

**MOBILITY IMPROVEMENTS TO SUPPORT THE SOUTH LAKEFRONT FRAMEWORK PLAN
CITY OF CHICAGO, COOK COUNTY, ILLINOIS**

FINAL SECTION 4(f) EVALUATION
Submitted Pursuant to 49 USC 303
by the

U.S. Department of Transportation
Federal Highway Administration

and

Illinois Department of Transportation

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For FHWA

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ABSTRACT:

The proposed improvements for this project include roadway improvements within and adjacent to Jackson Park to accommodate changes in travel patterns as a result of roadway closures implemented by the City of Chicago (City). Bicycle and pedestrian facilities and connections are proposed to improve access and circulation to, from, and within Jackson Park.

Lake Shore Drive (U.S. Route 41) will be widened to the west to provide an additional southbound travel lane between 57th Street and Hayes Drive. To accommodate the additional travel lane, the 59th Street Inlet Bridge will be widened and modifications at the intersections of 57th Street, Science Drive, and Hayes Drive are proposed.

Hayes Drive will be reconfigured to remove existing on-street parking to provide two travel lanes in each direction with minimal widening. A traffic signal and intersection improvement is proposed at Richards Drive. Hayes Drive will be realigned at 63rd Street to provide a through movement for predominant travel. Southbound Cornell Drive will be widened to accommodate two-way traffic at Stony Island Avenue.

Stony Island Avenue will be widened to the east to accommodate additional through lanes and turn lanes at cross-street intersections. Intersections will be modified to accommodate the additional lanes. New traffic signals are proposed along Stony Island Avenue at 64th Street and 62nd Street. The N. Midway Plaisance (westbound only) will be widened to accommodate two-way traffic at Stony Island Avenue.

Proposed bicycle and pedestrian accommodations include the construction of four underpasses within Jackson Park. Proposed trails and connections along Cornell Drive, Hayes Drive, and Marquette Drive will improve circulation within the park and access to existing facilities. Curb extensions and pedestrian refuge islands are proposed along Stony Island Avenue and along Cornell Drive north of the Midway Plaisance to improve access to Jackson Park.

Jackson Park and the Midway Plaisance are jointly listed on the National Register of Historic Places (NRHP) as the Jackson Park Historic Landscape District and Midway Plaisance. They are also contributing resources to the Chicago Park Boulevard System (CPBS) Historic District.

This improvement will not require any acquisition from private properties. As design for transportation improvements has been developed, impacts have been refined and may differ from those provided in the Least Harms and Preferred Alternative analyses. Approximately 5.2 acres of Section 4(f) land within Jackson Park will be permanently used for transportation purposes. The City will close several roadways in Jackson Park and transfer 7.7 acres of right-of-way that is currently used for transportation purposes to the Chicago Park District (CPD), which will be incorporated into Jackson Park for recreational area and park purposes. A total of 417 trees are proposed for removal by the transportation project.

Approximately 18.5 acres of Section 4(f) land within Jackson Park will be temporarily used to construct the bicycle and pedestrian underpasses, trails, and connections. Additionally, temporary uses for construction staging and roadway grading affect approximately 5.0 acres of parkland, resulting in a total of 23.5 acres of temporary usage of Section 4(f) land. These temporary uses will be (1) temporary in duration and less than the time for construction of the entire project; (2) the scope of the work is minor and the nature and magnitude of the changes to the Section 4(f) properties are minimal; (3) there are no anticipated permanent adverse physical effects nor will there be interference with the protected activities, features, or attributes of the Section 4(f) properties, on either a temporary or permanent basis; and (4) the land will be fully restored to a condition that is at least as good as that which existed prior to the project. While the Chicago Park District provided concurrence of these conditions, concurrence was not received from all Officials with Jurisdiction (OWJ), therefore, these temporary uses cannot be declared exempt from Section 4(f) approval and are subject to approval under 23 CFR 774.3(a).

The total Section 4(f) use of land, including permanent and temporary uses, is 28.7 acres. This use affects Jackson Park (park/recreational land), the Jackson Park Historic Landscape District and Midway Plaisance, and the CPBS Historic District. However, after the transfer of closed roadways from the Chicago Department of Transportation to the CPD, there is a net increase in Section 4(f) park land of 2.5 acres in Jackson Park.

