archaeological site as having a “free-standing” archaeological eligibility under NRHP Criterion A. In the absence of appropriate contexts, archaeological practices dependent on site integrity do not support a recommendation that the specified areas retain archaeological significance that can be supplemented by further excavations.

Likewise, under Criterion C (embodies the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic value, or that represent a significant and distinguishable entity whose components may lack individual distinction) the same requirement of contextual integrity is not met. For Criterion B (associated with the lives of persons significant in our past) the same concern results in the same recommendation. Context, not simply artifacts, dictates significance and conditions the ability of an archaeological site to convey that significance. Stated in another way, an archaeological resource that cannot generate new or additional information does not merit being considered NRHP significant under any criteria.

In the following sections and Table 1 we present overviews of investigated contexts within the APE. ISAS finds no basis to recommend further work within the APE as it is currently defined.

ISAS Testing Results and Data – Evaluation of NHRP Significance

Survey methodology

Survey within the APE was guided by archival research and systematic geomorphic investigations. Specific details are contained within the Archaeological Properties Identification Report (Tolmie and Branstner 2018), and survey methods and results are only briefly summarized here. Geocoring was undertaken to locate stratigraphic contexts with geologic potential for buried archaeological deposits. Stratigraphic contexts with potential were subsequently sampled by hand excavation of test units. Disturbances associated with existing road construction, Park infrastructure, and utilities, along with Park District restrictions (tree drip lines) imposed frequent limits on the survey within the APE. During the course of survey three previously recorded sites (11CK1105, 11CK1106, and 11CK1107) were revisited and four new sites were recorded (11CK1289, 11CK1290, 11CK1291, and 11CK1292).

Cores 1-42 were placed within the footprint of the proposed OPC, within sites 11CK1106, 11CK1289, and 11CK1290. Sediment profiles indicated considerable historic alteration and infilling of the natural landscape. Archival research demonstrates that extensive land reclamation efforts occurred immediately before the World's Fair with grading and infilling, followed by another 125 years of intermittent construction of park facilities including post-1895 landscaping, lagoon dredging and filling, and construction of boat launches, playgrounds, gymnasiums, ball fields, roadways, and utility emplacement. Cores 43-56 were placed along roadways within the refined APE. In general, core profiles indicate considerable alteration of the landscape within the APE.

Revisited Sites

11CK1105

Site 11CK1105 is located just south of the Museum of Science and Industry and was first investigated by Graf (2011). Less than 5 percent of the reported site area, primarily within existing right of way lies with the APE (Figure 2). Archival and visual inspection indicated that the portion of the site has been impacted by road construction and installation of utilities. 11CK1105 has not been evaluated for NRHP eligibility, however no further work is recommended for the small portion of the site within the APE. No evaluation regarding NRHP eligibility can be made for the remainder of the site area, which lies outside the present APE. Should the portion of the site outside the APE be subject to future ground disturbance, additional survey is recommended to evaluate those areas for NRHP eligibility.

11CK1106

Site 11CK1106 was originally defined by Graff (2011) and includes the area of the Sunken Garden. However, ISAS investigations extended the site boundary to include the northwest corner of the intersection of Midway Plaisance/E. 60th Street and S. Stony Island Avenue (Figure 2). Approximately 90 percent of the site lies within the APE. Seven geomorphological cores (GC24-GC26 and GC33-GC36) and three hand excavation units (HU8, HU9, and HU13) were completed within the portion of the APE within the original site boundary. Material recovered was largely non-diagnostic and consistent with material reported in secondary context by Graff (2011).

ISAS investigations in 2017 recovered a total of 703 artifacts from cores and excavation units within the site area and identified one subsurface feature (Feature 3), a trench of indeterminate function/association likely dating to post World's Fair landscaping. The majority of the artifacts were recovered from Zone A, the modern topsoil. The most common artifact category was miscellaneous (n=185, largely coal/slag/clinker), followed by flat glass (n=151), limestone and gravel (n=110), and container glass (n=102). Ceramics include redware (n=62), mostly flowerpot fragments and 3 undecorated ironstone fragments.

Site 11CK1106 represents a landscape modified by large-scale earth moving connected to the 1930's construction of the Sunken Garden, the deposition and redeposition of fill related to construction of existing berms associated with the modern all-weather athletic field, and on-going emplacement of utilities and sub-surface park infrastructure. Cultural material from 11CK1106 is largely non-diagnostic and recovered entirely from secondary context (contained within redeposited fill), and the single indeterminate function feature encountered cannot be associated with any particular period of Park history. Therefore, it is our opinion that portions of 11CK1106 within the APE do not warrant further consideration under Criteria D or any other criteria, as the deposits lack integrity of association and the ability to generate new data that would substantially enhance our understanding of Park history beyond that already reflected in the historic record.

11CK1107

Originally recorded by Graff (2011), the site is located in the vicinity of and on the grounds of present day Rabida Hospital and has not been evaluated for NRHP eligibility. The small portion of the site within the APE to the east of South Shore Drive was not investigated due to disturbances from road construction, pathways and park infrastructure, tree driplines, and the presence of an unmarked gas utility line. Graff (2011) recorded shallow nineteenth century artifact concentrations to the north of the present survey area, which she interpreted as remnants of the Engle incinerator, but more likely represent redeposited fill associated with post Fair landscape and construction activities. Furthermore, ISAS archival research has determined that these positive shovel tests are potentially associated with the location of the former Forestry Building. ISAS revised the

site boundary to distinguish the artifact scatter identified by Graff from that of with new site 11CK1292, which is associated with the Engle Incinerator. No evaluation regarding NRHP eligibility can be made for the remainder of the site area, which lies outside the present APE. However, the portion within the APE does not appear eligible due to lack of integrity. No evaluation regarding NRHP eligibility can be made for the remainder of the site area, which lies outside the present APE. Should the portion of the site outside the APE be subject to future ground disturbance, additional survey is recommended to evaluate those areas for NRHP eligibility.

New sites

11CK1289

This site is located in the athletic field to the south of the playground and all-weather track (Figure 2). A total of 3,533 artifacts (11 prehistoric and 3,522 historic artifacts) form the assemblage, all of which were recovered in secondary fill context. The entire site area lies within the current APE. Eleven positive cores (4, 5, 6, 7, 11, 12, 13, 14, 17, 18, and 19), eight negative geomorphological cores (1, 2, 3, 8, 9, 10, 16, and 31), and seven hand excavation units (HU1, 2, 3, 4, 5, 6, 7) were placed within the site boundary and used to define site boundaries. Two trench features of undefined purpose/association were identified.

Architectural material (n=2,408) is the most common artifact class. The most common item within this category is staff or plaster (n=1,325) followed by nails (n=615) and window glass, (n=156). One fragment of window glass is of amber colored stained glass. The majority of staff are small, eroded fragments, with the exception of 8 pieces of plaster or staff with traces of red colored paint and 10 small fragments retaining evidence for molding. The painted staff and the stained glass are probably debris from the Transportation Building, the only building to be decorated externally as well as internally. This material was recovered in a layer of redeposited fill encountered in HU2. Georeferenced maps show that this unit was 50 meters north of the Transportation Building, in the vicinity of the Choral Building, therefore the presence of the debris layer in in HU2 indicates considerable redeposition of material during demolition and post Fair clearance/grading of the site. The recovery of a small amount of prehistoric lithic debris in an inverted stratigraphic profile, underscores the large-scale disposal and subsequent redeposition of material obtained from off site during post Fair landscape modification.

The next most common categories are container glass (n=556), the majority of which is machine made. Only three diagnostic bottle fragments dating from 1885-1951 were recovered in mixed fill contexts. Miscellaneous items representing unidentified metal items (n=257) and coal, slag or clinker (n=192), ceramic (n=16), and faunal (n=15) were also recovered, all in secondary or modern context, limiting their interpretive usefulness.

11CK1289 has been heavily impacted by both pre-fair landscape modification as well as post Fair demolition and construction of modern Park infrastructure. Material recovered

from 11CK1289 appears to be a composite of mixed demolition debris and is unlikely to yield significant new data in support of research questions aimed at evaluating aspects of Park history and use beyond those already abundantly illustrated in the existing historical record. Beyond the site's ability to yield artifacts representative/illustrative of known facts the archaeological data potential of the site is limited due to heavy post fair disturbance and lack of integrity. Due to the disturbed nature of the archeological context, it is our opinion that 11CK1289 lacks integrity and does not warrant NRHP consideration under Criteria D, or any other Criteria.

11CK1290

Site 11CK1290 is located in the former location of the western half of the 1893 World's Fair Horticultural Building, the Greenhouse, and the northern portion of the Admissions and Collections building (Figure 2). This area was subsequently redeveloped as an open-air gymnasium, according to the 1895 plan for Jackson Park. The present all weather athletic facility was constructed sometime between 1988 and 1992 adding to additional disturbances.

ISAS recovered 411 artifacts from five geomorphological cores: 4 container glass, 185 architectural fragments, 1 fauna, and 221 miscellaneous items, mostly coal, slag, or cinder (n=204). Miscellaneous items formed 53 percent of the artifact inventory by count, with the next most common artifact class as architectural debris (41 percent of the inventory), mostly very small pieces of staff or plaster fragments (n=102) derived from disturbed fill deposits. The 11CK1290 assemblage differs from the other site assemblages. It contains a very high proportion of coal, ash, or clinker relative to architectural or other debris, and may represent a hazardous material work environment in the event of additional ground disturbing activities in the area.

In summary, 11CK1290 represents the locus of a series of construction and demolition episodes associated with the World's Fair and post-fair construction of an open-air gymnasium and has been severely impacted by construction of the modern athletic facility and utility placements. Archaeological material at 11CK1290 is largely composed on non-diagnostic artifacts that lack depositional integrity and association and are of limited interpretive value. Further work is unlikely to yield significant new data in support of research questions posited to explore unknown aspects of Park history and use beyond those already abundantly illustrated in the existing historical record. Beyond the site's ability to yield artifacts merely representative/illustrative of known facts, the archaeological data potential of the site is limited due to heavy post fair disturbance and lack of integrity. Due to the disturbed nature of the archeological context, it is our opinion that 11CK1290 lacks integrity and does not warrant further NRHP consideration under Criteria D, or any other Criteria.

11CK1291

Site 11CK1291 is located within the area of the World's Fair that contained structures associated with the stock exhibits (Figure 2). The site was subsequently landscaped as a golf course in 1895-99. Further modifications to the landscape occurred during the construction of Jeffery Avenue sometime after 1939 and prior to 1952 (NETR 2017). A total of 278 artifacts were recovered, largely non-diagnostic and in secondary context, which represents material redeposited from unknown off-site sources during grading and filling in the post-fair period. Fill within the site area is particularly deep, ranging in depth from 187 to 250cms. Architectural debris (n=185) forms 54 percent of the assemblage, with nails being the most common item. Container glass (n=67) is the next most common item, and miscellaneous items comprise the remainder of the assemblage, with little diagnostic material that can be conclusively connected to the World's Fair. The artifactual assemblage recovered is incohesive and of little interpretive value in regard to providing data for larger research questions aimed at illuminating poorly known aspects of Park history. In sum, material present is in secondary context contained within fill utilized for landscaping and infilling swale or marsh lands as part of golf course construction. The source of this fill is unknown, and as such lacks integrity or association necessary for a determination of eligibility under Criteria D, or other Criteria.

11CK1292

This site is located 30 meters west of the intersection of South Shore Drive and 67th Street (Figure 2). The entire site lies within the current APE. 11CK1292 was identified by the presence of a series of fill deposits composed of ash, cinder, and other material in CG48. Three negative geomorphological cores (47, 49, 50) define the site boundary.

11CK1292 is directly east of the location of the Engle Crematory which functioned as the garbage incinerator for the World's Fair. The incinerator was in operation from May 9th to November 1st, 1893. This facility was used to burn both garbage and the processed solid human waste from the sewage treatment plant ("sludge cake"). The incinerator was cleaned regularly, and the layers of material present are interpreted as different episodes of clean out and discard of the incinerated waste material remains. The artifacts present are consistent with debris from what would be expected at the various eating establishments present within the fairgrounds. Extensive written documentation exists surrounding the operation of the Crematory and describes the process of incinerating both garbage and the sewerage sludge cake collected from the Fair grounds and sewer plant. These sources describe in detail the operation, incineration process, and description of the final by-product of incineration, which matches and confirms the interpretation of the material present at 11CK1292. 4,916 artifacts were recovered including 1,026 fragments of hotel ware including cups, saucers, jugs, sugar dishes, small plates, and serving plates. A number of vessels are marked 'Chase and Sanborn "Seal Brand" Coffee", the company that was known to have supplied coffee to the Worlds' Fair. Decorated ceramic vessels are rare, but include Greenwood China of Trenton New Jersey,

UPW porcelain, and Thomas Haviland, Limoges. A considerable amount of melted container glass (n=503) was recovered. Six teaspoons of a style known to be sold as souvenirs for the World's Fair were also recovered. Recovered metal is represented by 606 burned container fragments, and a key can-opener.

While site 11CK1292 contains deposits of material associated with the operation of the Engle Crematory during the 1893 Columbian Exposition, it represents an amalgam of redeposited and thermally altered material connected to either periodic cleaning of the incinerator or perhaps final dismantlement of the incinerator. An extensive archive of historic documents detailing the operation of the incinerator indicate that this material is composed of a mix of incinerated sewage and general garbage collected from the grounds and various facilities of the World's Fair. Analysis of recovered artifacts suggests the deposits are heavily biased towards material that survived incineration such as serving wares, calcined bone, and melted glass. Geomorphic cores indicate this material is fairly constrained in extent and buried beneath at least 60 cm (2 feet) of fill and lie outside current construction limits (see Figure 6.5). Although the material appears to be related to the operation of the Engle Crematory, the deposits in reality represent a secondary deposit of incinerated general refuse and lack the potential to provide additional information beyond that provided in the extensive written record available. Therefore, it is our recommendation that 11CK1292 does not warrant further NRHP consideration under Criteria D, or other Criteria.

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Tolmie, Claire and Paula Porubcan Branstner (2018) Draft Section 106 Archaeological Properties Identification Report: Obama Presidential Center (OPC) Mobility Improvements to Support the South Lakefront Framework Plan (SLFP), Cook County, Illinois. Illinois State Archaeological Survey Technical Report 184, Prairie Research Institute, University of Illinois – Urbana Champaign. Download: https://www.cityofchicago.org/content/dam/city/depts/dcd/supp_info/jackson/2018-03-19-Arch-Report.pdf

Table 1
Summary of Field Investigation Results

Site	Status	Comments	Assessment	Recommendation
11CK1105	Previously reported	Portion of site within APE already impacted. Not evaluated for NRHP.	Area of potential impact within existing ROW and not accessible for survey due to presence of utility lines.	Recommend further evaluation if APE expanded.
11CK1106	Previously reported	Site bounds expanded. 90% of site within APE. Material in secondary contexts only. One trench of possible World's Fair era.	Modified by large-scale earth-moving per 1930s construction of Sunken Garden and subsequent construction and utilities placement. Deposits lack integrity of association.	Does not meet NRHP eligibility under Criterion D or any other criteria per ability to generate new data.
11CK1107	Previously reported	Site boundary revised (see 11CK1292). Not evaluated for NRHP.	Previously reported artifact concentrations are redeposited fill.	Recommend further evaluation if APE expanded.
11CK1289	New	Large # artifacts are architectural debris recovered from secondary fill.	Prehistoric material above historic fill. CK1289 is debris from demolished Transportation Bldg redeposited to area of Choral Bldg area.	Does not meet NRHP eligibility under Criterion D or any other criteria per ability to generate new data.
11CK1290	New	Moderate # architectural debris. Proportion of coal, ash, clinker (possible hazardous material environment).	Locus of multiple construction and demolition episodes. Lacks depositional integrity and association.	Does not meet NRHP eligibility under Criterion D or any other criteria per ability to generate new data.
11CK1291	New	Particularly deep fill (185-250 cmbs) with primarily architectural debris, plus container glass.	All material in secondary deposits – landscaping fill from unknown off-site sources during grading and filling post-World's Fair.	Lacks integrity or association necessary for determination of eligibility under Criterion D or any other criteria.
11CK1292	New	Directly east of Engle (World's Fair) Crematory. Ash, cinder, etc. derived from human sewage and garbage cleaned out of incinerator.	Material consistent with redeposited homogenized amalgamation of durable elements of World's Fair refuse, buried beneath at least 60 cm of more recent fill. Inside APE but outside construction limits	Does not meet NRHP eligibility under Criterion D or any other criteria per ability to generate new data. Recommend further evaluation if limits of impact expanded.

Figure 1. SLFP (IDOT Seq. 20908) Area of Potential Effects.



Project Name: FAU 2929/1520/2873, FAP 341,
 Jackson Park
 ISAS Project # 17080, Cook Co., Dist. 1
 IDOT Sequence # 20908
 Adapted from NAIP 2012
 1:15000
 PB

N

0 200 400 600 800 Meters

0 750 1,500 2,250 3,000 Feet




	APE Final
	Obama Presidential Library and Garage
	Roads



Figure 2. Archaeological Site Locations.



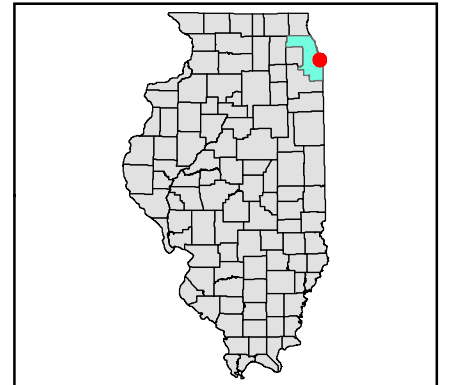
Project Name:FAU 2929/1520/2873, FAP 341
 Jackson Park
 Dist. 1, Cook County, ISAS Project# 17080
 IDOT Sequence # 20908
 Adapted from NAIP 2015 orthoimagery
 1:15,000
 CT



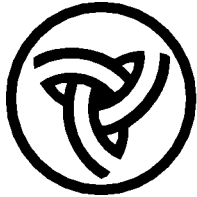
0 0.15 0.3 0.45 0.6 Kilometers

0 0.15 0.3 0.45 0.6 Miles

- APE Final
- Obama Presidential Center and Garage
- New Site
- Revisited Site
- Jackson Park National Historic District and Midway Plaisance
-



IDOT Memorandum – NRHP Eligibility and Adverse Effects
September 10, 2019



Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

September 10, 2019

Mr. S. Matthew Fuller
Environmental Programs Engineer
Federal Highway Administration
Illinois Division Office
3250 Executive Park Drive
Springfield, Illinois 62703

RE: National Register of Historic Places Eligibility and Adverse Effects
Jackson Park Historic Landscape District and Midway Plaisance
Proposed Undertaking In and Adjacent to Jackson Park Jackson Park, Chicago, Illinois
Chicago, Cook County, IDOT Sequence #20908

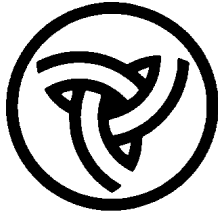
Dear Mr. Fuller:

As recently discussed, the Cultural Resources Unit at the Illinois Department of Transportation (IDOT) has reviewed the continued National Register of Historic Places (NRHP) eligibility of Jackson Park and Midway Plaisance in light of potential adverse effects to this historic landscape district by alterations stemming from the subject undertaking. As outlined in the attached memo by IDOT Architectural Historian, Elizabeth (Becky) Roman, it is the professional opinion of my office that the proposed undertaking, as currently designed, will likely cause an adverse effect to Jackson Park and Midway Plaisance. However, the adverse effect will not sufficiently diminish or remove the overall integrity of Jackson Park and Midway Plaisance in such a way that they would no longer qualify for NRHP listing. These cultural landscapes will remain a historic landscape district and will continue to be accorded protection under Section 106 of the National Historic Preservation Act of 1966, even if the proposed subject undertaking is fully implemented as described in the Section 106 Assessment of Effects.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Koldehoff'.

Brad H. Koldehoff, RPA
Cultural Resources Unit Chief
Bureau of Design & Environment



Illinois Department of Transportation

Memorandum

To: Brad Koldehoff, Cultural Resources Unit Chief

From: Elizabeth (Becky) Roman, Architectural Historian

Subject: National Register of Historic Places Eligibility and Adverse Effects
Jackson Park Historic Landscape District and Midway Plaisance
Proposed Undertaking In and Adjacent to Jackson Park, Chicago, Illinois
Chicago, Cook County, IDOT Sequence #20908

Date: September 9, 2019

In this memo, I review the continued National Register of Historic Places (NRHP) eligibility of Jackson Park and Midway Plaisance in light of potential adverse effects to this historic district by planned changes stemming from the proposed subject undertaking. As outlined below, in my professional opinion, the undertaking will cause an adverse effect to Jackson Park and Midway Plaisance; however, the adverse effect will not sufficiently diminish or remove the overall integrity of these historic properties in such a way that it would no longer qualify them for NRHP listing. These cultural landscapes will remain a historic landscape district and will continue to be accorded protection under Section 106 of the National Historic Preservation Act of 1966, even if the proposed subject undertaking is fully implemented as described in the Section 106 Assessment of Effects.

Established NRHP Significance of Jackson Park and Midway Plaisance:

Jackson Park and Midway Plaisance were listed on the NRHP in 1972 as a historic district significant for the themes of Architecture and Landscape Architecture, Science, Sculpture and Urban Planning. No other criteria are noted on the NRHP form, but based on the themes checked on the form, this historic district was listed under Criterion A, for its role as an urban park and site of the 1893 World's Fair, and under Criterion C, as an example of the work of Frederick Law Olmsted.

In the *Historic Properties Inventory Report* completed in June 2018 for the OPC undertaking, a detailed history of both Jackson Park and Midway Plaisance is provided. This report describes changes to the landscape of both parks through time and states why both parks retain their historic integrity. This report concludes that even though circulation routes had been somewhat altered with widening and selective relocation, and new buildings and park elements had been added over the past 50 years, that the historic landscapes of Jackson Park and Midway Plaisance possess integrity and the ability to convey their historic character present during the period of significance from 1875-1968. The report also notes that the parks hold significance under Criterion A for the themes of African American History, Entertainment/Recreation, and Social History.

In reviewing this report in July 2018, the Illinois State Historic Preservation Office concurred with the period of significance and additional areas of significance. They also noted that the parks may hold significance under the themes of Community Planning and Development and Politics/Government, and that resources less than 50 years in age can be included as contributing to a historic district when they represent one of the themes for which the district holds significance. This would make the entirety of the structures, buildings, site furnishings, objects, circulation (roads and paths), and natural features (topography, vegetation, and water features) within Jackson Park and Midway Pleasance contributing to its cultural landscape.

Treatment of Cultural Landscapes:

Jackson Park and Midway Pleasance are examples of a Historic Designed Landscapes, associated principally with Frederick Law Olmsted, who completed its original design in the 1870s and whose firm completed its redesign after the World's fair in the 1890s. Though the design from ca. 1901 is largely still intact, it has been altered through realignment and widening of roadways to accommodate changes in the technology and volume of traffic through time.

As stated in the National Park Service's *Guidelines for the Treatment of Cultural Landscapes*, cultural landscapes are considered a dynamic historic property type that will and must evolve through time, and as such must be evaluated with that in mind. Though there is a balance between change and continuity in all historic cultural resources, this is especially the case with historic districts and cultural landscapes where obvious changes may occur that will not detract from their overall integrity due to their size, placement, natures, and design. Such changes may occur from natural processes or human activities, and they may relate to and be part of the significance of the cultural landscape.

Adverse Effects versus National Register Eligibility:

Undertakings can typically cause adverse effects to historic properties without causing the historic properties to be no longer eligible for NRHP listing. Adverse effects are defined as any effect "that may alter directly or indirectly any of the characteristics of a historic property that qualify it for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, and association" (36 CFR 800.5(a)(1)). When character-defining elements are altered in such a way as to affect their integrity, an adverse effect is likely to occur. Examples of adverse effects include: physical destruction to or alteration of all or part of the historic property; removal of a historic property; change in the character of the property's or of physical features within the property's setting that contribute to its significance; introduction of visual elements that diminish integrity of character defining elements; transfer, sale or lease of a historic property out of Federal control without adequate and enforceable restrictions or conditions to ensure long-term presentation.

Adverse effects are caused to historic properties by many types of undertakings without removing that property's ability to convey its significance under the NRHP criteria. Effects that are adverse versus those that are not adverse can be a subjective opinion and can vary from state to state or by circumstances. However, with the definitions provided in 36 CFR 800.5, alterations including small property takes or construction of a new structure in a park or historic district may be adverse. The magnitude of the change, which character defining elements are affected, and how they are affected all play into that evaluation or opinion. The more complex and multi-layered a historic property, through its size, number of contributing elements, or years of and/or themes of significance, the more difficult it becomes for alterations to remove its integrity in a way that causes the property to no longer be eligible for NRHP listing. Historic

districts and cultural landscapes are historic property types that lend themselves to alterations that may cause adverse effects, but the effects typically are not substantial enough to cause removal of overall integrity.

Historic Properties are rarely removed from the NRHP even following severe damage or removal through a natural disaster, fire, or demolition. Reporter Adrienne Lafrance of Digital First Media in her January 2013 article "At Least 1,700 sites removed from the National Register of Historic Places since 1970" found that roughly 2% of listed properties nationwide have been removed from the NRHP. In Illinois, a review of the National Register listings on Wikipedia revealed that the total is somewhat higher, with 2.9% delisted and another 1.9% are known to have been demolished but still remain listed on the NRHP. This is the case because, removal of a historic property from the NRHP requires a formal submission requesting delisting justified by a narrative and photographs. Removal must be justified by total loss of integrity through extensive alterations or removal/demolition of the property or its principal elements.

Effects to Jackson Park and Midway Plaisance by the proposed Federal Undertakings:

Jackson Park and Midway Plaisance have seen changes in their design and elements since their inception. Most have been for augmented use of these parks by the public for recreation, education, and entertainment. Others have been to construct public facilities. The widening of the roadways has occurred to accommodate through traffic, not visitors to the parks, but have also served to handle the increased traffic with events held in the parks. As a cultural landscape, changes to the parks may occur that alter character defining elements or portions thereof without removing their overall integrity or ability to convey their historic significance. They may even augment the historic character through returning character defining elements that once existed in the landscape, or by making landscape features more accessible to the public. Though character-defining elements will be altered by the undertaking, with roadway and path improvements, and foreseeable construction of the OPC itself, these planned alterations only diminish integrity of design, materials, and workmanship in specific portions of the overall historic district.

Therefore, in conclusion, while the undertaking will cause an adverse effect to Jackson Park and Midway Plaisance, the effect is limited to specific portions of the historic district's character defining elements and does not sufficiently diminish or remove its overall integrity in such a way that it would no longer be eligible for NRHP listing.

If there are any questions concerning this memorandum, please contact me by email at Elizabeth.Roman@illinois.gov or by phone at 217-558-4752.

Appendix F – Public Involvement

Consulting Party Invitation - Sample Letter



DEPARTMENT OF PLANNING AND DEVELOPMENT
CITY OF CHICAGO

October 27, 2017

Mr. Ward Miller
Executive Director
Preservation Chicago
4410 N. Ravenswood Avenue
Chicago, IL 60640
Attn: Adam Natenshon, Director of Operations

Subject: OPC Mobility Improvements to Support the SLFP
Section 106 Consulting Parties Request

Dear Mr. Miller:

The Federal Highway Administration (FHWA), in cooperation with the Illinois Department of Transportation (IDOT), the City of Chicago Departments of Transportation (CDOT) and Planning and Development (CDPD), and the Chicago Park District (CPD), is initiating an Environmental Assessment (EA) for the Obama Presidential Center (OPC) Mobility Improvements to Support the South Lakefront Framework Plan (SLFP) project. The project is located within Jackson Park, which is generally bordered by 67th Street, Stony Island Avenue, 56th Street and Lake Michigan in the City of Chicago.

The FHWA and the City of Chicago, as the lead agencies for this project, are responsible for identifying Federal, State and local agencies that may have an interest in the project and inviting consulting parties for meeting the requirements of Section 106 of the National Historic Preservation Act of 1966. Your organization has been identified as one that may have an interest in this project's potential impacts on historic and archaeological resources.

Therefore, with this letter, FHWA and the City of Chicago invite Preservation Chicago to become a **Section 106 Consulting Party** in the development of the EA for the OPC Mobility Improvements to Support the SLFP project. The designation does not imply that your agency either supports the proposal or has any special expertise with respect to evaluation of the project.

The role of a consulting party is to consult with FHWA and the City of Chicago during the project development process to provide information on potential historic and archaeological properties in the study area, provide comments on potential effects to historic properties and consult to seek ways to avoid, minimize or mitigate adverse effects upon these properties. During the project development process, we would be seeking your input as a consulting party on these issues.

Attached to this letter, you will find a form that will allow you to check a response to either accept or decline the offer to become a Section 106 Consulting Party. Please check the response that is appropriate for you, and return this form using the enclosed self-addressed, stamped envelope prior to November 17th, 2017.

Background:

The South Lakefront Framework Plan, originally authorized in 1999 by the Chicago Park District, includes three parks: Jackson Park, Washington Park and South Shore Cultural Center. The purpose of the Framework Plan was to "define the changing needs of these parks, to provide a plan to enhance each of the park's commitments to serving the neighboring communities and to preserve the intended historic character." Many of the improvements planned for in the 1999 Framework Plan have been completed, however, today other significant changes are proposed, including the Obama Presidential Center. These future improvements call for a Jackson Park and South Shore Park update to the South Lakefront Framework Plan as well as an evaluation of the existing transportation network to support these future improvements. This project, which includes the development of the Obama Presidential Center, aims to reduce the effects of vehicular traffic within Jackson Park by consolidating roadways and improving circulation for all modes of travel.

Jackson Park is bordered by heavily travelled arterial roadways including South Lake Shore Drive (US Route 41) to the east, Stony Island Avenue to the west, and 67th Street to the south. Within the park, 57th Street carries east-west traffic from South Lake Shore Drive (SLSD) to the Museum of Science and Industry campus. South of the Museum, 57th Street becomes Cornell Drive and carries north-south traffic from the Museum toward park recreational facilities. Collector roadways within the park include Hayes Drive and Marquette Drive. The Lakefront Trail parallels the east side of SLSD and serves recreational users, commuters, and tourists. The proposed improvements consist of roadway closures to accommodate future facilities within Jackson Park and the improvements to the remaining roadway network to carry diverted traffic. Roadway improvements will likely require bridge widening of the North Inlet Bridge (or 59th Street Inlet Bridge) along South Lake Shore Drive. Pedestrian and bicyclist improvements will improve accessibility to and circulation within the park and lakefront.

Jackson Park is a 547-acre park that is listed on the National Register of Historic Places. All land within the limits of Jackson Park is protected under Section 4(f) of the *Department of Transportation Act of 1966* and under Section 106 of the *National Historic Preservation Act of 1966*. Any impacts or changes to parkland will involve Section 4(f) and Section 106 coordination. Attached are exhibits depicting the draft Area of Potential Effects (APE) for architectural as well as archaeological resources.

FHWA and the City of Chicago will complete an EA for the OPC Mobility Improvements to Support the SLFP project in order to satisfy the requirements of the National Environmental Policy Act (NEPA). FHWA is the federal agency responsible for final approval of the environmental document. The federal and state regulatory requirements governing this project include NEPA, 23 U.S.C. 139, and Section 106 of the National Historic Preservation Act, which requires the FHWA and the City of Chicago to take into account the effect of the proposed project on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places and offer the Advisory Council on Historic Preservation the opportunity to comment. These requirements create opportunities for State, Federal, and local agencies as well as the public to provide input into the project development process.

Information regarding the Federal process that this project is following can be found at https://www.cityofchicago.org/city/en/depts/dcd/supp_info/jackson-park-improvements.html. Also, please feel free to visit the official website of the Chicago Park District's South Lakefront Framework Plan at www.southlakefrontplan.com to view additional information on the project.

FHWA and the City of Chicago will host a kick-off meeting and site visit on Friday December 1st at 10 AM at the South Side YMCA. Attached is a map illustrating the location of the YMCA. Please RSVP your attendance to the meeting as part of the Section 106 Consulting Party Response.

If you have any questions or would like to discuss the project or the respective roles and responsibilities of a consulting party in more detail, please contact Abby Monroe, Coordinating Planner at (312) 744-9416.

Thank you for your cooperation and interest in this project.

Sincerely,



Eleanor Esser Gorski, AIA, LEED AP
Deputy Commissioner
Planning, Design and Historic Preservation Division
Department of Planning and Development

cc: FHWA – Environmental Programs Engineer

Mr. Ward Miller
Executive Director
Preservation Chicago
4410 N. Ravenswood Avenue
Chicago, IL 60640
Attn: Adam Natenshon, Director of Operations

OPC Mobility Improvements to Support the SLFP

Section 106 Consulting Party Response

Accept: _____

Contact email address: _____

Do Not Accept: _____

Reason(s) for not accepting:

Signature: _____

Title: _____

Agency: _____

Date: _____

RSVP for December 1, 2017 Kick Off Meeting

I will attend in person _____

I will attend remotely (via phone) _____

I will not attend _____



Note:
 Jackson Park, Midway Plaisance,
 and South Shore Cultural Center
 Park are all individually listed on the
 NRHP. A nomination of Burnham Park
 for the NRHP is in progress.

DRAFT

South Lakefront Framework Plan Update

Area of Potential Effects
 Historic Architecture/Landscape

LEGEND

	Existing Right-of-Way		NRHP Properties		Historic District
	Parkland		Chicago Landmark		40-year Building
	Existing Bridge		Potential Building Foundations		OPC Site Footprint
	Area of Potential Effects Historic Architecture/ Landscape				

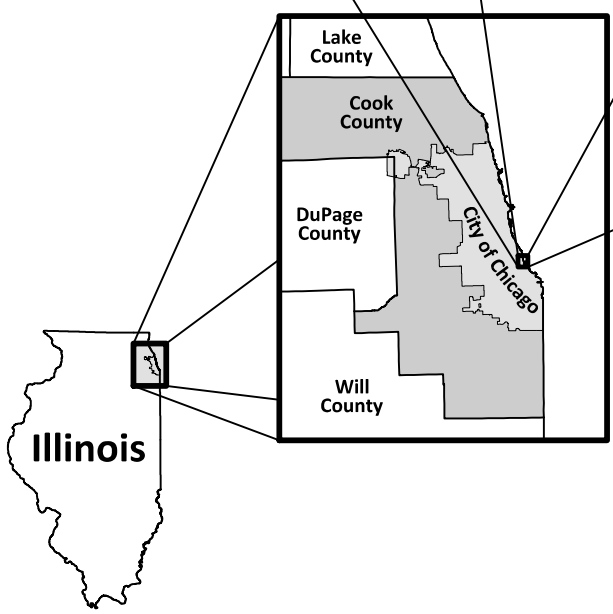
October 2017



Note:
 Jackson Park, Midway Plaisance,
 and South Shore Cultural Center
 Park are all individually listed on the
 NRHP. A nomination of Burnham Park
 for the NRHP is in progress.

DRAFT

LEGEND		South Lakefront Framework Plan Update	
	Existing Right-of-Way		NRHP Properties
	Parkland		Chicago Landmark
	Existing Bridge		Potential Building Foundations
	Area of Potential Effects Archaeological		Historic District
	Area of Potential Effects Archaeological		40+ year Building
	Area of Potential Effects Archaeological		OPC Site Footprint



OPC Mobility Improvements to Support the SLFP

Location Map

South Side YMCA

October 2017

Consulting Party Participant List
As of November 26, 2018

Section 106 Consulting Parties (as of 11/26/18)	
Agency	Accepted
1Woodlawn	YES
20th Ward Service Office	YES
51st Street Business Association	YES
5th Ward Service Office	YES
Advisory Council on Historic Preservation (ACHP)	YES
Blacks in Green	YES
Business Leadership Council	YES
Chicago Historical Society	YES
Chicago Lawyers' Committee for Civil Rights	YES
Chicago Park District	YES
Chicago Transit Authority	YES
Chicago Urban League	YES
City of Chicago, Office of the Mayor	YES
Coalition for the Obama Presidential Center	YES
Community Task Force for Promontory Point	YES
Cultural Landscape Foundation	YES
Federal Highway Administration	YES
Federal Transit Administration	YES
Friends of the Parks	YES
Hyde Park Academy	YES
Hyde Park Art Center	YES
Hyde Park Historical Society	YES
Hyde Park-Kenwood Community Conference	YES
Illinois Department of Agriculture, Bureau of Land and Water Resources	YES
Illinois Department of Natural Resources	YES
Illinois Department of Transportation	YES
Illinois Environmental Protection Agency	YES
Illinois Natural Resources Conservation Service	No Response
Illinois State Archaeological Survey	No Response
Illinois State Geological Survey	NO
Illinois State Historic Preservation Office (SHPO)	YES
Jack and Jill Moms Chicago	No Response
Jackson Park Advisory Council	YES
Jackson Park Highlands	YES
Jackson Park Watch	YES
Jackson Park Yacht Club	No Response
Kenwood-Oakland Community Association	YES
KLEO Community Life Center	YES
La Rabida Hospital	No Response
Landmarks Illinois	YES
LISC	No Response
Metra	YES
Midway Plaisance Advisory Council	YES
Museum of Science and Industry	YES
Museum Shores Yacht Club	YES
National Association for Olmsted Parks	YES
National Park Service	YES
National Trust - Chicago Office	NO
Network of Woodlawn	YES
Nichols Park Advisory Council	YES
Obama Foundation	YES
Openlands	YES
Preservation Chicago	YES
Promontory Point Conservancy	YES
Pullman National Monument Preservation Society	YES
Real Men Charities, Inc. and The South Shore Current & West of the Ryan Magazines	YES
Rosalie Villas Homeowners Association	YES
Save the Midway	YES
School of the Art Institute of Chicago	YES
South Shore Advisory Council, South Shore Cultural Center	YES

South Shore Chamber	YES
South Shore Works	YES
South Shore YMCA	YES
Southern Shores Yacht Club	YES
Southside Together Organizing for Power	YES
Tribes - Ho Chunk Nation	No Response
Tribes - Miami Tribe of Oklahoma	YES
Tribes - Peoria Tribe of Indians of Oklahoma	No Response
Tribes - Potawatomi – Forest County	YES
Tribes - Potawatomi – Prairie Band	No Response
Tribes - Potawatomi-Citizen Nation	No Response
Tribes - Potawatomi-Hannahville Indian Community	No Response
Tribes - Potawatomi-Pokagon Band of Potawatomi	No Response
Tribes - Sac and Fox Nation of Missouri	No Response
Tribes - Sac and Fox Nation of Oklahoma	No Response
Tribes - Sac and Fox Tribe of the Mississippi in Iowa	No Response
U.S. Army Corps of Engineers - Chicago District - Planning	No Response
U.S. Army Corps of Engineers - Chicago District - Regulatory	YES
U.S. Department of the Interior Fish & Wildlife Service	YES
U.S. Environmental Protection Agency	YES
University of Chicago	YES
Vista Garage Building Cooperative	YES
Vista Homes	YES
Westside Health Authority	YES
Woodlawn Community Development Corporation	YES
Southside Neighbors for Hope (SSN4H)	YES

Consulting Party Meeting #1 – Meeting Summary
December 1, 2017

Section 106 Consulting Party Meeting Summary Report

January 10, 2018

On December 1, 2017, the Chicago Department of Planning and Development (DPD) and the Chicago Department of Transportation (CDOT) jointly hosted a Section 106 Consulting Parties Kick-off Meeting as facilitators for the lead Federal agency, the Federal Highway Administration (FHWA), at the South Side YMCA at 6330 S Stony Island Avenue, Chicago, Illinois from 10:00 AM – 12:00 PM (beginning closer to 10:30 AM due to technical difficulties). This was the first in a series of Section 106 Consulting Party meetings that will be held. The meeting included a Section 106 process overview presentation, a question and answer session with attendees and concluded in an open house format with exhibits on display for review. The goal of the meeting was to receive feedback on three primary topics:

- *Do participants understand the Section 106 process, its purpose and how to provide input?*
- *Are there any historic resources that were not included on the preliminary list presented that should be added?*
- *Is the draft Area of Potential Effect (APE) map for architecture accurate?*

Participants had three options for participation: attendance in person, attendance by phone or written comment submission by comment card or via email. Comments were accepted after the meeting until January 5th, 2018. The meeting was attended by 151 people, with roughly 100 people in the main presentation room and the remainder in an overflow room or calling in by phone. Representatives from the Federal Highway Administration, Illinois Department of Transportation, Obama Foundation, Chicago Park District, DPD, CDOT and project consultants were present in addition to representatives from consulting parties as outlined below:

Section 106 Consulting Party Attendance Record		
Agency	Accepted	Meeting Participant on 12/1/17
1Woodlawn	YES	YES
20th Ward Service Office	YES	YES
51st Street Business Association	YES	YES
5th Ward Service Office	YES	NO
Advisory Council on Historic Preservation (ACHP)	YES	YES
Blacks in Green	YES	YES
Business Leadership Council	YES	NO
Chicago Historical Society	YES	YES
Chicago Lawyers' Committee for Civil Rights	YES	NO
Chicago Park District	YES	YES
Chicago Transit Authority	YES	YES
Chicago Urban League	YES	YES
City of Chicago, Office of the Mayor	YES	YES
Coalition for the Obama Presidential Center	YES	YES
Community Task Force for Promontory Point	YES	YES
Cultural Landscape Foundation	YES	YES
Federal Highway Administration	YES	YES
Federal Transit Administration	YES	NO
Friends of the Parks	YES	YES
Hyde Park Academy	YES	YES
Hyde Park Historical Society	YES	YES
Hyde Park-Kenwood Community Conference	YES	YES
Illinois State Archaeological Survey	No Response	NO
Illinois Department of Agriculture, Bureau of Land and Water Resources	YES	NO
Illinois Department of Natural Resources	YES	NO
Illinois Department of Transportation	YES	NO
Illinois Environmental Protection Agency	YES	NO
Illinois Natural Resources Conservation Service	No Response	NO
Illinois State Geological Survey	NO	NO
Illinois State Historic Preservation Office (SHPO)	YES	YES

Section 106 Consulting Party Meeting Summary Report

January 10, 2018

Jack and Jill Moms Chicago	No Response	NO
Jackson Park Advisory Council	YES	YES
Jackson Park Highlands	YES	YES
Jackson Park Watch	YES	YES
Jackson Park Yacht Club	No Response	NO
Kenwood-Oakland Community Association	YES	YES
KLEO Community Life Center	YES	YES
La Rabida Hospital	No Response	NO
Landmarks Illinois	YES	YES
LISC	No Response	NO
Metra	YES	YES
Midway Plaisance Advisory Council	YES	YES
Museum of Science and Industry	YES	YES
Museum Shores Yacht Club	YES	YES
National Association for Olmsted Parks	YES	YES
National Park Service	YES	YES
National Trust - Chicago Office	TBD	YES
Network of Woodlawn	YES	YES
Obama Foundation	YES	YES
Openlands	YES	YES
Preservation Chicago	YES	YES
Promontory Point Conservancy	YES	YES
Pullman National Monument Preservation Society	YES	NO
Real Men Charities/South Shore Current & West of the Ryan Magazines	YES	YES
Save the Midway	YES	YES
South Shore Advisory Council, South Shore Cultural Center	YES	YES
South Shore Chamber	YES	YES
South Shore Works	YES	YES
South Shore YMCA	YES	YES
Southern Shores Yacht Club	YES	YES
Southside Together Organizing for Power	YES	YES
Tribes - Ho Chunk Nation	No Response	NO
Tribes - Miami Tribe of Oklahoma	YES	NO
Tribes - Peoria Tribe of Indians of Oklahoma	No Response	NO
Tribes - Potawatomi – Forest County	YES	NO
Tribes - Potawatomi – Prairie Band	No Response	NO
Tribes - Potawatomi-Citizen Nation	No Response	NO
Tribes - Potawatomi-Hannahville Indian Community	No Response	NO
Tribes - Potawatomi-Pokagon Band of Potawatomi	No Response	NO
Tribes - Sac and Fox Nation of Missouri	No Response	NO
Tribes - Sac and Fox Nation of Oklahoma	No Response	NO
Tribes - Sac and Fox Tribe of the Mississippi in Iowa	No Response	NO
U.S. Army Corps of Engineers - Chicago District - Planning	No Response	NO
U.S. Army Corps of Engineers - Chicago District - Regulatory	YES	YES
U.S. Department of the Interior Fish & Wildlife Service	YES	NO
U.S. Environmental Protection Agency	YES	NO
University of Chicago	YES	YES
Westside Health Authority	YES	NO
Woodlawn Community Development Corporation	YES	YES

Several participants spoke during the question and answer period. There were 18 comment cards submitted during the meeting and 15 emailed comments received after the meeting. Phone participants were given an opportunity to ask questions towards the end of the question and answer session, with no response. The following is a summary of key topics raised.

Important questions were raised about the Section 106 process, the Federal actions included, and the role of consulting parties. There were also questions about the historic building survey that will be conducted and what it means for residents if a property is listed on the National Register of Historic

Section 106 Consulting Party Meeting Summary Report

January 10, 2018

Places. The project team will be developing a series of educational handouts covering key topics related to Section 106 in advance of the next consulting party meeting, which should address many of these questions.

The following were requested to be added to the list of historic features presented:

- Museum Shores Yacht Club
- 67th street beach and promenade
- Significant trees
- South Shore Cultural Center
- First auto race in the USA monument
- South Shore Parks System
- La Rabida Monastery Hill and promenade
- 1893 historic promenade wall
- Structures associated with the historic neighborhood organizations of Woodlawn, Washington Park, Bronzeville and South Shore
- Structures associated with the 122-year history of the National Association of Colored Women Clubs (NACWC) and its historic members
- Paul Douglas Nature Sanctuary on Wooded Island
- Haiti Pavilion
- Frederick Douglass' participation in Columbian Exposition monument
- Nike missile site
- Cornell and Hayes Drives

Additionally, the following requests were made for modifications to the Area of Potential Effect (APE) map for architecture:

- Consider including Jackson Park Highlands and/or entire South Shore neighborhood
- Consider adding the entire South Shore Parks System
- Consider including the entire Midway Plaisance
- Consider expansion to the following to include a larger number of South side cultural institutions and landmarks:
 - North-South: 47th to 79th and South Chicago to 87th
 - East-West: Beaches and Lake Shore Drive to the Dan Ryan
- Remove Promontory Point
- Identify GLFR project on APE map

Comments were also received emphasizing the significance of views, historic roadways, circulation and landscape as historic elements unto themselves, even though they are not “mapped” or specific to one location within the park. Comments also recommend that reference documents and evaluation criteria are clearly outlined as common resources for consulting parties. The City will be sure to do this at the point in the Section 106 process when potential effects are discussed.

The project team is reviewing each of the above requests and will present any modifications to the list of historic features or the architecture APE with distribution of the **Historic Properties Inventory Report**, which is the next step in the Section 106 process. The Historic Properties Inventory Report will include photos of and analysis of historic eligibility for the National Register of Historic Places for each historic feature on the final list.

Section 106 Consulting Party Meeting Summary Report

January 10, 2018

The Historic Properties Inventory Report will be available for review by consulting parties and the general public. In consultation with the State Historic Preservation Officer (SHPO) and taking public comments into consideration, Federal Highway Administration (FHWA) will make final eligibility determinations.

Additionally, several comments were shared on topics outside of the Section 106 scope, such as components of the South Lakefront Framework Plan update, the Federal NEPA review and development of the Obama Presidential Center. Though recorded as a part of this meeting, attendees were advised that such comments are best suited for submission at public meetings related to each of those specific planning processes.

Project updates, including distribution of the Report, will be disseminated via email as well as posted online at: www.tinyurl.com/JPIImprovements.

Consulting Party Meeting #2 – Meeting Summary
March 29, 2018

Section 106 Consulting Party Meeting Summary Report

March 29, 2018

On March 29, 2018, the Chicago Department of Planning and Development (DPD) and the Chicago Department of Transportation (CDOT) jointly hosted the second Section 106 Consulting Party Meeting at the Logan Center for the Arts at 915 E. 60th Street, Chicago Illinois from 3:30 PM – 5:30 PM. Three options were made available to participate in the meeting: attendance in person, attendance by phone, or attendance by webinar format. The meeting was attended by 96 people, with roughly 20 people participating via webinar. Representatives from the Federal Highway Administration, Illinois Department of Transportation, Obama Foundation, Chicago Park District, DPD, CDOT and project consultants were present in addition to representatives from consulting parties as outlined below:

Section 106 Consulting Party Attendance Record (status as of 03/27/18)		
Agency	Accepted	Meeting Participant
1Woodlawn	YES	
20th Ward Service Office	YES	
51st Street Business Association	YES	
5th Ward Service Office	YES	
Advisory Council on Historic Preservation (ACHP)	YES	YES
Blacks in Green	YES	
Business Leadership Council	YES	
Chicago Historical Society	YES	
Chicago Lawyers' Committee for Civil Rights	YES	
Chicago Park District	YES	YES
Chicago Transit Authority	YES	YES
Chicago Urban League	YES	
City of Chicago, Office of the Mayor	YES	YES
Coalition for the Obama Presidential Center	YES	
Community Task Force for Promontory Point	YES	YES
Cultural Landscape Foundation	YES	
Federal Highway Administration	YES	YES
Federal Transit Administration	YES	
Friends of the Parks	YES	YES
Hyde Park Academy	YES	
Hyde Park Art Center	YES	
Hyde Park Historical Society	YES	YES
Hyde Park-Kenwood Community Conference	YES	
Illinois Department of Agriculture, Bureau of Land and Water Resources	YES	
Illinois Department of Natural Resources	YES	
Illinois Department of Transportation	YES	YES

Section 106 Consulting Party Meeting Summary Report

March 29, 2018

Illinois Environmental Protection Agency	YES	
Illinois Natural Resources Conservation Service	No Response	
Illinois State Geological Survey	NO	
Illinois State Historic Preservation Office (SHPO)	YES	
Jack and Jill Moms Chicago	No Response	
Jackson Park Advisory Council	YES	YES
Jackson Park Highlands	YES	
Jackson Park Watch	YES	YES
Jackson Park Yacht Club	No Response	
Kenwood-Oakland Community Association	YES	
KLEO Community Life Center	YES	
La Rabida Hospital	No Response	
Landmarks Illinois	YES	
LISC	No Response	
Metra	YES	
Midway Plaisance Advisory Council	YES	
Museum of Science and Industry	YES	
Museum Shores Yacht Club	YES	
National Association for Olmsted Parks	YES	
National Park Service	YES	YES
National Trust - Chicago Office	NO	
Network of Woodlawn	YES	
Obama Foundation	YES	YES
Openlands	YES	YES
Preservation Chicago	YES	YES
Promontory Point Conservancy	YES	YES
Real Men Charities, Inc. and The South Shore Current & West of the Ryan Magazines	YES	
Save the Midway	YES	
School of the Art Institute of Chicago	YES	
South Shore Advisory Council, South Shore Cultural Center	YES	YES
South Shore Chamber	YES	

Section 106 Consulting Party Meeting Summary Report

March 29, 2018

South Shore Works	YES	
South Shore YMCA	YES	
Southern Shores Yacht Club	YES	YES
Southside Together Organizing for Power	YES	
Tribes - Ho Chunk Nation	No Response	
Tribes - Miami Tribe of Oklahoma	YES	
Tribes - Peoria Tribe of Indians of Oklahoma	No Response	
Tribes - Potawatomi – Forest County	YES	
Tribes - Potawatomi – Prairie Band	No Response	
Tribes - Potawatomi-Citizen Nation	No Response	
Tribes - Potawatomi-Hannahville Indian Community	No Response	
Tribes - Potawatomi-Pokagon Band of Potawatomi	No Response	
Tribes - Sac and Fox Nation of Missouri	No Response	
Tribes - Sac and Fox Nation of Oklahoma	No Response	
Tribes - Sac and Fox Tribe of the Mississippi in Iowa	No Response	
U.S. Army Corps of Engineers - Chicago District – Planning	No Response	
U.S. Army Corps of Engineers - Chicago District – Regulatory	YES	
U.S. Department of the Interior Fish & Wildlife Service	YES	
U.S. Environmental Protection Agency	YES	
University of Chicago	YES	
Vista Garage Building Cooperative	YES	YES
Vista Homes	YES	YES
Westside Health Authority	YES	
Woodlawn Community Development Corporation	YES	

The meeting included a presentation discussing the Section 106 process, results of the identification of properties (both archaeology and architecture/landscape), and the next steps in the process. A question and answer session followed the presentation, including questions from attendees in person, on the phone, and via webinar.

On March 19, 2018, a draft Historic Properties Inventory (HPI) Report and a draft Archaeology Report were distributed to Consulting Parties for a 30-day review period. The goal of the meeting was to

Section 106 Consulting Party Meeting Summary Report

March 29, 2018

provide a summary of the two reports and request input from Consulting Parties on the eligibility recommendations included in each report.

Several participants spoke during the question and answer period and there were 29 written or emailed comment letters received after the meeting (before the end of the public comment period on April 19, 2018). The following is a summary of key topics raised:

Comments Regarding the Section 106 Process

- How can the Section 106 process begin without final OPC plans?
- How does the Section 4(f) review fit in with Section 106?
- Will replacement UPARR land be considered in the Section 106 process?
- How will visual impacts to historic resources be addressed?

Comments Regarding the NEPA Process

- Concern for content and timing of the elements of the NEPA process.
- Questions regarding how the Section 106 process fits within NEPA.
- How will the public be able to participate in the NEPA process?
- What is the schedule for the NEPA process?

Requests for Historic Resource Additions

- Southern Shore Yacht Club

Comments on Area of Potential Effect (APE) Map for Architecture

- Consider including Jackson Park Highlands and/or entire South Shore neighborhood.
- Please remove the request to remove Promontory Point from the APE.
- Please consider “flatness” as a contributing feature to the historic landscape.

Comments on the Historic Properties Inventory (HPI) Report

- Why would a structure be deemed eligible or not eligible for the National Register?
- Provide more information regarding specific types of trees within Jackson Park.
- The 1930 plan that includes drawings from Alfred Caldwell showing vegetation, tree plantings, and golf course plans should be included.
- Clarify the selection of 1953 as the end of the period of significance. Does the selection of this date make critical historical changes outside of this period vulnerable?
- Period of significance should be adjusted to 1981 to account for social history.
- Period of significance should be adjusted to the 50-year cutoff (1968) as is customary.

Comments on Archaeology

- Recovered artifacts should be used for educational purposes within Jackson Park.
- More information can be extracted from the artifacts that were recovered.
- The borings collected seem limited, will more borings be conducted on the OPC site? What if volunteers can help?
- Please develop an inadvertent discovery plan for items recovered during construction.
- Please clarify why Criterion D was the only criterion used for archeology eligibility analysis.

Section 106 Consulting Party Meeting Summary Report

March 29, 2018

Comments Regarding Historic Roadways and Circulation

- Are all of the roadway closures within Jackson Park needed?
- Roadways and paths contribute to integrity of Jackson Park, why couldn't Cornell Drive be narrowed instead of removed completely?
- Is the roadway configuration considered a defining characteristic of Olmstead's plan?
- How will the roadway closures and improvements be sequenced?
- Significant roadway changes are listed between 1895 and 1953. What is considered a 'major roadway change'?
- Please acknowledge the historic significance of the Midway Plaisance terminus.

Comments Regarding Historic Landscape Analysis

- Evaluate the historic landscape by section for the entire park
- Tree loss will be important to mitigate.
- Too many park features are listed as contributing.

Other Topics Raised*

- How will changes in the park provide adequate access for people with disabilities?
- The FHWA Purpose and Need Statement should change the No-Action condition to only include roadways that would be closed if OPC was not in Jackson Park.
- Removing parking on Hayes Drive will affect hundreds of people who use the athletic fields on either side.
- How will NEPA reviews address cumulative effects?
- How can the OPC continue moving forward through City approvals before the federal review is completed?
- The decisions to locate the OPC in Jackson Park and close roadways were made prior to the completion of the SLFP.
- Safety is a concern for users in the park.
- Consider selecting replacement recreational opportunities somewhere that is not currently parkland.
- How many UPARR grants were received for Jackson Park?
- Has there been coordination with NPS regarding the recreational uses of the OPC?
- What is the timeline for determining replacement parkland?
- What categories of recreational opportunities are recognized by NPS?
- Consider the plans included in the existing Midway Plaisance Framework Plan.
- Is additional area outside of the OPC 19.3 acre footprint needed for construction equipment?
- Has a delayed replacement option for replacement parkland been discussed with NPS?
- How will displacement and the potential for rising home values be addressed?
- Please do not put baseball on the Midway Plaisance.
- Will OPC campus remain available for public use?
- Will the OPC actually include a Presidential Library?

**These comments are unrelated to topics covered under Section 106 but will be shared with colleagues managing the South Lakefront Framework Plan Update, the Federal NEPA review and development of the Obama Presidential Center.*

Many of the above questions are addressed directly in the revised HPI and/or through the FAQs published online. The next step in the Section 106 process is to finalize the Historic Properties

Section 106 Consulting Party Meeting Summary Report

March 29, 2018

Inventory Report with the Federal Highway Administration (FHWA), National Park Service (NPS) and State Historic Preservation Officer (SHPO) to determine final eligibility recommendations. After the report is finalized, the effects of the FHWA and NPS undertakings will be documented in an **Effects Assessment Report**.

Project updates, including distribution of the Effects Assessment Report, will be disseminated via email as well as posted online at: www.tinyurl.com/JPIImprovements.

Summary of Consulting Party Comments – Draft Assessment of Effects
August 2019

**Section 106 Assessment of Effects to Historic Properties:
Proposed Undertaking In and Adjacent to Jackson Park, Chicago Illinois
Summary of Consulting Party Comments on AOE**

The Section 106 Assessment of Effects dated July 29, 2019 was submitted to Consulting Parties for review and comment on the effects determinations. Written comments were received from the following Consulting Parties:

- Advisory Council on Historic Preservation
- Department of the Army Corps of Engineers - Chicago District
- Chicago Park District
- Obama Foundation
- National Association for Olmstead Parks
- Museum of Science and Industry
- Landmarks Illinois
- The University of Chicago
- Openlands
- The DuSable
- Preservation Chicago
- Chicago History Museum
- Jackson Park Watch
- Chicago Urban League
- Hyde Park Historical Society
- Jackson Park Advisory Council
- Friends of the Parks
- Midway Plaisance Advisory Council
- Save the Midway!
- Jackson Park Highlands Association
- Vista Homes Building Corporation
- South Side Neighbors for Hope
- Nichols Park Advisory Council
- Business Leadership Council
- South Side YMCA
- The Neighborhood Network Alliance
- South Shore Chamber of Commerce
- South Shore Works
- Rosalie Villas Homeowners Association
- Network of Woodlawn
- Jackson Park Golf & Community Leadership council
- K.L.E.O. Community Family Life Center
- Jackson Park Yacht Club
- Hyde Park Art Center
- Hyde Park Academy

- Coalition for the Obama Presidential Center
- Park Advisory Council for Don Nash Community Center
- Emerald South Economic Development Center
- Cassandra Cecelia Guice – Network of Woodlawn, NACWC and Myra Hunter Reeves Culture Club
- The Cultural Landscape Foundation
- Vista Garage Building Cooperative

Collectively, the forty Consulting Parties (CPs) submitted approximately 250 individual comments on proposed changes to Jackson Park and the Midway Plaisance, the assessment of effects that those changes would cause and the Section 106 process. Some CPs suggested alternatives to the proposed undertaking that would lessen impacts. Of the forty CPs, 25 submitted statements of support for locating the Obama Presidential Center (OPC) in Jackson Park. Ten CPs opposed parts or all of the proposed undertaking, two CPs commented but did not offer a statement of support or opposition, and three CPs were agencies with jurisdiction and/or responsibilities for implementing Section 106 regulations.

There were a number of common themes that ran through the Consulting Party comments. Following is a summary of those themes, organized by the number of CPs that offered similar or opposing comments on the proposed undertaking.

- **Statements of Support/Opposition for locating the OPC in Jackson Park** – Twenty-five CPs made statements that supported locating the Obama Presidential Center in Jackson Park. Many cited the positive economic impact the OPC would bring to the area including the creation of jobs. They felt those benefits would greatly outweigh the adverse effects that would result from the proposed undertaking. Four CPs supported the OPC, but opposed locating it in Jackson Park. Washington Park was suggested as a less impactful location.
- **Parks should evolve to serve the needs of those who use them** – Ten CPs stated that parks are living entities that should evolve to best serve the community and the park users. In addition, five CPs noted that Jackson Park has undergone substantial changes since its 1972 NRHP listing without apparent loss of its historical integrity or importance. Among the changes cited were: addition of athletic fields and courts, removal of the Nike Missile Base, rerouting of park roads, addition of lanes to Cornell Drive, reduction of lanes on South Lake Shore Drive, expansion and modifications to the MSI, expansion of LaRabida, and installation of multiple park underpasses and new bike and walking paths. Three CPs noted that the OPC is an extension of a long tradition of locating major cultural institutions in Chicago's parks.
- **Statements of Opposition/Support to Road Closures/Modifications** – Fourteen CPs commented on proposals to modify historic roadway circulation routes. Five were opposed to the closure of Cornell Drive adjacent to the OPC and three CPs supported it. Four stated that closure of the eastbound Midway Plaisance roadway east of Stony Island Avenue removes an historic circulation route that was central to the Olmstead park design. Four CPs stated the circulation changes necessitated by the OPC will disrupt original Olmstead Jackson Park design. One CP was opposed to the widening of Hayes Drive and another felt the closure of Marquette Drive was needed only for the golf course expansion. One CP commented on parking impacts that would result from the removal of roadways.

- **The AOE did not adequately document avoidance and minimization efforts** – Six CPs noted that the City did not include Consulting Parties in discussions centered on Section 106-required efforts to first “avoid” and then “minimize” impacts to historic resources, with “mitigation” of impacts as a last resort. CPs noted that the AOE did not present evidence of avoidance and minimization efforts, and went directly to mitigation of impacts.

In addition, four CPs stated that the AOE is incomplete as it did not fully assess effects of the proposed undertaking on Washington Park and on the Midway Plaisance. They noted that Jackson Park, the Midway Plaisance and Washington Park were originally conceived as parts of a common entity called South Park.

- **Statements of Opposition/Support for location of UPARR park replacement** – Six CPs stated their opposition to locating UPARR replacement park facilities within an existing park in general and within the Midway Plaisance in particular. Three CPs were opposed to locating a playground within the Midway Plaisance as part of the UPARR replacement. Three CPs supported the UPARR replacement site in the Midway Plaisance and two specifically supported the children’s playground at that location.
- **Opposition to removal/replacement of Women’s Perennial Garden** – Six CPs stated their opposition to the removal and then replacement of the Women’s Perennial Garden. They felt the original garden should be preserved.
- **Visual impact and view shed analysis lacking in the AOE** – Six CPs noted that the visual impacts of the OPC tower were not analyzed. They noted that the tower will harm vistas in Jackson Park in general, as well as views from historic properties adjacent to Jackson Park. One CP noted that the OPC tower will cause particular harm to Olmstead’s intent for a view corridor down the Midway Plaisance.
- **Need for concurrent consideration of golf course consolidation/expansion project** – Four CPs stated a need to consider the cumulative effects of the proposed golf course consolidation/expansion project that encompasses the Jackson Park and South Shore Country Club golf course.
- **Jackson Park is underutilized and in need of substantial upgrades** – Four CPs stated that Jackson Park is underutilized and in need of substantial upgrades. They felt the OPC would be a catalyst to drawing more visitors, investment and park upgrades.
- **Opposed to tree losses caused by the proposed undertaking** – Three CPs stated their opposition to the mature tree losses that would be caused by the proposed undertaking. They noted it would be impossible to replace those trees on an inch diameter basis.
- **Traffic Study was inadequate** – Three CPs stated that the Traffic Impact Study was inadequate as it did not consider traffic impacts in adjacent neighborhoods nor impacts to Washington Park. One CP felt there would be a large attraction of traffic to and from the west, which will impact the Midway Plaisance and may cause parking impacts as far west as Washington Park.

- **Need for concurrent Section 4(f) evaluation and EIS preparation** – Two CPs cited a need to conduct a Section 4(f) evaluation in concert with the Section 106 study. Two CPs stated that an Environmental Impact Statement should be prepared for the proposed undertaking rather than an Environmental Assessment.

Consulting Party Comments – Draft Assessment of Effects
August 2019



Preserving America's Heritage

August 22, 2019

Ms. Arlene K. Kocher
Division Administrator
Federal Highway Administration
3250 Executive Park Drive
Springfield, IL 62703

Ref: *Obama Presidential Center Mobility Improvements to Support the South Lakefront Framework Plan
City of Chicago, Cook County, Illinois
ACHPConnect: #012213*

Dear Ms. Kocher:

On July 29, 2019, the Chicago Department of Transportation (CDOT), on behalf of the Federal Highway Administration (FHWA), provided the Advisory Council on Historic Preservation (ACHP) with its *Draft Section 106 Assessment of Effects to Historic Properties: Proposed Undertaking In and Adjacent to Jackson Park, Jackson Park, Chicago, Illinois* (Effects Report) for the referenced undertaking. The Effects Report is submitted as part of the FHWA's compliance with Section 106 (54 U.S.C. § 306108) of the National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). As the ACHP is formally participating in this consultation, we are providing our comments regarding FHWA's draft assessment of effects. Our comments are also informed by the August 5th, 2019, consultation meeting regarding this Effects Report.

The Effects Report provides a helpful overview and description of the undertaking. We appreciate the comprehensive approach FHWA and the National Park Service (NPS) used in assessing effects of other non-federal actions associated with the referenced undertaking. In the Effects Report, FHWA analyzed the potential effects to multiple historic properties including the nationally significant Jackson Park Historic Landscape District and Midway Plaisance. However, the ACHP is concerned that not enough detail is provided to properly characterize the nature and intensity of the adverse effects to the cultural landscapes of Jackson Park and Midway Plaisance in a way that will enable informed consideration of avoidance, minimization, or mitigation measures. Additionally, the ACHP has identified a number of issues that should be addressed in the final version of the Effects Report to help facilitate consideration of all the potential effects of this undertaking. We clarify as follows.

Potential Effects to the Jackson Park Historic Landscape District and Midway Plaisance

The Jackson Park Historic Landscape District and the Midway Plaisance are complex cultural landscapes with a broad period of significance that include multiple periods of development. These historic properties were listed in the National Register of Historic Places (NRHP) in 1972 and are significant under Criteria A and C with a period of significance from 1875 – 1968. They have evolved over time as noted in the Historic Property Inventory (HPI); these improvements and alterations were guided by plans produced by Frederick Law Olmsted, Sr., and other noteworthy designers. The Effects Report, however, does not articulate how the overall undertaking is altering or diminishing the integrity of the character defining landscape characteristics, including

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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spatial organization, land use, and views; circulation; vegetation; and buildings, structures, and small-scale elements. It is difficult to comprehend the degree of change that will occur to the individual character defining elements as thoroughly defined in Appendix F of the HPI and to the landscapes as a whole. The ACHP recommends the effects analysis (pages 23 – 33) be reorganized and rewritten to summarize how the landscape characteristics and the overall cultural landscapes will be altered based on the types of effects (physical, visual, traffic, and noise) instead of, or at least in addition to, the current analysis that is divided based on effects from the various federal actions. Additionally, it remains unclear from the Effects Report if the proposed undertaking will result in the properties no longer being listed in the NRHP.

Archaeology

The ACHP recommends that FHWA restate in the Effects Report that it has determined that the archaeological sites identified in Jackson Park as part of the subject undertaking are not eligible for the NRHP under criteria A, B, C, or D and the Illinois State Historic Preservation Officer (IL SHPO) concurred with this finding in September 2018. Considering the amount of documentation and correspondence regarding this topic that occurred after the final HPI was issued, it will help the consulting parties and the public understand the final determination.

Indirect Effects

The ACHP recommends FHWA include information and data explaining if the surrounding historic residential neighborhoods will experience traffic changes due to the road closures and changes, and if these changes will affect historic properties. In particular, the Traffic Impact Study should be expanded to include the roads in the historic neighborhoods surrounding Jackson Park.

During the August 5th consultation meeting, several consulting parties requested a viewshed analysis from a higher perspective to ensure all visual effects could be thoroughly assessed. The ACHP agrees that such an analysis would be useful and recommends that FHWA determine the feasibility of capturing viewpoints from above-ground level considering the proposed height of the new Obama Presidential Center (OPC) could potentially affect surrounding historic properties. The Effects Report should include a discussion of this analysis, and whether any viewsheds will be affected by the undertaking.

Washington Park

Several consulting parties questioned why potential effects to Washington Park are not included in this Effects Report. Given that Washington Park, Jackson Park and Midway Plaisance are interrelated as part of the original Olmsted design, it would be beneficial to understand if the undertaking could indirectly or cumulatively affect Washington Park. Specifically, in the final version of the Effects Report, FHWA should consider whether any upcoming projects in Washington Park may affect Jackson Park and/or the Midway Plaisance. The effects may include changes in the number of visitors, or in the pedestrian or bike circulation.

UPARR Program

The Effects Report states that the City of Chicago proposes to “dedicate acreage as replacement recreation opportunity on the eastern portion of the Midway Plaisance... (Section 1.1.1.3; page 4).” It remains unclear how this site was selected under the Urban Park and Recreation Recovery (UPARR) Program, and if other sites were considered that would avoid effects to historic properties. The Effects Report should demonstrate how the choice of the replacement parcel may affect historic properties, and what avoidance measures were considered as part of the selection process. Additionally, the Effects Report will need to consider the potential effects from the final design for the selected replacement recreation area. Should the final design be decided at a later date, the Section 106 agreement should include a design review process that will include the consulting parties as well as design criteria.

Lastly, based on questions brought up during the last consultation meeting, we request FHWA clarify the division of responsibility between NPS, which manages the UPARR Program, and FHWA on the overall environmental review and explain what each agency is reviewing under the National Environmental Policy Act (NEPA) and Section 106 of the NHPA.

Section 106 Consultation – Next Steps

The ACHP urges FHWA to clarify the next steps it intends to carry out in this Section 106 review, and provide sufficient notice and time for consulting parties to review reports prior to consultation meetings. To complete the consultation process in a timely manner, we encourage FHWA to provide a consultation schedule so the consulting parties can prepare and participate in upcoming reviews of documents and meetings.

As we understand, FHWA intends to finalize the Effects Report shortly after August 30th. The ACHP strongly urges FHWA to share its final effects finding with the consulting parties shortly thereafter, along with a summary of the comments it received and an explanation of how FHWA considered and addressed these comments. Should there be any outstanding objection to this finding, the ACHP remains available to provide further views on the objection.

We look forward to receiving a final Effects Report and a summary of how FHWA has addressed our comments and others provided by the consulting parties. Should you have any questions or concerns regarding our comments, please contact Sarah Stokely at (202) 517-0224, or via e-mail at sstokely@achp.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jaime Loichinger". The signature is written in a cursive, flowing style.

Jaime Loichinger
Assistant Director
Federal Permitting, Licensing, and Assistance Section
Office of Federal Agency Programs



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
CHICAGO DISTRICT, CORPS OF ENGINEERS
231 SOUTH LA SALLE STREET, SUITE 1600
CHICAGO, ILLINOIS 60604-1439

August 30, 2019

Technical Services Division
Regulatory Branch
LRC-2017-00676

SUBJECT: Comments on Assessment of Effects to Historic Properties, Jackson Park Mobility Improvements, City of Chicago, Cook County, Illinois (SHPO Log #021081017)

Ms. Abby Monroe
Chicago Department of Planning and Development
120 North LaSalle Street, Room 1000
Chicago, Illinois 60602

Dear Ms. Monroe:

The U.S. Army Corps of Engineers, Chicago District (“the District”) would like to offer our comments on the July 29, 2019 Assessment of Effects to Historic Properties From the Proposed Undertaking in and Adjacent to Jackson Park, Cook County, Illinois report, which we received at the August 5, 2019 Consulting Party meeting.

Our overarching concern is that the District is anticipating actions under our authorities pursuant to Section 404 of the Clean Water Act (33 USC 1251 et seq., “Section 404”) and Section 14 of the Rivers and Harbors Act of 1899 (33 USC 408, “Section 408”). As these federal actions must also comply with Section 106 of the National Historic Preservation Act, the District would prefer to be a full signatory-level participant, by right of our federal approval authorities, in this process.

The District has the following comments to offer, which we believe would result in an ability for the District to remain suitably involved in the NHPA process.

1. Please revise all references to the National Park Service and Federal Highway Administration in aggregate as the federal action agencies, to include the US Army Corps of Engineers. This occurs on many of the pages of the document. These include, but are not necessarily limited to, Sections 1.0, 1.1, 1.3, 2.1, 3.2, 5.0, and 6.0.
2. In Section 1.1, please add the following to the fourth sentence: “and the authorization of discharges of fill material into waters of the United States and permission to alter the Great Lakes Fishery & Ecosystem Restoration project, both by the U.S. Army Corps of Engineers (USACE).”

3. In Section 1.1.1.3, please remove the terms “isolated low-quality” from the fifth sentence of the tenth paragraph.
4. In Section 1.1.1.3, (and Section 5.0) please consider that “the future public process regarding the changes on the Eastern Midway” will need to be addressed more fully in order to meet the conditions of the District’s Regional Permit Program (RPP); or alternately, the USEPA’s Guidelines for Specification of Disposal Sites for Dredged or Fill Material (“404(b)(1) Guidelines”). The District’s action vis-à-vis the wetland fill on the Eastern Midway has the effect of needing the proposed park conversion to be detailed enough to allow the District to comply with the NHPA, among other Federal laws, in the present as opposed to the future.
5. Add a Section 1.4 addressing the USACE actions. The District suggests the following as a starting draft: “The purpose of the USACE actions are to authorize the proposed City of Chicago actions insofar as they require a discharge of fill material and/or alter a federal civil works project. The City of Chicago’s underlying purpose for requesting these authorizations is stated previously in Sections 1.1.1.2 and 1.1.1.3.

The City’s decision to widen Lake Shore Drive involves expanding the bridge abutment, which as proposed, will result in a discharge of fill material which requires authorization under Section 404 of the Clean Water Act (33 USC 1251 et seq.). Further, the City’s decision to temporarily dewater the portion of the lagoon under Hayes Drive to complete bridge improvements will result in a discharge of fill material requiring a Section 404 authorization. The City’s proposal to fill a wetland on the Eastern Midway Plaisance is a discharge of fill material requiring a Section 404 authorization. Finally, the Chicago Park District proposes to temporarily impact 1.7 acres and permanently impact an additional 1.3 acres of the Great Lakes Fishery & Ecosystem Restoration (GLFER) project in Jackson Park. This proposed alteration requires USACE permission pursuant to Section 14 of the Rivers and Harbors Act of 1899 (33 USC 408).

Evaluation of the USACE Section 404 actions is expected to be completed using the USACE Chicago District’s Regional Permit Program (RPP), whereby USACE staff will determine whether the City’s actions comply with the terms and conditions that were established as part of the public interest review undertaken in the establishment of the RPP. If so, the USACE will “verify” the activities are authorized by the RPP. If not, the USACE will process the requests under the Individual Permit process described at 33 CFR 325.

Evaluation of the USACE Section 408 action will be completed as described in Engineer Circular 1165-2-220. This includes a determination whether the proposed alteration will impair the usefulness of the GLFER project, and whether the proposed alteration is in the public interest.”

6. In Section 3.3.2.2, under the subheading “City Proposed UPARR Replacement Area within the eastern Midway Plaisance,” please directly reference the District’s Section 404 permit action for the proposed wetland fill.

7. In Section 3.3.2.2, under the subheading “Improvements along Lake Shore Drive,” please directly mention the District’s actions, i.e. Section 404 in the second paragraph and Section 408 in the fourth paragraph.
8. In Section 3.3.2.2, under the subheading “Hayes Drive Reconfiguration,” please directly mention the District’s actions, i.e. Section 408 in the second paragraph, Section 408 in the third or fourth paragraph, and Sections 404 and 408 in the fifth paragraph.
9. In Section 3.3.2.2, under the subheading “Other Transportation Improvements,” please directly mention the District’s actions, i.e. Section 408 in the first and third paragraphs. Please also clarify which agencies are included in the phrase “Federal Undertaking” in the third sentence of the first paragraph.
10. In Section 3.3.2.2, under the subheading “Bicycle/Pedestrian Enhancements,” to the extent that the activities in the first and/or second paragraph(s) will have impacts on the GLFER project, please directly mention the District’s action.
11. In Section 3.3.2.3, under the subheading “OPC Site Development,” the fourth through sixth sentences of the eighth paragraph refer to GLFER impacts for the proposed water lift station. Because this is part of the District’s Section 408 action, this should be included in Section 3.3.2.2 as a federal action.
12. In Section 3.4, the District recommends that the District’s actions be included in the assessment of effects for each property. While large portions of the District’s actions overlap in physical footprint with NPS and FHWA actions, the GLFER replacement areas and the GLFER water lift station impact, do not overlap with the NPS or FHWA actions. The effect of these actions should be addressed for each property.
13. In Section 5.0, the District recommends a subheading “USACE Actions” which would state that the District has actions including the Section 408 authorization for the GLFER replacement areas and the small water lift station, and Section 404 and Section 408 approvals for other areas already included in the NPA and FHWA actions. This section should then address how the proposed design minimizes impacts on the Historic Properties.
14. In Appendix A, Exhibits 2a, 2b, 3a, 3b, 4a, and 4b, and Appendix C, Exhibit C-1, please clarify in the map legend that the “GLFER Replacement” areas are a USACE Undertaking, and add a map symbol to indicate areas of GLFER impacts, also a USACE Undertaking. Please consider adding a map symbol to indicate the locations of the Section 404 permit areas, as a USACE Undertaking.

If you have any questions or would like to discuss any of these comments, please contact Mr. Colin C. Smalley, PG of my staff by telephone at (312) 846-5538, or email at Colin.C.Smalley@usace.army.mil.

Sincerely,

CHERNICH.KATHLEEN.G.
1230365616

Digitally signed by
CHERNICH.KATHLEEN.G.
EN.G.1230365616
Date: 2019.08.30
13:30:28 -05'00'

Kathleen G. Chernich
Chief, East Section
Regulatory Branch

Copy Furnished

Advisory Council on Historic Preservation
U.S. Department of the Interior, National Park Service
U.S. Department of Transportation, Federal Highway Administration
Illinois Department of Transportation
Illinois Department of Natural Resources, State Historic Preservation Office
City of Chicago Department of Transportation
Chicago Park District



BUSINESS LEADERSHIP COUNCIL

The Business Leadership Council supports the plans to build the Obama Presidential Center (OPC) in Jackson Park. While mapping out this monumental project, many fears and concerns have been raised around the community but we believe the measures being implemented by the Foundation will turn the tide for a community historically left behind. Frank Clark, President of the Business Leadership Council encourages approval of this undertaking stating “the facilities and planned changes to the park can bring a cohesive, positive change to Jackson Park that unites the Southside and the City of Chicago.” We also believe the economic stimulus generated by the OPC can help change the trajectory of disinvestment on the South side of Chicago which is crucial to improving the quality of life for everyone.

The unique design of the planned facilities will inspire and engage youth while peaking the interests of international visitors eager to learn more about President and Mrs. Obama, the civil rights movement and his vision for a diverse global community in the 21st century. We believe the OPC design optimizes Jackson Park resources; balances community interests and strengthens the potential for an economic infrastructure that can grow local businesses and develop the community’s workforce.

The Business Leadership Council supports approval of the Obama Presidential Center by the National Park Service and the Federal Highway Administration.

On Behalf of the Business Leadership Council,

Executive Director

Frank Clark
President
*Business Leadership
Council*

James Reynolds
Co-Vice President
*Chairman & CEO
Loop Capital Markets*

John Rogers
Co-Vice President
*Chairman
Co-CEO & CIO
Ariel Investments*

Melody Spann-Cooper
Member
*Chairman & President
Midway Broadcasting
Company, WVON*

John Hooker
Member
*Chairman
Chicago
Housing Authority*

Martin Nesbitt
Member
*President & Co-CEO
The Vistria Group*

Dr. Leon Finney
Member
*CEO & President
Woodlawn Community
Development Corp.*

Charles Smith
**Emerging Leader
Member-at-Large**
*President
CS Strategies*



Chicago History Museum

Gary T. Johnson
Edgar D. and Deborah R. Jannotta President

1601 North Clark Street
Chicago, Illinois 60614-6038
gtjohnson@chicagohistory.org

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www.chicagohistory.org

August 27, 2019

Abby Monroe
Public Participation Office
Department of Planning and Development
City of Chicago
121 N. LaSalle, Room 1000
Chicago, IL 60602

Dear Ms. Monroe:

Over its 181-year history, Chicago has maintained its reputation as one of the world's grandest cities by always changing — evolving, improving.

We took a quaint carriage road next to the lake and turned it into beautiful Lake Shore Drive. We built a roof over railroad lines. We created Millennium Park. This perpetual drive to improve our city is exactly why the city should embrace the Obama Presidential Center, a global destination that will not just remind people about our nation's first African-American President, but of the journey we took together to make the story of President Barack Obama possible. The plan for the presidential center calls for a reimagining of the northern end of Jackson Park, turning a small portion of the 543-acre park into a campus that will serve as a hub of activity for the community and the city.

The Obama center would increase public engagement with the park, create jobs and give the South Side an economic boost. Despite these benefits, the plan has also

drawn some criticism: Specifically, some seem to reject out of hand any proposed changes to a park co-designed by Frederick Law Olmsted, while others argue that the presidential center design will somehow weaken the historic integrity of the park.

Some historians are ignoring the fact that, through its history, Jackson Park has not been a delicate artifact that has been perfectly preserved for more than 100 years. Rather, it is a city park that has been altered significantly since it was first developed.

The addition of the Women's Park & Gardens, filling in portions of the lagoon with sports courts and, of course, the transformation of a carriage path into a six-lane road, are all significant changes that have been made to the park over the years. Preserving historic land is important, but it's hard to argue the 20-acre site of the Obama center is historically significant. With the exception of the Women's Park & Gardens (which came along later in history and is being elevated in the center's design), it is among the least significant sections of the park historically. No important archaeological remains have been discovered there.

Essentially a site of two athletic fields stranded between roads, the site in its current state does little to engage community or contribute significantly to the experience of Jackson Park. Drive by it on a beautiful spring day and you're likely to see little activity. Can anyone really argue this specific site is contributing significantly to Jackson Park or the community, or embracing Olmsted's vision?

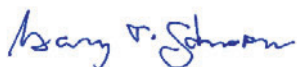
The Obama center design will change that, creating a new center for active community life that will add to Chicago's iconic parks and help bring back some of the bravado of the World's Fair, for which the park is known. Another question that has been raised is whether or not it is appropriate to locate a museum in a park. Do the two uses work together, or against each other?

What is being proposed with the presidential center is a relationship that has been well-known in Chicago since the time of the World's Columbian Exposition in 1893: a museum that faces the city and serves as one of many gateways for members of all communities into a large park.

Since the Field Museum's origins in Jackson Park during that exposition, and the continued presence of the Museum of Science and Industry, many iconic Chicago museums have featured both an urban edge and a park edge. It is a defining feature of many of Chicago's best-loved institutions that makes the Obama center feel very much in the spirit of Chicago. Other examples of this time-honored Chicago formula are the Art Institute of Chicago in Grant Park and the Chicago History Museum in Lincoln Park.

To those hardline purists who want to preserve the park in amber, never changing or evolving, I suggest they look closely at Chicago's history of adapting and reinventing itself. We used to be the "hog butcher to the world," but we've moved from this gritty past to become a cosmopolitan city and global destination, and we have done so while cherishing and improving our parks.

Sincerely



Gary T. Johnson

Edgar D. and Deborah R. Jannotta President
Chicago History Museum



Administration Office

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August 29, 2019

Ms. Abby Monroe
Public Participation Officer
City of Chicago
121 N. LaSalle, Room 1000
Chicago, Illinois 60602
abby.monroe@cityofchicago.org

Re: Jackson Park
Section 106 Assessment of Effects to Historic Properties

Dear Ms. Monroe:

Thank you for the opportunity to comment on the Section 106 Assessment of Effects (AOE) to Historic Properties from the Proposed Undertaking In and Adjacent to Jackson Park dated July 29, 2019. As you are aware, the Chicago Park District is the property owner of Jackson Park and has a continued vested interest in the park and its landscape.

The Park District hereby submits its comments on the effect determinations in the AOE as a Consulting Party to the process. We offer the following highlights of the comments:

Effect Determination

The Park District acknowledges that the Assessment of Effects has determined that the proposed undertaking will have an impact on the Jackson Park Historic Landscape District and the Midway Plaisance. However, the Park District is actively working and will continue working with the City of Chicago and the Barack Obama Foundation to identify those amenities impacted and to discuss options for repair or replacement of the impacted features.

Public Involvement

The Assessment of Effects lists the public involvement as it relates exclusively to the Section 106 process, but the Park District would like to add that prior to this process, there was extensive public engagement. The Park District, along with many partners - including the City of Chicago, Barack Obama Foundation and numerous community stakeholders - engaged in a ten-month long community planning process through 2017 and 2018 to develop the South Lakefront Framework Plan. The Plan lays out recommendations for the future of both Jackson Park and South Shore Cultural Center Park. Recommendations in the plan were derived from thirteen large-scale community meetings and twenty-four smaller stakeholder meetings with a total of 2,300 attendees over the ten month period.

Minimization & Mitigation of Effects

The Park District supports the City of Chicago's selection of the Midway Plaisance as a replacement site for the UPARR designation. In 2003, the Park District worked with the community to develop a master plan for a Children's Garden in this location that was never realized. While the design of the Midway Plaisance may not be part of this undertaking, the Park District looks forward to further plan development and community process to implement recreation uses on this section of the Midway.

The Park District has also worked with the City of Chicago and will continue to do so to minimize impact to Jackson Park through the careful design and placement of pedestrian path alignments, minimization of impacts to existing trees and preservation of other landscape features within the park. The Park District believes there are several opportunities for landscape enhancement within Jackson Park if mitigation of effects is determined to be necessary.

Finally, the Park District has identified several historic buildings and contributing features within Jackson Park that require further rehabilitation including the English Comfort Station, the Iowa Building, the Burnham Building, the Statue of the Republic and the Cheney Goode Memorial. If further mitigation of effects is necessary, the Park District strongly encourages the FHWA and NPS to consider conservation and/or rehabilitation of these existing features within the park.

We look forward to continued coordination with the City in regards to the minimization and mitigation of impact to this significant park.

Sincerely,



Heather Gleason

Director, Department of Planning & Construction

Attachments: Section 106 CPD Review Comments dated 8/29/2019

cc: D. O'Donnell / N. Sheehan / S. Gelder / M. Fus / J. Bornstein

Section 106 AOE Report

CPD Comments

August 29, 2019

1. Page 24 – Section 3.3.2.2 – UPARR Replacement Area within the eastern Midway Plaisance
No detail has been provided for treatment of the Cheney Goode Memorial other than depiction of a new pathway near the bench as indicated on Figure 3 east of the memorial. This memorial includes an accompanying sundial (only the sundial pedestal is extant), and both the bench and sundial require extensive conservation. A possible mitigation action could include restoration of this memorial.
2. Page 26 – Section 3.3.2.2 – Hayes Drive Improvements
No detail has been provided for treatment of the Statue of the Republic other than an indication of new paving beyond the original memorial site as indicated on Exhibit 4a 1-2j and as described in the second and third paragraphs on page 26. This monument features an elaborate base and formal paving that require extensive conservation. A possible mitigation action could include restoration of this memorial.
3. Page 26 – Section 3.3.2.2 – Hayes Drive Improvements
The Assessment of Effects states that the historic design highlighted the statue as the focal point of surrounding roads and that the monument placement was intended to be viewed from vehicles or at a distance. However, the park serves many more users than just vehicles passing by and should balance park users with vehicular use. The Park District believes the change to the triangular intersection of Hayes Drive and Richards Drive will allow park users to access and interact more safely with this memorial without compromising the ability to still view the statue from the roadway.
4. Page 27 – Section 3.3.2.2 – Stony Island Avenue Improvements
This section discusses the landscape features along Stony Island. Note that the screened buffer has been altered over time and the landscape understory is no longer present in several sections along Stony Island. A possible mitigation action could include restoration of the landscape features mentioned in this section.
5. Page 30 – Section 3.3.2.3
The Assessment of Effects refers to the English Comfort Station but does not provide detail for the treatment of this building. The English Comfort Station is in need of rehabilitation and a possible mitigation action could include rehabilitation of this building.
6. Page 30 – Section 3.3.2.3
There is an inaccurate reference to Exhibit 4a 1-2m, believe it should be Exhibit 4b 1-2m.
7. Page 51 – Section 5.0
This section header (Minimization and Mitigation of Effects) does not match with the introduction sentence “The following summarizes efforts made to minimize or avoid impacts of effects to historic properties”. Any efforts to avoid effects should also be noted in this section.
8. Page 57 - Appendix A
Organization of Exhibits 2a through 4b would read more clearly if the matchlines for exhibits directly faced each other.

Opportunity. Community. Impact.

ChiUL.org

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Contributions to the Chicago Urban League are deductible for income tax purposes

An affiliate of the
National Urban League

August 28, 2019

Abby Monroe
Public Participation Officer
Department of Planning and Development
City of Chicago

Dear Ms. Monroe:

I am writing to reiterate the Chicago Urban League's support for the Obama Presidential Center (OPC) in Jackson Park.

As an organization based on the South Side of Chicago for more than 100 years, the League is well aware of the decades-long disinvestment that has characterized predominantly African-American communities in this part of the city. This underinvestment extends to the historic and underutilized Jackson Park. While we applaud efforts to assess any potentially adverse effects for the park and surrounding community, we firmly believe that, far from taking anything away from Jackson Park, the addition of the OPC will enhance its use as a recreational resource.

While there is visibly less activity at Jackson Park relative to other parks near the city's lakefront, the OPC will add open space that can be used for biking, walking, playing or simply enjoying nature. Plans for the Center, along with proposed federal actions, will result in an actual net gain of 3.7 acres of parkland, and it will be more accessible. Additionally, the Center's three buildings--a museum, forum and library--will stand as new jewels of culture and history and as a symbol of progress and promise for the city's South Side.

At the Chicago Urban League, we are excited about the possibilities. Each year, the League serves more than 1,300 youth, primarily African-American middle and high school students who live on the South Side. As part of our Summer Immersion program, we take students to significant cultural locations in Chicago to which they might not otherwise be exposed. Most of these are in downtown or other parts of the city that are not readily accessible to our young clients. We look forward to future visits to the OPC, and we anticipate the pride and hope our youth will experience in having this symbol of the legacy of our country's first African-American president so close to their communities.

We are excited for other reasons, too. Along with enhancing Jackson Park, the Center is expected to generate jobs and have a positive economic impact of \$3.1 billion for the Chicagoland area. The Obama Foundation has said that it aims to build an economic engine for the South Side. This goal aligns with the League's vision and mission to make all of Chicago better by building strong African-American communities.

Members of the League's senior staff have attended multiple community meetings where the Obama Foundation has discussed plans for the Center, and we have been pleased with their willingness to adopt community input. The League stands ready to partner with the Foundation to help ensure the success of the Center.

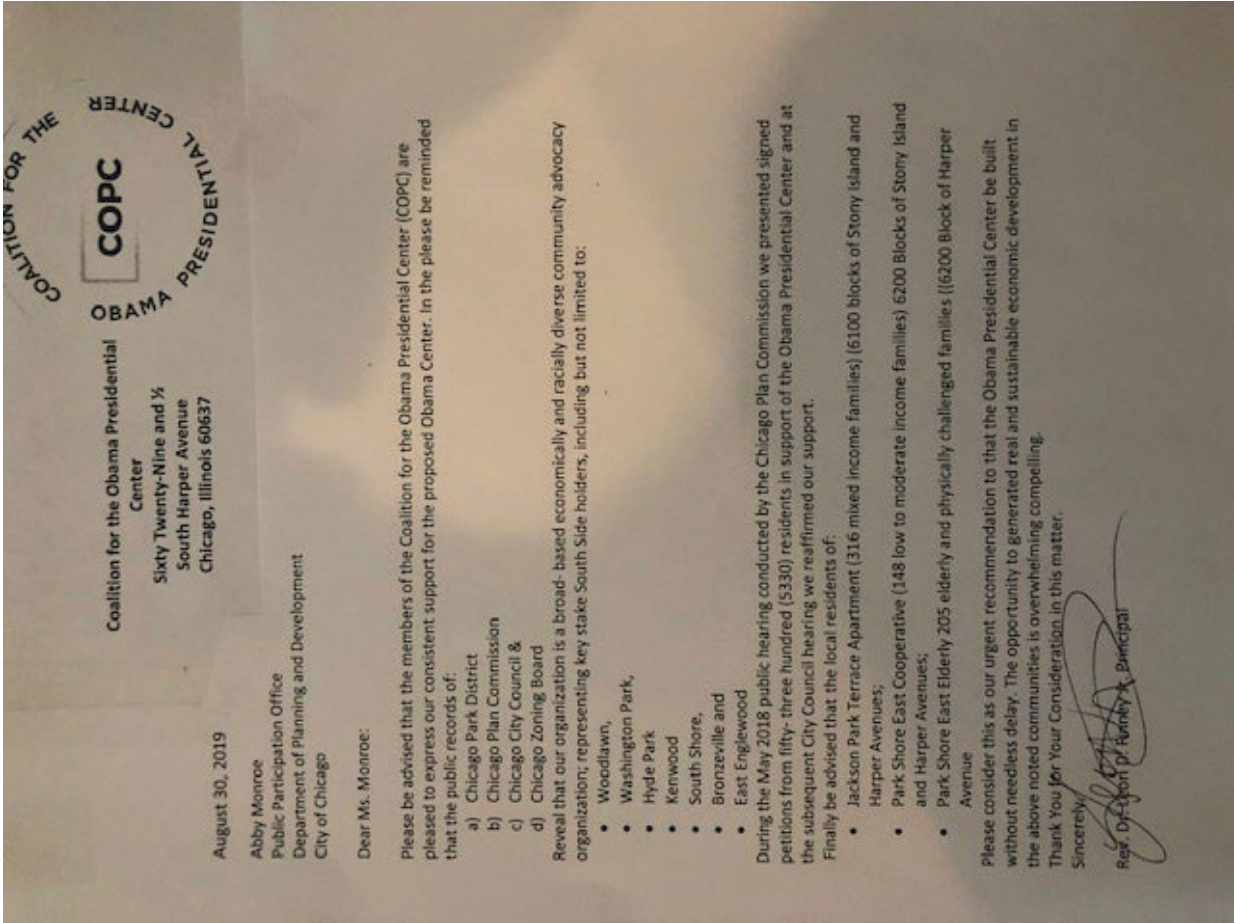
We encourage the City of Chicago to continue to move forward with this once-in-a-lifetime project.

Respectfully,



Barbara A. Lumpkin
Interim President & CEO

From: Kristinfinneycooke@yahoo.com
To: Abby Monroe
Cc: drleonfinney312@gmail.com
Subject: Obama Support Letter
Date: Friday, August 30, 2019 5:22:57 PM



Please accept this letter. You may have already received, however, I am having computer issues and want ensure my support is recorded for the Obama Center.

Sincerely,
Rev. Dr. Leon D. Finney, Jr.

Sent from my iPhone

August 30, 2019

VIA EMAIL TO: abby.monroe@cityofchicago.org

Ms. Abby Monroe
Public Participation Office
Department of Planning and Development
121 North LaSalle Street, Room 1000
Chicago, IL 60602

RE: **FEEDBACK ON ASSESSMENT OF EFFECTS REPORT**

On behalf of the Park Advisory Council for Don Nash Community Center, I am writing to express our overwhelming support for locating the Obama Presidential Center (OPC) in Jackson Park and for the plans the Obama Foundation has taken to minimize and mitigate any “adverse” effects as identified in the Assessment of Effects Report developed as part of the Federal 106 Review Process.

Most of the members of the Don Nash Park Advisory Council (DNPAC) are seniors 65+ who have lived in South Shore for decades. They have witnessed continued disinvestment in South Shore and the other neighborhoods surrounding Jackson Park. They have seen the decay and lack of maintenance in Jackson and South Shore parks. While the main commercial areas in Hyde Park, downtown and the North side of Chicago have and continue to be developed, those areas heavily populated by black people are still neglected.

Having the OPC coming to Jackson Park is a beacon of hope and change for the great majority of our community. Any “adverse” effects should be treated the same as has been done for other historic parks. Similar opportunities for minimization and mitigation should be advocated in recognition of the historic and significant impact the OPC will provide. Naysayers attempts to abandon the plans for the OPC in Jackson Park should be considered the minority perspective and not representative of most residents in the area.

We appreciate the hard work and transparency that has gone into this process and look forward to the construction of the Obama Presidential Center in Jackson Park.

Sincerely,

Alisa Starks

Alisa Starks
President
Don Nash Park Advisory Council
1833 East 71st Street
Chicago, Illinois 60649

Cc: Members of DNPAC

the DuSable.
MUSEUM OF AFRICAN AMERICAN HISTORY
A Smithsonian Affiliate

August 30, 2019

Ms. Abby Monroe
Public Participation Office
Department of Planning and Development
121 N. LaSalle Street, Room 1000
Chicago, IL 60602

Dear Ms. Monroe,

Please find attached the Federal Section 106 Consulting Party letter and supporting information of The DuSable Museum of African American History. Please contact me directly if you have any questions or require any further information.

Best,

Sincerely,



Perri L. Irmer
President & CEO

740 E. 56th Place
Chicago, IL 60637
773.947.0600 phone
773.947.0716 fax
www.dusablemuseum.org



DuSable Bust Sculpture: Erik Blome

August 30, 2019

Consulting Party Section 106 Submittal by the DuSable Museum of African American History

“The enjoyment of the choicest natural scenes in the country and the means of recreation connected with them is thus a monopoly, in a very peculiar manner, of a very few very rich people. The great mass of society, including those to whom it would be of the greatest benefit, is excluded from it.”

- *Frederick Law Olmsted: Writings on Landscape, Culture, and Society*

Part I.

Baseline Assumptions of OPC Opposition are Flawed

It appears to many that the core premise of the Protect Our Parks lawsuit and most of the organizations and individuals attempting to block construction of the Obama Presidential Center in Jackson Park rests on the fundamental assumption that the desires of the few to honor a 126 -year-old design by Olmsted shall forever trump the interests of entire communities of people for which the park was created, excluding those who are, in Olmsted’s own words, “the great mass of society...to whom it would be of the greatest benefit.” So is it really the design of the park that the opposition holds “sacred” or the man who designed it, or is it simply that they just believe this is their domain?

Friends of the Parks has imported “experts” from Washington DC who claim to know what was in the heart and mind of Olmsted not only when he designed the park in 1893, but today, and according to them Olmsted doesn’t want the OPC in Jackson Park. The same person thought it was a good idea last year to show a largely black community audience images of Janet Jackson, and Angela Bassett playing the queen from the Black Panther movie whom he said “has great bone structure, just like an Olmsted park” – presumably in an effort to “relate” to the same people who their protest will harm economically. Friends of the Parks already successfully blocked the Lucas Museum, and are quite proud that they “preserved” a few of acres of asphalt for generations to come. The Lucas would have brought over \$600 million a year in revenues and hundreds of jobs into the surrounding near south side Bronzeville community. Congratulations. Now they want to block the OPC from bringing jobs and economic development into South Shore, Woodlawn, Washington Park and our predominantly black neighborhoods beyond.

Do those who oppose any modernization of the Olmsted design realize who Olmsted was, and what he did before he went into landscape design? A historical examination of Frederick Law Olmsted reveals that he was an influential journalist and an *abolitionist credited with helping dissuade England from joining the south in the Civil War*. In 1852, decades before starting to design parks for a living, Olmsted was hired by the newspaper that would later become The New York Times, and his assignment was to roam the Antebellum South as an undercover correspondent. In his 1856 book, “A Journey in the Seaboard Slave States: With Remarks on Their Economy,” Olmsted wrote “**the possession of arbitrary power has always the world over tended irresistibly to destroy humane sensibility, magnanimity and truth.**” He spoke these words in regard to the slaveholders in the south and their arbitrary power that flowed from the wealth built through the economic advantage of slave labor.

Therefore, I would posit that Mr. Olmsted would be delighted that his park will house structures and activities welcoming our families, celebrating and preserving the legacy of America's first black president, who represented the United States with honor, grace, pride and intelligence, untarnished by scandal, cruelty or corruption (undeniable truths even if people disagree on his overall effectiveness in reversing four centuries of oppression during his eight years in office). And the fact that President Obama's career began in the cradle of Black Chicago leadership, only to return to the south side of Chicago to invest in his Foundation's mission and entrust his and Mrs. Obama's legacy to our communities in order to catalyze economic investment by others cannot be ignored. We cannot allow this project, this mission, to be diminished, discounted or devalued any more than we can allow our communities be similarly treated from this point forward.