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1.0 Introduction

Section 4(f) of the U.S. Department of Transportation Act of 1966, known as Section 4(f), provides for consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites during transportation project development. The law, now codified in 49 U.S.C. §303 and 23 U.S.C. §138, applies only to agencies within the U.S. Department of Transportation (U.S. DOT) and is implemented by the Federal Highway Administration (FHWA) and the Federal Transit Administration through the regulation at 23 CFR Part 774. Before approving a project that uses Section 4(f) property, FHWA must determine that there is no feasible and prudent alternative that avoids the Section 4(f) properties and that the project includes all possible planning to minimize harm to the Section 4(f) properties; or, FHWA makes a finding that the project has a de minimis impact on the Section 4(f) property.

Section 4(f) protects publicly owned park and recreation areas that are open to the general public, publicly owned wildlife and waterfowl refuges, and public or privately owned historic sites. The term historic sites includes prehistoric and historic districts, sites, buildings, structures or objects listed in, or eligible for, the National Register of Historic Places (NRHP).

Like Section 4(f), Section 106 of the National Historic Preservation Act (NHPA) of 1966 also mandates consideration of a project's effect on historic sites. The most important connection between the two statutes is that the Section 106 process is generally the method by which historic properties are identified that would be subject to consideration under Section 4(f). The results of the identification step under Section 106 - including the eligibility of the resource for listing on the NRHP, the delineation of NRHP boundaries, and the identification of contributing and non-contributing elements within the boundary of a historic district—are a critical part of determining the applicability of Section 4(f).

The most important difference between the two statutes is the way each of them measures impacts to historic sites. Whereas Section 106 is concerned with adverse effects, Section 4(f) is concerned with use. The two terms are not interchangeable and an adverse effect determination under Section 106 does not automatically equate to a Section 4(f) use of the property.

Use of a Section 4(f) property occurs: (1) when land is permanently incorporated into a transportation project; (2) when there is a temporary use of land that is adverse in terms of the statute's preservation purpose; or (3) when there is a constructive use (a project's proximity impacts are so severe that the protected activities, features, or attributes of a property are substantially impaired).

2.0 Project Description

2.1 Proposed Action – FHWA Action

The City of Chicago (City) is proposing to close roadways within Jackson Park, Chicago, Illinois to meet the planning and development objectives for Jackson Park which are fully described in the 2018 South Lakefront Framework Plan (SLFP)¹ in **Appendix I**. The permanent roadway closures include: 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 South Midway Plaisance (eastbound only) between Stony Island Avenue and Cornell Drive. See **Exhibit A-3**. Closures of South Midway Plaisance and Cornell Drive between 62nd Street and 59th Street are necessary to accommodate the development of the Obama Presidential Center (OPC), a separate privately funded action that is part of the vision for the park described in the 2018 SLFP. The additional roadway closures will allow for a more connected park and enhanced access to important amenities within Jackson Park. The roadway closures and construction of the OPC are separate independent actions that do not require any Federal approvals and are therefore considered the baseline condition as well as the No-Action alternative.

The roadway closures and the decision to locate the OPC in Jackson Park are local land use and land management decisions by the City and are not under the jurisdiction of FHWA. These actions **are not** subject to Section 4(f) because:

- (1) These actions do not require an approval from FHWA in order to proceed;
- (2) These actions are not transportation projects;
- (3) These actions are being implemented to address a purpose that is unrelated to the movement of people, goods, and services from one place to another (i.e., a purpose that is not a transportation purpose.)

The City seeks Federal approval from the National Park Service related to the Urban Parks and Recreation Recovery (UPARR) program that encumbers Jackson Park. Section 4.1.10 discusses UPARR requirements in detail. Any proposed action by the National Park Service **is not** subject to the Section 4(f) requirements because:

- (1) The UPARR decision by the National Park Service does not require an approval from FHWA (or any other Federal transportation agency) in order to proceed;
- (2) The UPARR decision is not a transportation project;
- (3) The UPARR decision is being implemented to address a purpose that is unrelated to the movement of people, goods, and services from one place to another (i.e., a purpose that is not a transportation purpose.)