We should reject the thinly veiled rhetoric of opponents like the Protect our Parks president who cloaks his resentment in attempts at legal analysis, thinks that "brand new laws" aren't really laws; who deems the OPC "an incongruous personal ego monument," prefers to harken back to the University of Chicago's "past glory days" and calls on our new mayor to "introduce unbiased reason to this entire situation by imposing a freeze on all land and development transactions including lease changes, sales deals, development permits, zoning changes *in the impacted wards.*" Really? What level of disrespect - or dare I say white privilege - must be present to believe there's an entitlement to prioritize their right to argument over the well-being of families who live in our communities, to further delay progress *throughout our neighborhoods* while they fight over the "public interest" as if WE are not the public whose interest is at stake? We, who have been denied equal treatment in this city for generations, we who have been redlined, prohibited from access to capital, denied infrastructure investment and public safety, watched our TIF and tax revenues be redirected, had institutional anchors closed, and been denied public resources and quality of life components readily enjoyed by our north side counterparts? No, there is fortunately no such privilege to be allowed here.

I know what the response will likely be to this part of my letter from some folks because I've heard it too many times. Don't play the race card. You'll alienate people if you *say that out loud*. Many would prefer to safeguard the sensibilities of those who are trying to perpetuate the status quo. They'll warn me that some are not going to support the DuSable Museum if I upset them. But this museum, the oldest independent African American museum in the nation, deals in truth-telling and historical facts. It is who and what we are, and we are mission-bound to stand as a vanguard to our history and heritage.

The DuSable Museum is presenting real stories in an authentic voice and building bridges between all communities. We regularly partner with the Illinois Holocaust Museum, the National Museum of Mexican Art, and others. Here, people of all ages and races are introduced to the historic leadership of black people all over the world in every profession, every industry, and every level of society: from art, literature and journalism, to medicine and law, from the Mayoralty of Chicago to the Presidency of our United States. We've built international relationships and educational partnerships that speak to our mission to teach young people that *slavery is not our origin story as a people*, that we are descendants of kings and queens and poets and physicians and wise men and women throughout the millennia. We present stories of Chicago as the cornerstone of black accomplishment and excellence -- stories that are very, very different from what our youth see on the nightly news, and hear about themselves from others who also clearly need the education that institutions like the DuSable Museum provide.

The idea that certain people believe they have a right to deem a swath of land in a community they don't even live in as "sacred" and self-proclaim the power to decree that a park design is more worthy of defending than the living people for which the parks were created is not only illogical, but a prime example of "the possession of arbitrary power" that Olmsted himself so disdained. But this is America, and the fact is that our history, our entire economy, has been built on a foundation of racism and white supremacy. One glance at the daily headlines confirms that both are still alive and well. And yes, we're all tired. So let's stop dancing around the issues, keep celebrating the best of ourselves and respecting our own history even as we continue to create it. Only then can we work together to build a better future for all of our communities.

Part II.

Expand the Area of Potential Effect to Include Washington Park.

Just as we believe there is a basic flaw in the assumptions of those who oppose the OPC's construction in Jackson Park, we also think that the Federal 106 study is missing a critical component and should be extended to Washington Park, which will also allow for a broader area of mitigation.

A Fair and Inclusive Planning Process

It is unclear why the Area of Potential Effect (APE) was confined only to Jackson Park and the Midway Plaisance. There's not much logic in cutting off the analysis at Washington Park because it is part of the same historic South Park system consisting of Jackson Park, the Midway Plaisance AND Washington Park. Washington Park is itself a Registered Historic District, which is a National Register of Historic Places listing. The original study should not have been truncated at Cottage Grove, resulting in the western portion of the community being deprived of further analysis and consideration of impact – whether good or bad. All three were created as one interconnected park, all designed by Olmsted during the relevant historical period, and all abut communities that will be affected – we believe positively – by the OPC project which sits just one short mile to the east.

Historically and politically, there has been an arbitrary "boundary" created at Cottage Grove Avenue for generations, separating the University of Chicago campus and Hyde Park from areas to the west of the park. I know this because I was born in Hyde Park and have lived here for all of my 60 years. Some liken it to the Dan Ryan's function of separating and "protecting" the Bridgeport neighborhood from the former CHA projects and communities to the east which were predominantly African American. But those times are gone, and semblances of creating an enclave through urban planning policies, using an old-Chicago style imaginary line that people were encouraged not to cross, must be abandoned.

As it now stands, because the APE is so limited, the Museum of Science and Industry – by an overwhelming margin -- will be the de facto beneficiary of increased tourism traffic as a result of the OPC. That is rather unfair to the other wonderful institutions in the area, and detrimentally affects the economic interest of the entire area because we will be unable to capture that spending once capacity at those institutions is reached. Whereas, if there is thoughtful planning and marketing of ALL of the neighborhoods, we can all reap the benefits of the economic engine that is the OPC. Properly handled, the expanded APE can act as not only a mitigation opportunity for the Jackson Park site, but another

basis for infrastructure improvements that have been sorely needed at the western section of the South Park system for many years.

Additionally, Washington Park, and specifically the DuSable Museum of African American History's campus area, contains several architecturally significant, historic and/or landmarked structures including the Museum itself, a Daniel Burnham designed former park administration building and police station located at 740 East 56th Place, and the nationally landmarked Daniel Burnham Roundhouse and Stables, including the recently renovated pedestrian plaza, located at the southwest corner of 57th Street and South Cottage Grove Avenue, which are both leasehold interests of the DuSable Museum, but owned by the Chicago Park District. The main building lease originated in 1972, and the 66,000 square foot Roundhouse was included by lease amendment in 2003. The Roundhouse is about to undergo a long delayed interior renovation to expand the DuSable's exhibition halls, galleries, retail and special event and performance space. Second to the OPC, this museum project will likely be the most significant development project in the area.

If travelers to the OPC are "told" - by virtue of a non-inclusive area planning process - to keep to the east, then most of them will be missing important parts of our culturally rich and exciting neighborhoods, including major works of public art like the **Fountain of Time** (1920) by artist Lorado Taft, located at the west end of the Midway. Inspired by Henry Austin Dobson's poem "Paradox of Time", and with its 100 figures passing before Father Time, the 126 ft. long concrete sculpture was created as a monument to the first 100 years of peace between the United States and the United Kingdom resulting from the Treaty of Ghent in 1814. Also nearby is **Nuclear Energy** (1967) by artist Henry Moore, a bronze sculpture commemorating the accomplishments of physicist Enrico Fermi and his colleagues in creating the world's first man-made, self-sustaining nuclear chain reaction that occurred under the original Stagg Field on the University of Chicago campus.

There are numerous other statues, historical markers and architectural landmarks throughout the University of Chicago campus and historic Washington Park. And in 2021, the DuSable Museum, in partnership with The Equal Justice Initiative, will be unveiling the new William Bell Memorial Park on our museum campus, as part of their lynching memorial and historic marker program that seeks to commemorate racial terror lynchings across all U.S. counties in which such deaths have been documented. Cook County and The University of Illinois at Chicago are also partners in this project, which commemorates the death of one Mr. Bell, murdered near Maxwell Street in October of 1924. This project will undoubtedly be the most significant memorial installation and social justice program in the Midwest region.

Traffic, Parking and Economic Development

In addition to the above, Washington Park should be brought within in the APE for other reasons, including exponential increases in vehicular and pedestrian traffic from the projected 750,000-plus annual visitors to the OPC site, which will not be coming solely, or maybe even predominantly, from South Lake Shore Drive or US-41. A large percentage of vehicular traffic will be approaching from the west, via the I-90/94 Dan Ryan Expressway or the 55th Street-Garfield Boulevard corridor. In fact, encouraging traffic along Garfield Boulevard, which already functions as a gateway to the Hyde Park neighborhood and the University of Chicago, will have the positive effect of drawing activity, investment

and development into the neighborhoods west of the expressway, along the route from Midway Airport. Therefore, it will be necessary to perform a Traffic Impact Study of the Washington Park area to determine the effects of OPC visitor traffic and the need for additional parking, which could easily be provided at the west end of the Midway Plaisance, as more fully discussed below and shown in the attached site plan and conceptual drawings by SITE landscape architects, that were prepared on behalf of the DuSable Museum.

Providing parking at the western end of the Midway would likewise create a secondary “landing pad” for OPC visitors, thereby mitigating negative effects of parking on the OPC site, creating parking and a secondary point of arrival not only for the OPC but for the expanding south side arts and culture district which will grow along with the DuSable’s expansion into the Burnham Roundhouse and the structures to its south. It would also increase and encourage pedestrian flow to and from the OPC along the Midway, and provide a complete South Park experience. This would of course increase attendance for the DuSable, but also the other Museum Campus South institutions: The Logan Center, Smart Museum, Renaissance Society, Oriental Institute and Robie House, and provide a broad cultural experience for tourists beyond the Museum of Science and Industry and the future OPC. It would functionally connect the westernmost end of the Midway and Jackson Park, as well as all the major historic sites and public art attractions in between, establishing a robust, economically and culturally vibrant Arts & Culture District. That is an extremely positive outcome and one that should be encouraged through the expansion of the APE to include Washington Park.

The DuSable, the Chicago Park District and the University of Chicago have been in informal discussions for some time about creating an at-grade but visually underground parking facility along Cottage Grove south of the DuSable. It is contemplated that the historic buildings would be re-purposed into an expanded museum campus with various public arts and education uses, that other dilapidated structures will be removed and their functions relocated elsewhere, and that land above the parking will be built up and returned to public park space, creating a beautiful vista to the Midway, the Fountain of Time, and areas of south Washington Park that are neglected and underutilized today. This plan would relieve the parking demands and congestion at the OPC’s Jackson Park site, provide needed parking for the DuSable and a growing Arts & Culture District, and create entrepreneurial opportunities not only for the district but for tourist-friendly transportation services to traverse the campus along the Midway Plaisance. Removing a significant number of cars from the Jackson Park site would result in the mitigation of traffic, noise and congestion in the residential areas surrounding the OPC. At the Cottage Grove site, virtually no residents or residential structures will be negatively affected because the area is either comprised of parkland or institutional uses.

Conclusion

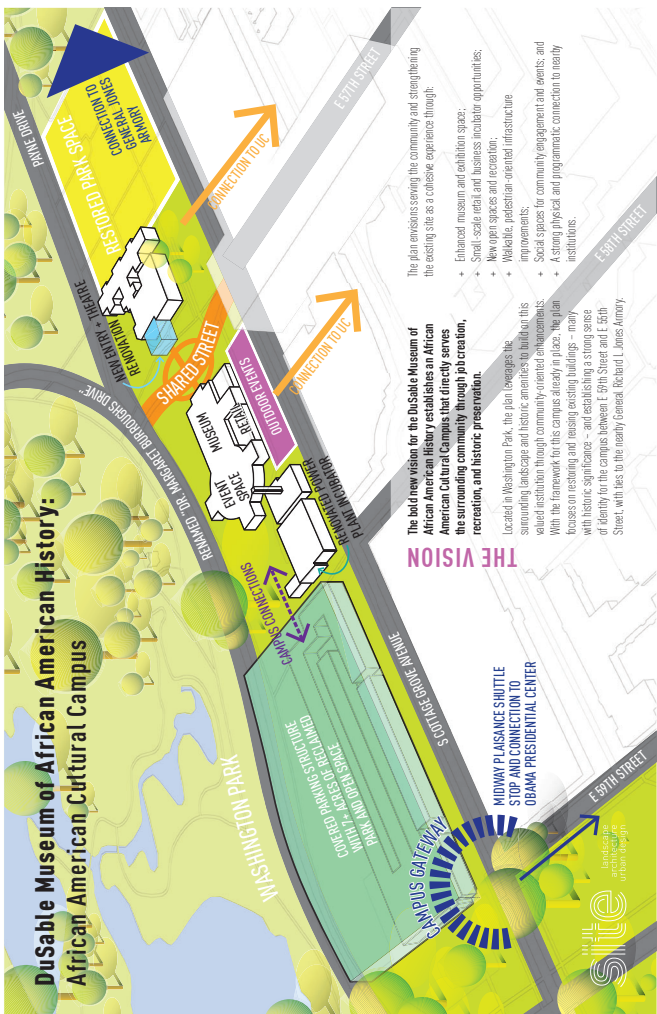
In conclusion, the DuSable Museum of African American History, as a Section 106 Consulting Party, recommends that the Obama Presidential Center be allowed to continue construction in Jackson Park, with mitigation opportunities to be pursued as set forth in this submittal. The DuSable further requests that Washington Park and its surrounding area be made part of the Assessment of Effects, deemed included in the Area of Potential Effects along with the concepts contained within the DuSable’s area development plan, and be strongly considered by the City of Chicago, and the Illinois Division of the U.S. Department of Transportation and Federal Highway Administration. We are available to meet to discuss any aspects of this Section 106 submittal, and respectfully await your response.

Respectfully submitted,

Perri L. Irmer

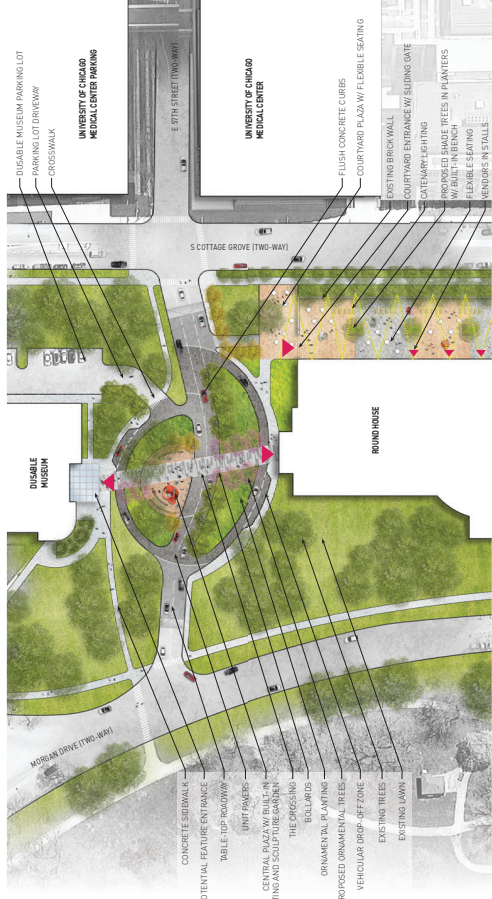
Perri L. Irmer has served as President and CEO of the DuSable Museum of African American History since September, 2015. She is a lifelong resident of the Hyde Park-Kenwood community. Irmer holds a Professional Bachelor of Architecture from the Illinois Institute of Technology (1981), and a J.D. from the University of Chicago Law School (1991).

DUSABLE MUSEUM SITE IMPROVEMENTS, CHICAGO, IL
 Streetscape Concept, Project Number: 7828
 May 14, 2019

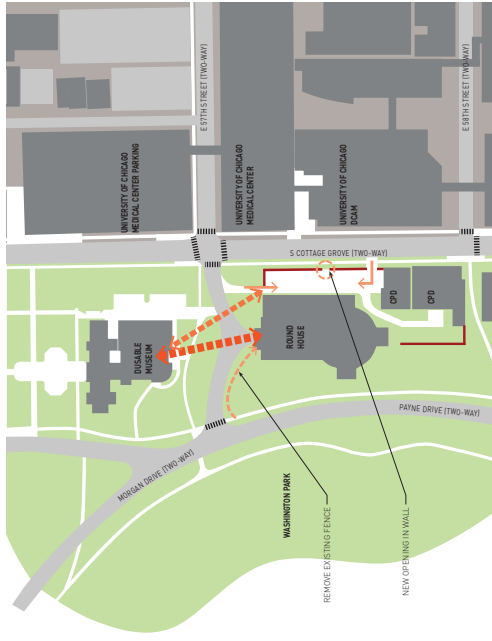


DUSABLE MUSEUM, CHICAGO, ILLINOIS
 Streetscape Concept, Project Number: 7828
 May 14, 2019

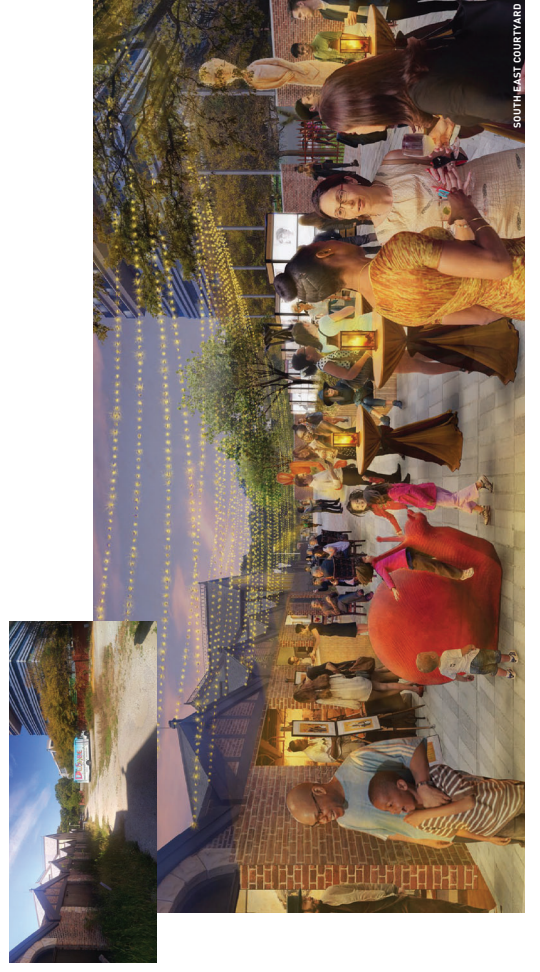




1 SCHEMATIC PLAN
 SCALE 1" = 48'-0"



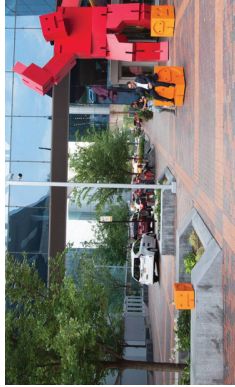
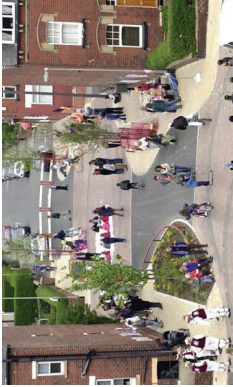
2 PROPOSED ACCESS ANALYSIS



SOUTH EAST COURTYARD



57TH STREET STREETScape



August 30, 2019

Abby Monroe
Public Participation Office
Department of Planning and Development
City of Chicago

Dear Ms. Monroe:

As the President and Chief Executive Officer of the Emerald South Economic Development Collaborative, I write in support of the efforts to improve Jackson Park and enhance its historic nature with the addition of the Obama Presidential Center.

Emerald South aims to foster the growth of existing local businesses and leaders, attract new investment, develop our local workforce, and support inclusive housing by capitalizing on the major new projects, like the Obama Presidential Center (OPC), now happening in our neighborhoods. We work to ensure that access and opportunities are shared and benefit the residents and business owners who call the South Side home today.

New development projects, in particular the creation of the OPC, present an unprecedented opportunity to spur innovative and impactful investments. The OPC is estimated to have an economic impact of \$3.1 billion in Chicago alone and create and support thousands of jobs for the Center's construction and operations. Perhaps most importantly, thousands more indirect and induced jobs are expected to be created by the influx of an anticipated 760,000 visitors to the OPC on a yearly basis. We expect that nearby home values will increase with the addition of the OPC and are working to capture this increased value for current residents.

This is a once-in-a-lifetime opportunity for the South Side and for Chicago in general. Bringing hundreds of thousands of visitors to Jackson Park offers the chance to help strengthen the local economic climate in ways that encourage other developments across the area. To that point, the site was designed to reach directly into our community in an effort to create inviting ways for visitors to not only come to the OPC but also to stay and explore the rest of the nearby neighborhoods—getting a cup of coffee at South Shore Brew, grabbing lunch at Evelyn's Food Love, or visiting the DuSable Museum of African American History or Theaster Gates' Arts Bank.

Jackson Park itself is an important historic and economic feature for Chicago and the South Side community. Parks increase nearby property values and contribute to a higher quality of life for home and business owners. We are pleased that numerous aspects of the OPC design further historic preservation goals while retaining the open space and key features of Jackson Park.

Further, we believe that closing Cornell drive to vehicles will increase access and enjoyment for park visitors while also honoring the park's historic design and delivering greater economic benefits for nearby residents. The economic impact parks and recreational areas have on home prices depends on how far the home is from the open space, the size of the open space, and the characteristics of the surrounding neighborhood. Studies have shown that larger parks generate more economic value for greater distances. Closing the high-speed, 6-lane Cornell Drive to allow greater pedestrian access to the park will benefit not only visitors to the park but also adjacent neighbors.

During this process the federal agencies have also stressed the importance of recreation and recognize that the Park was originally intended to provide opportunities for both passive and active recreation. For example, the Assessment of Effects points out that the original design for the Park incorporated a gymnasium area. The AOE doesn't acknowledge, however, that development of the OPC would, in fact, increase opportunities for active recreation in Jackson Park. The proposed plan for the OPC includes additional and expanded children's playground areas. These playground improvements will be a tremendous benefit to the families with young children in our community. Similarly, the Program, Activity and Athletic Center (PAAC) of the OPC will be able to support a variety of active recreational opportunities for children and adults alike. The PAAC can even be utilized year-round, which will be very beneficial during the winter when opportunities for active recreation decrease. As with parks and open space, having nearby quality recreation areas increases home values and the quality of life for nearby residents.

The design of the OPC in Jackson Park was developed with community concerns in mind and has been revised over time to incorporate community feedback. The Obama Foundation has received input from hundreds of organizations throughout the community, including Emerald South, and thousands of Chicagoans and South Siders.

Emerald South appreciates being a consulting party to the Section 106 process and is pleased that the City of Chicago along with the federal agencies have also sought to engage the broader public in this important process. In our meetings throughout the South Side we have heard time after time how anxious the community is to welcome the OPC and the myriad benefits it will create for our communities and Jackson Park.

We welcome the opportunity to share our views and those of the community we call home and look forward to working with the City, federal agencies, and our fellow residents to find ways to honor the history of Jackson Park while developing an unprecedented economic, cultural, and historical asset on the South Side.

With sincere thanks,



Ghian Foreman
President and CEO
Emerald South Economic Development Collaborative



August 30, 2019

Ms. Abby Monroe
Coordinating Planner
City of Chicago
Department of Planning and Development

RE: Response to request for comments on the Assessment of Effects to Jackson Park Historic District and Midway Plaisance

Dear Ms. Monroe:

As a Section 106 Consulting Party, Friends of the Parks is pleased to submit our comments regarding the Assessment of Effects (AOE) to the Jackson Park Historic District and Midway Plaisance associated with the proposed road and park changes to accommodate the Obama Presidential Center. The city, state and federal agencies have acknowledged an “Adverse Effect” finding in the AOE, and Friends of the Parks agrees with the adverse effect findings.

We echo the concerns of many other Consulting Parties. Many of the comments speak very formally in response to a very formal federal process. But rather than repeat that language and each of those topics, Friends of the Parks seeks to focus our attention, that of the Lightfoot administration, and that of the public on a few key problem areas that others may not stress in this particular manner. We imagine that the new Lightfoot administration may not be aware of all the conversations and processes that did and did not take place under the Emanuel administration.

While Section 106 is a federal process, it is City staff that is managing it, which in and of itself is problematic in terms of conflict of interest, especially when the former mayor had previously been the chief of staff to the president whose center is in question. Since the City staff continues to manage the process, though under different leadership, we call upon the Mayor Lightfoot to manage this process according to the higher standards articulated by the new administration, whose stated priorities include: Transparency, Transformation, Accountability, Equity, and Diversity and Inclusion.

To live up to the spirit of transparency, the Lightfoot administration cannot allow this process to continue to move forward under the cover of darkness that is reflected in the failure to document consideration of avoidance of adverse effect.

This Section 106 processes has immediately bypassed “avoidance” and goes straight to “minimization” and “mitigation.” And then the examples that are offered for mitigation are ridiculous. The Consulting Parties were not consulted in the discussion or development of avoidance or minimization efforts as we should have been. And the suggestion that was presented to the public as an appropriate example of

mitigation—the mere putting up of a sign to denote the historic significance of the area—is simply offensive.

Though we call for Consulting Parties to be invited to participate in conversation about potential avoidance and minimization measures, if this process is going to go straight to mitigation, then:

- 1) The Obama Foundation should pay for actual mitigation in a way that reflects the \$175 million public investment that is required to facilitate the plan that they insist on. While Friends of the Parks has not taken a position on the road closures, any straightforward examination of the process will reveal that there has not been any public consideration of any options other than closing the roads—a very costly measure. (Even though green space organizations like ours can appreciate the closure of roads, we have also seen the Chicago Park District employ traffic calming measures in other large parks in Chicago. These options—minimizing the number of lanes and adding crosswalks and islands to facilitate pedestrians crossing the street—have not been offered for public vetting in this case.)
- 2) Additionally, the conflation of the South Lakefront Framework Plan process that often takes place in the broader Jackson Park community with the design of the Obama Presidential Center leads many in the community to be confused about what amenities the community is getting back in replacement for the 19.3 acres of the Obama campus. Many people in the community believe that the amenities laid out in the South Lakefront Framework plan are promised to come to fruition. Per our conversations with the Chicago Park District, the park district does not have funding for much of that plan at all. They are hoping that sometime in the next couple of decades they might be able to find money for some of those things. Friends of the Parks understands that such is typically how things go with park framework plans. But much of the public does not know this, and they are being duped. Even if the public agreed that those items constituted appropriate mitigation for the construction of the Obama Presidential Center in Jackson Park, there is no money committed by anyone for most of it. And it still doesn't provide a plan for the replacement of the baseball field that is being displaced by the new track and field because the previous track and field is being displaced by the Obama Center. As such, if this is the only opportunity to call for mitigation measures, we would name appropriate mitigation as the replacement of 19.3 acres of green space by the creation of parks and playlots throughout the communities surrounding Jackson Park, according to the needs and desires of those communities. And we call for the Obama Foundation to pay for a new field house in Jackson Park and new sports fields conceived of in the South Lakefront Framework Plan—conversations which we have already had with them and the Chicago Park District repeatedly.

Additionally as it relates to transparency, the South Lakefront Framework Plan public process took place long before the Section 106 process was announced. Regardless of one's opinion of the usefulness of that process, it is not honest or straightforward to suggest that questions that are legitimately being asked now by Consulting Parties and community residents during the formal Section 106 process had space to be asked in the very different process that was that framework plan process. The public sessions called for by the Section 106 process cannot be satisfied by meetings that took place before it was announced.

The Obama Foundation met with Friends of the Parks and then with the Midway Plaisance Advisory Council with Friends of the Parks staff and board members who live in Hyde Park present back in Winter 2017-2018 to pitch the idea of some set of us centering community conversations about what should be done with the east end of the Midway. It was suggested back then that a new and very inclusive Midway Framework Plan process be initiated, and it was suggested by the Obama Foundation that they would pay for the process and the community-derived outcome. Yet here we are, in 2019, with the Obama

Foundation having abandoned that conversation. No such community conversations ever moved forward. But a mysteriously-derived proposal to put a playground on the east end of the Midway did move forward as a Section 106 response to the UPARR requirement that existing parkland be replaced. And now the public is asked to trust that whatever conversations happen in the future will be robust, inclusive, and not based on done deals. This comes after the City has already decided, as expressed at several recent Section 106-related meetings, to move forward with a playground proposal recommendation for the east end of the Midway and pitch it to the community as a done deal. That is on top of the fact that the playground proposal has not been approved by the National Park Service. This does not rise to the level of transparency and transformation that we would expect of the new mayoral administration.

Finally, it is absurd to replace a baseball field with a playground, anyway. Regardless of what a community-led conversation about what is best for the east end of the Midway would come up with, the UPARR requirements call for an amenity that serves the same user community. Those who use a baseball facility at a huge park like Jackson Park and those who use a playground for children at a neighborhood park are not the same user community.

Again, we call upon the City to revisit avoidance and minimization opportunities. But if Consulting Parties are not given that opportunity, we also call for minimization efforts in the vein of planning ahead to assure that the Obama Presidential Center does not cause displacement, as we have seen in Chicago regarding The 606 and has happened across the country in relation to other park development efforts. The City should explore programs to help create healthy, mixed-income communities in the neighborhoods around Jackson Park. Certainly, this transformation opportunity should also include pocket parks and other appropriate green spaces for the health of the community.

Thank you for this opportunity to speak into the Section 106 process regarding the Obama Presidential Center.

Sincerely,

A handwritten signature in cursive script that reads "Juanita Irizarry". The signature is fluid and elegant, with a large initial "J" and a long, sweeping underline.

Juanita Irizarry
Friends of the Parks



"The school of choice, where an international education leads to a world of opportunities!"

6220 S. Stony Island Ave. Chicago, IL 60637 Ph:773-535-0880 Fax:773-535-0633
Antonio D. Ross **Principal** Stephanie Glover-Douglas **Assistant Principal** Joshua VanderJagt **Assistant Principal**

August 28, 2019

Ms. Abby Monroe
Public Participation Office
Department of Planning and Development
121 N. LaSalle Street
Chicago, Illinois 60602

Potential! Inspiration! Hope! It is with an enormous amount of enthusiasm and excitement that the administration, staff and students of Hyde Park Academy anticipate the opening of the Obama Presidential Center.

Hyde Park Academy has had a long standing relationship with President Barack Obama after his visit to the school in February of 2013. Since the spring of 2014, students and staff have attended a plethora of meetings to ascertain the **potential** of having such a world renowned entity in the city to showcase the South Side of Chicago, as well as its positive relevance to the Hyde Park/Woodlawn communities.

Ninety-eight percent of the student population at HPA is African-American. President Obama and Mrs. Michelle Obama continue to be an **inspiration** to our students and anyone else that they encounter. We consider them as "family" at HPA. We are grateful that they wished to share their historic journey and legacy by requesting that the Obama Presidential Center be located in "their" neighborhood here in Chicago. Having the Presidential Museum, Forum, and Library honoring the first African-American president is truly inspirational, and we cannot wait to see the structures rise into fruition.

In addition to the historic and cultural resources that will become available to the area, the Obama Presidential Center provides **hope** to the students of Hyde Park Academy. If President Obama could, then "We Can!" is also one of our mottos. We look forward to the arrival of the center.

Sincerely,

Antonio D. Ross
Principal



International Baccalaureate
IB for ALL

RESILIENCE · RESPECT · COURAGE · RESPONSIBILITY · CHARACTER

August 29, 2019

Dear Ms. Monroe,

I'm writing as the Executive Director of Hyde Park Art Center, a consulting party in the Obama Presidential Center impact process. After reviewing the National Park Service and Federal Highway Administration report as part of the Section 106 process, I write in support of the Center's proposed location in Jackson Park. As a cultural institution in the area, we believe that the addition of this cultural site will only further strengthen and enrich the neighborhood. The inclusion of more cultural capital further enhances an area of the city that includes the Museum of Science and Industry, the DuSable Museum of African American History, Smart Museum of Art, Frederick C. Robie House, and many others. Each of these landmarks is an important civic institution on its own, but together with the increased concentration of attention, interest, and support that the Obama Presidential Center will create, our institutions and the surrounding neighborhoods will be strengthened.

Hyde Park Art Center is the oldest community art center in the city of Chicago, having been a part of the community for eighty years. As a hub for contemporary arts in Chicago, we serve as a gathering and production space for artists and the broader community to cultivate ideas, impact social change, and connect with new networks. The Art Center functions as an amplifier for today and tomorrow's creative voices, and provides the space to cultivate and create new work and connections.

Here at the Art Center we are guided by the idea of creative citizenship, a tenant we believe fits hand in hand with the Obama Presidential Center's mission of creating pathways for young leaders from not only Chicago, but the world. The net positive addition of the Obama Presidential Center will only increase that gravitation pool of making the south side of Chicago a creative, civic, and historical hub for all.

Sincerely,



Kate Lorenz

Executive Director

Hyde Park Art Center



5529 South Lake Park Avenue, Chicago, IL 60637 + 773.493.1893

August 30, 2019

Ms. Abby Monroe
Coordinating Planner City of Chicago, Department of Planning and Development
121 N. LaSalle, Room 1000
Chicago, Illinois 60602

RE: Historic Preservation in Jackson Park and the Current Section 106 Review

Dear Ms. Monroe:

Thank you for yet another opportunity to comment on the 106 Review process following the August 5, 2019 meeting regarding the draft Assessment of Effect (AOE) report. As we said in our previous letter to you, "The Hyde Park Historical Society takes very seriously the preservation of the important historic resources in Jackson Park." We continue to be concerned about the Obama Presidential Center (OPC) plans for entirely removing a section of historic Cornell Drive and are distressed about the OPC's intentions to demolish the historic Women's Garden. In addition, we urge more diligent attention be paid to remaining archaeological evidence, especially regarding Louis Sullivan's World's Columbian Exposition Transportation Building. (For the details of our concerns see our April 17, 2018 letter which is attached).

These are among the many clear and significant 'adverse effects' noted in the draft AOE presented on August 5th. The Section 106 Review process enacted as part of the National Historic Preservation Act is designed to prevent the needless destruction of historic public resources. The Section 106 review process provides clear review criteria and procedural requirements to ensure the public that protection would be provided. The recent August 5th meeting failed to address these review criteria or the specific findings in the report. We find that only superficial attempts were made in the AOE draft and the city's presentation to avoid or minimize these adverse effects. Instead the emphasis was on mitigation that has little direct bearing on the adverse effects. The superficial and cursory nature of the draft AOE indicates a lack of good faith that compromises the 106 process. This is regrettable and poses a threat both to Jackson Park and to historic cultural landscapes across the nation.

As this process goes forward, we are concerned about the continuation of genuine public and democratic discourse. Until now the debate about the Obama Presidential Center and its potential effects on historic Jackson Park has been marked by articulate, civil and reasoned arguments from all sides. Contributing parties have been passionate but always serious, respectful and thoughtful. For

Hyde Park Historical Society
5529 South Lake Park Avenue, Chicago, IL 60637 + 773.493.1893

its part, the City has professed a commitment to transparency and thoroughness of the process. This is the kind of civic behavior that makes democratic participation worthwhile. The presentation at the August 5th meeting left the impression that the City is no longer fully engaged in this process and will pursue a predetermined path regardless of the validity of the public response to the Section 106 draft report. However, your email dated August 28, 2019 reaffirming the importance of the role of the Consulting Parties is evidence to the contrary.

The Hyde Park Historical Society looks forward to continued positive dialog on this important subject. Thank you very much for your time and attention.

Respectfully,

Michal Safar

Michal Safar, President
Hyde Park Historical Society, Section 106 Consulting Party

**To: City of Chicago
Department of Planning and Development
c/o: Abby Monroe, Public Participation Officer**

From: Jackson Park Golf & Community Leadership Council

Subject: Section 106 AOE Review and Narrative of Overwhelming Community Support from Jackson Park Golfers, Jackson Park/South Shore Lakefront Patrons, Residents and Community Stakeholders, in favor of Obama Presidential Center Development and Comprehensive Jackson Park Revitalization.

As a life-long Chicago resident and 20 year South Shore property owner who uses Jackson Park and its lakefront more than 200 days annually, I was appointed by 5th Ward Alderman Leslie Hairston to Chair a committee of community leaders that represents 4,000+ Jackson Park area homeowners, residents, park patrons and community stakeholders. Alderman Hairston asked if I could serve as Chair, after Ward residents and community stakeholders expressed a desire to participate in Jackson Park Golf Course restoration and Obama Presidential Center (OPC) park integration planning.

After participating in more than one hundred 5th Ward community meetings, Chicago Park District forums, park advisory council meetings, Obama Foundation public hearings, Jackson Park Harbor membership meetings, homeowner association/block-club/residential tenant meetings, Jackson Park Golf league forums, I can confidently say that there is overwhelming support tendered by Jackson Park area community stakeholders for the Obama Presidential Center and long-overdue improvements within Jackson Park. Remarkably, there are only a few disgruntled obstructionists that are not elected or appointed by community residents and who do not represent the overwhelming community sentiment in favor of Jackson Park revitalization. Sadly, these people are hoping that nothing changes and are content with the status quo, choosing continued deterioration and stagnation over helping the park to evolve. Under the guise of preservation, they profess to “protect our park”, while neighborhood children continue to be deprived of a functional park, responsive to the needs of current and future generations.

Moreover, because of past and current Jackson Park improvement opposition by non-residents and non-community appointed or elected anti-park revitalization obstructionists, Jackson Park has not been technologically improved with the latest lighting, traffic enhancements, sustainable energy sources, security surveillance, Wi-Fi connectivity, recreation facilities improvements or made compliant with The Americans with Disabilities Act (ADA), throughout the entire park footprint, beaches and shoreline. Nor has the park been the beneficiary of relevant cultural/artistic program implementations, athletic facilities enhancements and resultant increase in community employment opportunity, now prevalent in Millennium Park, Lincoln Park, and other more affluent Chicago park facility locations.

However, millions of dollars were recently spent by the U.S. Army Corp of Engineers, planting flowers, native plants and nature areas on 57th and 63rd street beach park/shorelines, while the south lakefront shoreline breakwaters and revetments continue to deteriorate into very dangerous conditions. To make matters worse, Lake Michigan has risen to its highest level ever and the lakeshore continues to feel the effects of corrosive shoreline erosion, as wave swells from Lake Michigan pound beaches, deteriorate revetments and encroach upon Lake Shore Drive. Curiously, no AOE review was requested by “so-called” Jackson Park watchdogs or park friends, who continue to obstruct OPC development.

That being said, all citizens should be nature lovers and fans of migratory birds or Monarch Butterflies migratory paths. This also includes being mindful of the challenges associated with “bee colony collapse disorder”, now affecting the North American bee population. However, does mass planting of natural areas outweigh the needs of a community so desperately in need of: youth services to combat gun violence, jobs, after school programs and a lakefront requiring **urgent** shoreline

preservation? Conversely, the development of the Obama Presidential Center does not, should not and cannot provide all answers to current systemic societal maladies or past park disinvestment policies.

Nevertheless, knowing some of the many needs of a long underserved community in which President and Mrs. Obama: worked, raised a family, represented constituents in the state legislature, U.S. Senate and The White House, President and Mrs. Obama chose a location that would inevitably become a corridor of transformation and hub of restoration, similar to that of Millennium Park and the Clinton Presidential Library/Center. (William J. Clinton Presidential Center Economic Impact, Exhibit I)

The fact that the Obamas selected this location, because of its unparalleled supportive city assets that's comprised of: three historic Chicago neighborhoods (South Shore, Woodlawn and Hyde Park) three marina/harbors, three public beaches, three Metra train stops, five modes of public transportation accommodation (walk, bike, bus, train, water), three main transportation corridors (South Lake Shore Drive, Stony Island and the Midway Plaisance) four high schools (U of C Lab, Kenwood Academy High School, Hyde Park Academy High School and South Shore International College Prep), three historic economic engines of higher learning, science and community services (The University of Chicago, The Museum of Science and Industry and South Shore Cultural Center), all within a park ecosystem designed by Fredrick Law Olmstead and Calvert Vaux, that contains three distinct park attributes (Jackson Park/South Shore Golf courses, Wooded Island and expansive park green space that also accommodates La Rabida Children's Hospital), is a testament to the remarkable intellectual insight continually exhibited by our 44th President and his wife, forever favorite neighborhood residents.

Since December of 2015, I have had the pleasure of working very closely with many South Shore, Woodlawn, Hyde Park, Washington Park community residents (renters and homeowners), stakeholders, 5th Ward Alderman Leslie Hairston, the Chicago Parks Golf Alliance, the Chicago Park District, Chicago Department of Planning, Chicago Department of Transportation executive leadership, 1Woodlawn, Jackson Park Advisory Council, South Shore Cultural Center Advisory Council, Jackson Park Golf Association, South Shore & Hyde Park Chambers of Commerce, South Shore Works and many other community civic/educational/social service/homeowner or residential neighbor associations.

Alderman Leslie Hairston was instrumental in facilitating many public community meetings and stakeholder forums that purposefully convened members from the 5th Ward and surrounding community residential or organizational/business leadership, in order to expressly address all issues and challenges associated with the plans for the Obama Presidential Center development and revitalization of the Jackson Park Golf and South Shore Golf courses. As well noted in Chicago Park District publications, revitalization of the Jackson Park Golf Course will be financed solely by private philanthropic donations, not requiring use or need of federal, City of Chicago or state funds.

In order to ensure a harmonious integration of Jackson Park Golf Course restoration, along with Obama Presidential Center development and the South Lakefront Framework Plan (SLFP) refinement, we organized a comprehensive golf-cart tour of the entire Jackson Park/South Shore Cultural Center/beaches/harbors/museum/park/lakeshore geographic footprint. Many community stakeholders and leadership of community organizations were invited and continue to contribute to the refinement of OPC plans, Jackson Park Golf course restoration and the SLFP. Tour participants included; Alderman Leslie Hairston, Chicago Park District Superintendent & CEO Mike Kelly, Chicago Park District COO Pat Levar, Chicago Park District CPO Alonzo Williams, Chicago Harbors GM Scott Stevenson, Obama Presidential Center design team, Jackson Park Golf course design engineers, Chicago Parks Golf Alliance, Friends Of The Park, Jackson Park Advisory Council, South Shore Cultural Center Advisory Council, Jackson Park Golf Association, South Shore & Hyde Park Chambers of Commerce, South Shore Works, Jackson Park Watch, Jackson Park Harbor/Marina boaters and residential leadership from the South Shore, Woodlawn and Hyde Park communities. (Park Tour Participants List, Exhibit II)

Since the final release of the South Lakefront Framework Plan and Jackson Park Golf Course restoration by the Chicago Park District, as well as final OPC plans submitted to City of Chicago Plan Commission by the Obama Foundation, council members continue to meet and communicate with community leadership and residents, regarding OPC development, golf course restoration and surrounding park facilities revitalization plans. As a result of Jackson Park/South Shore Cultural Center tour, a list of park recreation, beach, concession and shoreline items in need of repair/replacement due to age and weather-related erosion was generated. (Jackson Park/South Shore CC Needs, Exhibit III)

Currently, the Jackson Park Golf & Community Leadership Council continues to enjoy active support from Jackson Park area residents and those who use park recreation facilities, beaches, nature areas, harbors and golf facilities on a daily basis, including: a 500+ member baseball league, 500+ members of Jackson Park Golf Association, 200+ First Tee of Greater Chicago youth golf program members, 25 new Western Golf Association (WGA) sponsored Jackson Park Golf Course caddies and an Evans Scholar scholarship winner, 750+ youth soccer program participants/organizers, 200+ Jackson Park Marina/harbor boaters, hundreds/thousands of Jackson Park Harbor Junior Sailors youth, lakefront walkers, runners, cyclists and long-time tennis players/league members. Additionally, there continues to be an unmet need and strong community desire for the new track & soccer field completion, started and then stopped by park development obstructionists. There is an urgent need for a new Jackson Park Field House to complement Jackson Park Golf restoration and OPC development. The current one is in such disrepair that the cost to remediate would exceed costs to build a new one.

More persuasive, there has been an overwhelming amount of positive community support for the efforts to revitalize all park facilities, including the Jackson Park Golf course, park facilities and the south lakefront shoreline. This is in stark contrast to some media publication of community disharmony or cynicism expressed by few who do not play golf, tennis, soccer, baseball, basketball, swim, sail or sponsor children who could benefit from required park restoration. Unfortunately, there is a prevailing false narrative circulated, counter to the positive discourse really taking place between those directly affected by and would directly benefit from proposed park improvements, including the many youth program leaders who are truly concerned about the current community and generations yet born, who will benefit exponentially from long overdue Jackson Park restoration and OPC development.

Conclusively, any adverse effects identified under the Section 106 AOE review would be mitigated, minimized or prevented by OPC development, long overdue park/golf course restoration and much-needed SLFP implementation, as fully supported by most vested Jackson Park community stakeholders. I believe Frederick Law Olmsted would be troubled by any lack of public empathy for people living in the 21st century and beyond, including those with disabilities who would benefit greatly from the Obama Presidential Center development, Jackson Park Golf Course restoration and comprehensive Jackson Park revitalization. ADA federal statute compliance provides an even more compelling argument for the long overdue park restoration/enhancement efforts, sparked by the OPC.

Sincerely,
Al DeBonnett, Chair
Jackson Park Golf & Community Leadership Council

The Jackson Park Golf & Community Leadership Council is a cooperative of community leaders who meet and communicate frequently, while representing thousands of Jackson Park, South Shore, Woodlawn & Hyde Park civic, business, homeowners, social service stakeholders and area residents, who overwhelmingly support positive advocacy and collaborative contribution towards The Obama Presidential Center development, Jackson Park Golf Course restoration and South Lakefront Framework Plan implementation.

EXHIBIT I

WILLIAM J. CLINTON PRESIDENTIAL CENTER | ECONOMIC IMPACT

Key findings of research:

§ Investment in the downtown areas of Little Rock and North Little Rock has totaled \$2.46 billion since the Clinton Center location was announced in 1997, with a total economic impact of construction at \$3.3 billion.

§ The economic impact of construction of the Clinton Center and ongoing operation of the various organizations housed there is more than \$346 million.

§ Travel expenditures in Pulaski County have increased 68.1 percent since 2003.

§ More than three million people have visited the Clinton Center in the last 10 years, with increases in annual visitors every year, since 2007.

§ Total tourism-related expenditures of visitors to the Clinton Center total \$691 million since 2005.

§ Travel-generated revenue in Pulaski County has increased by 41.2 percent to more than \$28 million in 2013, while revenue from the City of Little Rock Advertising and Promotion tax has increased 64.5 percent to \$11.9 million in 2013.

§ Six new hotels have been built or announced in the downtown Little Rock area, with an additional five properties undergoing major renovation in the last 10 years.

§ Robinson Center, the city's premier performance hall, is undergoing a \$68.6 million renovation, which will be completed in 2016, while the Arkansas Repertory Theater, Ballet Arkansas and the Arkansas Symphony Orchestra have all enhanced their rehearsal and/or performance space.

§ Area attractions have expanded with the addition of new exhibits at the Little Rock Zoo, the renovation of the Museum of Discovery, enhancements to Riverfront Park, and the creative lighting of three bridges spanning the Arkansas River.

§ The Clinton School of Public Service has graduated almost 300 students, with more than 80 currently enrolled. Those students have participated in more than 60 practicums projects within a two-hour drive of Little Rock, in addition to their capstone projects requiring 250 hours for each project in or near Little Rock and international projects in more than 60 countries.

§ The Clinton School Speaker Series, which has offered more than 900 programs, has brought ambassadors, Pulitzer Prize winners and Nobel Prize winners to Little Rock for free presentation to students, as well as the general public, with total attendance of more than 150,000.

§□ The Central Arkansas Library System has significantly expanded its programming, particularly in the downtown area, with development of the Arkansas Studies Institute and the Cox Creative Center, in addition to the Hillary Rodham Clinton Children’s Library located in midtown.

§□ The Clinton Center was the first federally maintained building to achieve LEED platinum certification and led the way for an impressive commitment to sustainability throughout the state, with 122 LEED certified buildings in Arkansas, 58 of which are in the Little Rock metropolitan area.

§□ The Arkansas River Trail System, which begins at the Clinton Presidential Park Bridge, runs throughout Central Arkansas and includes a 16-mile loop through Little Rock and North Little Rock. More than \$62 million has been invested in development of the trail system.

§□ City Year Little Rock, an affiliate of AmeriCorps, was founded in 2004 to coincide with the opening of the Clinton Center. City Year members work more than 80,000 hours annually, serving 900 students in the Little Rock School District.

§□ Clinton Center volunteers have donated more than 469,000 hours to the operation of the Center, which has a value of more than \$8.2 million.

§□ Heifer International constructed a new world headquarters and adjacent educational center on property near the Clinton Center in 2009, which represented a total investment of approximately \$30 million.

§□ Little Rock’s Main Street is undergoing a renaissance effort focused on establishing a Creative Corridor that will include mixed-use space for arts organizations, offices, residential, and retail businesses. In addition, the Little Rock Technology Park has committed to a location along Main Street and is exploring available properties.

§□ The Clinton Library and Museum has 12 permanent exhibits related to all aspects of the Clinton presidency and has hosted more than 25 temporary exhibits featuring art, design, history, and music to attract a wide audience to the facility.

Source: Boyette Strategic Advisors (2014)

EXHIBIT II

**JACKSON PARK & SOUTH SHORE CULTURAL CENTER
COMPREHENSIVE ANALYSIS AND OPERATIONAL TOUR OF PARK FACILITIES**

JUNE 8, 2017



TOUR PARTICIPANTS:

**HONORABLE ALDERMAN LESLIE HAIRSTON
CHICAGO PARK DISTRICT SUPERINTENDENT,
CEO MICHAEL KELLY**

**CHICAGO PARK DISTRICT EXECUTIVE LEADERSHIP
CHICAGO PARK DISTRICT HARBOR EXECUTIVE MANAGEMENT
OBAMA PRESIDENTIAL CENTER DESIGN TEAM
JACKSON PARK GOLF COURSE RESTORATION DESIGN TEAM
SOUTH SHORE CULTURAL CENTER ADVISORY COUNCIL
JACKSON PARK ADVISORY COUNCIL
CHICAGO PARKS GOLF ALLIANCE
JACKSON PARK GOLF ASSOCIATION
JACKSON PARK HARBOR & MUSEUM SHORES MARINAS
FRIENDS OF THE PARK
JACKSON PARK WATCH
SOUTH SHORE WORKS
SOUTH SHORE CHAMBER OF COMMERCE
JACKSON PARK GOLF & COMMUNITY LEADERSHIP COUNCIL**

**SOUTH LAKEFRONT/JACKSON PARK GOLF/SOUTH SHORE CULTURAL CENTER/BEACH/HARBOR /FACILITIES
GEOGRAPHIC ANALYSIS BY COMMUNITY LEADERSHIP PARTICIPANTS**

Alderman Leslie Hairston – 5th Ward Alderman

Lanita Ross – 5th Ward Office Administrator

Mike Kelly – Superintendent/CEO, Chicago Park District

Pat Levar – COO, Chicago Park District

Alonzo Williams – CPO, Chicago Park District

Andrea Adams – Gen Mgr., Chicago Park District South Shore Cultural Center

Scott Stevenson – EVP, Westrec Marinas, General Manager of Chicago Waterways & Harbors

Al DeBonnett – Chairman, Jackson Park Golf & Community Leadership Advisory Council

Paul Wiese – VP, Smithgroup JJR, Design & Engineers for South Lakefront Framework Plan

Ernie Wong – Principal, Site Design, Landscape Architects for Obama Presidential Center

Robert Rock – Principal, Living Habitats, Landscape Architects for Obama Presidential Center

Brian Hogan – Director, Chicago Parks Golf Alliance

Mike Ruemmler – Director, Chicago Parks Golf Alliance

Ron Norris – President, Jackson Park Golf Association

Dr. Carol Adams – South Shore Works, South Shore Chamber of Commerce

Lauren Moltz – President, Friends of the Park

Walter Kindred – President, South Shore Cultural Center Advisory Council

Leslie Jackson – Former President, South Shore Cultural Center Advisory Council

Louise McCurry – President, Jackson Park Advisory Council

Jerry Levy – Chairman, Jackson Park Advisory Council, Steward for Wooded Island Nature Preserve

Brenda Nelms – President, Jackson Park Watch, Hyde Park Resident

Elliot El-Amin – Museum Shores Marina/Yacht Club board member, South Shore Resident

Hilton Clark – South Shore Property Owner/Hyde Park Resident

Charles Newsome – President, Quadrangle House Homeowners Association

Christine Bowen – President, Parkland Residents Association

Tracy Raoul – Board member, Chicago Parks Golf Alliance and Jackson Park Golf Association, Woodlawn Resident

Cheryl Mainor – Media Director, Jackson Park Golf & Community Leadership Advisory Council

Chiaka Patterson – Jackson Park Highlands Homeowner Association Board and Jackson Park Harbor/Yacht Club

EXHIBIT III

JACKSON PARK GOLF & COMMUNITY LEADERSHIP COUNCIL TOUR LIST OF PARK ASSETS IN NEED OF REPAIR OR REPLACEMENT

PARK ASSET BY FACILITY OR AREA

South Shore Cultural Center

Golf Course Facility
Interior
Exterior & Park Grounds
Nature Preserves
Golf Learning Center
Horse Carriage/Stable
Parking Lots
Tennis Courts
Beach
Water Barrier System
Breakwall/revetment
Lifeguard Station
Restrooms
Beach Concession
Roadways
Trails/Paths
Shoreline
Fencing
Security
Lighting
Signage (Multi-Lingual)
Youth Programs
Technology/Wi-Fi
Emergency Serv
Maintenance

Jackson Park Facilities

Golf Course Facility
Driving Range
Wooded Island
Soccer Fields
Baseball/softball fields
Tennis Courts
Basketball Courts
Lawn Bowling Pavilion
Special Events Space
Parking Facilities
Bike/Ped Paths

Trees/Preserves
Garbage Receptacles
Roadways
Signage (Multi-Lingual)
Security
Lighting
Restrooms
Fieldhouse (New)
Technology/Wi-Fi
Emergency Services
Bridges
Dog Park Facility
Maintenance

La Rabida Hospital (Non-Park Asset)

Shoreline
Ped Path
Parking
Lighting
Security
Technology/Wi-Fi

63rd Street Beach

Concessions
Shoreline
Lifeguard Station
Lighting
Restrooms/showers
Bathhouse
Parking Facilities
Walkways
Bike/Ped paths
Water Barrier System
Bacteria Prevention
Garbage Receptacles
Youth Programs
Security
Signage (Multi-Lingual)
Special Events
Technology/Wi-Fi
Breakwall/revetment
Maintenance

57 Street Beach

Concessions
Lifeguard Station
Shoreline

Lighting
Restrooms/showers
Parking
Boardwalk
Bike/Ped paths
Water Barrier System
Bacteria Prevention
Garbage Receptacles
Youth Programs
Security
Signage (Multi-Lingual)
Special Events
Technology/Wi-Fi
Breakwall/revetment
Maintenance

Harbors/Waterways

Jackson Park Outer
Jackson Park Inner
Museum Shores
Museum Shores Marina
Concessions
Youth Programs
Security/Cameras
Fencing/Removal
Emergency ladders
Coast Guard Station
Harbor Guard Station
Parking Facilities
Buoy Rings
Loaner Life Jackets
Youth Programs
Chase Boat
Emergency Comm bands
Breakwall/revetments
Maintenance
Bridges/Harbor Access

Historic Preservation

Iowa Building
Partee JPG Clubhouse
Comfort Station,
Wooded Island &
Darrow Bridge
Museum Science & Ind

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Jackson Park Watch

P.O. Box 15302, Chicago, Illinois 60615

jacksonparkwatch@gmail.com www.jacksonparkwatch.org www.facebook.com/jacksonparkwatch

August 26, 2019

Abby Monroe, Public Participation Officer
Department of Planning and Development
City of Chicago
Via email: abby.monroe@cityofchicago.org

Re: Section 106 Review – Assessment of Effects to Historic Properties relating to Jackson Park

Dear Ms. Monroe:

As a consulting party to the Section 106 review of the proposed changes to Jackson Park and the Midway Plaisance to accommodate the siting there of the Obama Presidential Center (OPC), we write to comment on the draft report of the Assessment of Effects to Historic Properties that was issued on July 29 and to address the next steps in the review process.

In this letter, we will discuss the following:

- Determination of Adverse Effect on Jackson Park and Midway Plaisance
- Omissions and Inconsistencies in Assessments of Adverse Effects on Other Historic Properties
- Need for a 4(f) Review Prior to Completion of the Section 106 Review
- Proposed Recreational Changes and Parkland Replacement
- Avoidance, Minimization, and Mitigation
- Definition of the Undertaking and Linkages between Section 106, EIS, and NEPA Reviews
- Scheduling and Further Meetings

I. Determination of Adverse Effect on Jackson Park and Midway Plaisance

We appreciate that the AOE report (Section 1) defines the undertaking under review expansively, that is to say, realistically, in light of the fact that the separate actions of both the Federal Highway Administration (FHWA) and National Park Service (NPS) are the result of and are inextricably tied to the City's actions. We think it essential that this realistic definition of the undertaking under review be adopted and continued throughout the remainder of the Section 106 review, the 4(f) review, and the National Environmental Protection Act (NEPA) review as well.

We appreciate and totally agree with the determination that there will be clear and significant adverse effects as a result of the undertaking proposed by the City, the Federal Highway Administration (FHWA) and the National Park Service (NPS). We note that the City has adopted and promoted the proposal for the OPC developed by the Obama Foundation along with its demand for road closures and realignments without allowing any open public review or

consideration of alternative road designs. We also note that the City's proposal to use the eastern portion of the Midway as acreage for a replacement recreation opportunity to meet the City's obligations to the National Park Service under the UPARR program is speculative and has not been endorsed by the National Park Service.

The AOE report (Section 3.3.2.1) identifies in detail the adverse effects, direct, indirect and cumulative, of the undertaking that would:

- alter the legibility of the design of the cultural landscape in ways that diminish the overall integrity of spatial organization in the property as a whole, ignoring that the park was designed as a single entity;
- alter the systems of pedestrian and vehicular circulation in ways that would further destroy the spatial design, including changing the symmetrical roadway design and spatial patterns that define the connection between Jackson Park and the Midway Plaisance;
- transform the settings of contributing resources in ways that are inconsistent with the Secretary of Interior's Standards for the Treatment of Historic Properties;
- diminish the intended prominence of the Museum of Science and Industry and disrupt the balance between park space and built areas; and
- diminish the sense of a particular period of time and impact the integrity of feeling and the integrity of the conscious design decisions made by the Olmsted firm.

We also agree with the comments of the Advisory Council for Historic Preservation (ACHP), dated August 22, 2019, that the adverse effects are even greater than has been set forth in the AOE report, and that all of the adverse effects should be fully and accurately identified and documented so that the complete picture on adverse effects can be understood, and so that principles of avoidance and minimization can be properly applied.

On a related point, one issue that should be recognized is the numerous attestations to the historic integrity of Jackson Park after 1968, the end date of the period of significance chosen for this review.

- The 1999-2000 South Lakefront Framework Plan adopted by the Chicago Park District after extensive community input states on page 9 in point 6: "Respect Historic Context: Jackson Park, Washington Park, and South Shore Cultural Center have a proud historic heritage. Carefully consider historic context when proposing circulation alterations." On page 13 of the same document the Plan asserts "Historic Context is an important consideration as one looks at upgrading present conditions and weighing future improvements. The original Olmsted design has served the park well over time and should not be compromised by future plans." (See Attachment A.)
- On December 10, 2012, in conjunction with a separate proposed project in Jackson Park, Deputy State Historic Preservation Officer Anne E. Haaker wrote: "As currently designed, [Jackson Park] retains a great deal of its integrity. While some of the original features have been modified, or removed, the remaining defining characteristics such as the overall plan developed by Olmstead (sic), Olmstead, and Elliot as depicted on the 1905 map must be respected. These include, but are not limited to, the Golden Lady statue, the Osaka Garden, the current roadway configuration, the beach house, and the configuration of the lagoons." (See Attachment B.)

- The Historic Properties Inventory compiled for the current Section 106 review also testifies to the current historic integrity of Jackson Park. In section 2.1.2, Jackson Park Landscape Integrity Analysis, the HPI concludes on page 59 that “Overall, Jackson Park generally possesses a high level of integrity...” and again, on page 60, “Jackson Park generally retains a high level of integrity.”
- Finally, the Assessment of Effects report itself comes to the same conclusion. In Section 3.3.1 on page 21 it states: “As community needs have changed, alterations to the park have been necessary to sustain its purpose, but the park continues to retain historic integrity because the overall effect of previous alterations retained consistency with the original design principles.” Shortly after that passage comes this summary on page 22: “In aggregate, the majority of alterations to the historic property over time have been consistent with the original design principles applied by the firm of Frederick Law Olmsted, Sr. As established by the HPI, the combination of changes made to date do not impair the integrity of the existing character-defining features reflecting the original design principles.”

II. Omissions and Inconsistencies in Assessments of Adverse Effects on Other Historic Properties

We disagree with and call attention to the report’s finding in Section 3.4 that there will be no adverse effects on other historic properties adjacent or proximate to Jackson Park and the Midway Plaisance. The draft AOE report should be revised to correct the following errors and omissions:

- The draft AOE report utilizes incorrect assumptions about the impact of traffic and parking diversions on these properties as a result of the road changes required by the OPC design. In Section 3.1.2, p. 15, the report asserts that the major north-south roadways “will not experience perceptible changes in traffic. Traffic volumes are not anticipated to be largely dispersed to lesser volume roadways through historic districts.” This implausible and awkwardly worded conclusion is based on the Traffic Impact Study conducted for the City by Sam Schwartz Engineering and released on February 2018.

Jackson Park Watch commissioned an independent assessment of the CDOT road proposal and of the Sam Schwartz study on which it is based. That assessment was conducted in May 2018 by Patrick E. Hawley, P.E., PTOE, of raSmith, a national civil engineering and surveying firm with transportation expertise. (See Attachments C-1 and C-2.) That independent assessment (Attachment D) identified several problematic aspects of the Sam Schwartz report, in particular with regard to the estimates for traffic diversions at both the major roadway and the local street levels. Among the examples of questionable conclusions in the AOE report as a result of reliance on incomplete data is the assertion that 67th Street would be unaffected even though the traffic volumes on that street at the southern border of Jackson Park were predicted to increase by 25-30%.

The AOE report’s determination of “No Effect” on historic residences along/by that street should be reexamined and corrected for the final version of the AOE report. Similarly, the assertion in Section 3.1.3 on page 17 that the neighborhood roadway network north and south of Jackson Park and the Midway Plaisance will “only experience minor traffic increases that will not be perceptible” lacks credibility and should be

reexamined and corrected. The entire issue of traffic diversions throughout the area should be revisited to allow for a thorough assessment of effects on historic structures and areas – and to avoid increased traffic problems in an area that already experiences frequent traffic overload.

- The loss of existing on-street parking and the impact of expanded visitor parking along the streets adjacent to Jackson Park has not been addressed in the draft AOE report. As noted by the Sam Schwartz report, the road reconfigurations and closures will result in the loss of over three hundred free, centrally located parking spaces within Jackson Park. Of particular note is the proposal to ban parking along Hayes Drive between Lake Shore Drive and Cornell Drive, an area that is heavily used for parking by people accessing playing fields, natural areas and the 63rd Street beach. The proposed parking garage to be built on the OPC campus is designed only to accommodate visitors to the OPC proper, not to accommodate local park users who will come for other activities. Either those local users will no longer be able to access Jackson Park or they will seek on-street parking along the streets adjacent to the Park, causing congestion and other problems for near-by residents in South Shore, Woodlawn, and Hyde Park. This, too, should be considered an adverse effect on these areas. Discussion of the impact of inadequate parking should be included in a corrected final version of the AOE report.
- As noted by the ACHP, the City and FHWA have inexplicably failed to conduct a proper above-ground-level analysis of the visual impact of the OPC museum tower on the surrounding properties, neighborhoods and historic districts despite the ready availability of relatively inexpensive technology; see Section 3.1.2, p. 15. That omission should be corrected in the final version of the AOE report.
- The failures to properly assess the visual impact of the OPC and the impact of new traffic patterns and other aspects of the undertaking in Section 3.4.5 seem particularly egregious when considering the “No Effect” determination regarding the Jackson Park Terrace Historic District. The Jackson Park Terrace Historic District will experience adverse effects in several regards: the alterations proposed for Stony Island between 60th and 62nd streets, far from improving traffic, will severely impact access into and out of that residential area. The increased traffic will assuredly increase the amount of traffic noise to which the residents will be subjected. The intrusion of a 235’ tower in the near proximity – replacing healthy mature trees – will clearly have adverse visual effects. The conclusion that the undertaking will not alter the District’s integrity of feeling and association should also be reexamined. The assessment of the District needs to be corrected in the final version of the AOE report.
- Similarly, the assessment of the Hyde Park-Kenwood Historic District in Section 3.4.6 should be reviewed and corrected. It is illogical and disingenuous to apply a single criteria and “No Effect” assessment to all parts of the large Hyde Park-Kenwood Historic District, an area that is more than a mile square, when one well-defined portion of the district – the area east of the ICRR Viaduct and Embankment – is adjacent to and will be immediately and directly impacted by the undertaking in ways that the rest of the historic district will not. The necessary and proper approach is to consider that impacted segment,

that fronting on 59th Street and Stony Island Avenue, separately. It contains an NRHP-eligible residential high rise, a daycare center, the Earl Shapiro Campus of the University of Chicago Laboratory Schools serving kindergartners and early elementary grade students, a number of low-rise apartment complexes, the headquarters office of a national sorority, and, at the north end of Stony Island, a Chicago public elementary school. Here again the proposed undertaking will cause severe adverse effects for this area. It is already crowded with both vehicular and pedestrian traffic many hours every weekday as a result of the operations of the schools and daycare center. Under the proposed OPC and related road plans, traffic volumes will increase, with attendant increased dangers to both vehicles and pedestrians in the already busy area. The proposed reconfiguration of the roadway connections between the Midway Plaisance, Stony Island, and Cornell Drive into a new pattern with several forced extremely sharp turns will cause confusion, consternation and accidents. Traffic noise will increase. Visitors to the OPC will likely attempt to find free, on-street parking the area, an area that already experiences severe parking problems all day long each weekday. The visual impact of a 235' tower looming at the south end of the district will be an additional adverse effect. Here, too, is a significant incomplete and erroneous assessment that needs to be corrected in the final version of the AOE report.

We also note for correction a misstatement on p. 43 of the draft AOE report of the boundaries of the HPK Historic District. It is bounded roughly by 59th St. on the south and by 47th St. on the north.

III. Need for a 4(f) Review Prior to Completion of the Section 106 Review

In the mid-1960s federal legislation was enacted to help preserve publicly owned parks and recreation areas, waterfowl and wildlife refuges, and historic sites considered to have national, state or local significance. The Section 106 review now underway is mandated by one of those pieces of legislation, the Historic Preservation Act of 1966. The Department of Transportation Act, also passed in 1966, likewise included a special provision, called Section 4(f), to assist in this effort to protect these important sites.

Section 4(f) provides that the FHWA cannot approve an action that would use land from a significant public park, recreation area, wildlife or waterfowl refuge, or historic site unless there is no feasible and prudent alternative to the use of that land and unless the decision about the proposed FHWA action includes consideration of all possible alternatives to minimize harm to the property resulting from use. A 4(f) review is required to determine whether that is the case.

Jackson Park is an example of the type of property to which the 4(f) mandate applies. However the FHWA has not carried out the mandated 4(f) review to date, a review that is necessary for completion of this Section 106 review and to inform the efforts to avoid and/or minimize adverse effects to this historic site.

Instead, major sections of the AOE report currently reflect the insistence of the FHWA and City that the roadway changes *proposed* to accommodate the Obama Presidential Center as described in Section 1.1.1.2 are actually in effect. Discussion of *Effects from Federal Actions* in Section

3.3.2.2 reflects this stance as does the discussion of Minimization and Mitigation of Effects in Section 5.0, which for example asserts that “the FHWA considered a wide range of alternatives to avoid and minimize effects to Jackson Park while meeting the objectives of the project.”

There is simply no evidence of such considerations. In fact, FHWA has not done a substantive search for feasible and prudent alternatives to the closure of Cornell Drive between 59th and 63rd Streets, closure of the section of the Midway Plaisance roadway between Stony Island Avenue and Cornell Drive, and the additional related major changes to Lake Shore Drive, Stony Island Avenue, and Marquette Drive. Prudent and feasible alternatives have not been investigated – although several have been identified – and planning to avoid and/or minimize the harm of the proposed roadway changes to Jackson Park has not occurred. As a result, the Section 106 review cannot come to a proper conclusion until the FHWA has conducted a proper 4(f) review.

IV. Proposed Recreational Changes and Parkland Replacement

The City’s proposals for recreational changes and parkland replacement (Section 1.1.1.3) are ill-conceived and, as the AOE report determines (Sections 3.3.2.2, p. 24 and 3.3.2.3, pp. 30-33), would have an adverse effect on Jackson Park and on the Midway Plaisance. The one exception is the proposed relocation of the track and field, which alone among the proposals would be consistent with Secretary of the Interior standards. The City must develop new proposals for recreational parkland replacement in keeping with both Section 106 and UPARR protocols.

With regard to the requirements for replacement parkland under the terms of the Urban Parks and Recreation Recovery Act of 1978, we note that the National Park Service has not yet approved the City’s proposals for either the OPC campus or the Midway Plaisance. We also note that the UPARR legislation (Section 72.72.b.3.ii) does not require that the replacement parkland be located at the same site: “Replacement property need not necessarily be directly adjacent to or close by the converted site. This policy provides the administrative flexibility to determine location recognizing that the property should meet existing public recreation needs. While generally this will involve the selection of a site serving the same community(ies) or area as the converted site, there may be exceptions.”

We have previously communicated concerns about the determination of replacement parkland to Morgan Elmer of the NPS. (See Attachment E.) We offer the following comments on the information in the draft AOE report and the City’s presentation on August 5.

- Although it was not discussed at either of the August 5 meetings, the City’s presentation (slide 8, Proposed Changes to UPARR Designation) seems to indicate that (1) the vacated roadway footprints, scattered throughout the park, are to be counted as new recreational park space, and (2) the area on the OPC campus that is judged to violate UPARR standards includes all of the buildings around the main plaza (museum, forum, library). Though no acreage is specified for that OPC plot, it is obviously greater than the one-acre footprint of the museum building, which had previously advertised as the amount of replacement parkland needed to meet UPARR requirements; perhaps it matches the 5.2 acres of the east end of the Midway Plaisance that the City proposes to

use as replacement parkland (Section 1.1.1.3, p. 4). More and accurate information on this point is required.

- An unspecified amount of vacated roadway should not count as recreational replacement parkland.
- Claiming that the 5+ acres at the east end of the Midway Plaisance is proper replacement parkland for the park space lost to the OPC should be disallowed on several grounds.
 - First, the Midway is already parkland. This attempt at double-counting does not pass inspection. The UPARR designation should be applied to new space(s) that would add to, not subtract from, the amount of public parkland available to nearby residents.
 - Second, the City's proposal to establish a playground on that portion of the Midway, if executed, would violate the Midway's status on the National Register of Historic Places and, as the AOE report concludes, would constitute an adverse effect.
 - Third, on page 4 of Section 1.1.1.3, the AOE report describes the land in question as including "an isolated low-quality wetland." Historically both the proposed OPC site and this Midway site were marshy, and the far eastern end of this proposed replacement parkland area now experiences standing water for a good portion of the year. It is well documented that water levels in Lake Michigan have recently risen substantially and that extensive flooding is occurring in multiple areas in Jackson Park. The Park District has asserted that the area could be engineered so as to end the problem of standing water but said at the same time that no studies of the issue have been completed, that no cost estimates are available, and that the cost of any such work would be borne by City taxpayers. Given the predictions of continuing increases in Lake Michigan water levels and the ready availability of other replacement parkland sites in the near neighborhoods, the selection of other sites seems prudent.
 - The UPARR legislation states that "the property should meet existing public recreations needs," but there appears to have been no analysis comparing the number of children who might use a playground in that location with the number of children who might use new playgrounds in other locations in the near neighborhoods. The nearest school serving young children in the area (the University of Chicago Laboratory School Earl Schapiro Campus) already has playground facilities and the adjacent residential high rise has an enclosed playground area as well. An additional consideration in assessing need should be the proximity of the Midway site to the playground to be erected as part of the OPC campus, which will be situated at approximately E. 61st Street, a block to the south along Stony Island Avenue.
 - The area in questions has an active roadway to the east and two roadways on both the north and south, suggesting that safe access to the site could be problematic. Weekday parking is very limited. Here again no data has been presented.

- If the current OPC plan to build in Jackson Park proceeds, the City should provide actual replacement parkland equivalent to the entire 19.3 acre site. The assertions that vacated roadway and other outdoor spaces on the proposed OPC campus constitute public parkland are nonsensical. While the agreements to be signed between the City and the Obama Foundation assert that the OPC campus will be, for the most part, open to all, those same agreements give the Obama Foundation control of the site for 99 years, allow it to maintain, operate, and control the site and the activities and visitors in it, and recognize that the U.S. Department of Homeland Security must review and approve security measures. In no way should this space be considered public parkland or public space at all. As example, Appendix B, Figure 1 of the draft AOE report labels spaces on the OPC campus as “generally available informal picnicking opportunities,” a designation that raises more questions than it answers: For example, will there will be many times when these “opportunities” are not available? Will the “opportunities” be available via reservation as with the Park District’s designated picnic areas?

IV. Avoidance, Minimization, and Mitigation

The Section 106 process requires a hierarchy of review that reflects important policy concerns. Given a finding of adverse effects, first there must be consideration of avoidance of the cause of the adverse effects, next consideration of minimization of the cause, and, only as a last step, consideration of mitigation.

Given this, we are extremely concerned that the City, IDOT, and FHWA seemed determined to skip the mandated consideration of, first, “avoidance” and then “minimization” as the review continues. Discussion at the August 5 meetings – both the consulting parties and public meetings – made it clear that the City, FHWA, and IDOT intend to subvert proper consideration of the federally mandated steps of avoidance and minimization in seeking ways to address the cause of the adverse effects. This was evident from the slide presentation during the August 5 meetings, which solely described mitigation. The documents and presentation expressly put forward that only mitigation is to be considered, and that is wrong legally and as a matter of policy under Section 106 and Section 4(f). Similarly problematic, Section 5.0 of the AOE report presents the avoidance and minimization steps as already completed, relying upon the truncated definition of undertaking that the City and FHWA have attempted to maintain to date – that is, that the only actions to be considered are the separate actions of the FHWA and NPS rather than the realistic definition of the undertaking as the consolidated, intertwined and inseparable actions of the City, FHWA, and NPS. We anticipate that consistent with the definition of the undertaking in the AOE report, consistent with federal law and regulations, and consistent with the continuing groundswell of concerns over the proposal for the OPC, both avoidance and minimization will be seriously and closely considered so that not only will the OPC project be improved as a result, but that this critical process be upheld and enhanced.

- *Avoidance*, as the preferred remedy, should be the first remedy explored. Given the determination that the current proposal for the OPC would, as a whole, have an adverse impact on Jackson Park, the avoidance option would be to relocate the OPC outside of Jackson Park elsewhere on Chicago’s South Side, recognizing that the OPC will be a success and a beacon of pride and promise for Chicagoans wherever it is located. There

are other suitable spaces available on the South Side that would not compromise an historic park and would enhance the positive impact of the OPC as a direct catalyst for economic development on particular areas of the South Side. Similarly, given the determination of the adverse impact of the City's proposal to use the eastern portion of the Midway Plaisance to satisfy UPARR requirements for replacement parkland, the avoidance option would be to seek space elsewhere in the community for this purpose. The change of location, perhaps to West Woodlawn or other nearby park-poor areas, would greatly improve the value and beneficial impact of the project for the community.

- *Minimization*, as the second remedy to be considered, presents several options that would be compatible with the possibility of siting the OPC in Jackson Park but with a different and redesigned footprint. Such options include:
 - keeping Cornell Drive open, but with a narrowed profile, traffic calming features and multiple enhanced pedestrian crosswalks;
 - retaining the east bound segment of the Midway Plaisance given its importance to the iconic design linking the Midway and Jackson Park;
 - retaining the Perennial/Women's Garden in its present state but with enhanced pedestrian crossings to connect with Jackson Park;
 - right-sizing the OPC museum tower to make it compatible with the Olmsted design for the park that established the Museum of Science and Industry as the dominant building;
 - retaining more of the mature trees on the OPC site and throughout the park.

Consideration of such alternatives would be both realistic and effective. We note that Obama Foundation officials have stated in direct conversation with Jackson Park Watch that the OPC could and would be built in Jackson Park even if Cornell Drive were to be kept open. Plans for a narrowed and calmed Cornell Drive have been proposed before: Project 120 developed such a plan in 2014-15 to address the problems of vehicular speed and pedestrian safety while also respecting the Olmsted design, and the concept was endorsed by the Park District. The professional traffic study commissioned by Jackson Park Watch and referenced above suggested the option of narrowing but not closing Cornell Drive as a traffic-effective and cost-effective alternative to closing the drive and transforming Hayes Drive into a new express crossway. Such alternatives should be considered as part of the minimization discussion.

- *Mitigation* is the remedy of last resort, and the least satisfactory of the options with regard to historic preservation. At the August 5 meetings, the City and federal officials gave several examples of possible mitigation steps in this case along with examples from other projects, actions such as taking measurements and creating a photo archive of the site as it is now. All would seem to result in the decertification of Jackson Park and the Midway Plaisance from the National Register of Historic Places, a step that would leave a cloud over the OPC and a troubled legacy for the current mayoral administration.

Here too, the comments from the ACHP are important because they affirm our concerns regarding the absence of proper consideration of avoidance and minimization to remedy the

adverse effects documented by the AOE report. All of this suggests that these steps are being ignored so as to implement a predetermined result insisted upon by the applicants. Such a process violates Section 106.

V. Definition of the Undertaking and Linkages between Section 106, EIS, and NEPA Reviews

As noted above, we applaud the expansive – and realistic – definition of the undertaking as set forth in Section 1.1 of the draft AOE report and believe that it is critical that this expansive and inclusive definition is adopted for the remainder of the Section 106 review and for the NEPA review going forward. We continue to have grave concerns about segmenting the definition of the undertaking in such a way that the proposals for changes in Jackson Park are considered in separate silos. Such a slice-and-dice approach makes no sense, because the designs for the OPC and the roadways are completely intertwined and the parkland replacement issue flows directly from that integrated plan. Such an approach is also yet another violation of Frederick Law Olmsted’s vision of the park as a single entity. We have already discussed the failure of the FHWA to conduct a required 4(f) review as a result of this flawed stance.

Just as there is a critical need for a legitimate and complete 4(f) review, there is a critical need for a proper NEPA review and a full Environmental Impact Study (EIS). The magnitude of the project, the already documented adverse effects, and the critical policy considerations and legal requirements all mandate that an EIS be performed.

Importantly, the recent significant rise in Lake Michigan water levels, an increase that the U.S. Army Corps of Engineers has predicted will continue, calls into questions the viability of some key elements of the undertaking. For example, plans call for an underground parking garage on the site of the Obama Presidential Center. Both the OPC and underground parking garage are to be situated adjacent to the western edge of the West Lagoon in Jackson Park. Due to the high water level in Lake Michigan, Jackson Park is already experiencing flooding in multiple locations. Construction of an underground parking garage in this location would require creation of what is called a “bathtub,” as was done for the parking garage at the Museum of Science and Industry, constructed in 1999 at a cost of \$57 million. Additionally, plans call for a 235’ museum tower on the same site, a building that would need to be grounded in bedrock. The City is insisting on locating UPARR replacement parkland at the east end of the Midway, another site in close proximity to Jackson Park lagoons and one that already suffers from intermittent flooding. Since water levels are expected to continue to rise as a result of climate change, there are critical questions concerning not only the costs of construction and maintenance in these at-risk locations, but also the long-term viability of such facilities. Expert examination of the environmental impact and feasibility of these plans is urgently needed now, and should part of a detailed and complete EIS.

We have seen the results of the attempt to truncate the definition of the undertaking into unrealistic segments in the deeply flawed NEPA documents developed by the City, FHWA, and IDOT in 2018 (still posted on https://www.chicago.gov/city/en/depts/dcd/supp_info/jackson-park-improvements.html). These documents pretend that the City’s action – the plans for the OPC and the roadway closures it demands – is completely disconnected from the current Section 106 and NEPA reviews rather than being the trigger for them. They disingenuously assert that

the proper procedure is to assume that the OPC is built and the road closures are in place and to conduct the Section 106 and NEPA reviews as if that construction were complete, resulting in the fanciful proposal that the proper “baseline” for review is the completed project.

We have previously outlined our objections to this approach with regard to the Section 106 review (statements of January 4, 2018 and April 18, 2018). We also outlined our concerns about how this approach distorted and invalidated the preparations for the NEPA review. Our letter of April 18, 2018 to Eleanor Gorski and John Sadler (Attachment F) stated our concerns about the flawed “Purpose of and Need for Action – Federal Highway Administration” developed by the City for the FHWA and dated February 6, 2018. Our letter of July 4, 2018, to the same project leaders (Attachment G), stated our concerns about the “Alternatives To Be Carried Forward” report, which used the flawed Purpose and Need statement as its basis. Now that the AOE report has documented the clear adverse effects on Jackson Park and the Midway that we and others have feared, it is vital that these flawed NEPA documents be discarded and that they be redrafted to conform to the realities of the situation.

VI. Scheduling and Further Meetings

The ACHP has identified flaws in the content of the AOE report relating its failures to provide complete detail relative to the adverse effects. It has also identified flaws relative to the Section 106 process to date, flaws that were evident in the timing and conduct of the August 5 meeting. We echo these sentiments, and believe that there needs to be a much more thorough, detailed and procedurally proper process, with significantly more time allowed to actually prepare the reports, more fully and accurately identify the adverse effects, and then review and discuss them. The failure to address these issues will allow a flawed and incomplete process to continue.

We appreciate the opportunity to participate as a consulting party in the Section 106 review and look forward to the next steps in that process.

Sincerely,

Brenda Nelms and Margaret Schmid
Co-presidents, Jackson Park Watch

cc: Matt Fuller, Federal Highway Administration; Arlene K. Kocher, Federal Highway Administration; David Clarke, Federal Highway Administration; Lee Terzis, National Park Service; Morgan Elmer, National Park Service; Jaime Loichinger, Advisory Council on Historic Preservation; Eleanor Gorski, Chicago Department of Planning and Development; Nate Roseberry, Chicago Department of Transportation; Brad Koldehoff, Illinois Department of Transportation; Anthony Rubano, Illinois Historic Preservation Agency; Heather Gleason, Chicago Park District; Bonnie McDonald and Lisa DiChiera, Landmarks Illinois; Gerald Adelman, Ted Haffner, and Stacy Meyers, Openlands; Ward Miller and Mary Lu Seidel, Preservation Chicago; Juanita Irizarry, Lauren Moltz and Fred Bates, Friends of the Parks; Charles Birnbaum, The Cultural Landscape Foundation; Dan Marriott, National Association of Olmsted Parks; Betsy Merritt, National Trust for Historic Preservation; Michael McNamee and

Karen Rechtschaffen, Save the Midway; Bronwyn Nichols Lodato, Midway Plaisance Advisory Council; Walter Kindred, SSCC Advisory Council; Naomi Davis, BIG; Jawanza Malone, Kenwood-Oakland Community Association; Alex Goldenberg, STOP; Jack Spicer, Promontory Point Conservancy

Attachments:

- A. Jackson Park South Shore Cultural Center South Lakefront Framework Plan. Phase 2 ([link](#))
- B. Illinois State Historic Preservation letter, December 12, 2012
- C-1. Patrick E. Hawley curriculum vitae
- C-2. raSmith Corporate Overview
- D. "CDOT's Transportation Plan for the Obama Presidential Center in Jackson Park: A Review and Alternative," May 10, 2018
- E. JPW letter, August 27, 2018, regarding replacement parkland
- F. JPW letter, April 18, 2018, regarding NEPA Purpose and Need statement
- G. JPW letter, July 4, 2018, regarding NEPA ATBCF report

Cook County

Chicago

Ecosystem Restoration at Jackson Park
6401 S. Stony Island Ave.

COEC
IHPA Log #017102912

December 10, 2012

Peter Bullock
Department of The Army
U.S. Army Corps of Engineers
Chicago District
111 North Canal Street, Suite 600
Chicago, IL 60606

Dear Mr. Bullock:

Thank you for requesting comments from our office concerning the possible effects of the project referenced above on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966 (16 USC 470), as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties". Jackson Park Historic Landscape and Midway Plaisance were entered into the National Register of Historic Places on December 15, 1972.

We have reviewed the preliminary concept plans for the ecosystem restoration project and have the following comments:

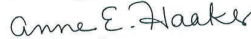
1. As currently designed, the park retains a great deal of its integrity. While some of the original features have been modified, or removed, the remaining defining characteristics such as the overall plan developed by Olmstead, Olmstead, and Elliot as depicted on the 1905 map must be respected. These include, but are not limited to, the Golden Lady statue, the Osaka Garden, the current roadway configuration, the beach house, and the configuration of the lagoons.
2. We support the rehabilitation of some of the plantings located within the golf course, but would find the introduction of new water features and/or wetlands to be an adverse effect.
3. We support the effort to retain and enhance the lagoon shorelines and the addition, or re-establishment, of islands within the lagoons so long as they reflect the configuration of islands in the 1905 plan. We also support the re-establishment of communication between the various lagoons and Lake Michigan.
4. We also support the re-introduction and/or enhancement of plantings using Olmsted's 1896 plant list.

A teletypewriter for the speech/hearing impaired is available at 217-524-7128. It is not a voice or fax line.

We look forward to working with the Chicago Corps of Engineers, the Chicago Park District, and our preservation partners on this complex and worthy project and will review items as quickly as possible as specific aspects of the project are proposed.

If you have questions please contact David J. Halpin, Cultural Resources Manager, at 217-785-4998.

Sincerely,



Anne E. Haaker
Deputy State Historic
Preservation Officer

AEH

Patrick E. Hawley, P.E., PTOE, Associate Assistant Director of Transportation, Senior Project Manager



Education
M.S. Civil Engineering, Transportation
Focus, Texas A&M University, 1994
B.S. Civil Engineering, Marquette
University, 1992

Professional Registrations
Professional Engineer, WI, 1996,
#31459
Professional Engineer, IL, 2016,
062068435
Professional Traffic Operations
Engineer, 2001
WisDOT Certified Roundabout Designer

Professional Affiliations
Institute of Transportation Engineers
(ITE), Wisconsin Section Past
President, Traffic Engineering
Workshop/Planning Forum Committee
2005-2013
Women's Transportation Seminar, 2017-
18 Board Member
Wisconsin Parking Association,
President 2012-2013, Board Member,
2006 to 2013
TRB Access Management Committee
Marquette University, Senior Design
Mentor, 1995 to 2013
City of Delafield Public Works
Committee, 2004-2015

Pat has 25 years of transportation project management experience. His areas of expertise include: traffic planning, access management, site circulation, traffic impact studies, roundabouts and parking studies. Pat regularly provides expert witness testimony on access, traffic operations and safety issues for public and private sector clients. He has managed large multi-disciplined project teams on complex projects.

Pat's public relations skills have enabled him to successfully orchestrate consensus among elected officials, public groups and key stakeholders on dozens of highly controversial projects. He presents regularly at conferences, publishes transportation articles in national publications, and teaches classes at Marquette University and through the University of Wisconsin system.

Traffic Support for Planning and Design Projects

- Calhoun Road, Brookfield, 2016-present
- STH 117/Durand Avenue, Racine, 2015
- Oneida Street, Appleton, 2014-2017
- STH 20/83 Waterford, 2011-2015
- I-39/90, Rock County, 2011 to 2015
- STH 50, I-94 to 43rd Avenue, Kenosha County, 2011 to present
- East Avenue Reconstruction, City of Waukesha, 2011 to 2014
- SE Freeway Prioritization Study, 2012-2016
- US 18 (Bluemound Road), Manhattan Drive to 124th Street, 2008 to 2010
- US 18 (Bluemound Road), 124th Street to Mayfair Road, 2008 to 2011
- STH 100 (Mayfair Road), 2008 to 2010
- I-43 North-South Freeway, Milwaukee and Ozaukee Counties
- Calhoun Road Reconstruction Project Traffic Study, 2005
- STH 116, Winneconne Bridge Study, 2009 to 2013
- USH 41 Operational Planning Study, 2007 to 2014
- WisDOT Interim Project Manager : STH 38 Corridor Study, Milwaukee and Racine Counties, STH 165 Corridor Study, Kenosha County, STH 50 Corridor Study, Kenosha County, STH 241 Access Management Study, Milwaukee County, USH 18 Railroad Crossing Feasibility Study, Waukesha County, 2004-2005
- Southeastern Wisconsin Regional Freeway Reconstruction Plan, 2000 to 2003
- CTH KD Extension, Twin Lakes, WI, 1998 to 2001
- South 68th and 76th Streets, West Allis, 2010-2015
- I-94 Interchange with County C, Kenosha County, 2006
- I-94 Interchange with STH 50, Kenosha County, 2007-2014
- STH 23, Lake Delton, Sauk County
- STH 190 Hazardous elimination project, Waukesha County
- STH 47, Outagamie and Shawano Counties

Patrick E. Hawley, P.E., PTOE, Associate Assistant Director of Transportation, Senior Project Manager

- STH 60, City of Harford, Washington County, 2009-2015
- STH 60, US 41 to US 45, Washington County
- STH 83, Waukesha County
- STH 164, County Q to STH 60, Washington County

Traffic Operation and Safety Studies

- US Open Transportation Plan, 2012-2017
- CTH CE & County N Corridor Improvement Analysis, Outagamie County, 2016
- Traffic Support Services, WisDOT SE Region, 2011 to 2017
- US 41/WIS 441 Corridor Analysis, Brown, Calumet, Outagamie & Winnebago Counties, 2007-2014
- Miller Parkway Corridor Evaluation, West Milwaukee, 2013
- Alison Viejo, Kensington Traffic Calming Plan, 2012-2013
- Traffic Support Services, Wisconsin Department of Transportation, 2003 to 2008
- 80th Street Extension Traffic Study, Pleasant Prairie, 2008
- Imperial Drive Traffic Calming Plan, Delafield 2007-2008
- Lakeside Bus Facility Relocation Study, Milwaukee, 2008
- Wausau Downtown Traffic Evaluation
- TIA and traffic study reviews for municipalities, SE Wisconsin
- Brookfield, 124th and Capitol Traffic Study, 2007
- Arbon Drive Traffic Study, Brown Deer, 2007
- Bain Station Road Railroad Crossing Traffic Study, 2007 to 2008
- Main Street Corridor Study, Oshkosh, 2002
- STH 114/USH 41 Corridor Traffic Study, Neenah, 1999
- Transportation Projects, University of Wisconsin-Madison, 1994 to 1998
- Zoo Interchange Development Lands, 2009-2013
- Whitewater Bypass Safety Audit, 2005
- Comprehensive Transportation Study, Glenview, IL, 2001
- Narrow Street Design Guidelines, Bielski Development, Southeast Wisconsin

Traffic Impact Analyses (TIAs)

- Sauk Prairie Memorial Hospital and Clinics, Sauk County, 2011
- Willow Creek, Germantown, 2015
- Titledown Retail Development, Green Bay 2015
- Woodman's Altoona
- Fox Head Apartments 2014
- Reserve at Brookfield, 2014-2015
- Reserve at Mayfair, 2015-2015
- Reserve at Madison, 2015
- Springs at Kenosha
- Mainstreet Senior Living, San Antonio
- CVS Pharmacy, Green Bay
- CVS Pharmacy, Sheboygan
- U-Haul San Clemente, CA
- Sokaogon Chippewa (Mole Lake Casino), 2006-2007
- Abele Dek Rink, Fayette Township, PA, 2011
- Dek Rink, Murrysville, PA 2010-2011
- Westlawn Neighborhood Redevelopment, Milwaukee, 2010
- Cabela's due diligence: Indianapolis, Green Bay, Richfield
- East Side Wal-Mart, Green Bay
- Fountains of Franklin Retail, Franklin
- Prairie Lakes Retail, Sun Prairie
- The Village Residential, Dousman
- Rolling Hills Residential, Ripon
- Edgewood Preserved, Menomonee Falls
- Fleming Retail, Waukesha
- State Street Condominiums, Wauwatosa
- Staybridge Suites, Milwaukee
- Providence Condominiums, Mukwonago
- Woodman's, Sun Prairie
- Sokaogon Mole Lake Casino, Mole Lake
- Fox Run, Pewaukee
- Burleigh Triangle, Wauwatosa
- Wal-Mart, Green Bay / Bellevue
- The Enclave Apartments,

Patrick E. Hawley, P.E., PTOE, Associate
Assistant Director of Transportation, Senior Project Manager

- Wauwatosa
- Wal-Mart, Delafield
- Willowtree Development, Pewaukee
- Brookside Baptist Church, Brookfield
- Walmart Supercenter, Greenfield
- Oak Creek Assembly of God
- Germantown Business Park, Germantown
- Walmart, Whitewater
- Woodman's, Waukesha
- Walmart Greenfield
- Walmart, South Milwaukee
- Walmart, Waukesha
- Walmart, Sun Prairie
- Walmart, Wauwatosa
- Walmart, Menomonee Falls (two locations)
- MarketPlace of Brown Deer Traffic Study and Site Design, 2007
- West Towne Mall Traffic Study, 2005
- Coffee Shop Drive-thru Analyses, 2003
- Wildflower Neighborhood Traffic Calming Plan, Muskego, 2007
- Olympia Brown School Site Design, Racine, 2007
- Edgerton Elementary School, Hales Corners, 2014

Access Management Projects

- 2008, 2010, 2012 and 2015 WisDOT Reasonable Access Master Contracts. Evaluated access at dozens of properties through eight reasonable access studies
 - Shell Travel Center, Mount Pleasant
 - Burger King, Mount Pleasant
 - BP Service Station, Milwaukee
 - Citgo Service Station, Wauwatosa
 - Shell Station, Oak Creek
 - County S Interchange, Rock County
 - County N Interchange, Dane County
 - STH 35/US 53/George Street, La Crosse
- US 18, Waukesha County, 2008-2010
- STH 23 Lake Delton,
- Shell Reasonable Access Reassessment, STH 20, Mount Pleasant
- Taylor County Credit Union, STH 13, Medford
- Ryan Law Building, STH 100, Wauwatosa, WI
- Slater Office Building, US 18 Waukesha, WI

- J&E Properties, STH 100, Wauwatosa, WI
- 2013 JK Lee, US 18, Waukesha, WI
- 2130 Mayfair Road Wauwatosa, WI

Expert Witness Consulting

- Studies
- 2008, 2010, 2012 and 2015 WisDOT Reasonable Access Master Contracts. Evaluated access at dozens of properties through eight reasonable access studies
 - Shell Reasonable Access Reassessment, STH 20, Mount Pleasant
 - Taylor County Credit Union, STH 13, Medford
 - Ryan Law Building, STH 100, Wauwatosa, WI
 - Slater Office Building, US 18 Waukesha, WI
 - J&E Properties, STH 100, Wauwatosa, WI
 - Somers USA, County S, Somers, WI
 - 2013 JK Lee, US 18, Waukesha, WI
 - 2130 Mayfair, Wauwatosa, WI
 - Mifflin Property, STH 241, Oak Creek
 - Schettle Property, STH 241 Oak Creek

Depositions

1. STH 100, Franklin
2. STH 50 Signal Timing, Kenosha County, 2007
3. James Defa v. GCC, Milwaukee County, 2010
4. J&E Properties, STH 100, Wauwatosa, WI, 2011
5. Medford, STH 13, 2012
6. Slater Office Building, US 18 Waukesha, WI, 2013
7. JK Lee, US 18, Waukesha, WI, 2013
8. 2130 Mayfair, 2014
9. Waukesha Woodman's, 2015
10. Milwaukee County Zoo, 2016

Testified in Court / Administrative Hearing

1. STH 50 Signal Timing, Kenosha County, 2007
2. James Defa v. GCC, Milwaukee County, 2010
3. J&E Properties, STH 100, Wauwatosa, WI, 2011
4. Slater Office Building, US 18 Waukesha, WI, 2013
5. JK Lee, US 18, Waukesha, WI, 2013
6. 2130 Mayfair, 2014
7. Waukesha Woodman's, 2015

Transportation Management Plans (TMP)



Patrick E. Hawley, P.E., PTOE, Associate
Assistant Director of Transportation, Senior Project Manager

- US 12: Lake Geneva to Elkhorn Road (Walworth, 2016) – Assisted John with TMP and review
- I-39 NC Region Culverts (Portage County/Marathon County, 2014-2016)
- I-39/90 with WIS 59 Interchange (Rock County, 2013-2015)
- US 61 with Eagle Point Road and WIS 11 Overpasses (Grant County, 2012)
- I-39/90/94 with County I Overpass (Dane County, 2011)
- I-794 Hoan Bridge Deck Surface Patching 1 (Milwaukee County, 2010)
- I-794 Hoan Bridge Deck Surface Patching 2 (Milwaukee County, 2010)
- I-794 Hoan Bridge Netting (Milwaukee County, 2010)
- CTH I over IH 39/90/94, Dane County, 2011
- US 12, Gasser Rd to STH 23, Sauk County, 2011
- STH 60 (Summer St) – Hartford, WI, Washington County, 2011
- North Street/St. Paul Avenue, Waukesha County, 2009 to 2010
- CTH K (Hampton Avenue), Waukesha County, 2009
- STH 26, NE Region
- STH 59 Interchange SW Region
- US 51 Alternate Route, SW Region
- US 61/Eagle Point Road Overpass and STH 11 Overpass, SW Region Type 2
- US 12 Lake Delton, SW Region Type 2
- STH 50 Interchange - SE Region Type 3
- US 45, SE Region Type 3
- STH 32/Happy Lane, NE Region Type 2
- East Ave. - SE Region Type 2
- STH 23/Happy Lane, Sheboygan Count, 2011
- STH 16/STH 71, Monroe County, 2011
- STH 20/STH 75, Kenosha County, 2011
- CTH Q Intersection with CTH U, Pleasant Prairie, WI 2009 to 2010
- STH 53/US 35/George Street/I-94 Intersection Alternatives Analysis, La Crosse, WI, 2009 to 2010: STH 241, 2007 to 2010
- Barker Avenue Intersection with North Avenue, Brookfield, WI, 2008
- Outagamie County Roundabout Feasibility, 2008 USH 12/STH 23 Lake Delton Roundabout Design, 2007 to 2009
- STH 60 / CTH C and CTH C/American Eagle Roundabout Design, 2007 to 2010
- Southridge Mall Roundabout Design, 2007
- STH 26 Bypass, 2006 to 2007
- CTH P Interchange with I-94, 2007
- CTH C Interchange with I-94, 2006
- CTH K Interchange with I-94, 2006
- STH 145 interchanges with USH 41 and USH 45, 2006 to 2007
- I-43 Interchange with Mason Street, 2006
- STH 60 intersection with CTH C and Interchange with USH 41
- Outagamie County Roundabout Review, 2006
- USH 45 Interchange with STH 60, 2005 to 2007
- CTH P Intersection with CTH PV Roundabout Design, 2006 to 2007
- I-43 Interchange with Racine Avenue, 2006: WisDOT Statewide Roundabout Master Contract, 2004 to 2006
- Chapman Farms Roundabouts, Mukwonago, 2005
- STH 32 Roundabout (Brown Deer Road/North Lake Drive), 2005
- Wescott Street / Washington Avenue Roundabout Study, Houston, TX, 2001 to 2003
- Roundabout Intersection Study, Brookfield, WI, 1999 to 2002
- USH 151 Roundabout Evaluation, Manitowoc, WI, 2000
- West 8 Development Roundabout Studies, Houston, TX, 2000

Roundabout Studies and Intersection Control Evaluations (ICE)

- Block at Orange Roundabout Review 2009-2011
- STH 20/STH 75, Racine County, 2010
- I-39 interchange with STH 59, Rock County, 2012
- STH 50 corridor, Kenosha County, 2012
- STH 164/STH 167, Washington County, 2012
- STH 21/STH 116, Winnebago County, 2011
- STH 23/CTH G, Fond du Lac County, 2011

Patrick E. Hawley, P.E., PTOE, Associate
Assistant Director of Transportation, Senior Project Manager

Parking Study Experience

- Reserve at Brookfield, 2015
- Oakbrook Center Theater
- Macerich Panorama Mall Parking Layouts, 2013
- Tanforan Square
- Shoppers World, Brookfield, WI, 2013
- Parking Rate Study, Racine, WI, 2011
- 125th Street Parking Study, Butler, WI, 2009
- Parking Rate Study, Racine, WI, 2003 to 2004: Project
- University of Wisconsin-La Crosse Comprehensive Parking Study, 2000 to 2002: Project
- Parking Structure Financial Feasibility, Milwaukee, WI, 2002 to 2003
- Edgewood College Parking Study, Madison, WI, 2002
- Parking and Traffic Studies, Village of Arlington Heights, IL, 1998 to 2001
- Downtown Parking Study, Milwaukee, WI, 1997 to 1998
- HOV Parking Study, Milwaukee County, WI, 1998

Teaching Experience

- Marquette University, Introduction to Transportation Engineering, 2001 to 2003, 2017: Instructor and/or co-instructor for Introduction to Transportation Engineering, a class which covers topics such as roadway design, traffic operations, traffic calming, parking, ITS, traffic flow theory, transportation planning, transit, traffic impact studies, and queuing.
- WisDOT TIA Training, 2005, 2006, 2007, 2009, 2012, 2015 and 2017: Pat helped develop the training material and he is a co-facilitator for the one-day course. Pat has been involved with every course offering since its inception.
- Marquette University, Urban Street Design, 2009: Instructor for Urban Street Design, a 3-credit class for undergraduates and graduates. The course included intersection design, planning elements, access management, traffic operations and pedestrian and bicycle accommodations.
- UW-Madison Professional Development, Traffic Engineering Fundamentals, October 2001, May 2003, June 2005, September 2006, October 2008, December 2011: Instructor for several components

- of the short course, including Parking Studies, Using Crash Data, Roundabouts, and Improving Intersection and Driveway Safety.
- UW-Madison Professional Development, Parking Lot Access and Site Design, September 2002, October 2003, November 2004, November 2006, September 2007: Pat helped develop and teaches several components of this short course. The course covers designing site plans for safe and efficient vehicle and pedestrian circulation, and understanding critical parking planning and design principles.
- UW-Madison Professional Development, Designing and Implementing Roundabouts, February 2004, April 2005, October 2007: Pat teaches the "Planning the Roundabout" segment of this short course. The segment focuses on conducting feasibility studies, developing conceptual plans, and preparing for the public involvement process. An interactive case-study is also used to involve the students in the planning process.
- UW-Madison Professional Development, TIAs and Site Design (formerly Transportation and Land Development), April 2004, November 2004, May 2005, November 2006, September 2007, May 2012: Pat helped develop and teaches the trip generation/distribution/assignment, access management, site access design, and parking design planning components of this short course. Pat also developed and facilitates case studies on the material.
- Guest Lecturer – 2004 to present: Pat is a frequent guest lecturer at Marquette University, University of Wisconsin-Madison and University of Wisconsin-Milwaukee discussing roundabouts, parking, traffic impact studies and access management.