¹ The 2018 South Lakefront Framework Plan was presented to the Chicago Park District Board of Commissioners on April 11, 2018. As a framework plan for the CPD, it does not require a formal approval.

The City also seeks Federal approval from the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act and Section 14 of the Rivers and Harbors Act of 1899 (“Section 408”). Section 10.2.1 discusses USACE requirements in detail. Any proposed action by the USACE **is not** subject to the Section 4(f) requirements because:

- (1) The USACE decisions do not require an approval from FHWA (or any other Federal transportation agency) in order to proceed;
- (2) The USACE decision is not a transportation project;
- (3) The USACE decision is being implemented to address a purpose that is unrelated to the movement of people, goods, and services from one place to another (i.e., a purpose that is not a transportation purpose.)

The roadway closures may require improvements to other roadways to mitigate traffic impacts. In order to meet the project’s Purpose and Need, improvements to bicycle and pedestrian accommodations to improve access and circulation to and within Jackson Park may also be proposed. Improvements to bicycle and pedestrian accommodations to improve access and circulation to and within Jackson Park are consistent with the planning objectives described in the 2018 SLFP. The potential roadway improvements and bicycle and pedestrian accommodations may be funded through the FHWA Federal-Aid Highway Program, which would require approval from FHWA. Therefore, the proposed roadway and bicycle and pedestrian improvements are subject to Section 4(f) because:

- (1) In order for the City to receive Federal-Aid funds for these improvements, FHWA must provide its approval;
- (2) The roadway and bicycle and pedestrian improvements are transportation projects; and
- (3) These improvements are being implemented to address a purpose and need that is related to the movement of people, goods, and services from one place to another.

2.2 Study Area

The Study Area is located in Chicago, Illinois, and encompasses Jackson Park. See **Exhibits A-1a, A-1b and A-2 in Appendix A**. Jackson Park is bounded by 67th Street, Stony Island Avenue, 56th Street and Lake Michigan. Jackson Park is served by heavily travelled arterial roadways, including Lake Shore Drive (U.S. Route 41) to the east and Stony Island Avenue to the west. Within Jackson Park, 57th Drive carries east-west traffic from Lake Shore Drive to the Museum of Science and Industry (MSI). South of the Museum, 57th Drive becomes Cornell Drive which carries north-south traffic from the Museum toward park recreational facilities and beyond to residential neighborhoods. These roadway facilities provide an important route for eastbound morning commuters and westbound evening commuters between major commuter expressways and the City’s Central Business District. Collector roadways within Jackson Park include Hayes Drive and Marquette Drive. Lake Shore Drive north of 57th Drive and Stony Island Avenue south of 57th Street are on the National Highway System, which consists of roadways that are important to the nation’s economy, defense and mobility. The Lakefront Trail is parallel to the east side of Lake Shore Drive and serves recreational users, commuters, and tourists.

A full list of Section 4(f) properties considered under this evaluation is contained in Section 4.0.

3.0 Purpose and Need – FHWA Action

3.1 Project Need

The Proposed Action relates to the potential roadway improvements that are necessary to address traffic impacts that will result from roadway closures within Jackson Park. The roadway closures do not require any Federal approvals and are therefore considered the baseline condition as well as the No-Action Alternative.

Improvement needs vary within the project area, but fall into two broad categories:

- Accommodate changes in travel patterns
- Improve bicyclist and pedestrian access and circulation

The roadway closures considered in the No-Action Alternative will result in a change in travel patterns in the study area and will redistribute traffic to the surrounding roadway network. An analysis of the Intersection Levels of Service for 2040² projected traffic conditions of the No-Action Alternative are shown in **Table 1**.

² In October 2018, the Chicago Metropolitan Agency for Planning (CMAP) formally adopted their *ON TO 2050* regional plan. In accordance with the adoption of the new regional plan, year 2050 traffic projections were obtained from CMAP and the traffic analyses were re-evaluated to ensure that traffic impacts would not significantly increase under year 2050 traffic volumes. This sensitivity analysis is discussed in Section 4 of **Appendix J**. The results of the sensitivity analysis found that while traffic volumes do increase over 2040 levels, the conclusions reached from the 2040 traffic analyses do not change for any of the alternatives under 2050 traffic volumes. It was therefore concluded that the original 2040 analyses are still valid for environmental review purposes.