Presentations and Published Papers

- US Open Transportation Plan, presented at APWA-Wisconsin meeting, May 2018.
- US Open Transportation Plan, co-presented at WisDOT/ACEC Transportation Improvement Conference, March



Patrick E. Hawley, P.E., PTOE, Associate
Assistant Director of Transportation, Senior Project Manager

- 18.
- US Open Transportation Plan, co-presented at ITE Wisconsin section meeting, July 2017.
- US Open Transportation Plan, presented at Local American Public Works Association (LAPWA), August 2017
- Traffic Calming for Local Communities, presented at Local American Public Works Association (LAPWA), August 2017
- Reasonable Access Evaluations, presented at ACEC Transportation Improvement Conference, March 2017.
- Dealing with Traffic Related Costs on your Development. Presented to NAIOP, Commercial Real Estate Development Association. March 2016.
- Defining Reasonable Access, Presented at the ITE Wisconsin Traffic Engineering Workshop/Transportation Planning Forum, 2013
- Principles of Access Management—Led a Conversation Circle discussion at the ITE Midwest Conference, 2013
- U-Turns at Traffic Signals: Access Management and Design Considerations. Presented at the APWA Spring Conference. 2010.
- Transportation Management Plans (TMPs) for Surface Streets. Co-Presented at the ITE Traffic Engineering Workshop/Transportation Planning Forum. 2010.
- Roundabouts: Wisconsin Safety Experience. Presented at the ACEC/WisDOT Transportation Improvement Conference. 2010.
- Top TIA Issues in Wisconsin. Co-presented at the ITE Midwest Conference. 2009.
- Traffic Forecasting Challenges in Wisconsin. Presented at the ACEC/WisDOT Transportation Improvement Conference. 2009.
- Roundabouts, The Win-Win Solution for Developers and Communities. Published in raSmith's Insight newsletter. 2008.
- P.E. Hawley. Narrow Residential Streets. Presenting at the Metropolitan Builders Association's Community Development Symposium, November 2006.
- P.E. Hawley. Future Perfect. An article detailing strategies for funding development driven transportation improvements. Published in Public Works Magazine, September 2006.
- P.E. Hawley. Access Management Resources. Presented at the Institute of Transportation Engineers Traffic Engineering Workshop, Pewaukee WI, April 2006.
- P.E. Hawley. Access Management Resources. Presented at the Institute of Transportation Engineers District 4 Conference, Wisconsin Dells, WI, June 2005.
- P.E. Hawley. Roundabouts and Retail, A Good Fit. Published in The Daily Reporter. 2005
- P.E. Hawley. More Parking without New Spaces? Published in R.A. Smith's On Track newsletter.
- P.E. Hawley. Don't let your Development get stuck in Traffic. Published in The Daily Reporter. 2005
- P.E. Hawley. Site Design and Circulation Issues. Presented at the Institute of Transportation Engineers Traffic Engineering Workshop, Waukesha, WI, March 2004.
- P.E. Hawley. Roundabouts: Lessons Learned and WisDOT's Roundabout Design Guide. Presented at WisDOT Project Development Conference, Waukesha Wisconsin, March 2003.
- P.E. Hawley. Parking Management as a Growth Regulator for Municipalities. Presented at the APWA International Public Works Congress and Exposition, Kansas City, Missouri. September 2002.
- P.E. Hawley, M. Butoroc, and S. Farranti. Understanding the Development Process. Presented at the Fifth National Conference on Access Management, Austin, TX, June 2002.
- P.E. Hawley. Roundabouts for Wisconsin. Presented at the Institute of Transportation Engineers (ITE) Transportation Planners Forum, Waukesha, WI, June 2000.
- P.E. Hawley and C.R. Luz. Arlington Heights Parking. Presented by C.R. Luz at the International Parking Institute Conference, Fort Lauderdale,



- Florida. May 2000.
- P.E. Hawley, Lori Kay and C.R. Luz. Kohl Center Parking Management Plan. Presented by C.R. Luz and Lori Kay at the International Parking Institute Conference. Fort Lauderdale, Florida. May 2000.
- P.E. Hawley. Roundabouts: Design Operation and Public Involvement. Presented at the ITE Traffic Engineering Workshop. Waukesha, WI. March 2000.
- P.E. Hawley. Roundabouts: An Overview. Presented at the Workshop on Traffic Engineering in Small Communities. Sponsored by the Wisconsin Section ITE. Milwaukee, WI. April 1998.
- P.E. Hawley. Data Collection Techniques. Presented at the Workshop on Traffic Engineering in Small Communities. Sponsored by the Wisconsin Section ITE. Milwaukee, WI. April 1997.
- P.E. Hawley and V.G. Stover. Guidelines for Left-Turn Bays at Unsignalized Access Locations. Presented by P.E. Hawley at the Second National Conference on Access Management and published in the conference proceedings. U.S. Department of Transportation. Federal Highway Administration. Vail, Colorado. August 1996.
- C.R. Luz, P.E. Hawley, and M.L. Hawley. Inclusion of Parking Management Techniques in the Development of TDM Plans. Presented by C.R. Luz at the TRB 5th Annual Transportation Conference for Small and Medium-Sized Communities in Greensboro, North Carolina (October, 1996) and at the International Parking Institute Transportation Seminar in New Orleans, Louisiana (January, 1996).
- C.R. Luz, P.E. Hawley, M.W. Husted, and M.L. Hawley. An Annotated Bibliography of Parking Management Tactics/Techniques and Programs. Presented by C.R. Luz at the Institute of Transportation Engineers 65th Annual Meeting. Denver, Colorado. August 1995.
- V.G. Stover, P.E. Hawley, D.L. Woods, and R.A. Hamm. *Access Management as a Congestion Management Strategy*. Presented by V.G. Stover

- at the First National Conference on Access Management and published in the conference proceedings. U.S. Department of Transportation. Federal Highway Administration. Vail Colorado. 1993.
- P.E. Hawley. *The Use of Access Management to Promote Arterial Mobility*. Graduate Student Papers on Advanced Surface Transportation Systems. Southwest Region University Transportation Center, Texas A&M University. 1993.
- R.A. Hamm, D.L. Woods, V.G. Stover, and P.E. Hawley. *Congestion Management Systems State-of-the-Practice Review*. Report No. FHWA/TX-92/563-18. Texas Department of Transportation. Texas Transportation Institute. 1993.

raSmith is a multi-disciplinary consulting firm comprising civil engineers, structural engineers, land surveyors, development managers, landscape architects and ecologists.

Our services are focused on our public and private sector client needs in design and construction including land development, site planning and design, structural engineering, municipal engineering,

transportation and traffic, surveying, construction services and geographic information systems (GIS). We work on projects nationwide from our eight locations in Wisconsin, Illinois, California and Pennsylvania.

raSmith was founded in 1978 by the current owner and CEO, Richard A. Smith, M.S., P.E. The firm employs a staff of 200.



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**CDOT's Transportation Plan
for the
Obama Presidential Center
in
Jackson Park
A Review and Alternative**

May 10, 2018

Prepared for
Jackson Park Watch
JacksonParkWatch.org

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CDOT's Transportation Plan for the Obama Presidential Center in Jackson Park: A Review and Alternative

raSmith is a national civil engineering and surveying firm with transportation expertise. raSmith has offices in Illinois, Wisconsin, Pennsylvania and California. Jackson Park Watch is a community organization whose mission is to preserve Jackson Park as a public space and to ensure any park changes are decided upon with meaningful community input.

The Chicago Department of Transportation (CDOT) developed a transportation plan for the proposed Obama Presidential Center. Sam Schwartz Transportation Consultants evaluated the CDOT transportation plan and documented their findings in the February 2018 *Jackson Park Revitalization Traffic Impact Study Final Report*. Jackson Park Watch retained raSmith to review the CDOT transportation plan and the Sam Schwartz report. As part of their review, raSmith was asked by Jackson Park Watch to assess the feasibility of alternative transportation plans to meet the following objectives:

1. Site the Obama Presidential Center within Jackson Park
2. Maintain the integrity of the Olmsted design, including keeping Cornell Drive open
3. Maintain vehicular access and parking within Jackson Park
4. Ensure the roadway improvements recommended to accommodate the Obama Presidential Center are a cost effective use of taxpayer dollars

This report summarizes the raSmith evaluation.

A Review of CDOT's Transportation Plan for Jackson Park

Sam Schwartz analyzed the traffic impacts of the roadway closures and realignments proposed to accommodate the Obama Presidential Library. As noted in Sam Schwartz's executive summary, their analysis was based on the premise that Cornell Drive and other roadways would be closed. No alternative transportation concepts were discussed in the report.

raSmith questions elements of the report's procedures, findings and recommendations. raSmith requests additional information to address the following comments:

1. Provide additional information to validate the traffic and parking numbers used in the analysis:
 - a) Limited information was provided on the CMAP model used to estimate the traffic diversion. Specifically, provide documentation showing how the CMAP model estimated traffic diversions at the local street level.
 - b) The report indicates adjustments were made to the CMAP traffic assignment. Identify the specific adjustments and note whether the adjustments were made by CMAP, CDOT or Sam Schwartz.
 - c) The manually adjusted traffic reassignment assumed some of the diverted traffic would never enter the study area. This assumption relies on the premise there is sufficient capacity to accommodate the diverted traffic outside the study area. Provide documentation showing the intersections outside of the study area were evaluated to ensure they could accommodate the additional traffic.
 - d) The assumptions used to analyze the Obama Presidential Center yield relatively low traffic and parking values, which underestimates the impact of the development. The average auto occupancy appears high considering other multimodal factors (transit, pedestrian/bicycle, taxi/Uber/Lyft, school bus, etc.) were also applied.

Please provide documentation from similar Chicago attractions to support these assumptions.

- e) Special events often have different traffic and parking characteristics than daytime activities, but the report grouped all Obama Presidential Center activities together. Provide additional information on the expected types and sizes of special events to be hosted at the Obama Presidential Center, including documentation from other residential libraries.
2. Similarly, Jackson Park hosts several special events throughout the year, which are not accounted for in the Sam Schwartz report. Summarize the Jackson Park events and document how the Obama Presidential Center traffic and parking will be accommodated on those days.
3. Most of the parking eliminated with the CDOT transportation plan is located on the south side of Jackson Park. The replacement parking is located on the north side of the park, and the proposed replacement parking does not replace all of the lost parking. Provide a mitigation plan that equitably distributes parking throughout Jackson Park and fully restores the lost parking.
4. The pedestrian, bicycle and parking counts were all collected in the fall when park usage is typically down. Arbitrary adjustments were made to the pedestrian and bicycle volumes but not the parking counts. Provide justification for the pedestrian and bicycle adjustment factors and adjust the parking numbers. Preferably, all data should be counted in the summer on both weekends and weekdays to reflect the park's peak usage times.
5. The proposed curb-side drop off and pick up operations at the Obama Presidential Center would likely impact traffic flow and safety, as well as pedestrian and bicycle safety along Stony Island Avenue. Provide off-street accommodations for drop off and pick up.
6. Provide a more holistic summary and plan of the improvements recommended along Stony Island, including but not limited to, travel lanes, progression analysis results, bicycle accommodations, pedestrian cross-walk enhancements, on-street parking, and intersection traffic controls.
7. The report indicates 67th Street would be unaffected, yet the traffic volumes are anticipated to increase 25-30%. Discuss the impact to traffic operations and pedestrian crossings along the corridor.
8. The report indicates Cornell Drive would need to be closed prior to 2020. Please confirm the mitigation improvements will be constructed prior to the closure.

raSmith believes responses to the above comments are needed to better understand the impact of, and to fully evaluate, the CDOT transportation plan.

Alternative Transportation Concept Plan

raSmith determined other transportation plans are feasible that warrant further consideration and evaluation. Exhibit 1 presents an alternative concept plan created to address the previously outlined objectives. The conceptual plan was developed based on the traffic volumes and capacity assumptions found in Sam Schwartz's February 2018 report. The following plan elements are shown schematically in Exhibit 1:

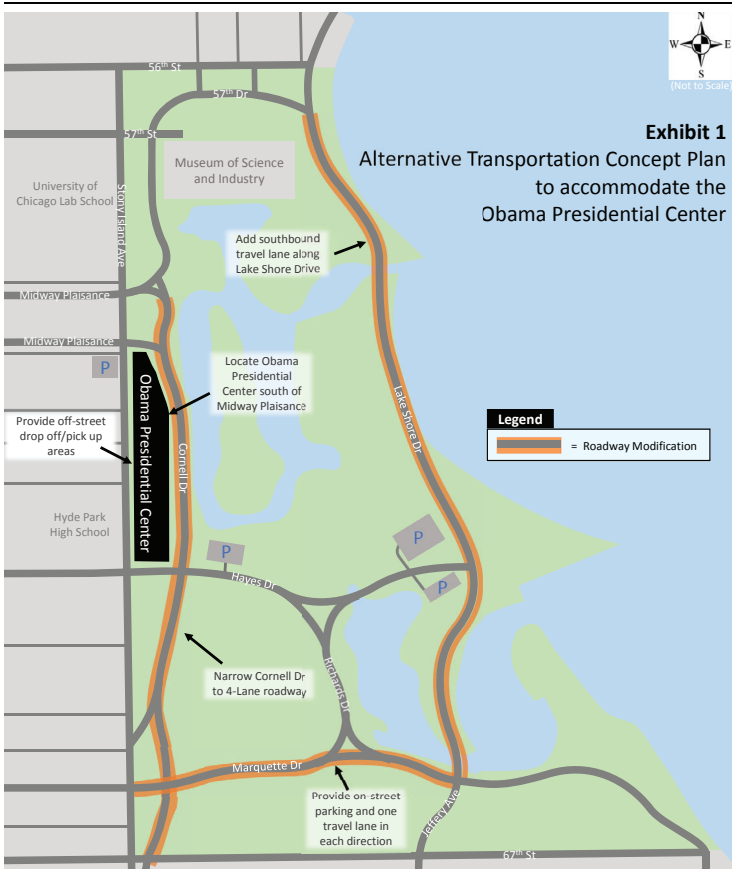
1. Keep Cornell Drive open and operate it as a four-lane roadway throughout the full length of Jackson Park. The proposed reduction to four travel lanes provides additional land to allow greater site flexibility for the Obama Presidential Center, as well as potential pedestrian safety amenities. The four-lane roadway could also result in reduced taxpayer costs compared to removing the roadway.
2. Locate the Obama Presidential Center south of the Midway Plaisance, as originally proposed. The Midway Plaisance and the eastbound Midway Plaisance roadway provide critical and historic linkages within the Olmsted design.
3. Provide off-street drop-off and pick-up areas for the Obama Presidential Center to enhance safety and minimize operational impacts along Stony Island Avenue.
4. Enhance the pedestrian accommodations along Stony Island Avenue between the Midway Plaisance and Hayes Drive to accommodate the increased pedestrian activity in the area.
5. Construct a third southbound travel lane along Lake Shore Drive as proposed in the February 2018 report. The Alternative plan differs from the February 2018 design by continuing the southbound lane to Marquette Drive. The additional travel lane will help offset the loss of capacity along Cornell Drive.
6. Utilize the existing pavement along Marquette Drive, west of Jeffery Avenue/Lake Shore Drive, to provide on-street parking and one travel lane in each direction.
7. Maintain Hayes Drive as is with on-street parking and one travel lane in each direction.
8. Maintain the existing number of travel lanes along Stony Island Avenue and do not widen into Jackson Park to add vehicular capacity.

This recommended alternative concept plan does not preclude the incorporation of additional improvements not directly tied to the Obama Presidential Center, such as the reconfiguration of the Richards Drive intersections with Hayes Drive and Marquette Drive to eliminate the three-legged intersections, enhancement of pedestrian and bicycle accommodations along Stony Island Avenue, enhancement of pedestrian accommodations within the park, and realignment of the southbound Cornell Drive intersection with Stony Island Avenue to eliminate the skew.

raSmith acknowledges other alternative plans are feasible that would accommodate the Obama Presidential Center in Jackson Park and not require the road closures proposed in the CDOT transportation plan.

Conclusions

raSmith's review identified several questions and concerns with the proposed CDOT transportation plan and corresponding Sam Schwartz report. raSmith concludes the closure of Cornell Drive and the eastbound Midway Plaisance roadway are not needed to accommodate the siting of the Obama Presidential Center in Jackson Park. raSmith believes the alternative transportation concept plan outlined above and shown in Exhibit 1 can accommodate the proposed Obama Presidential Center while addressing the concerns noted above for the proposed CDOT transportation plan. The alternative transportation concept plan will safely and efficiently address increased traffic flows, multi-modal access to Jackson Park and parking demands.



Jackson Park Watch

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August 27, 2018

Morgan McCosh Elmer, PMP
Project Manager – PMP
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Denver Service Center
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Denver, Colorado 80225-0287

Via Email: morgan_elmer@nps.gov

Re: NEPA Review of Proposal for Obama Presidential Center

Dear Ms. Elmer:

Greetings. We write as co-presidents of Jackson Park Watch, a community organization with a very keen interest in the massive changes proposed for Chicago's historic Jackson Park. Jackson Park Watch is a consulting party to the on-going federal reviews of this proposed project. We have learned that the National Park Service (NPS) will now serve as the lead agency for the National Environmental Policy Act (NEPA) review in addition to its oversight of the review required by the Urban Park and Recreation Recovery Act (UPARR) while the Federal Highway Administration (FHWA) will continue its role as lead agency for the National Historic Preservation Act-Section 106 review.

As a consulting party for the Section 106 review, we have communicated since December 2017 with the FHWA lead staff as well as with staff of the City of Chicago who are handling the day-to-day processes to comment and express our concerns regarding the Section 106 process and also the incipient NEPA-review. With your new role in the NEPA process, we would like to inform you of those previously-expressed concerns and comment on some additional matters.

We attach here copies of our earlier communications (dated April 18, 2018 and July 4, 2018) that related specifically to NEPA. The concerns expressed in these letters have not yet been fully addressed either by direct response (there has been none) or by the FAQ document posted on the City's website on July 27, elements of which we find to be incomplete or indeed erroneous. As you will see from the letters we attach, we have deep concerns about the badly flawed Purpose and Need statement and the equally flawed definitions and omissions in the Alternatives To Be Carried Forward (ATBCF) document that is based on that faulty Purpose and Need statement. We believe both of these documents need major revision in order to enable a proper NEPA review to proceed. We have also been concerned about the lack of clarity about the federal review process overall.

We would also like to address the issue of the conversion of public recreational parkland, which was raised briefly in our prior letters. Because Jackson Park received two grants under the Urban Park and Recreation Renewal Act of 1978, there are important limits on the conversion of recreational land in Jackson Park to non-recreational uses. This issue is generally discussed as an issue of "replacement" (or sometimes "relocated") parkland, a use of terms that we believe has created additional confusion and concern.

To date, the Obama Foundation and the City of Chicago have maintained that only very limited replacement parkland is required. They agree that under UPARR there needs to be replacement recreational parkland found for the baseball diamonds that were demolished when the Chicago Park District prematurely began construction of the field/track that will replace/relocate the current field/track that will itself be displaced by the Obama Presidential Center. With regard to the conversion (or relocation/replacement) of these baseball diamonds, there is widespread confusion and lack of understanding about the details and the process of determining the relocation of these sites. There is significant community concern about the NPS decision as reported by the City to use existing parkland on the Midway Plaisance for relocation purposes, contrary to the concept of "replacement" parkland as it has been generally understood locally.

Beyond the baseball diamond replacement/relocation issue, the Obama Foundation and the City maintain that only one acre of "replacement" land outside of Jackson Park is required for the 19.3 acres of existing Jackson Park land that will be taken for the OPC. We think that this is far too narrow an approach given that the entire site is currently in active use for a wide variety of recreational purposes and that the amount of public parkland in Jackson Park would be actually *reduced* if the City's argument is adopted.

In the FAQ already cited, the City asserts that "NPS determined that roughly one acre of Jackson Park would be converted to uses other than public recreation use. . . ." Based on publicly available information about the space that the proposed OPC buildings and plaza would occupy, it is unclear what "one acre" this assertion by the City references. The City and Foundation have argued that since some of the proposed buildings would have green rooftops in whole or in part, those rooftops should count as public recreational space, and that additionally the concrete plaza should also be counted as public recreational space. The City further asserts in the FAQ that "the ground surrounding the OPC buildings will remain open space and must remain open to the general public in a manner consistent with the public's access to the rest of Jackson Park," and alleges that this further demonstrates that replacement (or UPARR conversion) parkland beyond one acre is not needed.

There is great skepticism that a concrete plaza and rooftops, however green, can adequately replace the public open space now available on the OPC-designated site. We note that it appears to many to be highly unlikely that privately controlled space, even if "green," can be the equivalent of a public park. We also note that there is not yet any fully executed lease agreement between the City and the Obama Foundation, the private entity that will be operating the private facility and programming on the site. Only a fully concluded lease agreement for the OPC site will reveal the responsibilities for security, maintenance, financial liabilities, the limitations on access, procedures for the issuance of permits for events now allowed in the Park, rules

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Dan Marriott, National Association of Olmsted Parks; Betsy Merritt, National Trust for Historic Preservation; Michael McNamee and Karen Rechtschaffen, Save the Midway; Bronwyn Nichols Lodato, Midway Plaisance Advisory Council; Walter Kindred, SSCC Advisory Council; Naomi Davis, BIG; Jawanza Malone, Kenwood-Oakland Community Association; Alex Goldenberg, STOP; Jack Spicer, Promontory Point Conservancy; Herbert Caplan, Protect Our Parks

governing allowable noise and types of activities, and the like. Review of such an agreement when concluded will be essential to evaluating the claim that only one acre of replacement recreational parkland for the OPC site itself is required.

In addition, and as further evidence of the basis for our concerns, we also call your attention to the astounding statement in the FAQ regarding public participation in the NEPA process: "The public is invited to send comments to DPD@cityofchicago.org concerning the NEPA documents at any time and until the public comment period closes (which will be defined at a later date)." [Emphasis added.] The fact is that the NEPA review process has not been publicly defined or announced beyond occasional notices by the City to consulting parties registered for the Section 106 review. The Purpose and Need and ATBCF documents were posted on the City's web site without any notice. The much larger constituency interested in the NEPA review has not been addressed. In addition, the invitation to the public to submit comments until some undisclosed closure date only highlights the extent to which this process is not truly open or encouraging of community input.

As you assume leadership of the NEPA review, we hope you will address these and the additional concerns that we and other groups and individuals have expressed over the past several months. The Obama Presidential Center is an initiative of great significance and impact for the South Side, the City of Chicago, and the nation. It is also the subject of on-going controversy fueled at least in part by perceived inconsistencies and distortions of the federal, state and city review processes. It is important and essential to the future well-being of the OPC itself that the proposals for its development be given a serious and careful review that the public can understand and have confidence in.

We look forward to hearing from you in regard to all of these vital issues. We would welcome any clarifications that would assist us in most productively focusing on the issues of concern.

Sincerely,

Brenda Nelms and Margaret Schmid
Co-presidents

Attachments:
2018-04-18 JPW to Eleanor Gorski and John Sadler
2018-07-04 JPW to Eleanor Gorski and John Sadler
2018-08-27 JPW to Morgan Elmer

cc: Jeffrey Durbin, National Park Service; Matt Fuller, Federal Highway Administration; David Clarke, US Department of Transportation; Eleanor Gorski, Chicago Department of Planning and Development; Abby Monroe, Chicago Department of Planning and Development; John Sadler, Chicago Department of Transportation; Anthony Rubano, Illinois Historic Preservation Agency; Bonnie McDonald and Lisa DiChiera, Landmarks Illinois; Jerry Adelman, Ted Haffner, and Stacy Meyers, Openlands; Ward Miller, Preservation Chicago; Juanita Irizarry, Lauren Moltz and Fred Bates, Friends of the Parks; Charles Birnbaum, The Cultural Landscape Foundation;

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Jackson Park Watch

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April 18, 2018

Eleanor Gorski, Department of Planning and Development
John Sadler, Department of Transportation
City of Chicago
Via Email: eleanor.gorski@cityofchicago.org, john.sadler@cityofchicago.org,
dpd@cityofchicago.org

Re: NEPA Review Process

Dear Ms. Gorski and Mr. Sadler:

We are a consulting party for the Section 106 review of the proposals to construct the Obama Presidential Center (OPC) and to make related road changes in Jackson Park. We have provided our comments on the Section 106 review and the draft Historical Properties Identification Report in a separate communication, also dated April 18. Here we would like to express concerns about the definition and sequencing of the National Environmental Policy Act (NEPA) review process of which the Section 106 review is one part, but we note that the issues we raise here extend to the Section 106 review. We note also that concerns outlined in the separate comments on the Section 106 review apply generally. There is considerable inconsistency and confusion within the draft reports and public presentations to date about the definition of the "project" to be reviewed, confusion created in part by the misleading references to and uses of the South Lakefront Framework Plan update. Clarification is needed to insure that such confusion does not infect other elements of the federal review.

In mid-March, in advance of the second public meeting for the Section 106 review, you posted on the City's website (https://www.cityofchicago.org/content/dam/city/depts/dcd/supp_info/jackson/ha-purpose.pdf) a draft document, dated February 6, 2018 and entitled "Purpose of and Need for Action – Federal Highway Administration," which aims to define the OPC project, set the focus and parameters for the various reviews to be organized under the NEPA study, and determine how federal and City agencies examine the project alternatives and consider any associated adverse impacts. We understand that public participation is necessary in the development of the vitally important purpose and need statement, and so we have been surprised to learn that staff of the City's Department of Transportation (CDOT), Department of Planning and Development (DPD), and the Chicago Park District (CPD) composed the initial statement for the OPC project in mid-November 2017 without the expected public involvement in the scoping process.

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We have fully participated to date in the OPC planning process. We attended and participated in the meetings that have occurred over the past year, starting on May 3, 2017 (when President Obama first revealed his vision for the OPC), continuing in June 2017 with the presentation of CDOT's plan for road reconfiguration in Jackson Park and the launch of the South Lakefront Framework Plan (SFLP) process just concluded in April 2018 with its presentation to the Park District Board, and including many meetings in between. Some meetings were sponsored by the Chicago Park District, some by CDOT, and some by the Obama Foundation; some were open to the public, some were by invitation only. These meetings in the main were presentations with some limited opportunities for public comment on some elements of the various proposals prepared by the Obama Foundation, CDOT, the Chicago Parks Golf Alliance, and the Chicago Park District.

Yet, in none of these meetings was the development of the purpose and need statement for the NEPA review of the proposed initiatives discussed or even mentioned, nor was the federal review process fully explained. Participants were never told of the necessary public role in the development of the NEPA purpose and need statement. Any such public participation would need to be informed and focused, and we know that these past meetings did not allow for such focused public input. We feel confident that you would agree. This leaves us questioning how you now plan to meaningfully involve the public in developing a proper purpose and need statement for the NEPA and accompanying reviews, a critically important issue since the definition of the "purpose and need" shapes all that follows.

In addition to our concern about the lack of public participation in the development of the purpose and need statement required for the NEPA review and the urgent need to rectify this critical omission, we are greatly concerned about the February 6 draft statement "Purpose of and Need for Action -- Federal Highway Administration," now posted on the City website.

Although the current federal reviews have been triggered by the *proposals* (our emphasis) to construct the Obama Presidential Center in Jackson Park and to make numerous significant road changes to accommodate its desired design, the February 6 draft purpose and need statement makes the rather remarkable assertion, in the section entitled Project Need (p. 4): "Needs were identified based on the effects of the No-Action scenario, which *assumes* the roadway closures as described in Section 1.1 are in place and the OPC is constructed in Jackson Park." (Emphasis added) It goes on to assert, contrary to all evidence: "Stakeholder input was also considered." Following from its initial incorrect assumption concerning the baseline "No-Action scenario," the draft statement concludes (p. 8) with a definition limiting the purpose for the review: "The project purpose is to (1) address changes in travel patterns *resulting from closing roadways* (our emphasis) in Jackson Park and (2) improve bicycle and pedestrian access and circulation."

In fact, the baseline No-Action condition must necessarily be the condition obtaining in Jackson Park today – that is, the OPC is not in place and no roadway changes have been made.

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the March 29 meeting. We understand that the Section 106 review would help determine what the 4(f) review examines. With historic and publicly precious Section 4(f) resources at stake, we strongly urge CDOT to allow early and comprehensive public participation in identifying and evaluating all "prudent and feasible alternatives" that could minimize the range and severity of impacts before any particular alternative is selected.

- Similarly, we question the underpinnings and sequencing of the other federal reviews, such as the Section 404 permit review and Section 401 certification, and the UPARR review mentioned above. It is important to know up front whether certain alternatives will violate these provisions, and cause serious delay in the process.

Overall, the planning and approval process being advanced by the City seems to be getting ahead of the federal review process and the sequencing of the federal reviews is unclear. To give validity to all of those reviews, the full NEPA process needs to be clarified, the merger or overlap of some reviews explained, and the timelines should be coordinated.

In conclusion, we ask: When and how do you plan to initiate public participation in the scoping process for the NEPA purpose and need statement? What is the specific schedule for the NEPA review process and how are the elements of the review integrated? When and how will the public be allowed to fully participate in this process?

We appreciate your consideration of these questions and look forward to your response.

Sincerely,

Brenda Nelms and Margaret Schmid
Co-presidents
Jackson Park Watch

cc: Matt Fuller, Federal Highway Administration; Abby Monroe, Chicago Department of Planning and Development; Rachel Leibowitz, Illinois State Historic Preservation Office; Bonnie McDonald and Lisa DiChiera, Landmarks Illinois; Jerry Adelman, Ted Haffner, and Stacy Meyers, Openlands; Ward Miller, Preservation Chicago; Juanita Irizarry, Lauren Moltz and Fred Bates, Friends of the Parks; Charles Birnbaum, The Cultural Landscape Foundation; Dan Marriotti, NAOP; Betsy Merritt, National Trust for Historic Preservation; Michael McNamee and Karen Rechtschaffen, Save the Midway; Bronwyn Nichols Lodato, Midway Plaisance Advisory Council; Walter Kindred, SSCC Advisory Council; Naomi Davis, BIG; Jawanza Malone, Kenwood-Oakland Community Association; Jack Spicer, Promontory Point Conservancy

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Construction of the OPC has not begun, and a central purpose of the present federal review is to determine whether and under what conditions that construction may be allowed to proceed. Similarly, none of the proposed road changes have occurred, and a central purpose of the present federal review is to determine whether and under what conditions that road construction may be allowed to proceed.

Our concern about the seeming lack of the required public involvement in the development of the draft purpose and need statement and the erroneous baseline asserted by that statement extends to all aspects of the review process:

- We do not understand how the NEPA review with its various components could proceed without a purpose and need statement fully reflecting public input, which the statement dated February 6, 2018 does not.
- We question how the Section 106 review process could have been initiated on December 1, 2017, in advance of involving the public during scoping for the project to develop a viable purpose and need statement.
- We question how, when a comprehensive review of the "project" is necessary, the October 29, 2017 letter from Eleanor Gorski (which was responding to our request to be a consulting party for the Section 106 review) could already assert that the Federal Highway Administration (FHWA) and the City will complete an Environmental Assessment (EA) for the project under NEPA, an assertion that was repeated in the handout at the March 29, 2018 Section 106 meeting, and incorporated into the compressed timeline for the Section 106 review. Such a predetermination that there should not be a full Environmental Impact Statement (EIS) in this case would seem to be in conflict with the extent of resources at stake and the level of controversy surrounding the OPC project and with the full intent of the NEPA review. Given the scope of the project and its significant impacts, we believe that an EIS is necessary, appropriate and required. To that point, there should be much more information provided as to where the decision making process is on an EIS, and if a determination has been made not to perform an EIS, the public should be clearly notified as to who made the decision, when and why.
- We question why the subject of the National Park Service's review of the project under the terms of the Urban Parks Recreation and Recovery Act (UPARR) was introduced during the March 29 meeting for the Section 106 review without full explanation of the nature or import of that review. Further, we ask how the proposal to use the Midway Plaisance to replace converted recreational parkland accords with the concept of "replacement land," since the Midway parkland proposed as a "replacement" for recreational parkland in Jackson Park is already parkland in its own right.
- We question why the Section 4(f) review that we understand should be part of the early stages of the NEPA process, especially with the resources we know are at stake in this project, has not been mentioned beyond a passing reference in the October 29, 2017 consulting party letter and a brief acknowledgement by Abby Monroe in her introduction to

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Jackson Park Watch

P.O. Box 15302, Chicago, Illinois 60615

jacksonparkwatch@gmail.com www.jacksonparkwatch.org www.facebook.com/jacksonparkwatch

July 4, 2018

Eleanor Gorski, Department of Planning and Development
John Sadler, Department of Transportation
City of Chicago
Via Email: eleonor.gorski@cityofchicago.org, john.sadler@cityofchicago.org,
dpd@cityofchicago.org

Re: NEPA Review Process

Dear Ms. Gorski and Mr. Sadler:

We write you in your role as the facilitators for the on-going Section 106 review of the proposals to construct the Obama Presidential Center (OPC) in Jackson Park including related costly road changes that will likely significantly affect the surrounding human environment. This role has been delegated to you by the Federal Highway Administration, which oversees the various federal reviews triggered by the OPC proposals. In this role you have been conducting not only the impact review required by Section 106 of the National Historic Preservation Act of 1966, but also the development of key documents for the federal reviews as mandated by the National Environmental Policy Act of 1969 (NEPA).

In an April 18 letter to you, we expressed serious concerns and questions about the NEPA process, focusing on the draft Purpose of and Need for Action statement, dated February 6, 2018, that had been posted on the City of Chicago [website](http://www.cityofchicago.org) entitled "Environmental Review of Jackson Park Improvements." Having had no response from you and now noting that a second statement – the draft Alternatives To Be Carried Forward (ATBCF) document, dated April 18, 2018 – was posted on the same website at an unknown date just prior to the May 17 Plan Commission hearings, we write to reiterate and expand on our statement of concerns about the process by which the required federal reviews are being defined and implemented and the threat such a flawed process poses for the successful implementation of the plans for the OPC. We ask that you address the following points which we elaborate below:

- (i) lack of clarity and detail about the process for public participation and meaningful contribution in the NEPA review of the proposed road changes to accommodate the OPC;
- (ii) improper scoping of the draft Purpose of and Need for Action statement that is crucial for a hard look at the actual consequences of the actions related to the OPC;
- (iii) fatal flaws in the definitions established by the draft Purpose and Need statement;
- (iv) fatal flaws with the No-Action Alternative baseline that is defined in the draft Purpose and Need statement and applied in the ATBCF document;
- (v) omissions and inadequacies in the draft Alternatives To Be Carried Forward (ATBCF) document;

- (vi) based on the flawed No-Action Alternative baseline utilized in the ATBCF document, substitution of a deeply flawed Section 4(f) review for a legitimate review as required in the U.S. Transportation Act of 1966;
- (vii) absence of information about the parallel review of the OPC proposal for compliance with the National Park Service's Urban Parks and Recreation Recovery Act of 1978 (UPARR) legislation and the issue of replacement parkland.

I. Lack of clarity and detail about public participation in the NEPA review process

We have attended and participated in the public meetings during which you initiated the federal review process on December 1, continuing on March 29. While these meetings have focused on the Section 106 review mandated under the National Historic Preservation Act of 1966, you outlined a review process that entails multiple kinds of assessments (see [slide on p. 14](#) of the December 1 presentation). The outline specifies that, in the review of the plans relating to the OPC, the National Environmental Policy Act of 1969 is the procedural umbrella for all substantive reviews (e.g., Section 106, Section 4(f), Section 404) and as such it should provide the guiding principles and organizational structure for the entire review process. Yet the actual schedule of meetings and reviews seems to be out of order and segmented. Thus, the Section 106 review has proceeded in advance of and without the necessary initial definition of the NEPA review – the Purpose of and Need for Action statement – being concluded; indeed the Section 106 kick-off meeting was held two months before the date on the draft Purpose and Need statement. We are further concerned that the reviews that are to be conducted under NEPA guidelines are occurring improperly and in a way that segments and separates the various reviews and does not allow for the proper evaluation of cumulative impacts or for appropriate public comment and engagement across the full NEPA process.

What is the full, detailed schedule for the NEPA review process? How and when will public comment be incorporated? How will the results of the Section 106 review be incorporated into the NEPA review? How will the information from the other various reviews be consolidated for evaluation?

II. Flaws in the process of developing the Purpose and Need Statement

As we noted in our letter of April 18, in addition to being produced after the review process began, the draft Purpose of and Need for Action Statement was developed without proper public engagement. Such public review was omitted by claiming, retroactively and incorrectly, that prior public meetings had directly addressed the purpose and need as part of the NEPA process, an assertion that is demonstrably inaccurate. You have neither responded to our stated concern nor has any corrective action been taken to develop a proper Purpose and Need Statement that at the very least reflects the full range of impacts from the OPC. Further, the recent posting of the draft ATBCF document seems to imply that we are now considered to have concluded scoping, despite no hearings on the matter, and are now in the phase of developing alternatives, having somehow closed the door on critical preliminary steps.

When and how will you solicit public participation in the scoping process for defining the NEPA Purpose and Need Statement? We note that posting documents on a website is not adequate public notice. As with other City notices, there should be publication in a newspaper(s), with full disclosure of the schedule for comments and public meetings, and with the allowance of adequate time for public review. How will you publish and invite public participation in all phases of the NEPA process?

included in the definition of the baseline, a baseline that presumes that portions of Cornell Drive and the Midway Plaisance have already been closed and that the OPC has been constructed. Such a presumption runs contrary to law, practice and common sense. We note that such circular logic was ruled illegal in the case of the proposed Illiana Expressway. The No-Action Alternative baseline should properly include, in addition to the current configuration, only roads that would otherwise be closed or improved even if the OPC were never built in Jackson Park.

The effort by the City to invoke the Park District's South Lakefront Framework Plan (SLFP) as justification for No-Action Alternative baseline is fallacious and a red herring, as explained above. The draft ATBCF statement itself candidly admits that “[c]losures of South Midway Plaisance and Cornell Drive between 63rd Street and 59th Street are necessary to accommodate the development of the Obama Presidential Center.” (Section 2.1 at 3). At best, the SLFP's proposed road closures provide alternatives for consideration, but not the baseline.

Last, the road alternatives only cover a portion of the impacted area, excluding relevant neighborhoods and community concerns that provide reasoning for different alternative solutions. Although we previously raised this issue with you, we have not received a response as to why the agencies continue to use a flawed definition and scope of a baseline alternative.

What steps will you take, and by when, to establish a proper No-Action Alternative as the baseline for the federal reviews?

V. Flaws in the ATBCF draft document

A proper NEPA review must rigorously explore and objectively evaluate all reasonable alternatives for achieving the purpose and need for the project. Yet because of the fatally flawed No-Action Alternative baseline definition for this review, the draft ATBCF document does not adequately assess all available alternatives with regards to traffic configurations. As further discussed below, Jackson Park Watch commissioned an independent analysis of the proposed road changes ([attached](#)) and submitted it in May to the City's Plan Commission. That analysis identifies significant potential problems with the CDOT-developed proposal, and also includes a potential alternative that is less costly to tax payers, far less disruptive to the historic design of Jackson Park, and is in fact very similar to a proposal advanced by the Park District and Project 120 as recently as 2016. A legally defensible NEPA process would evaluate this reasonable alternative against the proposed one as well as a proper No-Action Alternative baseline.

Further, the ATBCF document does not fully address factors relating to noise; traffic; wildlife/habitat; air & water quality; and socioeconomic issues, as outlined at the Section 106 kick-off meeting on December 1, 2017. Instead, it presents preliminary Section 106 findings as if they were final. The socioeconomic analysis is vital, given the current, well-known controversies concerning the likely impact of the OPC on the Woodlawn and South Shore communities on property values, rents, property taxes, and the resulting displacement of long-term residents. Sufficient attention to environmental issues such as wildlife/habitat and air & water quality is likewise essential. None of this has been fully addressed. To that point, we (and many other consulting parties) have already expressed our concern about the implication in your earlier communications that there would be only a far less thorough Environmental Assessment without opportunity for public review or discussion. For a project of this scale and scope it is evident that an Environmental Impact Statement (EIS) is required. It appears through the various submissions

III. Flaws in the Purpose and Need Statement

Beyond the improper scoping process for the Purpose and Need Statement and the resulting need to re-do the scoping process with proper public participation, there is the flawed nature of the draft Purpose and Need Statement that you have put forward.

That Purpose and Need Statement alleges that the roadway changes are needed “...to meet the planning and development objectives for Jackson Park as described in the 2018 South Lakefront Framework Plan.” (cit. 1.1 Proposed Action, pp. 1) This effort by the City to invoke the Park District's South Lakefront Framework Plan (SLFP) as a basis for the Purpose and Need Statement is fallacious and should be disregarded. In reality, the SLFP is an *ex post facto* plan that was premised on the assumption that the OPC and related road changes were in place and was created as an attempt to legitimize and give cover to those pre-existing plans. The SLFP process was launched on June 21, 2017, a month after the OPC plan was unveiled. CDOT presented its fully developed road proposal at that same June 21 meeting. Neither the OPC plan nor the CDOT plan resulted from or was substantively changed by the SLFP community meetings and in fact discussion of these plans was disallowed at those meetings. Further the OPC and CDOT applications were presented to the Chicago Plan Commission before the SLFP process was concluded. The truth of the matter is found later in that same paragraph, which states the actual reason for the proposed road changes: “Closures of the eastbound Midway Plaisance and Cornell Drive between 63rd Street and 59th Street are necessary to accommodate the development of the Obama Presidential Center.” (same Cit.)

Based on the initial incorrect and disingenuous assertions concerning the Purpose and Need Statement, this flawed Statement comes to the improbable conclusion that the Project Need is to be defined as accommodating changes in travel patterns and improving bicyclist and pedestrian access and circulation resulting from the OPC-driven closures of the eastbound Midway Plaisance and Cornell Drive between 63rd Street and 59th Street. Further, and equally improbably, the draft Project Need asserts that “Needs were identified based on the effects of the No-Action scenario, which assumes the roadway closures as described in Section 1.1 are in place and the OPC is constructed in Jackson Park.” (cit. pg. 4, 2.0 Project Need)

This deeply flawed Purpose and Need Statement must be redone to acknowledge the actual situation: the proper Purpose and Need for this NEPA review is to assess the impact of the proposed OPC design and the related road changes on the current configuration of the roadways in Jackson Park and on the Park itself.

When will development of a proper Purpose and Need Statement take place? How will public comment be incorporated?

IV. Flaws in the No-Action Alternative Baseline

As noted above, the Purpose and Need statement is fatally flawed in that it includes the impetus for the transportation changes (construction of the OPC and related road changes) in the No-Action Alternative baseline.

As presented in the draft statements, the No-Action Alternative baseline is clearly an example of bootstrapping whereby the plan for the OPC and related road changes that is to be evaluated is itself

and statements that your goal is to avoid conducting an EIS. That too is contrary to law and practice, and unless corrected may be subject to additional remedial action that will also lead to further delays and ultimately to a process that will need to be amended and/or corrected and redone. The purpose of an Environmental Assessment is to determine whether an EIS is warranted due to significant effects to the human environment. Here, we already understand this would likely to occur. In addition, public outcry is a second ground for conducting an EIS, especially when the project will likely involve serious impacts. For these reasons and others, we continue to assert that an EIS is not only warranted – it is required by law.

When will you prepare a revised ATBCF statement that addresses all of the aspects of a proper NEPA review as outlined at the December 1, 2017 kick-off meeting of the Section 106 process, as referenced above? When will you prepare a revised ATBCF statement that includes consideration of all reasonable alternatives, including the traffic analysis commissioned by Jackson Park Watch? How will the public comment period be scheduled to allow for appropriate public review of the Alternatives analysis?

VI. Attempt in the ATBCF document to substitute a flawed Section 4(f) review

The draft ATBCF document, building on the deeply flawed definitions of both the Purpose and Need Statement and the No-Action Alternative baseline, proposes to substitute a flawed review of the undertaking for the mandatory, substantive review required by Section 4(f) under the U.S. Department of Transportation Act of 1966. Under the terms of Section 4(f), Jackson Park is a “Section 4(f) property.” The undertaking as properly defined – construction of the OPC in Jackson Park and related road changes – proposes to convert portions of Jackson Park into roadway. Section 4(f) requires that, before approving the use of Section 4(f) property for a project requiring approval by FHWA as in this case, the FHWA must determine that there is no feasible and prudent alternative that avoids the Section 4(f) property or that the project has a *de minimis* impact, something that is clearly not the case here.

As noted above, Jackson Park Watch commissioned an alternative to the proposed road changes and submitted it to the City including DPD and CDOT in mid-May. The alternative proposal is feasible and prudent. In accordance with the 4(f) requirements noted above, in your capacity as proxies for the FHWA, you must review the Jackson Park Watch alternative to the road changes that are being proposed to accommodate the OPC siting in Jackson Park.

When will you prepare a revised ATBCF statement that incorporates a proper Section 4(f) review of the alternative traffic plan commissioned by Jackson Park Watch?

VII. Status of and NEPA coordination with the parallel review for UPARR compliance

At the March 29 meeting, Ms. Gorski, introduced the proposal to relocate the baseball diamonds that would be displaced by the OPC project to an area in the Midway Plaisance immediately west of Stony Island Avenue and east of the Metra tracks. This was identified as required under the UPARR program, yet another aspect of the required federal reviews now underway. While we have been told that this particular relocation proposal has been withdrawn, the question of the relocation of the baseball diamonds remains outstanding along with additional specific requirements of conversion of recreational parkland to non-recreational uses under UPARR. We would like to understand the status of the UPARR review and how it is to be coordinated with the NEPA review.

Additionally, the broader issue of replacement parkland is very much unresolved. Instead, the Obama Foundation has advanced the assertion that only *one acre* of its proposed 19.3-acre site requires replacement parkland, and that concrete plazas, green rooftops, and green spaces open to the public but under private control constitute appropriate public parkland. This assertion is completely unsupported. The OPC proposal would result in a significant diminution of public park land in Jackson Park. This impact must be addressed and explained in an accurate fashion, and real mitigation measures considered and ultimately adopted.

What is the status of the UPARR review? What are the next steps in the UPARR review? When and how will the findings of that review be incorporated into the NEPA review?

* * *

Given the complexity of these various federal reviews and the importance of the Obama Presidential Center that is the subject of the reviews, we again ask that you provide confirmation and clarification of the full process, indicating the allocation of responsibilities among the federal agencies and the schedule for the reviews. But the first order of business is to assure that the reviews can proceed legitimately and effectively. That can be accomplished only by the development of a Purpose and Need statement (and a related ATBCF document) that reflects NEPA law and practice and will ensure a proper review of these current proposals. Without such proper procedures, there is the possibility of delays as reviews will likely have to be redone.

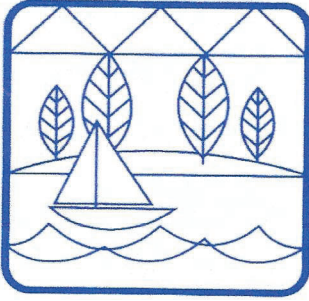
We look forward to your response.

Sincerely,

Brenda Nelms and Margaret Schmid
Co-presidents
Jackson Park Watch

Attachment: *CDOT's Transportation Plan for the Obama Presidential Center in Jackson Park: A Review and Alternative*

cc: Matt Fuller, Federal Highway Administration; David Clarke, Department of Transportation; Jeffrey Durbin, National Park Service; Abby Monroe, Chicago Department of Planning and Development; Rachel Leibowitz, Illinois State Historic Preservation Office; Bonnie McDonald and Lisa DiChiera, Landmarks Illinois; Jerry Adelmann, Ted Haffner, and Stacy Meyers, Openlands; Ward Miller, Preservation Chicago; Juanita Irizarry, Lauren Moltz and Fred Bates, Friends of the Parks; Charles Birnbaum, The Cultural Landscape Foundation; Dan Marriott, National Association of Olmsted Parks; Betsy Merritt, National Trust for Historic Preservation; Michael McNamee and Karen Rechtschaffen, Save the Midway; Bronwyn Nichols Lodato, Midway Plaisance Advisory Council; Walter Kindred, SSCC Advisory Council; Naomi Davis, BIG; Jawanza Malone, Kenwood-Oakland Community Association; Alex Goldenberg, STOP; Jack Spicer, Promontory Point Conservancy; Herbert Caplan, Protect Our Parks



JACKSON PARK HIGHLANDS ASSOCIATION

6825 South Euclid Avenue
Chicago, Illinois 60649

August 27, 2019

Ms. Abby Monroe
Public Participation Office
Department of Planning and Development
121 N. LaSalle St., Room 1000
Chicago, IL 60602

Dear Ms. Monroe:

My name is Russell Pike and I am the president of the Jackson Park Highlands Association. This organization represents 276 homes located within the Jackson Park Highlands, which is a historic landmark community bearing the name of the park that is immediately north of us. Our community is located within South Shore.

Approximately 73% of the residents within our community support the site that the Obama Foundation has selected to build the Obama Presidential Center (OPC). We are extremely excited about this and are anxiously waiting for its construction to begin.

It is our belief that that the OPC will provide the South Shore community and the city of Chicago with a significant stimulation for economic development, an increase of revenue and a positive catalyst within South Shore, which is long overdue. The OPC will also provide a beacon of hope for our youth and establish a place where the residents of South Shore can truly enjoy the historical Jackson Park. This project will provide a level of pride for all of our citizens and will represent a development that will establish an ongoing legacy for President Barack Obama.

It is amazing the level of attention that Jackson Park has received since the Obama Foundation selected it has the site to develop OPC. I have resided in the Jackson Park Highlands community for 36 years and have observed the constant deterioration of Jackson Park. The area that has been selected for the construction of the OPC, with the exception of the football field and track, is seldom utilized by the residents and others. The sidewalks adjacent to this area are in disrepair, the park benches are broken, the field house requires significant rehabilitation and the general upkeep of the park leaves much to be desired.

One of the concerns raised by many individuals is the closing of a section of Cornell Avenue. However, this roadway creates an adverse effect to the park and prevents visitors of the park from truly enjoying it. The potential danger and lack of safety caused by the traffic and drivers consistently exceeding the speed limit prevents individual park goers, bicyclists and pedestrians from comfortably utilizing this space. An old adage among park lovers is to leave things better than you found them. The improvements to the park and the community that will come from the successful development of the OPC do just that. We believe that the proposed plans for the OPC will result in a safer, more usable, and better maintained Jackson Park.