Table 1: 2040 No-Action Alternative Intersection Levels of Service Intersection	Intersection Level of Service and Delay (sec./veh.)	
	A.M. Peak Hour	P.M. Peak Hour
Lake Shore Drive		
<ul style="list-style-type: none"> Marquette Dr 	C (22)	C (24)
<ul style="list-style-type: none"> Hayes Dr 	F (**)	F (**)
<ul style="list-style-type: none"> Science Dr 	B (19)	F (**)
<ul style="list-style-type: none"> 57th Street 	B (13)	F (**)
Stony Island Avenue		
<ul style="list-style-type: none"> 67th St 	F (**)	F (**)
<ul style="list-style-type: none"> Marquette Dr 	D (50)	B (15)
<ul style="list-style-type: none"> 65th Pl 	F (**)	C (30)
<ul style="list-style-type: none"> 64th St * 	F (**)	F (**)
<ul style="list-style-type: none"> 63rd St/Hayes Dr 	F (**)	F (**)
<ul style="list-style-type: none"> 60th St 	C (20)	B (12)
<ul style="list-style-type: none"> Midway Plaisance (EB) 	B (13)	C (31)
<ul style="list-style-type: none"> Midway Plaisance (WB) 	F (**)	C (32)
<ul style="list-style-type: none"> 59th St 	F (**)	C (24)
<ul style="list-style-type: none"> 57th St 	F (**)	F (**)
<ul style="list-style-type: none"> 56th St * 	D (32)	D (31)
Cornell Drive/57th Drive		
<ul style="list-style-type: none"> 67th St 	Closed	
<ul style="list-style-type: none"> Marquette Drive 	Closed	
<ul style="list-style-type: none"> Hayes Dr 	F (**)	F (**)
<ul style="list-style-type: none"> Midway Plaisance (EB) 	Closed	
<ul style="list-style-type: none"> 57th St/MSI Drop off 	F (**)	D (54)
<ul style="list-style-type: none"> Hyde Park Blvd 	C (23)	B (20)
67th St		
<ul style="list-style-type: none"> East End Ave * 	B (12)	B (14)
<ul style="list-style-type: none"> Cregier Ave * 	B (13)	B (13)
<ul style="list-style-type: none"> Jeffery Ave 	B (20)	B (19)
<ul style="list-style-type: none"> South Shore Dr 	B (17)	B (19)
Marquette Dr		
<ul style="list-style-type: none"> Richards Dr (West) 	Closed	
<ul style="list-style-type: none"> Richards Dr (East) 	Closed	
<ul style="list-style-type: none"> La Rabida Entrance 	B (14)	A (7)
Richards Drive		
<ul style="list-style-type: none"> Marquette Dr (North) 	Closed	
<ul style="list-style-type: none"> Hayes Dr * 	A (9)	B (15)
56th St		
<ul style="list-style-type: none"> Hyde Park Blvd * 	B (12)	B (12)
<ul style="list-style-type: none"> Everett Ave * 	A (8)	A (7)

*Indicates All-way Stop-Controlled Intersection

** Indicates one or more movements operate over capacity ($v/c > 1$). These intersections are listed with a Level of Service F per the Highway Capacity Manual definition.

Under the No-Action Alternative conditions, eleven signalized intersections and one stop sign controlled intersection experience a Level of Service (LOS) F or operate over capacity during either the morning or the evening peak hour, with expected average vehicle delays of 1.5 minutes to as much as 4 minutes. These LOS F intersections are a result of traffic diversions and traffic redistribution caused by the roadway closures. There is a need to improve roadway and intersection facilities to accommodate the future changes in travel patterns and provide acceptable levels of intersection safety and operation.

Jackson Park attracts many local residents, tourists, and recreational users each day as the home of the MSI, an outdoor track and field facility, baseball and softball diamonds, a golf course and driving range, soccer fields, beaches, harbors, gardens, and natural spaces, among many other park amenities.

Improvements along Lake Shore Drive completed in 2001 provided or improved underpasses for east-west bicycle and pedestrian access to the lakefront and the Lakefront Trail at several locations: Marquette Drive, Hayes Drive (63rd Street), 59th Street, 57th Street, and 55th Street (Promontory Point).