2019 -- 2020

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August 27, 2019

It is the opinion of many residents in the Jackson Park Highlands that the development of the Obama Presidential Center will create an overall positive impact for our community, South Shore and the city of Chicago. **This development will especially provide the South Shore residents, as well as the residents of Chicago, with pride and unlimited opportunities.** We look forward to the day when we can visit the OPC campus and truly enjoy everything it will have to offer!

Finally, in regard to the Assessment of Effects (AOE) from the Section 106 process, those who support the center strongly believe that the benefits the OPC brings to our communities clearly outweigh the “adverse” effect that has been noted to Olmsted’s design for Jackson Park. **It is our belief that parks are living entities that evolve with their communities and should be able to be modified to best serve those who use them.**

Sincerely,

A handwritten signature in cursive script that reads "Russell C. Pike".

Russell Pike, President
Jackson Park Highlands Association

Jackson Park Yacht Club

6400 Promontory Drive, Chicago IL 60649

773-684-5522 [phone] ♦ 773-684-2697 [fax]

www.jacksonparkyachtclub.org

August 29, 2019

To Whom It May Concern:

Jackson Park Yacht Club (JPYC) is (almost) a 125 year old, fully vested stakeholder in the historic Jackson Park community. We have experienced first hand the neglect, lack of services and investment provided in Jackson Park. We look forward to the improvements and revitalization of Jackson Park from the presence of the Obama Presidential Center (OPC).

JPYC and Jackson Park Yacht Club Foundation (JPYC Foundation), have been fully committed to bringing youth and their families to the Chicago Lake front, through our youth sailing programing. The OPC facilities focus of bringing more families to the historic Jackson Park area and engaging them in programs, activities and athletics is very exciting.

JPYC has been committed to the embracing and honoring the historic structures of this area as we develop our own grounds. The OPC mirrors this commitment. As noted in the Assessment of Effects Report (AOE), the OPC designs will honor the historic Olmsted design by making walkable grounds for visitors. In addition, we are encouraged that the OPC will strengthen the local economic climate. Creating an opportunity for visitors to come and explore the rest of the neighborhood and lake front. The resulting investments in business and organizations within the Jackson Park Community, will know no limits.

Sincerely,

Janet Hansen

**Commodore
Janet Hansen**

**Vice-Commodore
Russell Fouts**

**Rear-Commodore
R. Delacy Peters, Jr.**

From: [Vera Mccurry](#)
To: [Abby Monroe](#)
Subject: 106 consulting partner and stakeholder comment
Date: Wednesday, August 28, 2019 2:05:50 AM

My name is Louise McCurry and I am President of Jackson Park Advisory Council and a Consulting Stakeholder for the 106 Jackson Park study.

Jackson Park Advisory Council is composed of many active and visionary volunteers who volunteer hundreds of hours to improving Jackson Park. We are proud of the improvements we have made in Jackson Park and the legacy we leave for our children. As you would expect, the planning for the Obama Center and its critically needed amenities for our community is a frequent topic of JPAC conversations. Jackson Park, unlike parks in wealthy neighborhood's, does not have donors willing to donate funds to restore our South Side park buildings and infrastructure. Approximately 80% of our active voting members support the Obama Presidential Center being built in Jackson Park.

The 106 study described the proposed site lines around the Obama Museum in Jackson and the proposed children's play area at Midway Eastbound and Stony Island as having adverse effects on the park historical importance.

We disagree with these findings because:

First, the study did not take into account the numerous changes in this Olmsted landscape since its 1972 historic designation.

We have changed the Park landscape markedly since 1972 without threat of historic status loss. We added an artificial track and field, numerous baseball fields, added lanes to Cornell Drive and took away lanes from Lake Shore Drive. We added a 57th Street Beach House. The MSI has added a parking garage, a parking lot, a bus drop off turn around area, a new wing, and closed off the historic Circle Drive. We added a new clinic wing at LaRabida. We added a large Drummers Circle and an Outdoor Cafe at 63rd Street Beach. We have rebuilt the walls of the Lagoons, planted hundreds of new trees, removed numerous invasive species. We restored repeatedly the frequently vandalized Japanese Gardens.

We removed and rebuilt the chip structures, removed vandalized play equipment and replaced it with new sturdier equipment. We have added new buildings and docks at the harbor marinas. We added new decks at the Coast Guard Station. We added new and expanded outdoor basketball courts. We have added new bike and walking paths. We built multiple park underpasses and rerouted roads. We added new sewer lines to replace our 100 year old lines that weren't built to handle the increased highway runoff. We added new lead free water pipes to replace 100 year old lead lined water pipes. We added new underground electric lines and regional boxes. We added new underground internet lines. We removed the Nike Missile Base, its infrastructure, its soldiers barracks, its parade grounds, and its recreation grounds. It took years to complete the removal of the Nike Base missile infrastructure and toxic wastes. We built Bobolink Meadow on the Missile transport roads. We built the Driving Range over the Nike missile silos. We built our picnic and special event fields over the parade grounds and the military barracks foundations.

We planted the trees and plants of the Wooded Island Natural Area over the Military Rec area. We have changed many things since the 1972 historic designation. We made park changes because Cold War priorities changed and community needs for green space usage changed. Bombing prevention as a Cold War priority after World War II had changed to planting and growing a green legacy as our community priority. We chose to mitigate change rather than avoid the change. We developed an extensive on line history of the Nike Missile Base and kept the Nike photos in the Regenstein Library files. All of these changes were a major benefit to the community and park users and to the parks historical significance. None of these changes were subject to this move before mitigating attack from the community. We had to beg community members to come to the Artificial Turf track and Field meetings. The community took little to no interest 10 years ago in the park or in the historical effects of placing our children's first turf field at this same location. The question I ask is how many of these changes I have listed had a 106 study of their effects on the park's historical significance?

A park is a living reflection of our constantly changing community. Olmsted designed no Nike Missile Bases or no lead free water pipes and no 59th Street Beach House or no outdoor basketball courts or no artificial track and field, and none were present in 1972. Olmsted understood park change was required as times and people changed. Olmsted before his death, repeatedly changed his own structures in Central Park to better serve the changing needs of the community. Central Park buggy roads were filled with healthy runners and bikers instead of pollution

spewing and speeding cars. Park Air quality became measurably better due to this removal of cars from the park change.

Was there a 106 study in Central Park closing off the roads to cars?

Why is the Obama Presidential Center, the museum of our first African American President who lived, worked, and raised his family in our community and is now creating, through donations, a wonderful public playground, public gymnasium, public library and public media center, public meeting space, public picnic space, public winter sports space, public track and field, public history museum and public observation space and a positive Proud legacy for our children being told his presidential museum is an adverse effect on the historical significance of a 550 acre park. It is a park surrounded by high rise buildings that are blocking the site lines of multiple surrounding low rise buildings. Rather than a negative effect, this museum in the park will have a positive effect on the park, its historical significance, its landscape, and the safety of the park. The benefits of the Obama Museum far outweigh any site line issue and I urge all parties to arrive at a positive mitigation.

A park's historic significance also depends on its MAINTENANCE. Without the money to maintain the historic park, it becomes broken, vandalized, damaged and historic features are altered irreparably until it loses its historic significance. This Olmsted Park was all of the above in 2010 and few visitors came to the park. There was graffiti, guns, robberies, open drug and prostitution sales, shootings, regular break-ins and regular damage to the historic buildings and gardens,

There was garbage and rats throughout the park. We have lost three historic Olmsted era park structures to vandalism and no money for maintenance since 1972.

This is about Equity. There are beautiful parks in the wealthy

sections of our city and suburbs that have sparkling fountains, beautiful park buildings, beautifully restored historic buildings, gardens, and swimming pools built with the combined funds of wealthy donors and public funds. Quite the opposite is true in Jackson. Our buildings, the Iowa Building is one current example, are decaying and in danger of falling down. We don't have donors coming to the South Side of Chicago to give money and restore our park.

The Obama Center can change all of that.

The Obama Museum is a place where we can honor our community history and our Olmsted history. The Obama center will entice other donors to come and donate to rescue and rebuild our current disintegrating park buildings. The Obama Museum is our children's beacon of Hope and our legacy for our grandchildren!

In regards to the adverse effect of a children's play area near Midway East and Stony Island on the Cheney bench, the report has got this wrong. The bench is damaged, unreadable, and the site of dangerous antisocial behavior due to its isolation. The activity of a children's play area would benefit the bench by increasing eyes on and attention on the bench and the flooded, muddy field. This area has already been a children's soccer play area for 32 years, was permitted and cared for by the Chicago Park District. As a soccer coach I have spent hours carrying away buckets full of the standing water on the field and hand siphoning off the water flooding our children's soccer playing area. It was unsafe to play near the standing water filled with mosquitoes and goose poop. Many children of members of JPAC played on our soccer teams there. This proposed wonderful children's play area also includes the plan to fix the drainage problems so the area is safe for our children and bench users. This plan also restores the historic walkways from the time of the Worlds Fair that I have been clearing the dirt and grass from for years. We save our history and we benefit our children. This is a major benefit not a negative effect. The presence of the Obama Center and museum will also entice donors and historians to restore the now vandalized Cheney Bench and Sundial which is estimated to cost \$ 15,000 to \$20,000 to restore and is currently used for drinking, getting high, and having sex.

The planned children's play area is a positive benefit instead of an adverse effect. Any adverse effect of a children's play area was mitigated with 32 years of children playing soccer in that children's play area. The primary thing adversely affecting on the Cheney bench today is its isolation, and the vandalism, and antisocial behavior taking place there. The children's play area will have a positive effect on the bench's historic survival.

Finally, I want to mention the other major benefit of this OPC plan- the partial closing of 6 lane Cornell Drive bisecting our park. Cars travel 45 to 50 miles per hour here. A child must cross 6 lanes of speeding traffic to reach their sports and recreation fields.

These cars spew tons of CO2 and SO2 in the middle of our park damaging our historic park trees, plants, and birds. Disabled park visitors in wheel chairs or walkers frequently do not make it across all 6 lanes and must stop in the middle as traffic speeds around them. Olmsted was himself disabled due to a wagon running over his leg and

painfully crippling him for life. He rode a buggy on a path to get around all 550 acres. Olmsted and Burnham did not allow gasoline powered cars in their park. The historic effects of closing Cornell can be easily mitigated with the replacement of the Olmsted buggy path.

In conclusion ,
the benefits of the Obama Museum far outweigh any Issues with site lines . I urge all parties to come up with a reasonable mitigation .
Thank you for allowing JPAC to offer comments on this report.

Louise McCurry, JPAC President

Sent from my iPhone

Sent from my iPhone

Sent from my iPhone




K.L.E.O. Community Family Life Center
"Building A Better World, one community at a time"

Lesle' Honore'
Executive Director

To Whom It May Concern:

What is a park? According to the dictionary, it is an area of natural, semi natural or planted space set aside for human enjoyment and recreation. It will change as the climate changes, as the needs of the community changes as time changes. Take away the historic name of Olmsted, and a design that was created in 1869 and remained untouched until 1893, that did not include the desires and needs of people who look like the community that currently surrounds Jackson Park, and what you do you have left ? Land that is only accessible by crossing several traffic lanes to get from one disjointed side of the park to the other. A black community on the southside of Chicago that has been left behind in investment, education, jobs and accessibility and a Historic Landmark Status.

When you ask the families that are in the immediate footprint of Jackson Park what their concerns are, you will not hear them say that changes to the historic Olmstead Park is high on their list. Someone who is more




concerned with the “disruption” of removing trees to replant more, over the removal of barriers to community investment, or is up in arms about the closing of Cornell Drive to create more accessible green space, or focuses on what they think was the desired feel of a park design from over 100 years ago over the real needs of living breathing Chicagoans, is a person who sees the world through a lens of privilege.

How nice it must be to never know what is like to have to leave your neighborhood for everything; jobs, education, a grocery store, a library, and a museum.

As the Executive Director of KLEO Community Family Life Center, I challenge my staff every day to create opportunities for the families we serve so they can feel safe, loved, worthy of investment and success. We plan trips for our youth to museums and libraries, all of which are downtown. We have job readiness workshops and teach teens how to take the Green Line train to job opportunities downtown. My KLEO kids have looked at pictures of the design of the Obama Presidential Center and assumed it was downtown. The shift that will happen when they no longer have to leave their neighborhood to experience what kids north of Madison have every day will change how they can envision the trajectory of their lives in ways I can only imagine.

The Obama Foundation has asked the important questions about what the communities on the South Side need to feel included and supported, and more importantly they have listened and adjusted and continue to be inclusive making sure that this community not only has a voice, but a seat at the table. What is a Park? Is there to serve itself or the community?

Lesle' Honore'
KLEO Community Family Life Center
Executive Director





LANDMARKS ILLINOIS

People saving places

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30 N. Michigan Ave.
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August 30, 2019

(SENT VIA EMAIL)

Ms. Abby Monroe
Coordinating Planner
City of Chicago,
Department of Planning and Development

RE: Response to request for comments on the Assessment of Effects to Jackson Park Historic District and Midway Plaisance

Dear Ms. Monroe,

Landmarks Illinois is writing to provide its comments regarding the Assessment of Effects (AOE) to the Jackson Park Historic District and Midway Plaisance associated with proposed road and park changes to accommodate the Obama Presidential Center (OPC). As a consulting party, we have several comments and questions in regards to this phase of the Section 106 review process.

The city, state and federal agencies have acknowledged an “Adverse Effect” finding in the AOE due to changes to the following:

- Cultural landscape
- Spatial organization of roadways
- Spatial organization of contributing resources such as:
 - Cheney-Goode Memorial
 - Statue of the Republic
 - English Comfort Station

An adverse effect finding in the AOE is also due to inclusion of new elements in the park including the OPC buildings and plaza, and due to removal, replacement, or alteration to historic resources including:

- Women’s Garden
- Western Perimeter Playground
- Eastern end of Midway Plaisance

Failure to Document Consideration of Avoidance of Adverse Effect

Landmarks Illinois agrees with the adverse effect findings stated above. However, at the August 5th, 2019 consulting parties meeting releasing the AOE Report published July 2019, the city’s presentation only posed considerations for minimization and mitigation. The Section 106 process, with a finding of adverse effects, first calls for the development of measures to

avoid the adverse effect by either cancelling or making significant changes to the project. Second to avoidance is minimization of the adverse effect, and mitigation as *the last option* if avoidance and minimization are not feasible. The AOE Report includes in Section 5.0, pages 51-52, a description of the minimization and mitigation efforts by the Federal Highway Administration (FHWA) and the National Park Service (NPS) in collaboration with the City of Chicago. Our concerns hinge on the important fact that the consulting parties were not consulted in the discussion, or development of, avoidance or minimization efforts. We call for a series of meetings that would focus on: 1) avoidance; 2) minimization; and then, 3) mitigation. Each step must be given full and transparent consideration and include the consulting parties. Otherwise, this Section 106 process is nothing more than a *fait accompli*. This is particularly troubling when a review under Section 4(f) of the U.S. Department of Transportation Act [1966] (discussed below) requires that avoidance measures be thoroughly investigated, but which remains largely unaddressed.

Examples of Avoidance Measures

As it relates to avoidance, Landmarks Illinois requests that the following actions be considered and implemented:

Eastern End of the Midway Plaisance

While the Area of Potential Effect (APE) was extended to include the entire Midway, as we had recommended in our January 5, 2018 letter, we do not agree that the eastern end of the Midway Plaisance should be offered for Urban Park Recreation and Recovery (UPARR) grant recreational land replacement. The intent of UPARR recreation replacement should be to provide recreational space where it does not currently exist, not on existing park property. Reuse of an existing park greenspace is not replacement. Not only does this deny the opportunity to create new park land in an area underserved by existing passive and active green and/or recreational space, but causes an additional adverse effect on the eastern end of the Midway Plaisance. The Plaisance was intended to be an open, green, passive and scenic vista creating an axial connection between Jackson and Washington Parks. We recommend the UPARR recreation replacement be moved to another geographic area where little accessible parkland currently exists and is in most need, such as West Woodlawn, Parkway Gardens, Greater Grand Crossing or Chatham. The eastern end of the Midway Plaisance should remain open and free of new landscape design and obstructions, as was intended in the *1909 Plan for Chicago*.

Midway Plaisance twin roadways that buffer the Midway's connection into Jackson Park.

The twin roadways on the north and south sides of the Midway Plaisance that connect into Jackson Park are a key original design feature of Frederick Law Olmsted's park circulation system. The current OPC campus site plan calls for the elimination of the southern road along the Midway Plaisance east of Stony Island Avenue. We recommend the OPC campus be shifted south toward the Jackson Park

track and field by the necessary measure to avoid elimination of this section of road that also flanks the Women's Garden and either retain the roadway as is, or hardscape using universal design principles to accommodate pedestrian and other individual active transportation modes (bicycle, scooter, skateboard, rollerblades, etc.).

The Women's Garden

This important Works Progress Administration (WPA) -era perennial garden, the first Chicago Park District woman-designed landscape, should be left intact, not destroyed and then recreated with alternative landscape features. Technology for water retention is advanced enough today that water runoff can be accommodated utilizing the design of the OPC Plaza and Entry Grove, the Forum Building, the Library Building, and the Program, Athletic and Activity center green rooves and permeable pavers. Should this treatment endangered archives, artifacts, or activities underneath, there is also planned green space, such as the Woodland Walk, the Entry Garden, the Lagoon View Lawn, the Wetland Walk, and the Great Lawn that provide ample water recapture and retention areas. Destroying the significant historic feature of the Women's Garden can be avoided.

Methods to Minimize the Adverse Effect

As it relates to minimization, we believe the following should also be implemented:

Real estate speculation and displacement

In our January 5, 2018 letter, looking to the recent example of The 606 trail on Chicago's northwest side, we noted the risk of real estate speculation that will invariably result in displacement and demolition. While The 606 is a valued and accessible amenity, it has caused documented displacement of low-income residents through speculative developments. As we previously stated, there is an opportunity to plan ahead to assure that the OPC does not have the same unintended impact. We strongly encourage that the city explore programs to ensure the preservation of the existing mixed-income community and create opportunities for its existing residents to remain and to invest, particularly relating to housing in the Woodlawn community. Programs, such as the creation of community land trusts or a housing preservation fund, which may curb displacement and encourage building rehabilitation over demolition should be prioritized.

Historic roadways and circulation patterns

FHWA and the Chicago Department of Transportation (CDOT) are proposing to expand Lake Shore Drive, Hayes Drive, and other intersections to accommodate diverted traffic from the closed Cornell Drive. The following should be considered concerning road widening:

- While Cornell Drive was widened over the years, there has been a circuit drive around the park since its original Olmsted design. A minimization effort would be to retain some aspect of this historic road for vehicular traffic, such as narrowing the road. A mitigation effort could include memorializing the roadway alignment in an expanded pathway utilizing alternate hardscape material, to set it apart from the other new design features, and providing interpretive activities and signage about how people felt moving through and around Jackson Park. Through our conversations at Section 106 meetings with Black residents living near the park, few felt welcome, understood how to navigate or use the park, or felt they had access to its history (because of a lack of signage). These important stories could be told using interpretive methods.
- Hayes Drive, and the southern portion of Cornell Drive that would remain open, will require appropriate traffic-calming measures so as to protect the expected experience of park-goers visiting the museum campus and the natural setting. Jersey barriers and high-speed traffic diminish the experience of being in Jackson Park.
- Existing historic resources should not be moved or locations altered for the proposed expansion of Hayes Drive, such as the Statue of the Republic which just celebrated the 100th anniversary of being its current location in 2018. The AOE report states of the proposed Hayes Drive and triangular road intersection reconfiguration, “the realignment will introduce visual elements that diminish the integrity the Statue of the Republic.” This impact could be avoided by maintaining and redesigning the traffic circle, and keeping the Statue in situ. Traffic circles have been deployed by departments of transportation nationwide as more efficient for the flow of vehicles than stop lights.

Mitigation Measures

As previously stated, the consulting parties should not be asked to present mitigation measures at this time, since we have not contributed to the discussion of avoidance and minimization. In the event our request for additional consultation is denied, and for the purposes of this response’s deadline, we suggest mitigation measures here.

Interpret Jackson Park’s women’s history through multimedia methods and on-site signage:

- The Women’s Garden, built in 1936 and designed by May McAdams, should not only be preserved (see avoidance section above), but interpreted with appropriate signage that notes its significance as the first woman-designed public landscape in the city, and that tells the story of McAdam’s career.
- The Cheney-Goode Memorial, dedicated in 1932, should be given a prominent location, conserved and interpreted with appropriate signage. The Chicago

Park District's website states, "The Cheney-Goode Memorial is one of Chicago's few early monuments dedicated to women who played a significant role in the city's history. It honors two accomplished women who lived on the city's South Side, Flora S. Cheney and Katherine H. Goode." Few people know this monument exists or the role these women played in Chicago and Illinois politics.

- The location of the Woman's Building from the World's Columbian Exposition of 1893 should be interpreted where appropriate at the OPC so that its prior existence on the site is understood.

Invest in, repair and maintain historic buildings and structures in Jackson Park, including:

- Iowa Building comfort station in the northeast corner of Jackson Park at 56th Street.
- Darrow Bridge, constructed in 1880 and designed by Daniel Burnham and John Wellborn Root, built as the Columbia Bridge and dedicated by Mayor Richard J. Daley as the Clarence Darrow Memorial Bridge in 1957.
- 9th hole golf shelter, circa 1912, designed by the D.H. Burnham & Co.
- Cecil Partee golf shelter building, circa 1900.
- The English Comfort Station, 1936, designed by E.V. Buchsbaum.

Additional concerns, requiring a response, include:

1. The Chicago Park District and its consultants with the Army Corps of Engineers ensured that that 2013-initiated Great Lakes Fisheries and Ecosystem Restoration (GLFER) project met the Secretary of Interior Guidelines for Cultural Landscape Rehabilitation and balanced ecological needs with historic preservation goals. We previously understood that the GLFER project was still underway and to be completed by the fall of 2019 according to the Corps of Engineers. What is the status of this effort and has its completion been stalled due to the current OPC planning?
2. It is still not clear if FHWA plans to conduct a Section 4(f) process for the OPC proposal, in coordination with a National Environmental Policy Act (NEPA) process. Such a review is required here. Often the outcomes of Section 4(f) have impact on Section 106 of the National Historic Preservation Act, and vice-versa. How will recommendations from 4(f) and NEPA studies be integrated with Section 106 outcomes?
3. While it has been continuously stated that the golf course project is a distinct and separate project from the OPC, the two projects will be equally benefitting from the same infrastructure changes, and it seems inconceivable that the planners of both projects are not in communication. What is the planned regulatory review for the golf course project, and when will these

reviews take place as it relates to the timing of OPC's Section 106 and NEPA reviews?

We echo the serious concerns raised by the Advisory Council for Historic Preservation (ACHP) in its recently issued comments. Some of those comments raised questions regarding the meaningful nature of the process being implemented and the timeline moving forward. We believe that an inclusive and transparent process is of the utmost importance for the public and the successful development of the OPC. Consistent with the concerns raised by the ACHP we encourage at least three different sessions in the future on the adverse effects, one devoted solely to the issues of avoidance, a second to minimization, and a separate one related to mitigation.

Lastly, there has been much reported in the press (as well as during the August 5th, 2019 meeting) relative to the start of construction at the OPC. The ongoing federal review process requires that no construction begin on the project as it remains subject to review – in essence, the whole point of engaging in a review process that would permit adverse effects to be avoided, minimized or otherwise mitigated. We would appreciate confirmation that no physical alterations to Jackson Park will be made for purposes of the construction and development of the OPC site (including all related roadwork) until the federal review processes have been completed, including Section 106, Section 4(f), and NEPA.

We look forward to participating in the ongoing Section 106 process and making further comments regarding the AOE draft and reviewing all avoidance, minimization and mitigation suggestions.

Sincerely,



Bonnie McDonald
President & CEO

Cc: Matt Fuller, FHWA
Arlene K. Kocher, FHWA
Lee Terzis, NPS
Nate Roseberry, CDOT
Heather Gleason, CPD
Eleanor Gorski, DPD
Samir Mayekar, City of Chicago
Brad Koldehoff, IDOT
Anthony Rubano, SHPO
Jaime Loikinger, ACHP

Ms. Abby Monroe
Department of Planning and Development
Chicago, IL 60601

August 29, 2019

Dear Ms. Monroe:

We are writing to you as members of the Midway Plaisance Advisory Council (MPAC) who fully support and endorse the location of the Obama Presidential Center in Jackson Park. This letter speaks specifically to our support for the City's recommendation to extend the Federal Urban Park and Recreation Recovery Act (UPARR) designation to the Midway Plaisance, east of the Metra tracks.

We were present at the August 20 MPAC meeting and appreciated the time and patience you, Heather Gleason, and Nate Roseberry took to explain the City recommendation and answer participants' questions. For MPAC that was an extraordinary meeting for its high attendance and diverse audience. Of the roughly 40 to 45 people present, more than 20 individuals from Woodlawn and Washington Park communities were in attendance to represent their interest in the Midway and, if not already members, to join MPAC. *One consequence of the session was that the membership voted not to submit a Consulting Party letter, but to encourage all of the members to submit their own personal statements.* This letter represents the position of several MPAC members, and you can expect to receive other individual or group letters representing varying views from membership as well.

Three concerns have been stated regarding the UPARR designation process:

- (1) The City has not been forthcoming and transparent in making its UPARR recommendation.
- (2) The transfer of UPARR designation from one historic site to another involves no increase in parkland.
- (3) The new park configuration triggers an "adverse effect" to the historic Olmsted landscape.

This letter addresses each of these points.

Lack of Transparency

There have been multiple opportunities for people to acquaint themselves with the UPARR designation and participate in the discussion. August 20th was the second time City representatives met with MPAC to present the UPARR designation idea, the first being October 2018. Prior to that meeting in July 2018, the City provided an FAQ that fully explained the UPARR decision process and guidelines.

Each presentation covered the basics of what the UPARR designation is and the protections it could provide the Midway, re-designation criteria and process, range of replacement options, and the importance of public involvement in developing the design for the designated site. Of particular note were the requirements that the replacement site must serve the same user community and be of equivalent usefulness, quality, and location. Also noted was the replacement site does not need to be either an acre-for-acre replacement or duplicate the recreational purpose of the original site.

This basic information has been consistently provided at other public meetings pertaining to both the South Lakefront Framework Plan and Obama Center public meetings. On all occasions interested parties had the opportunity to ask questions and discuss their concerns. For anyone wanting to understand the process and the recommendation made, information has been abundantly available and freely given. The staff involved in this process should be commended for their professionalism and patience.

Transfer of UPARR Designation Without Parkland Increase

Increasing parkland is not the purpose of UPARR reassignment. Maintaining and improving recreational space is. Some detractors from the UPARR re-assignment have suggested that the Midway Plaisance is a “regional” park and that the UPARR designation could be better used to create or improve a park in some other area of the south side where there are residents who need it. However, a number of Woodlawn residents pointed out that the Midway Plaisance is their local park and a well-planned and safe play area would be a welcome addition to their neighborhood. The comment was also made that a park that combined both passive space and modest play area would be welcomed by the seniors living on both sides of the Midway.

"Adverse Effect" on Historic Design

The modest changes suggested by the UPARR reassignment are not the first to affect “the design, setting, and feeling” of the Midway. The Historic Properties Identification Report issued in March 2018 identifies six (6) Non-Contributing Resources that were added outside of the designated “Period of Significance” and are deemed not to add to the historic significance or integrity of the Midway. These items include two Boulevard Kiosk signs located at the east and west ends of the Midway, the University of Chicago Winter Garden, the Carl von Linne’ Monument, the Midway Plaisance Bridge Crossings, and the Midway Skating Rink located on the site of the Columbian Exposition Ferris Wheel. The scale and design of most of these structures is much larger and have exponentially more impact on the Midway Plaisance’s historical integrity than the addition of a play area, fencing, and trees to the discrete area east of the railroad embankment.

In Appendix F, “Jackson Park and Midway Plaisance Supplementary Analysis of Landscape Integrity,” of the Historical Properties Inventory, several of the "Non-Contributing Resources" are cited as detracting from the historic aesthetic of the Midway landscape. Nevertheless, the report opines that despite such changes, the Midway Plaisance overall retains historical integrity in relation to the period of significance.

Question: Did any of the "Non-Contributing Resources" trigger an assessment of effects review, and if so, what accommodations were required (Avoid, Minimize, or Mitigate)? If not, what circumstances excluded them from such assessment?

Over the years MPAC has strived to address the balance of retaining the historical integrity of the Midway Plaisance with making the Midway a better park for users by building upon a Midway Plaisance Framework plan created in 2000. The Framework Plan was the result of a broadly collaborative initiative of the Chicago Park District and The University of Chicago which assembled a diverse community advisory group and hired a design team headed by Olin Partnership to create the plan. The recommendations of the Framework plan included the Skating Rink and improved bridge crossings, and the creation of a series of gardens including a Children’s garden and play area on the proposed UPARR site. Of course, these are precisely the "Non-Contributing Resources that trigger an “adverse effect” flag within the strict framework of an Assessment of Effects analysis. We doubt that Olmsted would

disagree that the Midway today is a wonderfully better place than it was in 2000, or that it should continue to be improved in a manner respectful of both his vision and contemporary needs.

Assigning the UPARR designation to the east end of the Midway Plaisance makes good sense in so many ways:

- (1) The UPARR designation would ensure that this parcel would always remain parkland.
- (2) It would improve the most problematic area of the Midway. Now used for passive play and soccer fields, for most of the year the area is swampy and mostly utilized by geese and mosquitoes. The UPARR designation provides the opportunity to improve drainage and upgrade the functionality and ambiance of the site.
- (3) The use and improvements to the site would be determined through public discourse bringing together members of communities from both sides of the Midway as has not been done since the 2000 Framework Plan.
- (4) And the public design process should be considered an educational opportunity to learn about the Midway's heritage and work toward a design that merges modern day needs with the historical Olmsted legacy.

Thank you for your consideration. We look forward to the public process that will follow the assignment of the UPARR designation to the east end of the Midway Plaisance.

Mary Anton, MPAC Member (Hyde Park) – letter contact: antonmary.bmaa@gmail.com

Erin J. Adams, MPAC Member (South Shore)

Jay Franke, MPAC Member (Hyde Park)

Kineret Jaffe, MPAC Member (Hyde Park)

Louise McCurry, MPAC Member (Hyde Park)

June Mire, MPAC Member (Hyde Park)



museum of
science+industry
chicago

August 26, 2019

Chicago Plan Commission
c/o Abby Monroe
Public Participation Office
Department of Planning and Development
City of Chicago
121 N. LaSalle, Room 1000
Chicago, IL 60602

Dear Ms. Monroe,

I am writing to express the Museum of Science and Industry's continued support for the Obama Presidential Center's Jackson Park location.

MSI has reviewed the Assessment of Effects on Historic Properties report and remains fully supportive of the Obama Presidential Center. While portions of Jackson Park will change, we believe that the OPC will be yet another example of how the city's parks have been utilized to strengthen Chicago's world-class reputation, attract visitors and inspire our children.

As a member of the South Side community for the past 86 years, we are confident that the OPC's offerings and resources will solidify the area as a destination unto itself, providing an economic boost to existing institutions and businesses while creating new opportunities to accommodate rising demand and improve infrastructure.

Equally as important, the OPC campus will provide resources for schools, businesses and community groups. This, in addition to the planned educational programming, will make significant economic, cultural and social contributions to the area.

MSI is prepared to do its part in supporting the OPC because we strongly believe in its power to transform the South Side. On behalf of the Museum of Science and Industry, I am proud to support this historic endeavor and this community's future.

Sincerely,

David R. Mosena
President and CEO



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Aga Simmons

August 29, 2019

Abby Monroe, Public Participation Officer
City of Chicago | Department of Planning and Development (DPD)
Bureau of Planning, Sustainability and Historic Preservation
121 North LaSalle, 10th Floor, Suite 1000
Chicago, IL 60602

ASSESSMENT OF EFFECTS

JACKSON PARK AND THE MIDWAY PLAISANCE

Review and comments by the National Association for Olmsted Parks

SUMMARY

The National Association for Olmsted Parks (NAOP) appreciates the opportunity to review and comment on the July 2019 Draft “Assessment of Effects to Historic Properties, Proposed Undertaking In and Adjacent to Jackson Park, Chicago, Illinois.

In summary, NAOP finds the “Assessment of Effects” supports and reinforces comments and concerns raised by NAOP in the past about the adverse effects the Obama Presidential Center (OPC) will have on the landscape, circulation system and built features of historic Jackson Park and the Midway Plaisance. The report, in Section 3.52 (pp 46-47) notes:

The components of the undertaking with negative effect on the historic landscape include: proposed changes to the Midway Plaisance, OPC site development, and certain roadway closures.

In light of these findings, NAOP supports the relocation of the OPC to a different location in Chicago that will not present such serious and demonstrable adverse effects to a nationally significant landscape and noteworthy legacy of Frederick Law Olmsted and the Olmsted Firm.

NAOP has reviewed the document and provides the following comments and recommendations by section.

SECTION 1.1

NAOP Comments:

For a document that purports to be an assessment of effects to historic resources, Section 1.1 provides little historic context in explaining proposed actions and at times is adding highly subjective valuations to the proposed actions.

Advisory Council

Eleanor Ames
Portland, ME

Ethan Carr
Amherst, MA

Kathleen Conner
Seattle, WA

Julie Crockford
Boston, MA

Eliza Davidson
Seattle, WA

Rolf Diamant
Woodstock, VT

Robert Doyle
Oakland, CA

Erin Gallentine
Brookline, MA

Betsy Shure Gross
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Esley Hamilton
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Donald Harris
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Thomas Herrera-Mishler
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Larry McCann
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Jean McKee
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Rosemarie Murane
Denver, CO

Christine Edstrom O'Hara
San Luis Obispo, CA

Ed Orser
Baltimore, MD

Elizabeth Barlow Rogers
New York, NY

Ann Satterthwaite
Washington, DC

1.1.1.2 Roadway Changes

“The City proposes the following permanent roadway closures within Jackson Park: Cornell Drive between 63rd Street (Hayes Drive) and 59th Street, the northbound section of Cornell Drive between 68th Street and 65th Street, Marquette Drive between Stony Island Avenue and Richards Drive, and the eastbound portion of Midway Plaisance between Stony Island Avenue and Cornell Drive. See Figure 2 in Appendix B. Closures of the eastbound Midway Plaisance and Cornell Drive between 63rd Street and 59th Street are necessary to accommodate the development of the OPC. The additional roadway closures will reduce the number of multilane roadways that currently divide Jackson Park to allow for a more continuous park.”

NAOP Response:

The underlined/highlighted sentence is deceptive and should be deleted from the report.

This comment is deceptive and suggests that the OPC is “correcting” a historic design flaw in Jackson Park and the Midway Plaisance. The original carriage drives were narrower roads that were widened to accommodate automobile traffic. While the current multilane roads may “divide” Jackson park, the original roads did not “divide” the park—they were a circulation feature of the park. The historic drives helped to define the “continuous park.” Suggesting that the original park design was flawed that the roads and divided the park is not accurate. Maintaining the footprint of the original drives, reduced to their original width and alignment is appropriate.

“The City proposes modifying the Eastern Midway to accommodate a combination of open space and a formal play area. In order to accomplish this project, the central area would reduce in size. The western side of the historic sunken lawn would be altered with the addition of a play area and walks. The new fenced play area and placement of walks, trees, and recreational features would reduce the central lawn panel. Addition of trees at the margins of the open space would result in a minor modification of the site and the existing wetland would be filled to allow for enhanced recreational use. The City has committed that there will be no alterations to the configuration of existing roadways or walking paths. A concept plan of the proposed recreational changes within the Eastern Midway is presented in Figure 3 of Appendix B. The future public process regarding the changes on the Eastern Midway will carefully consider the historic nature of the Midway Plaisance and seek to minimize any potential effects to historic properties, pathways, and plantings, to the extent possible.”

NAOP Response:

The underlined/highlighted sections should be clarified and historic design context provided.

The “central area would reduce in size”—this appears to be a reference to the historic width of the central green space of the Midway Plaisance. This sentence is vague, however on page 29 the following text is provided detailing the adverse effect:

Closure of the Midway Plaisance (South Roadway; eastbound) between Stony Island Avenue and Cornell Drive removes a historic circulation route. This roadway segment demonstrates a particularly strong expression of historic landscape character related to the design of the property....

The Midway Plaisance is not a series of segmented parks, but rather a principal organizing and defined landform, bracketed by two roadways, defining the Chicago South Parks. Importantly, the Midway Plaisance establishes the principal axial approach to Jackson Park from Washington Park and the west. It is for this reason that the entire Midway Plaisance was added to the Area of Potential Effect at the request of the National Association for Olmsted Parks and other advocacy organizations.

SECTION 1.2

Page 5

*“The City’s decision to locate the OPC within Jackson Park and **improve** the roadway network in and around Jackson Park changes areas that were previously in recreation use to something else, thus triggering a partial conversion. As long as the City identifies adequate recreation replacement to account for public recreation losses associated with the OPC and roadway **improvements**, NPS will amend the original UPARR agreements to exclude areas no longer in recreation and expand the boundary to include the recreation replacement.”*

NAOP Response:

The underlined/highlighted words “improve” and “improvements” should not be used within the context of proposed alterations to historic features that are being considered for demolition or significant change.

Again, the report is using subjective language that suggests a favorable valuation of the proposed language. The words “change,” “alteration” or “removal” should replace “improve” and “improvement.”

SECTION 3.1.3

Page 17

“The visual impact analysis (Photo 37) demonstrates that the OPC Museum Building will be partially visible at street-level from some historic properties along 60th Street, west of the ICRR viaduct (Center for Continuing Education, Chapin Hall, St. Paul’s Universalist Church). Views to and from the Midway Plaisance have been and will continue to be an important part of the setting that contributes to the significance of these properties.

However, views to Jackson Park do not contribute to the integrity of the properties' setting due to the visual barrier of the ICRR viaduct and the properties' substantial distance from Jackson Park. Though minimally visible within the properties' distant viewsheds, the OPC Museum Building will not alter the setting of these historic properties."

NAOP Response:

The underlined/highlighted section grossly disregards the axial relationship of the Midway Plaisance and Jackson Park, and ignores the inclusion of the entire Midway Plaisance as part of the APE and that views and vistas to and from Jackson park were a historic and original design decision.

The Midway Plaisance is the axial connection between Washington Park and Jackson Park. To suggest that the current visual barrier of the ICRR is sufficient to minimize the historic design intent is inaccurate.

While the ICRR rail line visually interrupts the strong axis of Midway Plaisance just before it meets Jackson Park, the strong axial relationship between Washington Park and Jackson Park is, nevertheless, a principal and defining feature of the historic Chicago South Park system. Olmsted, as a visionary and planner, anticipated an opportunity to reconsider the rail embankment in the future. The Midway Plaisance, as designed, was incumbent on the eventual resolution of this issue, i.e., the removal or relocation of the ICRR embankment. Without such a strong vision, the strong axis and spatial geometry of the Midway Plaisance would have been illogical. If the ICRR was viewed as a permanent obstacle, Olmsted would likely have considered an alternative design. Suggesting the presence of the ICRR embankment minimizes the historic axial relationship between the Midway Plaisance and Jackson Park grossly misrepresents both the original design intent and the existing current condition of the site. The proposed OPC actions could irreparably damage any future opportunities to restore the historic design concept for the axial relationship, and will forever destroy the final axial connection to Jackson Park.

SECTION 3.3.1

Page 21

NAOP Comment:

Per the above response to page 17, the construction of the ICRR railway line should be listed within the historic context on page 21.

SECTION 3.3.2.2

Page 24

NAOP Comment:

The section title "Improvements along Lake Shore Drive" should be changed to "Proposed Changes to Lake Shore Drive." Per NAOP comments on page 5,

“improvements” is a value laden descriptor that is not appropriate to an objective discussion on potential impacts to historic resources.

Page 27

NAOP Comment:

The section title “Other Transportation Improvements” should be changed to ‘Other Proposed Transportation Changes.’ Per NAOP comments on page 5, “improvements” is a value laden descriptor that is not appropriate to an objective discussion on potential impacts to historic resources.

SECTION 3.3.2.3

Pages 28-33

NAOP Comment:

This section clearly defines the negative impacts to historic Jackson Park, specifically Roadway Closures, OPC Site Development and Track and Field Relocation. These negative impacts have been previously identified by NAOP and NAOP continues to express its opposition to the loss of historic park features.

Draft provided by Paul Daniel Marriott, PhD
Board of Trustees, NAOP

Cassandra Cecelia Guice



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Unit 301
Chicago, Illinois 60615
(773) 624-1328
cassguice@yahoo.com

SENT VIA E-MAIL - Abby.Monroe@cityofchicago.org

Ms. Abby Monroe
City of Chicago
Department of Planning

**Re: Section 106 Assessment of Effects to Historic Properties From
the Proposed Undertaking in and Adjacent to
Jackson Park Cook County Chicago Illinois**

Dear Ms. Monroe:

The following addresses Section 3.3.2.2 – Effects from Federal Actions and
Section 3.3.2.3 – Effects from Reasonably Foreseeable/Probable Actions:

3.3.2.2 – It is agreed that the final effect will not alter the integrity of the historical district as defined in the report; however, there remains a concern that getting to the final effect will create not thoroughly addressed unforeseen problems that will impact areas outside the historic district. For example, commuters in an effort to avoid construction work may/will alter the paths to their various destinations. This could, conceivably, permanently alter traffic patterns/loads seriously impacting areas outside the Section 106 designated historic district – areas that are not designed to handle the change.

3.3.2.3 – OPC and the Cultural Landscape. Addressing the SOI Standard that states “When alterations to a cultural landscape are needed to assure its continued use, it is most important that such alterations do not radically change, obscure, or destroy character-defining spatial organization and land patterns or features and materials.” The current plan is seen as both an evolution and well deserved maintenance action. Past stodgy processes have stifled true intent of the quoted standard. Maintaining an esthetic past is not always in the best interests of what should be an ever evolving cultural landscape.

Comment: Evolution is a historical, cultural process. That process is represented by the creation of the OPC at this time and in this place.

Cassandra Cecelia Guice

Cassandra Cecelia Guice, Resident and Section 106 Consulting Party for
Woodlawn/Network of Woodlawn (SW Quadrant),
NACWC (National Association of Colored Women’s Clubs, Inc.), and
President - Myra Hunter Reeves Culture Club – a standard club of NACWC





Network of Woodlawn

6320 South Dorchester Avenue, Room FC100
Chicago, IL 60637

28 August 2019

Ms. Abby Monroe
City of Chicago - Department of Planning
City Hall - 121 North LaSalle, Suite 1000
Chicago, IL 60602

Re: Assessment of Effects

Dear Ms. Monroe:

This letter of support for the placement of the play lot in Midway Plaisance East is being submitted on behalf of the Network of Woodlawn (NOW). NOW is an authorized consulting party of the Section 106 review process in Jackson Park & Midway Plaisance and supporter for the development of the OPC in Jackson Park. The Network of Woodlawn (NOW) is a nonprofit organization located in the heart of Woodlawn that is focused on revitalization and generating self-sustaining community-based opportunities. NOW seeks to improve the overall vibrancy, vitality, and livability of the under-resourced/under-served Chicago south side community of Woodlawn.

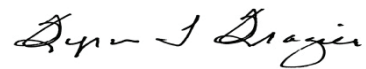
One of the positions taken by those who are opposing the City's recommendation is that Olmsted did not intend for these proposed changes. Actually, Olmsted did not want **any** changes. However, the conditions of the Park have changed greatly since 1874. Museums, libraries, and schools have enhanced the resources available in other Chicago parks. Why not Jackson Park? Significant changes to the park include: the University of Chicago Winter Garden, the Carl von Linné Monument, the Midway Plaisance Bridge Crossings, and the Midway Skating Rink.

It is our position that the benefits of the OPC outweigh Olmsted's plan. Benefits will impact Woodlawn, Washington Park, and South Shore communities. Tourism will drive business development in the three communities, and new businesses will make this area a place of destination for all Chicago.

Our 44th U.S. President, Barack Obama, lived, played, and worked near this south side community. There is no better place for his legacy to be shared with the world than in Jackson Park.

We look forward to the public process that will follow the assignment of the UPARR designation to the east end of the Midway Plaisance.

Sincerely,

A handwritten signature in black ink, appearing to read "Byron T. Brazier". The signature is written in a cursive style with a large initial 'B'.

Dr. Byron T. Brazier, Chairman

Duwain Bailey, Director



August 30, 2019

Nichols Park Advisory Council

<http://www.hydepark.org/programs/nicholspark.html>

STATEMENT OF NICHOLS PARK ADVISORY COUNCIL IN RESPONSE TO SECTION 106 DRAFT ASSESSMENT OF EFFECTS REPORT

While we are of course delighted that the Obama Center will be built on the south side of Chicago, it is clear from the Section 106 Assessment of Effects that Jackson Park is the wrong location. We have believed this from the beginning, ever since Jackson Park was first nominated as the proposed site.

We believe the disruption of the original Olmsted design, the proposed road closures necessitating the loss of additional slices off the east and west sides of the park, the sacrifice of from 500 to perhaps as many as 2,000 mature trees (estimates vary), the encroachment on the Midway, the potential exposure of the Paul Douglas Nature Sanctuary (aka Wooded Island) to substantially more human visitors, and the erection of a 23-story tower directly in the path of the North American migratory bird flyway are costs too great to tolerate when they are so unnecessary.

1. As is stated in the Assessment of Effects, the proposed changes undercut the "conscious decisions by the Olmsted firm in determining the organization, forms, patterns of circulation, relationships between major features, arrangement of vegetation and views."
2. The proposed change to roadway patterns, at a minimum cost of \$175 million (based on current estimates which likely will be exceeded) will cause unnecessary damage to the Olmsted design, and cause huge traffic congestion on surrounding streets. Retaining the Olmsted traffic circulation design would help maintain the aesthetic integrity of Jackson Park, and would lead the way to reducing the proposed public expenditures.
3. The proposed destruction of hundreds of mature trees to accomplish this project is in stark contrast to the claimed support, by those involved in the OPC project, of efforts to mitigate climate change. This is a further reason for the selection of a site that is not located within a landmarked historic park, and is outside of the migratory bird flyway.
4. The size and scale of the proposed OPC tower would be grossly out of place within Jackson Park. This could be avoided by moving the OPC tower west of Stony Island, or to a site neighboring (but not in) Washington Park.
5. The 'Cumulative Effects' analysis is woefully inadequate. This analysis claims to assess the impacts from 'reasonably foreseeable actions potentially affecting the same historic properties'. We assert that an unbiased analysis of the threats to the integrity of Jackson Park must include the proposed golf course consolidation/expansion. Combined, the OPC and golf course expansion would

collectively shatter the integrity of Jackson Park. It is therefore necessary to include the golf course expansion along with the more benign alterations that were included in the analysis (eg. the Osaka Garden)

6. The construction of any structure on the eastern end of the Midway would be contrary to the Olmsted design for open space in this location. Moreover, it would be difficult for pre-teen children to get access to this site, because of its comparative remoteness from residential areas populated by young children.

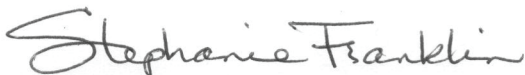
In addition, the use of the Midway as a UPARR replacement site would not add parkland, while there is a critical need to add parkland to underserved areas in the city. An alternative site should be found where play structures could be more readily accessible to residential areas, by creating or expanding a neighborhood park in an area that currently is underserved.

7. Minimization and Mitigation of Effects (p. 51) fails to provide a cogent or meaningful strategy for 'avoidance, minimization, and mitigation'. The proposed mitigations are so toothless and ineffectual as to suggest a marked tendentiousness in their derivation. 'Avoidance' is not even discussed, as if there were no alternative to locating the OPC within Jackson Park.

Chicago is the third largest city in the United States, but in spite of our expansive lakefront, it is 14th in the amount of open green park space per capita. The reason that Chicago is the only Great Lakes city with a magnificent stretch of public park along its lakefront is due to the foresight of our city founders. In contrast, the current attempt to destroy one landmark to build another is incredibly myopic. Undenijably, due to the magnitude of the adverse effects listed in the Section 106 assessment, no amount of "minimization" or "mitigation" will be sufficient to offset the damage to Jackson Park if the current OPC plans were to be followed.

Two solutions are possible: The architects could start over, jettison the "landscaped campus" idea, and create an entirely new design; or, the Obama Foundation could be sensitive to Chicago's need for more public park land and select a new site, adapting the current plan to fit the new space. Option 2 is obviously infinitely preferable. Chicago's south side would then have two magnificent historic sites instead of one, Olmsted's park would be preserved, and Chicago would add substantially to the amount of open, green, public space on the south (or west) side of the city.

Respectfully submitted on behalf of the Nichols Park Advisory Council,



Stephanie Franklin
NPAC President



August 28, 2019

To whom it may concern

The Neighborhood Network Alliance is in support of Jackson Park being home of Obama Presidential Center. While we appreciate the thorough and careful analysis done by the federal agencies to fully understand how historic and cultural resources in and adjacent to Jackson Park might be impacted by proposed federal actions, or “undertakings,” related to the construction of the Obama Presidential Center. As well as a substantial amount of time and effort was spent on this review, and it was indicative of the robust process that has taken place thus far in making the Obama Presidential Center a reality on Chicago’s South Side.

The propose concept the Obama Presidential Center is consistent with the other 11 museums in Chicago parks, the Obama Foundation will provide substantial public benefits, including admission pricing for City residents and low-income families. And, of course, the Foundation will offer free days and free admission for students accompanied by a teacher required by the Museum Act.

While we recognize there are valid concerns about the impact the center will have on the surrounding neighborhoods as relates to housing. Currently we are working with other groups to ensure equitable housing practices are in place. With the hope the City of Chicago will work with us to address this concern.

As community organization in South Shore which has its ear to the ground, residents are in favor of the Obama Presidential Center being located in Jackson Park.

Further, Chicago’s City Council voted to approve plans for the project, not once, but twice in 2018. The second vote of approval, outlining how the Obama Presidential Center will exist as a public benefit in keeping with operations of the other museums in the parks, was unanimous. More recently, a federal judge ruled in favor of the City of Chicago to allow the Obama Presidential Center to be built in Jackson Park.

With that being said, we are asking the governing body of the project to do everything within its power to allow this project to move forward without delay. According to what we know, the building will occupy less than 3% of the overall area of Jackson Park, and the proposed federal actions and OPC development will result in a net gain of 3.7 acres of parkland.

For further questions or concerns please feel free to contact us.

Sincerely

Val Free

Val Free

Lead Steward



August 29, 2019

Abby Monroe
City of Chicago, Department of Planning and Development
121 N. LaSalle St., 10th Floor
Chicago, IL 60602
abby.monroe@cityofchicago.org

RE: COMMENTS OF THE BARACK OBAMA FOUNDATION ON THE SECTION 106 ASSESSMENT OF EFFECTS TO HISTORIC PROPERTIES FROM THE PROPOSED UNDERTAKING IN AND ADJACENT TO JACKSON PARK, CHICAGO, ILLINOIS

Dear Ms. Monroe,

Thank you for the opportunity to comment on the Section 106 Assessment of Effects to Historic Properties Report from the Proposed Undertaking In and Adjacent to Jackson Park, Chicago, Illinois (AOE). On behalf of The Barack Obama Foundation (the Foundation), we would like to express our gratitude for the substantial time and effort invested in developing this AOE. The Foundation shares the commitment of the federal agencies participating in the AOE and the City of Chicago which prepared it to ensure that the effects of the proposed actions in and around Jackson Park are thoroughly analyzed. We have carefully studied the AOE, and believe that the following comments will add valuable context for the City's and federal agencies' consideration of the AOE and to the overall Section 106 process.

The Foundation's commitment to Chicago's South Side community is genuine and deeply rooted in the history, lives and promise of its residents. We have not just studied its history, but we have actively engaged with the families, organizations, businesses and institutions in the community to better appreciate that history. As a result of those efforts, we fully appreciate the importance of Jackson Park to the City, and to the City's South Side in particular. From the very outset of this process, we have made substantial efforts in planning and designing the Obama Presidential Center (OPC) to ensure that Olmsted's iconic vision for the Park is honored and promoted. Through its interactions with the community, the Foundation has learned that this Park is not just a beautiful space in some abstract sense, but is also a place for all people to feel welcome, to gather and enjoy unique experiences that add to the social, recreational, and civic fabric of life on the South Side. Indeed, one reason for locating the OPC in Jackson Park is to enhance the Park experience for as many people as possible.

The Foundation suggests that the City and federal actions comprising the AOE's "undertaking," when viewed as a whole, will help to make Jackson Park more connected to and therefore more valued by its neighboring communities. In fact, the development of the OPC will significantly increase and enhance

recreational, educational, and cultural opportunities for the community. Understandably, the focus of the AOE is not on these substantial benefits because the role of the federally-defined Section 106 process is more narrow. Nevertheless, assuming the OPC proceeds as planned, there will be an improved, more accessible, revitalized Jackson Park which honors and respects Olmsted's vision for the Park. These benefits will occur because the Foundation is and has been highly cognizant of this legacy and committed to working with the community. The plan for the OPC reflects community concerns and has been revised over time in response to community feedback. This ongoing dialogue will continue during the negotiation of a Memorandum of Agreement as envisioned by the Section 106 process which will address the one potential adverse impact identified by the AOE.

1. The development of the OPC will respect, revitalize and foster a new appreciation for Olmsted's vision for the Park.

At the outset, it is very important to note that development of the OPC will restore and enhance certain historic characteristics of Jackson Park, which have been compromised over time. Without development of the OPC, this revitalization would not occur within any reasonable time horizon. For example, portions of the Park have been reconfigured so that they no longer reflect their original historic design, and the Park has been segmented by the addition of major roadways, such as Cornell Drive. The proposed road improvements that would be approved as part of the undertaking present an important opportunity to enhance visitor experiences by reconnecting currently disjointed areas of the Park. Together, the roadway improvements and development of the OPC will improve the flow of both vehicle and pedestrian traffic within and around the Park and neighboring communities. In this manner, development of the OPC rehabilitates Park areas impacted by vehicles and revitalizes Olmsted's vision.

Perhaps the most historically significant beneficial impact of the proposed undertaking will be the closure of Cornell Drive. Building (and then expanding) this road into what is now a six-lane highway through the Park has severely eroded not only historic design features of the carriage road/pathway loops envisioned by Olmsted but their original character and intent. Currently, the Cornell Drive corridor through the western portion of the Park diminishes safety and tranquility in Jackson Park. Clearly, the non-historic road widths associated with Cornell Drive detract from Olmsted's vision for the Park which was to provide a relaxing escape from the growing city.

In the Foundation's view, closing Cornell Drive to automobile traffic and replacing it with a bicycle and pedestrian promenade comes closer in character to Olmsted's vision than its current use as a high-speed road that simply expedites traffic through the Park. This is because the pedestrian promenade that will take the place of Cornell Drive is designed to reflect the configuration and alignment of historic carriage drives, thereby recreating important characteristics of Olmsted's plan. Thus, while closure of Cornell Drive may as a technical matter affect the character of historic roadway use and features, it will also positively impact the existing non-historic roadway and result in improved circulation and better access and safety for pedestrians and cyclists within the Park.

In total, over 10 acres of roadways will be converted to park space, resulting, when the entirety of the undertaking is considered (including the OPC development), in a net gain of approximately 3-4 acres of parkland and providing for greater recreational opportunities within Jackson Park. These roadway conversions

will not only help to improve pedestrian circulation within Jackson Park but will also increase connectivity between Jackson Park and the Midway Plaisance by reducing the amount of roadways pedestrians are required to traverse to move from one portion of this historic district to another portion. This improved connectivity will make important historic resources more accessible to community members and is consistent with Olmsted's vision for a connected system of parks.

Other features of the OPC design similarly respect, incorporate and advance Olmsted's vision for the Park. For example:

- The OPC is sited in a location that does not encroach on the lagoon, fields, lakefront landscape, or other key features of the historic Olmsted design; rather, it is located at the planned juncture between Jackson Park and the more formal landscape of the Midway Plaisance.
- The proposed change to circulation along Stony Island Avenue at the intersection of the Midway Plaisance (North Roadway) follows the historic alignment of Stony Island Avenue.
- The view of portions of the OPC from the Wooded Island reflects the original design principle of emphasizing the stark contrast between the natural landscape of the Wooded Island and the highly visible adjacent formal structures of the World's Columbian Exposition.
- The planned planted berms and formal tree plantings along Stony Island Avenue reflect historic design intent, as does the berming and screening of the low structures on the eastern side of the OPC.
- The Program, Athletic and Activity Center ("PAAC") provides active recreational and athletic features in keeping with the original design for the proposed but never constructed gymnasium within the Park's western perimeter.
- The OPC does not encroach on any landscape remnants from the World's Columbian Exposition.
- The OPC was designed as a campus rather than an individual building. This campus design is integrated with the existing landscape of Jackson Park and encourages access to other parts of the Park.
- The proposed height of the Museum Building significantly reduces the building's footprint within the Park and 29,000 square feet of the Museum Building will be below grade. Moreover, the proposed landscaping plan features wooded areas such as the Woodland Walk, which will diminish the perceived height of the Museum Building when viewed from the south and the east.
- Building materials, focused on stone and glass, were selected to echo the buildings that made up the World's Columbian Exposition, including the material palette of the nearby Museum of Science and Industry. In addition, the Museum Building design incorporates distinct areas of stone patterning which will help to reduce the building's perceived height and massing. Moreover, the shape of the Museum Building is specifically designed to minimize or deflect a feeling of "heaviness" and to downplay its height.
- The Foundation specifically chose the site of the Museum Building in order to minimize sunlight impacts. *See Shade Study (May 10, 2018) (attached as Exhibit 1).*

- Even though the Women’s Garden will be temporarily impacted by construction of the OPC, the restored garden will include key historic features; for example, it will replicate the original dimensions, aesthetics, shape, feeling, and plant types. Moreover, the final redesign will be made fully accessible for all visitors, including those with disabilities.

Finally, it bears underscoring that the vast majority of relevant historic and cultural resources in Jackson Park will not be affected by the undertaking, part of which includes the City’s authorization for development of the OPC. The Foundation is committed to participating in the consultation process and dialogue to determine how best to address and mitigate any adverse effects, as described herein. At the same time, any efforts to minimize and mitigate potential adverse effects are augmented by the positive benefits that Jackson Park and its nearby communities will receive as a result of the development of the OPC.

2. In addition to respecting Olmsted’s vision, the OPC will provide community benefits, recreational opportunities, and other improvements.

a. Cultural and Educational Improvements

Building the OPC in Jackson Park is consistent with Chicago’s 125-year-old tradition of establishing museums in its parks. Examples of this longstanding trend include the Museum of Science and Industry in Jackson Park, the Chicago History Museum and Peggy Notebaert Nature Museum in Lincoln Park, and the DuSable Museum of African American History in Washington Park. This placement of museums in the City’s iconic parks creates a combination of culture, education, and recreation that inspires and informs the community. In keeping with this tradition, the OPC will provide opportunities for cultural enrichment and education that are available to all. The OPC also fits squarely within the City’s stated goals contained in its official cultural plans (including specifically the City of Chicago Cultural Plan 2012) of expanding cultural opportunities throughout Chicago by recognizing and supporting vibrant cultural districts. One such initiative identified by the 2012 Cultural Plan is the development of a “Museum Campus South.” The siting of the OPC within walking distance of the Museum of Science and Industry and interconnected with it by pedestrian walkways uninterrupted by a six-lane highway carries out this official cultural plan objective.

The OPC itself will serve numerous purposes supportive of the 2012 Chicago Cultural Plan and bring additional world-class facilities to Chicago. The OPC’s Museum Building will present President and Mrs. Obama’s story within the broader story of American history and the history of civil rights. This building will serve as a place to honor this shared history and provide the opportunity for visitors to better understand Chicago’s place in history. The OPC’s Library Building will feature a branch of the Chicago Public Library, which will provide further educational opportunities for community members. For example, the library branch will offer community programming, a children’s area, spaces for reading and studying that can be converted to open seating for events, and a teen-focused digital media room. The Library Building will also house a curated collection celebrating the life and legacy of President Obama and related subject matter.

b. Recreational Improvements

The proposed undertaking, including development of the OPC, will also bring new and improved recreational features and opportunities to Jackson Park. For example, the OPC site will include picnic areas, a nature walk along the lagoon, new bike paths, a sloped great lawn with a sledding hill, a fruit and vegetable

garden, and improved play areas. As part of the OPC's development, the Foundation will relocate and expand an existing children's playground located at 62nd Street. The new playground site was chosen in direct response to community input, and the relocated and enlarged playground will incorporate new and improved play equipment including custom-made experiential play features. A second entirely new experiential children's play area will also be added along the eastern side of the OPC site. The OPC development will also include construction of a plaza for community gatherings, performances, and celebrations.

The PAAC will provide space for year-round active recreation and community events, including, but not limited to, basketball and other court sports. It can also provide opportunities for coordinated and complementary programming with local facilities such as the Hyde Park Academy, South Side YMCA, and the nearby Chicago Park District Jackson Park Field House. The other OPC buildings (particularly the Forum Building) will also include various community spaces that will enhance opportunities for community members to connect, learn, and engage with one another. The vast majority of the OPC's campus will be dedicated as free space generally open to the public to ensure access to all community members. The entirety of the OPC grounds (which occupies approximately 90% of whole OPC "site") is available as open space that can be used for picnicking or other informal recreational activities. This includes the various green roofs and the plaza, which were designed for such public purposes.

Another recreational improvement associated with the proposed local, state and federal actions is the replacement of the existing track and field. Construction of the new track and field in a different, but adjacent location to the existing facility will not only improve this vital community resource, but will also ensure that community use of the track and field is preserved. The new track and field will include a wider turf field to accommodate a full soccer program, which is not feasible at the current location. The Foundation's agreement to donate funds for the new track and field is not conditioned upon the approval or construction of the OPC.

c. Traffic and Safety Improvements

The proposed Jackson Park improvements will also enhance Park safety. The proposed changes include new and improved lighting, pathways, signalized crossings, pedestrian refuge islands, and underpasses that will provide visitors and community members with safer access to the Park. Road closures within the Park will also improve safety for children and other Park users. In its current condition, Cornell Drive stands as a significant barrier to community access, effectively severing the Park into two discrete parcels, one on the east and the other to the west of this six-lane highway. It also promotes high-speed traffic, noise, and harmful pollutants. These impacts not only create significant safety risks but also affect Park users' enjoyment of the Park and impact the Park's flora and fauna.

Also, the undertaking will improve capacity at numerous intersections in and adjacent to Jackson Park and optimize traffic signal operations. As a result of the roadway improvements, all major intersections studied by the federal agencies and their state and local partners are expected to operate at desired Levels of Service, providing greater access into and throughout the Park and surrounding communities. Overall, the undertaking is expected to result in improvements to traffic operations.

d. Ecological Improvements

Furthermore, the development of the OPC site will incorporate ecological improvements and provide numerous opportunities for community members to connect with nature. For example, the proposed changes to the UPARR replacement land will provide much needed storm water management improvements that will make the land more usable. Similarly, the proposed landscaping surrounding the OPC includes new storm water runoff management features that will mitigate current storm water runoff issues. The planned landscaping surrounding the OPC also includes diverse trees and plantings with a focus on native plantings to promote and maintain wildlife habitats. And the green roof on the Library will feature a fruit and vegetable garden to be used in part for instruction on nutrition and healthy eating.

e. Economic Improvements

In addition to these benefits within the Park, the construction and ultimate operation of the OPC will attract additional investment to the South Side area, provide employment opportunities for community members, and increase opportunities for local businesses. Currently, the OPC is predicted to generate approximately 5,000 direct and indirect jobs during the construction phase and 2,500 direct and indirect jobs after the OPC is opened to the public. In its first decade, the OPC is also predicted to have a total economic impact of \$3.1 billion. Thus, while remaining faithful to Olmsted's vision for Jackson Park, the development of the OPC also will contribute to revitalization and economic stimulation of the area in which the Park is located.

3. The proposed OPC design reflects and has incorporated community feedback and concerns.

The Foundation understands the importance of Jackson Park to Chicago residents and the South Side community in particular. For this reason, the Foundation has been committed to respecting and honoring community concerns from the outset of the planning process. The original design of the OPC was developed with these potential concerns in mind. For example, knowing that community members care about preserving open space within Jackson Park, the Foundation proposed to locate the OPC buildings at the urban edge of the Park perimeter, an area initially intended to serve as a buffer or transition zone between the City and the Park. Locating the OPC at this site minimizes impacts to key scenic elements within Jackson Park including the lagoons, fields, and lake shore. The Foundation also designed the Museum Building as a vertical experience so that the building would occupy a small footprint and take up as little parkland as possible. To further reduce impacts, the Foundation proposes to make the rooftops of the Forum and Library Buildings generally publicly accessible. While the rooftops of the Museum Building and the PAAC will not be accessible to the public, those rooftops together occupy less than one third of 1% of the total parkland in Jackson Park. Cumulatively, the proposed undertaking, including the OPC development, will result in a net gain of approximately 3-4 acres of parkland.

The Foundation also took steps to reduce impacts to viewsheds in and around neighboring communities and within the Park itself. It incorporated design elements such as green roofs on three of the proposed buildings. It partially submerged approximately forty percent of the occupiable space within the OPC in order to reduce viewshed impacts. The OPC design team also proposes to use berms and planted buffers to minimize impacts to historic views and vistas. The conversion of roadways to pedestrian paths will also enhance the prominence of landscape scenery, improving views throughout the Park.



After the initial design for the OPC was completed, the Foundation began a practice of regularly convening public meetings across the area to gather feedback. It has solicited input from thousands of neighborhood stakeholders and residents through both these in-person meetings and online comments. The Foundation has listened to concerns voiced by these community members and significantly reformulated the OPC design in response. For example, the proposed parking facility for the OPC was moved underground and the playground and play areas were expanded and relocated closer to the park edge and community.

The Foundation's design team has also reduced the size of the courtyards to the north of the Museum Building and in the interior of the Library Building in order to provide additional public parkland; increased planned tree plantings; added a Wetland Walk and a Community Grove with a separate and more intimate play area; and added environmentally friendly design features such as a green roof on the PAAC. All of these changes were made in direct response to community feedback and concerns. Note that the City considered the community's feedback as reflected by the 2018 final approvals of the OPC plan by both the Chicago Plan Commission and Chicago City Council.

The Foundation has also taken steps to ensure that the OPC will remain available and accessible to all. For example, the Foundation will implement specific admissions policies for the Museum benefitting State of Illinois residents (including Illinois school children who are admitted without charge while on school field trips), City residents and low-income individuals and families. Additionally, the OPC will provide meeting space for local residents, community groups and people of all backgrounds to convene. For example, as noted earlier, the majority of the Forum Building, which has two levels of meeting and gathering spaces, will be free and open to the public. The Foundation will ensure that the green roofs on the Library Building and Forum Building are accessible and generally available for public use. And the Library Building will include a dedicated children's area, space for teens, and meeting space that will be available for public use. Also, the Foundation has met with members and organizations representing the local community of people with disabilities and has engaged a special consultant to assist in applying universal access principles across the design.

Overall, the Foundation is dedicated to ensuring that the OPC serves as an asset to the community and that it will enhance and improve upon the existing features of Jackson Park. The Foundation is confident that the proposed undertaking, including development of the OPC, embraces Olmsted's vision to make Jackson Park a welcoming place where community members could connect with nature and escape the hustle and bustle of city life. The OPC will provide additional and improved ways for visitors and, most importantly, Chicago residents to use and enjoy the Park, thereby adding value and offering new, transformative experiences that would not otherwise be possible in any reasonable future time horizon.

4. The Foundation is committed to fair and robust discussion in negotiations to resolve effects to historic resources.

In addition to efforts to improve the Park as described above, the Foundation is committed to the process envisioned by Section 106 to produce a Memorandum of Agreement. The AOE contains a detailed recitation of some of the steps already taken to avoid and minimize adverse effects to historic and cultural resources. The Foundation looks forward to the next step in this process, a consultation among stakeholders to discuss the actions that should be taken to address the adverse effect identified in the AOE.



The consultation leading to a Memorandum of Agreement represents a collaborative approach to achieving a procedural goal: consensus on the actions that the signatories to the Memorandum of Agreement agree to pursue in order to address the adverse effect. The Foundation will participate in this process in good faith, working with the City of Chicago, the federal agencies, other public and private entities and community organizations. The Section 106 process is working; it has already produced clear benefits and the Foundation believes it will continue to do so.

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OBAMA.ORG

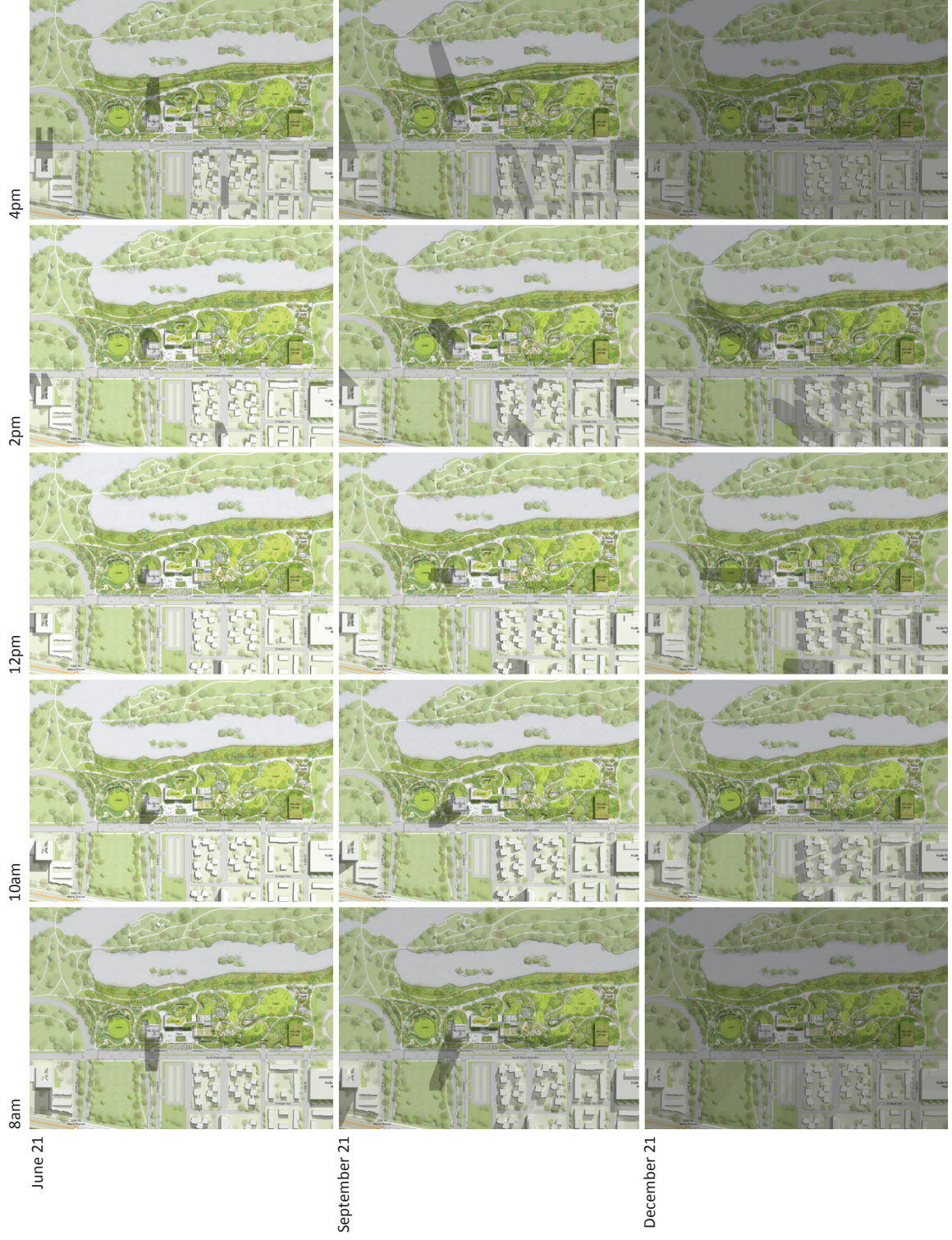
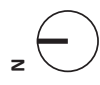
Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Robbin Cohen'.

Robbin Cohen
Executive Director

Exhibit 1



CONFIDENTIAL DRAFT



openlands

conserving nature for life

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August 29 , 2018

Ms. Abby Monroe
Public Participation Officer
City of Chicago Department of Planning and Development
121 N. LaSalle Street, 10th Floor
Chicago, IL 60602

Dear Ms. Monroe,

We are submitting these comments regarding the Assessment of Effects to Historic Properties (AOE) as a Consulting Party for the Section 106 process for the proposed undertaking in and adjacent to Jackson Park. As a Consulting Party, we welcome the candor of the AOE report, particularly the adverse impacts on the historic nature of Jackson Park. Despite this recognition, Openlands feels that this report disregards or omits several pertinent issues and items that are germane to both the Section 106 process and the undertaking. Given the interrelationship between various processes and the issues noted herein, Openlands strongly recommends that the National Park Service (NPS) and Federal Highway Administration (FHWA) conduct an Environmental Impact Statement (EIS) based solely on the results of the AOE. These issues and items are as follows:

1. Process and Policy

Openlands appreciates both the clear and thorough definition and subsequent examples of adverse effects presented in Section 3.1.1 (Definitions and Guidelines) of the AOE. Openlands recommends a similar approach in Section 5.0 (Minimization and Mitigation) so that all Consulting Parties understand the terms used in the first sentence: “The following summarizes efforts made to minimize or avoid impacts or effects to historic properties.” Openlands understands that as part of the Section 106 process, avoidance and minimization precede mitigation both as policy and regulation. We note these strategies are cogently missing from both the NPS and FHWA actions as presented in the AOE. We recommend the report be revised to both include the definitions of avoidance, minimization and mitigation, as well as describe the linear progression to addressing adverse impacts by these means within the Section 106 process. We note that to date, both avoidance and minimization have been ignored with respect to the undertaking. Furthermore, in section 1.2 and 1.3, the AOE presents a very clear and thorough explanation of the NPS and FHWA actions. As Federal Agencies, both the FHWA and the NPS may not be as well versed on the local issues, particularly a feasibility study by U3 Advisors that showed the alternative Washington Park location to be the least impactful and most preferential site. This analysis is completely ignored in terms of the policy and regulatory trajectory: avoidance, minimization, and mitigation.

Additionally, there is no reference to the 4(f) review within Section 5.0 of the AOE. Openlands understands that the 4(f) process is a separate but intertwined element of the National Environmental

Policy Act (NEPA), but we were surprised by this omission given Jackson Park's listed designation on the National Register of Historic Places. Openlands understands that 4(f) is a substantive law and precludes project approval if there is a use of a historic site when a prudent and feasible avoidance alternative is available. Again, the operative word avoidance arises and yet is critically missing from Section 5.0. Moreover, since the Section 106 process cannot be completed until the 4(f) process is complete, delaying (or omitting the results) of the 4(f) process is problematic because it short-circuits the Section 106 process as well as the search for alternatives. Therefore, Openlands recommends that a description of the 4(f) process to date, if not the results, be included as part of this AOE.

What is not so clear is the concluding paragraph in section 3.2 (Presentation of Assessment.) The AOE indicates that information within the report was included at the request of the Advisory Council on Historic Preservation (ACHP) and the agreement of the project sponsor (the City) but does "not obligate either NPS or FHWA to address mitigation related to these reasonably foreseeable/probable actions. Furthermore, inclusion of this evaluation does not commit either NPS or FHWA to proceeding similarly with respect to other undertakings or obligate these agencies to future mitigation actions not related to the federal actions." As we have commented previously, it is important to recognize and note that both the FHWA and NPS actions and adverse impacts cited in the AOE would not occur but for the Obama Presidential Center (OPC) project. Worse, this statement appears to clear the way for the proposed golf course to be ignored altogether as part of this undertaking as an impact and/or adverse effect on the Park, yet not require an additional Section 106 review process in the future – despite the fact that both these projects share common costs and design elements as part of this review.

2. FHWA Actions – Roadway Configuration:

As illustrated in previous comments, both Cornell Drive and the southern portion of the Midway Plaisance eastbound lane are reflected in all of the plans generated for the post-1893 World's Columbian Exhibition plans for Jackson Park. Furthermore, Marquette Drive is also recognized for all plans except the 1895 plan. Pursuant to, and complimentary of, the comments above, Openlands has similar concerns regarding the proposed roadway closures and widenings. As witnessed by the various iterations of the Park District's South Lakefront Framework Plan, there was no effort to undertake design solutions that explore avoidance or minimization. Avoidance would include adjusting the location of the proposed OPC to fit within the current historic roadway configuration. Minimization would include explorations of traffic calming measures such as road narrowing, bumpouts, etc... to reduce speed and increase safety while maintaining the current roadway alignments. With these comments we note:

- That the AOE fails to acknowledge the hierarchy of roads present during the period of significance. This hierarchy was both an intentional design element and an invaluable tool to Olmsted as a means to provide varied park experiences. Unfortunately, past alterations to Jackson Park's roadway networks have eroded this experience. We recommend that the AOE reflect the further loss of the park-like scale of roads that are either eliminated altogether (Cornell, Marquette) or increased in width to become arterials (Hayes). If this road plan is fully implemented, there will be no remaining park-scale roads, arguably impacting and denying a valuable way to experience the park.
- A traffic analysis of the proposed plan by raSmith indicates that the original study by Sam Schwartz was flawed and that avoidance and or minimization measures would be acceptable without impacting traffic.
- As highlighted above, the FHWA actions and adverse impacts cited in the AOE would not occur but for the Obama Presidential Center (OPC) project.

- The closure of Marquette Drive has no beneficial impact on the undertaking other than to more easily accommodate the proposed golf course renovation. As previously highlighted, the golf project is omitted as part of the undertaking.

While the AOE presents eight bullet points on pp. 22-23 specific to the nature of the impacts and adverse effects, we feel that the general nature of these eight items trivializes both the effects and adverse impacts to the Park. For example, the first bullet point indicates that “the changes alter the legibility of the design of the cultural landscape in ways that diminish the overall integrity and spatial organization in the property as a whole.” What is not mentioned is the fact that 350-400 mature trees will be removed to accommodate the roadway reconfigurations alone. While these trees will no doubt be replaced at some mathematical value, we note the following cumulative effects not discussed in the AOE:

- Replacement trees will likely not be replaced at an inch for inch diameter value, typical of CDOT projects. Assuming these trees have an average diameter of 12”, CDOT would have to plant +/- 2,250 trees at 2” diameter to replace these +/- 375.
- While the AOE deals with historic impacts, Openlands would like to point out that these landscapes are also functional. Mature trees not only have a different aesthetic, but also provide important functions in terms of climate change mitigation benefits that will not be recognized through immature trees. These include carbon sequestration, heat island mitigation, rainwater interception and flood reduction.

3. NPS Action - Replacement Parkland:

Openlands has many issues with the replacement parkland associated with the NPS actions. First and foremost, it seems odd that the proposed replacement parkland as required by the Urban Park and Recreation Recovery (UPARR) grant agreement is slated for transfer to existing parkland. While Openlands is not an expert on UPARR Act grants, we note:

- The Chicago Park District is not pursuing an acre for acre allotment of replacement parkland for the entire 19.3 acres of the project despite numerous opportunities for such replacement within the adjacent neighborhoods.
- The proposed UPARR replacement site at the eastern end of the Midway has not been approved by NPS.
- That the proposed replacement parkland site both sits on an existing wetland and does not appear to have the support of the community.
- As highlighted above, the NPS action and adverse impacts cited in the AOE would not occur but for the Obama Presidential Center (OPC) project.

4. Missing or Incorrect Information

The AOE suggests that the visual impact analysis of the OPC tower is sufficient based on the description of activities presented in Section 3.1.2 as well as in the Appendix. Additionally, this issue was brought to light in the Consulting Parties meeting on August 15. The description of means and methods for this assessment, as well as the Appendix exhibits and the City’s explanation regarding this matter are rudimentary and insufficient. Inexpensive technology does exist through products like TerrSet geospatial monitoring and monitoring software. A license for the Terrset product costs approximately \$1300, while other products of similar quality and affordability no doubt exist. Openlands recommends that a more robust visual analysis be conducted and the determination of effects be re-examined, especially for the areas immediately adjacent to the proposed OPC site including but not limited to the Wooded Island, the

Jackson Park Terrace Historic District, The Hyde Park-Kenwood Historic District as well as regular intervals of the entire Midway Plaisance.

As previously mentioned, an independent report by raSmith examines the original traffic study performed by Sam Schwarz Engineering. This report finds multiple inconsistencies and incongruities and requests further information for five separate assumptions. Additionally, the report contains seven other noteworthy points as well as an alternative conceptual plan for consideration. Given the cost over-runs with which the City currently faces, the traffic analysis should be re-examined by an independent firm and the pertinent AOE sections revised as necessary.

Similarly, as previously indicated, there is no mention of the Golf Chicago effort to combine the Jackson Park course and the South Shore course into a single championship caliber golf course. At the very least, this effort should either be:

- Included within this undertaking given its direct relationship with the closure of Marquette Drive, or;
- Listed with the other activities in Section 3.5.1 (Methodology) as an unrelated activity that are currently and reasonably foreseeable given its own impact on Jackson Park as a designated National Register of Historic Places.

5. Call for NEPA EIS

As Openlands indicated in the opening paragraph of these comments, we feel there is enough complexity and inconsistency associated with the undertaking to call for a deeper examination of this project. Once again, we praise the AOR for its honest and open reporting on the adverse impacts to Jackson Park. In a process that has been historically closed rather than transparent, this information is welcomed.

At the very first Section 106 meeting, a portion of the meeting was dedicated to explaining the Section 106 process and its integration into the NEPA process. For reference, this graphic is highlighted below in Figure 1. What is striking about this graphic is the six buckets associated with the NEPA process, all of which are directly related to the proposed undertaking in ways that have not been sufficiently addressed or studied with any modicum of diligence. The Section 106 process reveals adverse impacts on Jackson Park as a historic resource. While noise and traffic have been somewhat addressed within the AOE, our comments indicate that a deeper examination should not only be explored but is necessary. Moreover, the proposed OPC tower will be located approximately .10 mile from arguably one of the City's most beloved destination for bird watching on the Wooded Island. The recently installed

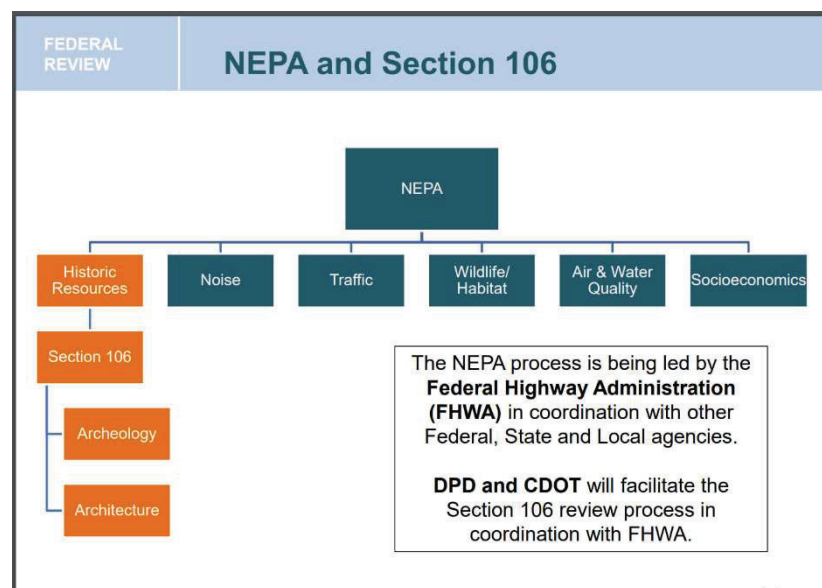


Figure 1: Introductory Process Slide Presented to Consulting Parties on 12/1/2017

GLFER restoration project increases habitat, but a deeper understanding of the undertaking's impacts on these wildlife and habitat areas are not well understood. Similarly, the air and water quality impacts from the undertaking are also not well understood. We know that stormwater must be addressed on-site as part of the City of Chicago requirements. We also know that the proposed redesign of the historic Women's Garden serves solely as a stormwater retention area for the OPC site to meet the City requirements. Simultaneously, as the recently updated Bulletin 70 indicates, Chicago is currently experiencing increasingly larger storm events. How will the undertaking and the proposed stormwater strategies serve to deal with the increasing amounts of precipitation? Finally, there has been much discussion regarding the undertaking and its effects on the socioeconomics of the adjacent communities. Many local community groups seek a Community Benefits Agreement (CBA) while other meetings address gentrification. Rents in the area are already becoming unaffordable for some who have long suffered a lack of investment.

It is Openlands understanding that an EIS will more thoroughly address and study the effects of the undertaking on all of these issues. As Exhibit 1 correctly indicates, the Section 106 process will be complete only when a NEPA determination has been made by NPS. Yet as Exhibit 2 indicates, a less thorough Environmental Analysis (EA) is slated, tidily completing the process in a matter of mere months. We note that Exhibit 2 indicates that all dates are subject to change, however, we are also aware that the project timeline has slipped, and the project sponsors are eager to proceed.

At each comment submission, Openlands as a Consulting Party concerned about access to open space, reiterates its support for the OPC on the south side of Chicago. But as the AOE indicates, the undertaking to date has flaws and serious impacts on Jackson Park as a historic resource. Therefore, we request that the AOE be revised as suggested and that both the NPS and FHWA recognize the complexities and various tensions of this undertaking and commit to an EIS. While this is a longer process, it is imperative that the avoidance and minimization alternatives other than mitigation be explored so that the impacts to this historic and officially recognized park are fully minimized to the extent possible.

Sincerely,



Gerald Adelman
President and CEO, Openlands

cc: David Clarke, Federal Highway Administration; John Fowler, Advisory Council on Historic Preservation; Jaime Loikinger, Advisory Council on Historic Preservation; Samir Mayekar, City of Chicago

Exhibit One: NEPA Schedule Presented at Introductory NEPA Presentation, 9/17/2018

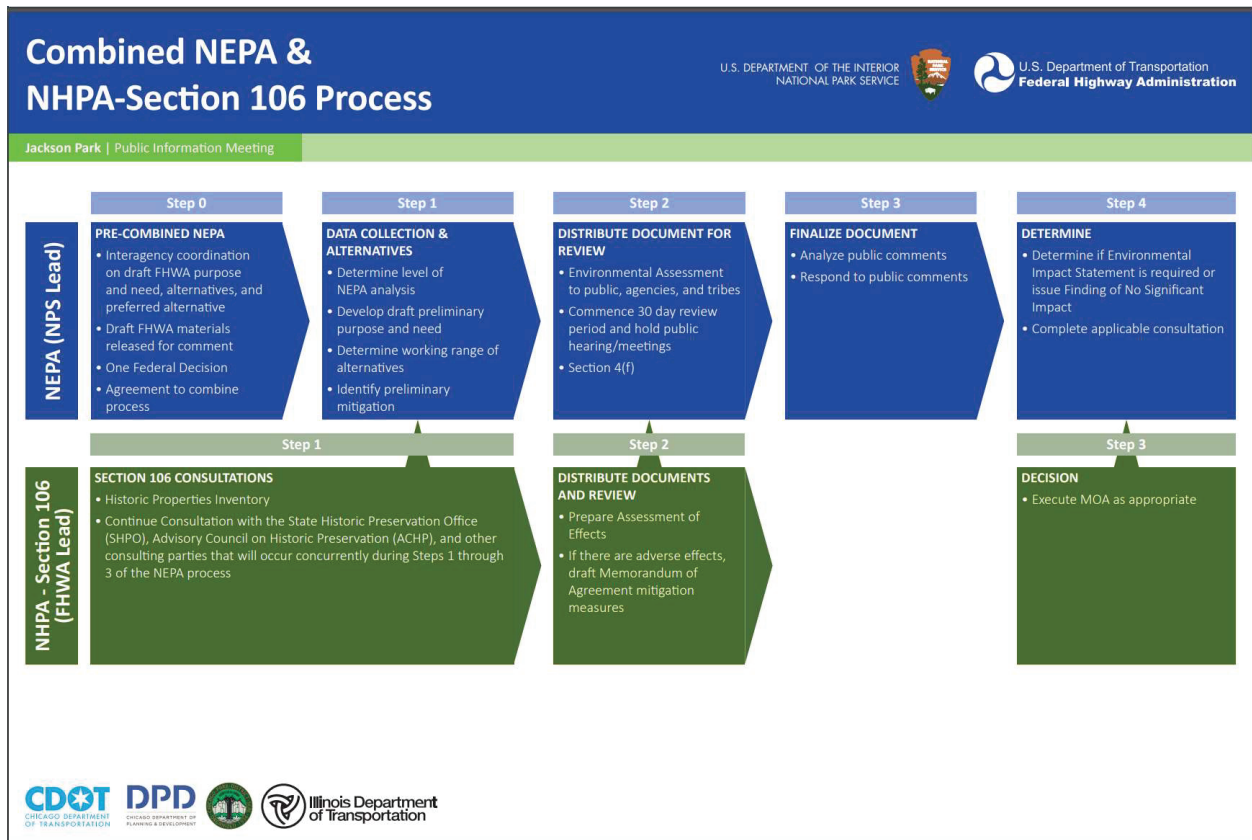
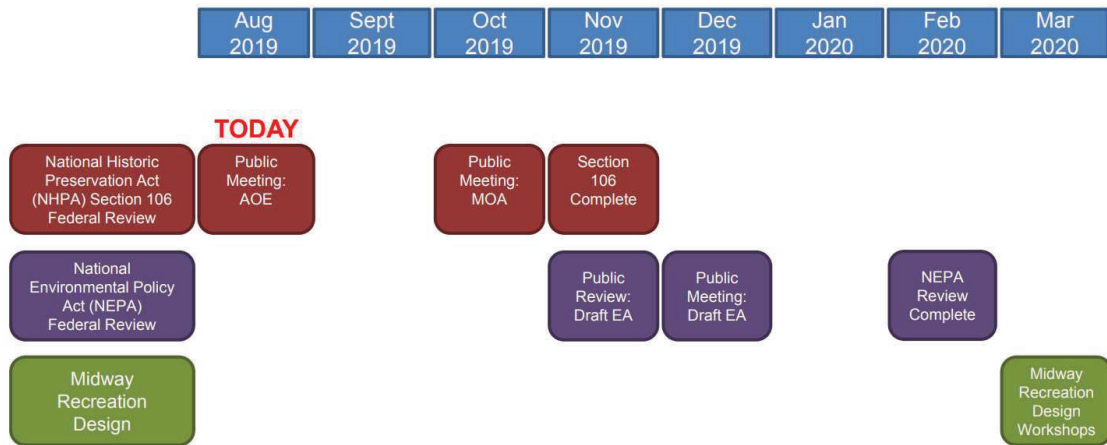


Exhibit Two: Updated Section 106 Schedule Presented at Third Consulting Party Meeting, 8/5/2019

Anticipated Timeline*



**All dates are subject to change.*

August 29, 2019

Ms. Abby Monroe
Public Participation Officer
Department of Planning & Development
City of Chicago
121 N. LaSalle Street, 10th Floor
Chicago, IL 60602

RE: Comments to Assessment of Effect to Historic Properties: Proposed Undertaking in and Adjacent to Jackson Park

Dear Ms. Monroe:

We have reviewed the Assessment of Effect (AOE) to Historic Properties: Proposed Undertaking in and Adjacent to Jackson Park related to the impact of the proposed Obama Presidential Center (OPC) which was publicly released on July 29, 2019. In addition to the comments Ward Miller and Mary Lu Seidel of Preservation Chicago shared at the August 5, 2019 OPC Section 106 Consulting Parties meeting, we submit for your consideration our comments to the AOE report.

The historic public parklands of Jackson Park, the Midway Plaisance and Washington Park were designed by Frederick Law Olmsted and Calvert Vaux, with additions by Alfred Caldwell, May McAdams and others of national and world recognition. The significance of Jackson Park, Midway Plaisance and the South Shore Cultural Center are monumental and well known to most audiences, including national and international scholars of architectural landscape design, historic landscapes and cultural heritage. The sites are listed on the National Register of Historic Places, and certain features, structures and buildings of both park sites are designated Chicago Landmarks. These designated Chicago Landmarks within the boundaries of the two parks include the Museum of Science and Industry building, constructed as the Palace of Fine Arts in 1893, along with the Columbia/Darrow Bridge and the landscape features of the park surrounding the MSI building and bridge. The South Shore Cultural Center building, the Club Building, the Gatehouse, Stable, Pergola, and several outdoor terraces are also part of the Chicago Landmark designation.

The 500-acre Jackson Park was designed by Frederick Law Olmsted, perhaps the most famous landscape designer of the 19th century and widely considered to be “the father of American landscape architecture.” Jackson Park was also the site of one of the most important events in Chicago’s history and arguably one of the most important cultural events of the 19th century, the World’s Columbian

Exposition of 1893. Jackson Park is connected via the Midway to Washington Park and then to Chicago's Emerald Necklace of great parks and boulevards, forming one of the most magnificent networks of urban parkland in the country.

Avoid & minimize

With the Section 106 process, the first goal should be to avoid any adverse effects. If avoidance is not possible, the second default is to minimize adverse effects. Finally, if minimization is not possible, the path of last resort is to mitigate the adverse effects of a development. This AOE report is focused exclusively on mitigation, openly bypassing avoidance and minimization. In the public Section 106 process, City and CDOT representatives continued to reiterate that the intention of this report is to consider only mitigation. Without any further discussion of the other issues with this report, it should be re-written to instead focus on real and viable avoidance and minimization strategies.

Within the study area, there are seven historic districts and 29 historic individual properties that are listed or are eligible for listing on the National Register of Historic Places. A viable, suitable and acceptable avoidance option would be to move the OPC to private land near Washington Park. This location would still be a great boon for Woodlawn and the South Side, and it would not require the level of acrobatics to maneuver around as the historic Jackson Park area. Placing a 235-foot-tall building and campus in the center of the incredible history that is in and surrounds Jackson Park, closing off Olmsted-designed roadways and clear-cutting old growth trees is insensitive to and disregards all the people and all the years that went into retaining what is still remains intact around Jackson Park.

The AOE report cites how well-preserved the park has been through the 125 years it has been in Chicago. Why does the City of Chicago, the Chicago Park District and the Obama Foundation now want to negatively impact 125 years of diligent stewardship? Section 3.3.1 (Page 21) of the report states: "As community needs have changed, alterations to the park have been necessary to sustain its purpose, but the park continues to retain historic integrity because the overall effect of previous alterations retained consistency with the original design principles." The changing community needs in the coming century can also be met while also retaining the historic integrity of Jackson Park. Also Section 3.3.1 (Page 22) of the report states: "In aggregate, the majority of alterations to the historic property over time have been consistent with the original design principles applied by the firm of Frederick Law Olmsted, Sr. As established by the Section 106 Historic Properties Identification Report (HPI) dated March 15, 2018, the combination of changes made to date do not impair the integrity of the existing character-defining features reflecting the original design principles." Again, after 125 years of continued maintenance and care of the historic integrity of Jackson, avoidance seems like the most logical action to take in addressing the adverse effects on this historic area.

Section 3.3.2.1 (Page 22) of the report details the extensive adverse effect the OPC will have on Jackson Park. "The undertaking will have an adverse effect to Jackson Park Historic Landscape District and Midway Plaisance because it will alter, directly or indirectly, characteristics of the historic property that qualify it for inclusion in the National Register.

- "The changes alter the legibility of the design of the cultural landscape in ways that diminish the overall integrity of spatial organization in the property as a whole. . .

- “[T]hey diminish the historic property’s overall integrity by altering historic, internal spatial divisions that were designed as a single entity.
- “The undertaking impacts the overall historic road network.
- “The undertaking alters the shape, form, and function of the historic primary entrance to the property.
- “Spatial organization and the landscape setting of some contributing resources (Cheney-Goode Memorial and Statue of the Republic) are transformed in ways that are inconsistent with the Secretary of Interior’s Standards for the Treatment of Historic Properties.
- “The undertaking removes, replaces, or otherwise alters historic resources and landscape features within portions of the historic property. New materials with modern functions differ from historic materials at a scale and intent that does not conform to the Secretary of the Interior’s Standards.
- “The size and scale of new buildings within the historic district diminish the intended prominence of the Museum of Science and Industry building and alter the overall composition and design intent of balancing park scenery with specific built areas.
- “The combined changes diminish the sense of a particular period of time within the historic property and impact the integrity of feeling.”

This is not one small adverse effect on a large park, but a substantial and large adverse effect on Jackson Park. This development on the parkland that will have a devastating effect on the entire landscape. Historic properties can be modified to meet the needs of the 21st Century, but this heavy-handed destruction is not how it should be accomplished. Avoidance and minimization strategies can guide a plan that will bring jobs and economic growth to the South Side without destroying a historic asset in the process. If we were in a completely land-locked area, that would be one issue. However, no one has made the claim recently that there is a shortage of vacant land in and around Woodlawn on which an extraordinary Obama Presidential Center can be built without destroying Jackson Park.

Section 3.5.1 (Page 46) on methodology reiterates the incredible stewardship that have withheld the test of time for 125 years: “[T]he HPI includes extensive analysis of how Jackson Park and Midway Plaisance have undergone substantial change over time while maintaining historic value and function.” We should continue this legacy of great stewardship by focusing instead on avoidance, preservation and restoration of existing features.

Section 5.0 (Pages 51-52) of the report’s attempt at “efforts made to minimize or avoid impacts” reads more like minimization and mitigation at best. Making the building taller is indicated as a way to reduce its footprint, which appears to ignore the Olmsted plan to have the Museum of Science and Industry be the most prominent building in the park. Although taking “approximately 3%” of the parkland, the OPC plan as proposed will have a devastating impact on the historic integrity of Jackson Park – integrity that has stayed intact for 125 years.

The AOE report’s conclusion in Section 6.0 (Page 53-54) focuses yet again on mitigation – with no mention of minimization or avoidance. “The City continues to investigate other potential mitigation strategies that will be further developed as part of the next stage of the Section 106 process, addressing adverse effect. . . . Measures necessary to mitigate adverse impacts from the Federal actions will be

incorporated in to the action and are eligible for FHWA funding when (1) the impacts for which the mitigation is proposed result from the Federal action; and (2) the proposed mitigation represents a reasonable public expenditure after consider the impacts of the action and the benefits of the proposed mitigation measures.”

Cumulative Effect

It is important that as we review the adverse effects of the proposed Obama Presidential Center, we also consider the looming Tiger Woods PGA golf course proposed by merging the South Shore and Jackson Park golf courses. When Tiger Woods was in town in August 2019, he said he decided to take action on this site because President Obama asked him to. The connection of these two developments and their potential effect on Jackson Park would be undeniably devastating to the historic integrity of Jackson Park and Frederick Law Olmsted’s vision for this internationally renowned landscape, and they should be considered cumulatively. One may even consider that between these two proposed projects, Olmsted’s vision for Jackson Park may be completely changed and perhaps obliterated.

Traffic

There are many significant flaws in the traffic assumptions utilized in the AOE. An analysis of the CDOT traffic analysis study was conducted by Patrick E. Hawley in May 2018 and noted several significant flaws in the data assumptions. Traffic along major roadways and past nearby historic properties and districts is an important area of study, and these assumptions need to be as precise and accurate as possible. Relying on poor data in the City’s analysis of traffic impacts in Woodlawn does not do justice to the people who live, work and play in the area, and it does not do justice to the historic landscapes and properties that have been a physical anchor in the Woodlawn community for more than 100 years.

Cost

While the City of Chicago and the State of Illinois are facing considerable budget crises, this does not seem like the best time to be investing public money to meet the requests of a private development which is already proposed to be given the park land at no cost. The estimated costs to make all of these changes – including the widening of Lake Shore Drive, the widening of Stony Island Avenue and the closure of large sections of Cornell Drive -- are substantial and a burden that the city and state should not bear at this time.

UPARR concerns

The Urban Park and Recreation Recovery (UPARR) program requires that every acre of lost parkland in Jackson Park be replaced. While the primary replacement park location on the Midway Plaisance is problematic on its own, the calculation of total lost acreage is also flawed.

Section 1.1.1.3 (Page 3) of report indicates that the public library roof will include picnicking space to make up for picnicking areas being lost with the proposed OPC construction. When will this area be open and free to the public for use? Will it replace hour-for-hour the recreational uses that are proposed to be lost?

There are informal recreational areas currently existing at Jackson Park mentioned on page 3 of the AOE which will be lost if the OPC is constructed as proposed. Will the opportunities for informal recreational use around the proposed Obama Presidential Center be available for free to the public for the same number of hours and days as the current space, or will they be forever open and free except when private events and limited hours of operation prohibit it?

Section 1.1.1.3 (Page 4) of the report addresses the planned Program, Athletic and Activity Center: When will this space be open and free for the general public to use? How often will it be leased out for private use or used for OPC activities? Will this be a one-for-one replacement of lost recreational space in Jackson Park?

Section 1.1.1.3 (Page 4) details plans to replace lost parkland in Jackson Park with redevelopment of the Eastern Midway area. Following the UPARR standards for replacement parks, how is developing a park on land that is already dedicated open space an acceptable replacement? Page 24 of the report further addresses the negative effect using this dedicated open space for replacement park will have on the Midway Plaisance: "The requirement that equivalent recreation opportunities are provided within the replacement area would modify the historic character of the Midway Plaisance east of the railroad embankment and viaduct with the addition of physical features for a play area."

The Midway Plaisance is a distinctive feature of this unified park system designed by Olmsted connecting Jackson Park with the larger Midway Plaisance to the west and to Washington Park beyond. This is one cohesive design that should not be disturbed or altered.

Counting vacated roads in the park as replacement parks is an additional assault to an objective effort to comply with the UPARR requirements. Those roads as roads contribute to the park itself. Pulling up pavement, adding some surfaces and grass and calling it replacement park is an affront to the integrity of the UPARR requirements.

Road closures and alterations

While Section 1.2 (Page 5) of the report routinely talks of "improvements" to the roadway system to benefit the proposed OPC, we think it is more appropriate to call it "significantly altering a historic landscape and roadway system." These road alterations will negatively and permanently effect the historic integrity of Jackson Park, and the City of Chicago should instead focus on avoidance as a strategy to address those negative impacts.

The Hayes Drive reconfiguration is reviewed in Section 3.3.2.2 (Page 25) of the AOE report. "Realignment of the intersection of Hayes Drive with Richards Drive is not consistent with the Secretary of Interior (SOI) standards. . . .The new design of the roadway bypasses the Statue of the Republic that is the focus point of the historic intersection." We hold President Barack Obama in high regard, but it is incomprehensible to us why a center honoring his legacy has to do such harm to a historic asset that has been maintained for more than 125 years.

The closure of the portion of Cornell Drive north of Hayes Drive is reviewed on Page 27 of the AOE report. "For the removed portion of Cornell Drive north of Hayes Drive, the new walk approximates the existing road alignment near the West Lagoon and connects to the walk proposed as part of the OPC

development.” While the report finds this solution acceptable, it does not acknowledge the value of the vehicular access that Olmsted intended nor does it acknowledge the limiting factor for people with accessibility limitations who can best access the views of the park from a vehicle. A narrower Cornell Drive (pre-1960s conditions) with improved pedestrian and bicycle access would be the ideal compromise here.

The following bullet points are pulled from Section 3.3.2.3 (Page 29) of the AOE and illustrate the extent of the impact of road modifications recommended for the OPC:

- “Removal of historic roadways alters spatial organization of the overall park, reduces differentiation of landscape character areas within the historic property, and is not consistent with SOI standards that recommend the retention and preservation of historic land patterns and circulation systems.”
- “Closure of the Midway Plaisance between Stony Island Avenue and Cornell Avenue. . .removes an aspect of spatial organization that is fundamental to the historic design of Jackson Park and its connection to the Midway Plaisance.”
- “Closure of Marquette Drive. . .eliminates the historic, contributing triangular intersection with Richards Drive. . .The intersection and Marquette Drive approximately between S. Cregier Avenue and Lake Shore Drive demonstrate particularly strong expressions of historic landscape character related to the design of the property. The road closures alter contributing spatial organization and circulation routes.”
- “Closure of Cornell Drive north of Hayes Drive between 59th and 62nd Streets and the northbound portion of Cornell Drive south of Hayes Drive between 65th Street and 66th Place removes a road segment that contributes to the historic circulation network of the property.”

Shutting down roads may “prioritize pedestrians over vehicles as well as internal circulation with the historic property over commuter traffic through the property,” but it will substantially impair the historic character of the park and makes the park less accessible to people with disabilities who can best tour the park from a motorized vehicle. It is possible to narrow roadways and add design elements to slow traffic that do not mean cutting whole arteries out of a historic park design.

View sheds

It is essential that a proper above-ground-level analysis of the Obama Presidential Center’s impact is conducted to gain a complete perspective on the adverse effects of this proposed development.

At the August 5, 2019 Section 106 Consulting Party meeting, City of Chicago representatives indicated they did not have the technology to prepare visual impacts from different perspectives beyond the street-level shots in the AOE appendices. It is unbelievable that a city the size of Chicago does not have access to software that by even the highest estimates will cost between \$3,000 and \$5,000. With the amount of money the City of Chicago has already funneled into considering the OPC in a historic park surrounded by significant historic assets, \$3,000 does not seem like much to ask for if the City genuinely wants to assess this proposed project’s full impact.

This AOE is not acceptable if it doesn’t include well-done visual impact assessments of all the historic properties and districts near the proposed OPC. We are of the opinion that a 235-foot-tall tower will

negatively impact view sheds from almost every angle of Jackson Park and destroy the naturalistic features of the park. The view sheds would be severely impaired from not only within Jackson Park but also looking east from the Midway Plaisance. Careful consideration should be given to an enhanced view shed analysis that meaningfully depicts what this project's visual impact will be on the entire area.

Historic landscape and trees

Jackson Park was one of Chicago's first, grand-vision Lakefront parks. Its pedigree design was always considered superior to any other park in the City of Chicago. Both scholars and Chicago residents considered Lincoln Park as secondary in design to the great and magnificent South Side and South Park System of Olmsted's vision and design. This was not only a professional opinion amongst scholars of landscape design, but also a popularist view among citizens of Chicago for decades and perhaps a century. It is only recently that this fact has been mostly forgotten.

The AOE report notes that the Women's Garden built in 1936-1937 and designed by May McAdams "will be replaced." Replacement of historic character after it is destroyed should be the last-resort strategy if nothing else works. This destruction and replacement is unacceptable. Avoidance and minimization should be thoroughly vetted first. While we fully support universally accessible design, there has to be a better way to improve accessibility in this garden feature without completely destroying it. The garden is not being destroyed to improve accessibility. It's being destroyed to accommodate the OPC which is then placating some critics by touting a universally accessible redesign. This women's garden was built on the location of the Woman's Building from the 1893 World's Fair designed by Architect Sofia Hayden, the only woman architect involved in the 1893 World's Fair buildings.

Section 3.3.2.3 (Page 31) of the report further details the devastation to Jackson Park's historic landscape and flora. "With the exception of the English Comfort Station building, the remainder of the contributing historic features south of the Perennial Garden/Women's Garden to 62nd Street will be removed or altered to accommodate the elements associated with the OPC. . . .The change to this portion of the historic property is not consistent with SOI standards that stipulate the need to preserve contributing historic features and discourage 'placing a new feature where it may cause damage to, or be intrusive in spatial organization and land patterns.'"

Section 3.3.2.3 (Page 32) notes Olmsted's intention that the Museum of Science and Industry be the "dominating object of interest" within Jackson Park. "Within the historic property, the comparatively low-lying Museum of Science and Industry building was intended as the only building to be a 'dominating object of interest' inside of Jackson Park and the Midway Plaisance. The proposed OPC Museum Building affects views within the historic property by drawing specific focus to an exceptionally prominent building."

Section 3.3.2.3 (Page 32) reviews the negative effect on historic vegetation in Jackson Park: "Construction of the OPC also changes existing historic vegetation in a way that is inconsistent with SOI standards which emphasize the retention, preservation, protection, and maintenance of historic material features. . . .the [OPC] design results in partial removal of Olmsted designed historic vegetation patterns including groves of canopy trees around the historic playing fields and regular rows of trees along the streetscape."

It is estimated that 408 trees will or already have been removed to make the OPC possible, with another 350-400 trees coming down for the proposed road reconfigurations. Looking at the cumulative effect of the OPC and a Tiger Woods golf course, it is estimated that an additional 2,000 trees will be felled for the golf course. In total, nearly 3,000 trees will be lost in a nationally significant historic park. That kind of deforestation is unacceptable.

Summary

Like the rest of Chicago, Preservation Chicago is ready to welcome the Obama Presidential Center to the South Side of Chicago. Avoidance and not mitigation should be the required first course of action under consideration. This AOE report needs to be done with that as its primary objective.

The traffic impacts and view shed impacts of the proposed Obama Presidential Center also need more thorough research and assessment.

If this project and others planned in the immediate future go forward as proposed, virtually nothing will be left of Frederick Law Olmsted's vision for Jackson Park. From the perspective of Chicago history, architecture and parks, that is unacceptable. The current proposal for the Obama Presidential Center in no way respects or contributes to the historic integrity that is Jackson Park, the Midway Plaisance and Washington Park.

We look forward to continuing this Section 106 process and seeing a better assessment produced going forward. If you have any questions or concerns about our comments, please feel free to contact Ward Miller directly at 773.398.6432 or via email wmiller@preservationchicago.org.

Sincerely,



Ward Miller
Executive Director



Mary Lu Seidel
Director of Community Engagement

cc: Matt Fuller, Federal Highway Administration
Arlene K. Kocher, Federal Highway Administration
Lee Tezis, National Park Service
Jamie Loichinger, Advisory Council on Historic Preservation
Eleanor Gorski, Chicago Department of Planning
Nate Roseberry, Chicago Department of Transportation
Brad Kodehoff, Illinois Department of Transportation
Anthony Rubano, State Historic Preservation Office
Heather Gleason, Chicago Park District

Ms. Abby Monroe
Department of Planning and Development
Chicago, IL 60601

August 30, 2019

Dear Ms. Monroe:

Rosalie Villas Homeowners Association is located on Harper Avenue between 57th and 59th Streets. I am writing as one of its two Consulting Party representatives to provide the response to the Assessment of Effects report from our members who support and endorse the location of the Obama Presidential Center in Jackson Park and the City's recommendation to assign the Federal Urban Park and Recreation Recovery Act (UPARR) designation to the Midway Plaisance, east of the Metra tracks.

This letter addresses three aspects of the AOE review process:

- (1) Comments on the AOE Report
- (2) Comments on the "Adverse Effect" Finding
- (3) Minimization and Mitigation Strategies

Comments on the AOE Report

The AOE Report is thorough and clearly written as the culmination of a long and complex process. We have no recommendations for additions or revisions to the methodology or scope of work, nor believe there is any need to extend the review period to redo report content. Our review appropriately required revisiting earlier documents, notably the Historic Properties Inventory and the AOE appendix, to fully understand the limits of the review, methodology used, and criteria applied to the conclusions reached. Toward that end, the linked references to information from earlier stages of the review process were extremely helpful.

Within the narrow scope of the review, the findings are consistent with the applied methodology and understandable. The description of the responsibilities for actions and approvals associated with the undertaking, and the steps that follow on from the Consulting Party review are useful in understanding how the final recommendations leading to the Memo of Agreement will be developed and finalized. We would like to thank the staff who created the report for their work to create a thoughtfully organized and informative report.

Comments on the "Adverse Effect" Finding

We submit this letter from the position that the Obama Presidential Center should be sited in Jackson Park: to honor our first African-American President, as an extension of Chicago's 100-year tradition of siting major cultural institutions in its parks where they are broadly accessible to citizens and tourists alike, and to be an economic and social catalyst to the South Side's

underserved neighborhoods. Additionally, we concur with the City recommendation to designate the east end of the Midway Plaisance as a replacement recreation area by amendment to the original UPARR agreement.

While we appreciate how the Section 106 process helps evaluate and codify the historic value of properties on the National Register of Historic Places, we also are concerned about the limits it may place on the evolution of properties, particularly parks, to meet the changing needs of users. With a scope for the AOE limited to assessing proposed changes as they might affect the historic integrity of the Jackson Park Historic Landscape District and the Midway Plaisance, it would be hard to imagine that many modern additions to their park facilities for recreational or educational purposes would not trigger an adverse effect.

Jackson Park and the Midway Plaisance have experienced many changes, not all to the good, in their histories and have for the most part still retained the basic historic characteristics for which they earned their historic preservation designation. But their continued value is based on the ability to continue to change – notably to support needs stemming from the demographic and economic changes of their surrounding communities and, more recently, adaption to the growing threat of climate change. As the Section 106 process now moves into the Memorandum of Agreement phase, perhaps we need to consider less the strict interpretation of the AOE methodology and instead responses that balance the preservation of the history of our parks with recognition that they must continue to adapt. Other Olmsted parks, notably Central Park in New York City, have found ways to retain their historic character even while implementing changes as major as closing the park to vehicular traffic and absorbing the 20-fold increase in growth of the Metropolitan Museum of Art since its inception.

Minimization and Mitigation Strategies

Section 5.0 lists recommendations for minimization and mitigation of effects. Minimization options put forward for the OPC Site Development reflect the work of a talented architectural team that is both knowledgeable and respectful of Olmsted's design philosophy. They have thoughtfully designed modern buildings and climate change-appropriate landscaping to harmonize and blend with the historic landscape and in some instances offer remedies to poor design decisions that adversely affected Olmsted's designs over recent decades. The OPC minimization strategies also offer solutions that while seemingly detract from historic integrity on one hand offer opportunities on the other including reattaching the western perimeter to the rest of the park and creating both a museum campus environs with the Museum of Science and Industry and eliminating highway volume vehicular traffic through the heart of the park.

In addition to minimization options, we would suggest considering mitigation options that focus on educating visitors, particularly children, about the history of our wonderful South Side parks through a permanent exhibit in the Museum. Dr. Louise Bernard, Director of the Museum, has talked about the museum telling the story of the interwoven fabric of American History, the Civil Rights Movement, and the Obama family's journey. Why not consider a similar museum

exhibit that traces the parks' history in relation to the history of the City and the South Side? What better way to honor the Olmsted legacy long after the last tree he planted stands no more?

Another possible educational option might include access to the digital model of the Columbian Exposition developed by Dr. Lisa Snyder at UCLA's Institute for Digital Research and Teaching. Developed over the past 20 years through the digitization of maps and photos, the model allows the viewer to walk through the Fair and into some of its buildings. Perhaps the segment of that model that corresponds with the OPC site could be developed to show the layers of change that have occurred in that one area of Jackson Park. During the World's Fair, the area was the site of the Horticultural Building, one of the largest on the fairgrounds, at 250' wide (wider than the Museum tower is tall), 997' long, and 113' high at its tallest point. The building extended on a north-south axis from 60th Street to 62nd Street, covering in one building the major part of the OPC site.

Thank you for your consideration. We look forward to the public process that will follow the issuance of the Memo of Agreement recommendations.

Best,

A handwritten signature in black ink, appearing to read "Mary Anton". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Mary Anton
Rosalie Villas Homeowners Association
5720 South Harper Avenue
Email: antonmary.bmaa@gmail.com

Save the Midway!

August 30, 2019

Ms. Arlene K. Kocher
Division Administrator
Federal Highway Administration
3250 Executive Park Drive
Springfield, IL 62703

cc: Ms. Abby Monroe, Public Participation Officer, City of Chicago, Department of Planning and Development (DPD), abby.monroe@cityofchicago.org

RE: *Obama Presidential Center Mobility Improvements to Support the South Lakefront Framework Plan City of Chicago, Cook County, Illinois*

Dear Ms. Kocher,

Save the Midway is a group of local residents, city park-users, national environmentalists, preservationists and friends of open public land. We agree with many of your findings regarding Jackson and Midway Parks and the Women's/Perennial Garden, i.e., that these areas would suffer adverse effects if the current plans are allowed to move forward as proposed. We would like to offer some suggestions to avoid adverse effects to the Midway and the Women's/Perennial Garden, and to describe adverse effects that your report omitted and offer some suggestions to avoid these effects.

A. UPARR PROGRAM

The ACHP indicates in their August 22, 2019 comments to the Section 106 AOE that "...it remains unclear from the Effects Report if the proposed undertaking will result in the properties (i.e., Jackson Park and the Midway) no longer being listed in the NRHP." STM finds it unacceptable that the City's UPARR conversion plan could jeopardize the Midway's NRHP listing.

STM believes it is necessary and achievable for NPS and FHWA to protect the historic integrity of the Midway and Jackson Park in the course of this undertaking.

The City says in the AOE that the "selected UPARR replacement site adheres to criteria set forth by the NPS, which generally considers sites proximate and of similar quality and use to the area of proposed conversion." However, the UPARR statute 36 CFR Part 72.72(b)(1)(ii) states that "Replacement property need not be necessarily be directly adjacent to or close by the converted site." And Part 72.72(a) requires only that a conversion should provide "opportunities of reasonably equivalent location and usefulness."

STM proposes that:

1. To avoid any adverse effect to the east section of the Midway, the City should remove the playground and the UPARR designation from the plan for the east section, and leave the

east section as primarily an open flexible meadow as designed by F. L. Olmsted in his *Study of Design for the Midway Plaisance—Alternative*, 1894 (Olmstead Archives, NPS).

2. The City should work with local community organizations to create new parkland on empty lots or other City owned property within the area to provide more neighborhood parks. We note that the City's targeted area on the Midway is near other current and planned play areas and would thus be redundant. Such redundancy would not be the case in some neighborhoods close to the Midway.
3. The City should place the UPARR designation on the new parks and playground.

B. OTHER ADVERSE EFFECTS TO THE MIDWAY

The City's current plans, as noted in your report, destroy the historical significance of the Midway as part of Olmsted's South Park System primarily by destroying its integrity as an open meadow with flexible use. We find the City's current proposal to build fences, pour concrete, and to re-landscape offensive for the following reasons:

- It violates the City's promise via the ordinance that gave the land for the OPC to its citizens that new parkland would be created to compensate for the land given to the OPC;
- It seeks to fulfill its UPARR obligations via a loophole: rather than truly creating new parkland to compensate for play areas lost to OPC, it plans to claim it has created new parkland by adding formal structures that will destroy the historic nature of the eastern panel of the Midway.
- To destroy the integrity of a park on the National Register of Historic Places to avoid creating new parkland in a City short on greenspaces but rich in empty lots is offensive. That such a plan was done without community input—most especially—without the prior consultation of the local park advisory council would seem to violate the very reason the City of Chicago was forced in 1982 by a federal consent decree to create local park councils. (We are pleased to see that the City has met with the advisory council but nevertheless question creating such plans without consultation.) We note that at the 5 August 106 consulting party meeting, the City indicated that it was currently *only* considering the eastern panel of the Midway as “replacement” parkland.

The AOE report implies that filling in a natural occurring wetland on the Midway is an improvement. We challenge this conclusion and ask that this action also be categorized as an adverse effect.

Our suggestions to avoid the adverse effects on the Midway are as follows:

- Expand the area of the Midway by reopening the embankment underpass according to the original Olmsted plan and take no measures in the plans for the space that would preclude such a restoration.
- The City should not fill in the space of the ephemeral wetland but should rather enhance it. It should be respected as an ecological resource that promotes the richness of flora and fauna of the

entire area. We suggest any future plans for the space respond to the natural environment and to enhance it.

C. THE WOMEN'S/PERENNIAL GARDEN

While we agree with the AOE report's findings that many of the historical aspects of the park will be destroyed (its historical materials, its role within the symmetry of both Jackson and Midway Parks, etc.), and while we applaud the City's efforts to make this park more accessible to all, we note that the AOE report neglects to find and report a central historical aspect of this park that will be destroyed if current plans proceed: it was designed in 1936 by a noted female landscape designer, May E. McAdams. Any "expansion" of this park, any change to its current footprint, any destruction of the trees and plants is therefore a destruction of a historical design and would in essence erase the work of a woman, Ms. McAdams, by Michael Van Valkenburgh, a man. We find it ironic that at a time of greater advocacy for women's history (as evidenced, for example in the *New York Times* regular publication of "overlooked" obituaries to showcase prominent, yet forgotten women), the City and OPC are planning to obliterate the legacy of one such woman. That the location of this garden is on the site of the Women's Pavilion of the 1893 World's Fair (designed by Sophia Hayden, the first woman to graduate from the architecture program of MIT) only serves to highlight this irony. We find such plans therefore not only to be an adverse effect not fully articulated in the AOE, but also deeply offensive.

We note further that removing the Women's Perennial Garden from its status as public parkland and conveying it to a private foundation threatens to alter its historical significance. The current plans of the OPC call for this garden to lose its separate nature by incorporating it into the OPC campus—further diminishing the prominence and independence of a woman's design. Thus, the current plans erase the accomplishments of Ms. McAdams's designs as well the celebration of those designs through the existence of a completely separate park. In short, the OPC plans for this space will destroy its monumental status by incorporating and thereby erasing Ms. McAdams's design into that of Mr. Valkenburgh's.

Our suggestion to avoid these adverse effects:

- We request that the achievements of both women and women's history be respected and that the site remain separate public parkland and retain the original landscape design. If this is not possible, then we request that the current landscaping be completely respected and remain intact.
- We suggest that the City add a ramp and some walkways around the current garden as required to make it ADA accessible.

We are appending pictures from 1945 and today to show the current integrity of the original design and to remind everyone of the beauty of the space.



Photo 19: View of Perennial Garden (extant) looking northwest, 1945, Chicago Park District Records: Photographs, Special Collections, Chicago Public Library

from Section 106 HPIR 07/27/18, p39



photos 2019 by Doug Shaeffer



Sincerely,

Michael McNamee and Karen Rechtschaffen

Co-chairs

Save the Midway

SavetheMidway.org

SavetheMidway@gmail.com



August 30, 2019

Dear Ms. Monroe,

This letter comes to underscore support for the erection of the Obama Presidential Center in Jackson Park. As advocates for community economic development and neighborhood stabilization we are excited at the impact this institution will have on our community and the inspiration it will provide for our youth. As a gateway neighborhood for the OPC, South Shore Works find that the changes associated with this development, rather than being negative, will open the way for meaningful investment to a long-neglected community.

We hope that the end of this process will provide the necessary closure to advance the Obama Presidential Library project to the next stage of development with no further delays.

Very truly yours,

Members of

South Shore Works



SOUTH SHORE
chamber of commerce

South Shore Chamber, Inc.
1750 E. 71st Street
Chicago, IL 60649
P: (773) 955-9508
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Henry English
Chairman Emeritus
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Board of Directors

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Advisory Board Member
Tyronne Stoudemire
Hyatt Hotels Corporation

Tonya Trice, Executive Director

Ciera Whitaker, Office Manager

Kenneth Vasser, SSA #42
Program Manager

August 27th, 2019

Abby Monroe
Public Participation Office
Department of Planning and Development
City of Chicago
121 N. LaSalle
Chicago, IL 60602

Dear Ms. Monroe,

This letter serves as an expression of support for the Obama Foundation and its plans to build the Obama Presidential Center in Jackson Park. South Shore is the neighboring community and as the name would suggest, is nestled along the beautiful lakefront. In spite of its prime location, our community has suffered from the lack of capital investment and economic revitalization for decades. Governmental resources designated to stimulate economic growth in low income communities like ours, have been thwarted and re-directed to more popular projects in more affluent parts of town. But those projects have not been met with the same level of opposition that the OPC currently faces. Nor have the OPC opponents advocated on behalf of underserved communities surrounding Jackson Park.

The OPC promises to be a catalytic development that will change the trajectory of the South side of Chicago with economic impact of over \$3.1 billion dollars in the first decade. This is the most significant development on the south side in generations and will support at-risk youth through scholarships, apprenticeships and job training programs.

The Assessment of Effects report released on Monday, July 29th indicates that any alterations to Jackson Park will not disrupt the function of the park as a community resource but instead enhance it. Currently Jackson Park is underutilized by local residents and in desperate need of substantial upgrades. The OPC buildings will occupy less than 3% of the overall area of Jackson Park and will result in an overall gain of 3.7 acres of parkland. There can be no economic development without change. And the proposed upgrades to the park will conform with resources important to modern day living, inclusive of people from all socioeconomic, educational, age and mobility levels

To that end, the South Shore Chamber of Commerce and its constituents support the Obama Foundation and its current plans to build the OPC in Jackson Park. Thank you for your consideration.

Sincerely,

Tonya Love Trice

Executive Director
ttrice@southshorechamberinc.org



**FOR YOUTH DEVELOPMENT
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY**

August 28, 2019

Abby Monroe
Public Participation Office
Department of Planning and Development
121 N. LaSalle St., Room 1000
Chicago, IL 60602

Dear Ms. Monroe,

The South Side YMCA supports the Obama Presidential Center because it will complement our mission with more programs and resources for the children, youth and families.

Since 1984, the South Side YMCA of Metro Chicago located at the corner of 63rd Street and Stony Island Avenue has strengthened adults, seniors, and families in the Woodlawn and Hyde Park communities through programs, services, and resources that promote academic readiness, character development, violence prevention, and fitness and healthy living.

Having the Obama Presidential Center across the street from the Y will serve as an inspiration for the children enrolled in our programs. Providing the opportunity to learn about the life journey of our nation's first African American President who happens to come from their own neighborhood will inspire the youth we serve as they prepare for high school, college and beyond.

We appreciate the time, effort and careful analysis placed into understanding the impact related to the construction of the Obama Presidential Center. The positive result of embarking on this new development outweighs the few adverse effects that could result.

The OPC offers a number of benefits to the community. Not only will this development act as a catalyst for new development but it will also bring about park beautification, increased safety, provide access, support and improve youth programming/development and improve our local economic climate.

In closing, we would once again like to express the YMCA's support for the Obama Presidential Center. We look forward to working with the President, the First Lady and the Foundation staff on making a better tomorrow for the children, youth and families in Chicago and throughout the country.

Sincerely,

Cherese Ledet
Vice President of Operations
Executive Director, South Side YMCA
YMCA of Metropolitan Chicago



South Side Neighbors For Hope

sosideneighbors4hope@gmail.com

www.sosiden4hope.org

Ms. Abby Monroe
Department of Planning and Development
Chicago, IL 60601

August 27th, 2019

Dear Ms. Monroe,

South Side Neighbors for Hope is a grassroots organization represented by members from South Shore, Woodlawn, Washington Park and Hyde Park. We were founded to advocate for our south side parks and communities, with our current focus on advocating for the Obama Presidential Center in Jackson Park. We write to you today as a consulting party to the Section 106 process to provide our response to the Assessment of Effects (AOE) report released on July 29th.

We have both general and specific comments on the AOE report itself, but would like to first take the opportunity to state that our organization, composed of almost a dozen core members as well as a subscriber list of nearly 200, unequivocally supports the current plans, as presented, for the OPC in Jackson Park. We believe the OPC will bring an economic and social stimulus to our communities that we have not seen for over a century and will revitalize a park (Jackson Park) that has been neglected and underutilized for decades. We have a **letter of support** (<https://www.sosiden4hope.org/letter-of-support>) signed by nearly 600 people from the University of Chicago and the surrounding communities, that clearly states this support. Most of us are frequent users of Jackson Park and live in the communities that will directly benefit from the OPC. We believe our voices are the most important when weighing the consequences of the OPC in Jackson Park.

We understand the process of the generation of the AOE report and appreciate the thoroughness and care that went into its production. We acknowledge the conclusion that there will be one adverse effect on Jackson Park, stemming from the alteration from the historical nature of Frederick Law Olmsted's design. We note below many modifications that have already been made to Jackson Park that obviously detract from Olmsted's design, most notably the current six-lane "highway" that is Cornell Ave, which was originally designed as a carriage road for horse-drawn buggies. We also would like to point out modifications to other notable Olmsted designs, such as the recent elimination of vehicular traffic from Central Park in New York City as well as the massive expansion of the Metropolitan Museum of Art.

We state, in the strongest of terms, that the benefits that the OPC provide to Jackson Park and our communities easily outweigh the noted adverse effect. Parks are living entities that must evolve with the communities they serve. We see no better addition than the OPC campus, both for the actual amenities it brings (Chicago Public Library,

community meeting rooms, sledding hill, picnic area, childrens' playground, nature areas, etc...) and the obvious significance of **honoring and remembering our first African American president, Barack Obama**. What this represents to our communities is priceless: a beacon of hope that we and our neighbors have never seen in our hood. It is perfectly placed in Jackson Park and will serve the community as a park should. This also does not take into account the current and future positive community building work that the Obama Foundation, which will take residence in the OPC, is performing. To have such a positive influence located in our south side park honors Olmsted's philosophy of having "parks for the people".

Below are specific responses to parts of the AOE report that we hope you might consider in the generation of the Memorandum of Agreement.

Thank you for your consideration,



Erin J. Adams
President, SSN4H

General Comment Themes:

1. The goal of historical preservation is maintaining the historical storyline while allowing current use of historical structures. Change over time is inevitable, and it is absurd to think that the South Side of 1874 (or 1968) can or should be preserved unchanged for all time. The City of Chicago and the National Park Service (NPS) have allowed and promoted changes at numerous historically important public facilities when those changes were considered beneficial to key stakeholders. For example, Burnham Park has been modified greatly from the original plan created in 1909; buildings were added and roadways were rerouted to accommodate changes in the public's recreational and educational interests. Yet Burnham Park retains its historic significance. The communities around Jackson Park deserve the same accommodation to current recreational and educational needs. The undertaking addresses many of those needs.
2. Have the City, the NPS, and the FHWA applied Criterion C consistently at all Historic Properties since enactment of the National Historic Preservation Act of 1966? Specifically, please explain the apparent divergent interpretation of Criterion C associated with approved changes in the Hyde Park-Kenwood Historic District. This Historic District has been physically and culturally altered by the construction of modern glass and steel residential high-rise buildings that are completely out of character with the historic stone and frame single family homes that once characterized the Hyde Park-Kenwood Historic District. Despite this obvious break with historical style and function, and the subsequent change in population density and traffic congestion, the AOE determined that "the addition of contemporary structures has not diminished the historic district's integrity of setting."

3. The “historic” baseline extending from 1874 (Olmsted’s vision) to 1968 (other visions) incorporates multiple cultural periods, none of which include African Americans as stakeholders or decision-makers. The preservation of a period of history that intentionally excluded the populations that now dominate the Jackson Park neighborhoods is both arbitrary and disrespectful to current citizens of South Side Chicago.
4. The original intent of Olmsted’s vision was to include recreation and leisure space for the community. The community has changed since 1874, as have the dominant types of recreation and leisure opportunities people expect of their parks. The community includes people of all ages, from all socioeconomic strata, all levels of mobility, with various approaches to recreational and leisure use of Jackson Park. The federal undertaking would maintain the spirit of Olmsted’s 1871 vision for Jackson Park while recognizing the expansive nature of the community that surrounds the park, as clearly described in the Chicago Park District’s 2018 *South Lakefront Framework*.
5. The same goals and objectives that led to the development of museums, libraries, and schools in other Chicago parks (e.g., parks on the north side in predominately white neighborhoods) should be applied to Jackson Park. The Project would upgrade the recreational, leisure, and educational assets of Jackson Park while facilitating economic development in a historically neglected area of the city.

Specific Comments:

Page	Section	Paragraph	Comment
2	1.1	1	In the spirit of cooperation and transparency, the CCDPD voluntarily allowed the Section 106 review to include City of Chicago actions that do not require federal evaluation. How would the conclusions of the AOE change if only the required federal actions were considered?
3	1.1.1.3	2 nd indented paragraph	The text states that the undertaking will include a minimum of 1 acre of picnic space. Please clarify whether this is a change from current acreage.
3	1.1.1.3	2 nd indented paragraph	Please confirm that there will be no net loss of area in the Perennial/Women’s Garden.
4	1.1.1.3	2	Was the area proposed for road closure originally envisioned as multi-lane roads in Olmsted’s plan?
14	3.1.2	3 rd full paragraph	Has any major undertaking in a Historic District in Chicago been determined to have “no adverse effect?” Given the broad and subjective definition of “effect,” and the requirement that <i>any single effect</i> be

			interpreted as the undertaking having an adverse effect, it seems that a finding of adverse effect is inevitable. Please provide counterexamples to this assumption.
21	3.3.1	2	<p>The “period of significance” for Jackson Park spans 93 years (1875-1968), during which the Columbian Exposition was constructed and removed; the University of Chicago was built and repeatedly expanded immediately adjacent to the Midway; Lakeshore Drive and Cornell Drive were widened; the streets surrounding Jackson Park were paved.</p> <p>Since 1972, when the Park was listed as Historic, golf courses have been added; the Japanese Garden has been rebuilt and expanded more than once; MSI has added two new wings and an underground parking lot; underpasses and beaches have been updated; LaRabida outpatient facility has been constructed; and numerous other alterations to the “historic” park have been made. The AOE states that “the majority” all these previous projects were “consistent with original design principles.”</p> <p>Please clarify whether any of these projects required federal review? Were AOE’s prepared? How does the current undertaking differ substantively from these previous major construction projects that were approved in the park?</p>
22	3.3.2.1	2	<p>The text states that the undertaking diminishes the historic property’s integrity...” Please describe specifically how the undertaking differs from these previously constructed projects in its degree of “consistency with original design principles.” For example, how is an underground parking lot and 4-lane street consistent with the original design idea focused on scenery and recreation? Please clarify whether the determination of adverse effect was reached using consistent interpretation of effects among these other projects.</p>
32		1	<p>The text quotes an 1894 letter from Olmsted stating that the MSI was to be the only building considered a “dominating object of interest” in the park. The HPI quotes</p>

			Olmsted, Olmsted & Eliot's 1895 Revised General Plan for Jackson Park Plan as including "three principal elements of the scenery" for Jackson Park, "the Lake," "the Lagoons," and "the Fields." Please revise the AOE to indicate that neither the Lake, the Lagoons, nor the Fields would be adversely affected by the undertaking.
44			The text states "Although the structures represent a broad range of architectural styles, designs, and materials, most of them are similar in scale and height to other nearby structures within the historic district. In addition, many have setbacks, courtyards, or other landscaped spaces that provide unity between these contemporary buildings, the historic properties, Jackson Park and the Midway Plaisance. Therefore, the addition of contemporary structures has not diminished the historic district's integrity of setting."



August 28, 2019

Ms. Abby Monroe
Coordinating Planner
City of Chicago
Department of Planning and Development
121 N. LaSalle, Room 1000
Chicago, Illinois 60602

Dear Ms. Monroe,

As a designated consulting party to the National Historic Preservation Act Section 106 review and the National Environmental Policy Act (NEPA) review underway for Jackson Park, The Cultural Landscape Foundation (TCLF) is pleased to comment on the draft Assessment of Effects (AOE; “Assessment of Effects to Historic Properties: Proposed Undertaking In and Adjacent to Jackson Park, Chicago, Illinois”), publicly released by the City of Chicago on July 29, 2019.

We commend the explicit commitment to use the *Secretary of the Interior’s Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes* as a baseline of analysis in preparing the AOE (AOE, p. 14), and we believe that doing so will further aid consulting parties as they fully consider efforts to avoid, minimize, or mitigate adverse effects to properties listed in, or eligible for listing in, the National Register of Historic Places (NRHP). We are also pleased that the AOE formally recognizes and evaluates the effects of non-federal actions on historic properties (AOE, pp. 2, 6, 20 ff.) as part of this Section 106 review, categorizing such effects as those to be avoided, minimized, or mitigated and thereby informing the applicable reviews that are still to come in accord with NEPA.

We were, however, surprised when, at a meeting of consulting parties on August 5, 2019, a representative of the city stated that the location of the Obama Presidential Center “is not something that would change.” Given that the undertaking, as defined, includes “the construction of the Obama Presidential Center in Jackson Park” (AOE, p. 2), as well as related road closures, we hope that the city’s remarks do not indicate an intention to place prior restrictions on statutory requirements that direct consulting parties “to seek ways to avoid, minimize, or mitigate the undertaking’s adverse effects.”

With regard to the draft AOE, we believe that the assessment is incomplete for the following reasons, which are discussed in more detail below:

- Effects on the Midway Plaisance, listed in the NRHP in 1972, are not fully assessed, because detailed plans that would directly affect that historic designed landscape, pursuant to the proposed federal action, have not yet materialized.
- Effects on Washington Park, listed in the NRHP in 2004, are not assessed, because no analysis of such effects was undertaken in the AOE (see TCLF’s initial request for such an

analysis [in our correspondence](#) dated January 3, 2018; “Expanding the APE to Include the Entire South Park System”).

- The visual and spatial effects of the undertaking are not fully assessed, because the requisite visual analyses related to the undertaking were not completed.

In addition to the above points, we offer the following comments to suggest necessary improvements to the AOE, which are discussed in more detail below:

- The AOE’s sections titled “Effect Determination” and “Minimization and Mitigation of Effects” contain contradictory statements, and those contradictions must be reconciled to clearly state unambiguous conclusions and preserve the internal logic of the document.
- The AOE’s overall analysis of effects should be reorganized and expanded so as to delineate individual effects on character-defining features of the historic designed landscapes, thus enabling a clearer, more detailed statement of specific adverse effects that are to be avoided, minimized, or mitigated.

I. Completing the AOE

- A. The AOE states (p. 4) that “the future public process regarding the changes on the Eastern Midway will carefully consider the historic nature of the Midway Plaisance and seek to minimize any potential effects to historic properties, pathways, and plantings, to the extent possible.” That passage indicates that effects of the undertaking cannot be fully assessed at this time, because the specific plans to modify the Eastern Midway in order to create recreational space for a conversion under the UPARR Program, pursuant to the undertaking, have not yet materialized. As much was affirmed at a public meeting on August 20, 2019, some 22 days *after* the AOE was released for review, when a representative of the City of Chicago stated that “the concept [for the Midway] is very loose.” At a meeting of consulting parties on March 29, 2018, Eleanor Gorski, now the acting commissioner of the city’s Department of Planning and development, was asked whether potential adverse effects to the Midway Plaisance, stemming from the UPARR conversion, would be assessed during the present Section 106 review, to which she answered in the affirmative. What the present AOE reflects, however, is essentially an ‘IOU’—a general statement that some future process will do its best to “minimize any potential effects” on the National Register-designated landscape.

We believe that any effects to the Midway Plaisance deriving from the undertaking should be fully assessed in the current AOE. To delay such an assessment would be contrary to the purpose of the Section 106 process itself and would deprive consulting parties of the ability to ascertain the impact of the full scope of the undertaking and to weigh whether other prudent action was taken to avoid adverse effects. The provisions and strictures of the UPARR Program have been in place since 1978, when the program was established by law. Furthermore, the city has presumably understood its obligations under the UPARR agreement since it moved to cede land in Jackson Park to the Obama Foundation, so seeking a separate, future review process is unwarranted. Moreover, the staffs of consulting parties and federal agencies are now actively engaged in the assessment process, and the city has already indicated its intention to move

forward with plans that will have demonstrable adverse effects on the historic designed landscape. As signatory consulting parties, the National Park Service and the Advisory Council on Historic Preservation should be fully availed of those plans before the AOE is finalized—all the more so because the Eastern Midway is intrinsically linked to both Jackson and Washington Parks (see below) and would appear to be an inapposite location for recreational activity.

- B. As TCLF stated in an [earlier correspondence](#) to the City of Chicago, of the three tracts of land today known as Washington Park, the Midway Plaisance, and Jackson Park were conceived and designed as a single park. The report to the South Park Commission by Olmsted, Vaux & Co., submitted in March 1871, refers, in fact, to the whole of the bounded area as “The Chicago South Park,” which it then describes as comprising an “Upper Division,” a “Midway Division,” and a “Lower or Lagoon Division.” As such, Chicago’s South Park System is today the only intact park system designed by Olmsted and Vaux outside the State of New York. In failing to analyze potential effects on Washington Park, listed in the NRHP in 2004, the current AOE fails to recognize the essential unity of the three parks. We therefore urge the City of Chicago to provide a full assessment of the potential cumulative and indirect effects of the undertaking on Washington Park, without which the AOE must be regarded as incomplete.
- C. With regard to the visual impact of planned OPC structures, the AOE states (p. 15) that “the ability to capture viewpoints from above-ground level (i.e. upper-levels of a multi-story building) is not available, however, possible views of the OPC Museum Building from elevated viewpoints are noted, as applicable, for historic properties.” The precise meaning of the phrase “not available” in that passage is unclear. In fact, relatively inexpensive (*i.e.*, licensed for less than \$1,000) off-the-shelf software (*e.g.*, TerrSet Geospatial Monitoring and Modeling Software) enabling such analyses has long been widely available. When asked, at a public meeting of consulting parties on August 5, 2019, why the proper visual analyses had not been conducted, a representative of the City of Chicago responded that the city does not have the technology. We believe the city should acquire the technology and conduct a proper above-ground-level visibility analysis of potential effects on all historic properties and districts within a one-half-mile radius of the location of planned OPC structures. Absent those analyses, the AOE is incomplete because the potential adverse effects on such designated resources cannot be fully assessed.

II. Improving the AOE

- A. In the section titled “Effect Determination,” the AOE states (p. 22) that “primary physical changes that are concentrated in the western perimeter of Jackson Park and the eastern Midway Plaisance impact adjacent park areas including the Lagoons, Fields, and Lake Shore.” But the AOE later states, in the section titled “Minimization and Mitigation of Effects” (p. 51), that “The project footprint has been developed to affect a relatively small area of the total acreage of the historic property (approximately three percent).” Both statements cannot be true. One can say that the project footprint was developed *with the intention* to affect a relatively small area of the historic property, and that despite that intention, the AOE has concluded that a much larger portion of historic properties would nonetheless be impacted. This important distinction underscores the fact that the stated efforts to minimize the impact of the OPC during the design phase, so as to affect only

approximately three percent of Jackson Park, were not successful, as the AOE otherwise makes clear.

Likewise, the AOE states (p. 23) that “New materials with modern functions differ from historic materials at a scale and intent that does not conform to the Secretary of the Interior’s Standards. Integrity of workmanship is obscured by changes to the integrity of park design, the addition of new features and materials, and by the removal and alteration of historic fabric that relates to material integrity.” Despite this clearly stated conclusion that the building materials introduced by the OPC would constitute an adverse effect on the historic property, the AOE later states, again in the section titled “Minimization and Mitigation of Effects” (pp. 51–52), that “the orientation, location, and materials of the Museum Building have been developed with attention to views from the historic property and the skyline surrounding.” The statements are, again, at odds, and the text should be rewritten to note that here, too, efforts to minimize or mitigate effects, with regard to materials, were unsuccessful.

- B. We strongly suggest that the AOE’s analysis of effects be reorganized and expanded so as to delineate individual, categorical effects on character-defining features of the historic designed landscapes of Jackson Park, the Midway Plaisance, Washington Park, and other designated historic resources. As in the original effects assessment, the *Secretary of the Interior’s Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes* should continue to serve as a baseline of analysis. The overall aim is a clearer, more detailed statement of specific adverse effects that are to be avoided, minimized, or mitigated—one that is more comprehensible to consulting parties and the public, and that can be easily converted to a tabular matrix.

TCLF appreciates the opportunity to comment on the draft AOE, and we look forward to responses to all of the issues that we and other consulting parties have raised.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
President + CEO
The Cultural Landscape Foundation

Cc: Eleanor Gorski, Chicago Department of Planning and Development; Anthony Rubano, Illinois State Historic Preservation Office; Matt Fuller, Federal Highway Administration; Juanita Irizzary, Friends of the Parks; Margaret Schmid, Jackson Park Watch; Ted Haffner, Openlands; Lucy Lawliss, National Association for Olmsted Parks; Michael McNamee, Save the Midway!; Lisa Dichiera, Landmarks Illinois; Ward Miller, Preservation Chicago



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CONSULTING PARTY LETTER: University of Chicago

Abby Monroe
Public Participation Office
Department of Planning and Development
City of Chicago

August 26, 2019

Dear Ms. Monroe:

Thank you for the opportunity to submit a letter on behalf of the University of Chicago in response to the recently released draft Section 106 Assessment of Effects (AOE) report.

We appreciate the thorough and careful analysis done by the federal agencies to understand how resources in and adjacent to Jackson Park might be impacted by proposed federal undertakings related to the construction of the Obama Presidential Center. We recognize that a substantial amount of time and effort was spent on this review, and it was indicative of the process that has taken place thus far in making the Obama Presidential Center a reality on Chicago's South Side—a process that we have been involved with since 2015. Further, as a consulting party, we have appreciated the opportunity to participate in the robust Section 106 process alongside stakeholders and offer our input at multiple junctures throughout the effort.

Many of the proposed changes in Jackson Park will enhance community members' ability to enjoy the park, by improving access and increasing the opportunities for active recreation.

As the Section 106 process continues, we look forward to working collaboratively with the community, the City of Chicago, and the federal agencies to explore additional ways in which we can celebrate the history and function of Jackson Park while delivering on opportunities for learning and culture – all in a community that we have called home since 1890.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Susan S. Sher".

Susan S. Sher
Senior Adviser to the President of the University

Ms. Abby Monroe
Department of Planning and Development
Chicago, IL 60601

August 30, 2019

Dear Ms. Monroe:

I am writing on behalf of Vista Garage Building Cooperative, comprised of over 100 shareholders in a shared parking structure adjacent to the Midway Plaisance. The Vista Garage Building Corporation is a Consulting Party to the Section 106 Federal Review process for the Obama Presidential Center in Jackson Park. This letter speaks specifically to support for the City's recommendation to extend the Federal Urban Park and Recreation Recovery Act (UPARR) designation to the Midway Plaisance, east of the Metra tracks.

The Vista Garage is located immediately east of the Metra tracks and behind the Vista Homes and Midway Apartments multiunit residential buildings. The Garage has parking below grade and serves as a barometer for the water table in the area north of the section of the Midway Plaisance in question –the garage has two sump pumps, but still experiences regular ground water seepage.

We support maintaining the Midway Plaisance east of the Metra tracks as an as an open park and passive recreation facility. But any improvements to this part of the Plaisance will require addressing the standing water that gathers on this property for much of the year. We encourage careful consideration of drainage, groundwater and sewer capacity in the area. It was mentioned at the MPAC meeting on August 21 that the low spot “simply be filled and force the water into the sewers”. Such a simple fix may not be effective in solving this persistent water problem. To understand the natural water movement that follows the path of the Midway, a hydrology study of the area is recommended.

Creative landscaping solutions for managing the naturally occurring water should be considered. Fredrick Law Olmstead's original design for the Midway, as a watercourse between Washington Park and Jackson Park, and ultimately draining into Lake Michigan should be an indication that the standing water at the east end of the Midway is not new or man made.

Thank you for your consideration of our concerns.

Sincerely,

Kay Poyner Brown
President
Vista Garage Building Cooperative Board

Vista Homes Building Corporation

5844 Stony Island Avenue
Chicago, IL 60637

August 28, 2019

This letter is submitted by the Board of Directors on behalf of the Vista Homes Building Corporation (VHBC), a recognized consulting party to the Section 106 process. We represent VHBC, a 120-unit residential cooperative that is located at 59th and Stony Island Avenue. Our location gives us intimate day-to-day knowledge of the roadways and parks, and we note the following aspects that have either been left out of the AOE report or, in our view, ones which have not received the proper emphasis.

A key aspect of Olmsted's landscape philosophy was a democratic perspective: he designed parks and their road- and pathways in ways that were meant to make them as accessible as possible to all people. Widening Stony Island Avenue and closing off of Cornell, will actually make the parks less accessible to the people in the neighborhood. For residents on the Southside—whether they will be driving or as pedestrians trying to cross a much busier and wider Stony Island—accessing the park will be much more difficult. For a discussion of this issue, please listen to Professor Stovall from the University of Illinois at Chicago at his recent Chicago Tonight appearance. <http://bit.ly/2KoFVRn> Given Olmsted's democratic vision of parks, this decrease in the park's accessibility is an adverse effect on the historical nature of the park.

We are concerned about the adequacy of the traffic studies that have been done. From our experience living on Stony Island, we fear that the traffic jams will be frequent and severe and will thus create a barrier to the park and its accessibility. We note as one recent example, when Uber held a private event at the Museum of Science and Industry, Stony Island was completely overwhelmed and this happened while Cornell Drive was still open. Please see the Chicago Tribune's coverage of this event: <https://www.chicagotribune.com/news/breaking/ct-met-uber-event-museum-science-industry-hyde-park-traffic-20190611-story.html> Traffic jams will certainly serve as a barrier to park usage; this is an adverse effect of the historical nature of the park.

Suggestions for amelioration:

- Consider adding more pedestrian underpasses for local Hyde Park and Woodlawn residents
- Consider not closing Cornell entirely, but only some of its lanes

A great many of VHBC's residents are concerned with the City's plans for the Midway and would argue that the AOE report does not go far enough in reporting the damage to the Midway. Many of us believe that the City should honor UPARR and the City ordinance that promised replacement parkland to create new, replacement parkland and not to destroy the open, meadow nature of the Midway. We realize that it may be difficult for those simply driving by on Stony Island to appreciate the quiet beauty and elegance of the open meadow as Olmsted designed it, but as residents, we have experienced this firsthand and wish to maintain it for posterity. We encourage anyone who wishes to pour concrete and build fences on the eastern panel of the Midway to go onto the park and look east in various seasons and times of the day to appreciate the park fully. We note further that Olmsted designed the three parks—Jackson, Washington

and the Midway Plaisance—as a park system. The size and location of the high-rise museum tower will destroy the eastern vistas and views from the Midway and will serve to sever the visual coherence of the three parks.

Suggestions for amelioration:

- To honor the true spirit of UPARR, create new parkland entirely in the Woodlawn neighborhood, large areas of which do not have public parks.
- To avoid further damage to the Midway's historic status, place the proposed playground initiatives next to the skating rink on the Midway. According to the AOE, this area has already suffered an adverse effect.
- Rather than seeking to eliminate the ephemeral wetland of this section, enhance it by creating a year-round pond in one corner.
- Reduce the height of the tower and move it south, away from the site lines of the Midway.

Finally, we note that the AOE seems to focus upon the utilitarian aspect of the Women's/Perennial Garden and only refers to the loss of historical materials should the OPC plans proceed. We note, however, that there would be additional historical losses that have not been documented in your report. This garden was designed in 1936 by noted landscape architect, May McAdam, the park district's first female landscape architect. The location is further noteworthy because it resides on the location of the Women's Pavilion of the 1893 World's Fair, a pavilion that was designed by Sophia Hayden, the only woman who designed a building at the World's Fair and the first woman to graduate from the architecture program at MIT. We are concerned that the accomplishments of women, May McAdam and Sophia Hayden, will be destroyed by using this park as a staging area for the OPC construction and then by the subsequent plans to "enlarge" it and combine it with the larger OPC campus. It is our understanding that McAdam's 1936 designs are still intact but will be wiped out by the new plans.

We would like to add that we have a unique perspective on the Women's/Perennial Garden given our close proximity to it. We have seen how its enclosed, sunken space is used so variously, whether for weddings, children's groups, or the annual commemoration of the Thanksgiving Day Chicago Times-Herald Race of 1895 (the first automobile race in the U.S. which served to introduce the car to the American people.) Like the eastern panel of the Midway, unless you have experienced the beauty of this park oasis in various seasons, it may be difficult to appreciate its significance as a separate park.

Suggestions for amelioration:

- Stage the construction site on property that is not historically significant or intact.
- Respect the design and legacy of noted women designers; keep the current design of the park; and keep it as a separate park.

Respectfully submitted,
Alyssa Qualls
President, Board of Directors, Vista Homes Building Corporation

Appendix G – Document Preparers

List of Staff

City of Chicago – Department of Planning and Development Bureau of Planning, Sustainability and Historic Preservation

Eleanor Gorski – Bureau Chief

Abby Monroe – Public Participation Officer

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Mary Young, P.E., PTOE – Senior Project Manager

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