Other than the underpasses beneath Lake Shore Drive, no other grade separated bicyclist or pedestrian locations exist within the park. To circulate within the park, users must cross four to six lane heavily travelled roadways, either at signalized intersections or uncontrolled crosswalks, some of which are unmarked.

Crossing locations are typically spaced approximately 700 to 800 feet apart. One of the longest stretches within the park without a crossing location occurs along the six lane section of Cornell Drive between Hayes Drive and the Midway Plaisance, a length of over one-third of a mile (1,760 feet). The Clarence Darrow Bridge, which provides an east-west connection over the Columbia Basin south of the MSI, is in need of repair and is currently closed to all traffic due to its poor condition. Improvements to this structure are currently under preliminary design and environmental review as part of a separate federally funded project. The Clarence Darrow Bridge, currently closed to all pedestrian and bicyclist traffic due to its poor condition, is meant to provide an east-west connection over the Columbia Basin south of the MSI. Due to the current closure of the Clarence Darrow Bridge, pedestrians and bicyclists can only cross roadways at intersections or crosswalks in order to circulate within Jackson Park.

The *Chicago Streets for Cycling Plan 2020* aims to provide safe bicycle accommodations within 0.5 miles of every resident for access to and from homes, businesses and recreational facilities. Neighborhood routes are generally located along residential streets and provide connections between local destinations. Crosstown routes are identified along collector and arterial streets to connect major destinations through a variety of land uses. These routes may include treatments such as barrier or buffer protected on-street bike lanes, striped bike lanes, marked shared bike lanes, or signed routes. Both classes of routes in the *Streets for Cycling Plan* have been identified along roadways bordering and terminating into Jackson Park.

Divvy is Chicago's bike share system, which allows users to rent bicycles for trips such as commuting to work, visiting Chicago's landmarks or enjoying a ride along the lakefront. Bicycles can be picked up or dropped off at any station, typically located at major end points of user routes.

With future plans to provide routes for local residents to Jackson Park, as well as several Divvy stations currently provided in the area, there is a need to provide safe and frequent access points and to improve facility conditions that allow for better circulation within Jackson Park.

Improvements to bicycle and pedestrian accommodations to improve access and circulation to and within Jackson Park are consistent with the planning objectives described in the 2018 SLFP and will enhance bicycle and pedestrian access to and enjoyment of Jackson Park.

3.2 Project Purpose

The purpose of the Proposed Action is to (1) address changes in travel patterns resulting from closing roadways in Jackson Park and (2) improve bicycle and pedestrian access and circulation.

4.0 Description of Section 4(f) Properties

As noted in Section 1.0, Section 4(f) properties include publicly owned park and recreation areas that are open to the general public, publicly owned wildlife and waterfowl refuges, and public or privately owned historic sites.

In compliance with Section 106 of NHPA, a Historic Property Inventory (HPI)³ report surveyed properties within an identified Area of Potential Effect (APE)⁴ for the project to determine properties that are listed in or considered eligible for the National Register of Historic Places (NRHP). The HPI was reviewed and the determinations concurred upon by the Illinois State Historic Preservation Officer (SHPO) on July 10, 2018. The HPI was amended on January 16, 2020 to include the Chicago Park Boulevard System (CPBS) Historic District, which was listed on the NHRP in December 2018. The HPI was used to identify Section 4(f) historic properties for this Section 4(f) evaluation.

In the study area, there are four Section 4(f) properties that have overlapping boundaries, either in whole or in part. Jackson Park and Midway Plaisance are protected by Section 4(f) because they are both publicly owned parks important for recreation in the community. Combined, Jackson Park and Midway Plaisance are protected by Section 4(f) because they are listed together on the NRHP as the Jackson Park Historic Landscape District and Midway Plaisance. Additionally, the CPBS Historic District, which is 26 miles in length, includes the entire boundary of the Jackson Park Historic Landscape District and Midway Plaisance. Any Section 4(f) use of Jackson Park or the Midway Plaisance also results in a Section 4(f) use of the historic properties of Jackson Park Historic Landscape District and Midway Plaisance and the CPBS Historic District. Detailed descriptions of these Section 4(f) resources are included below. Listed and eligible properties for the NRHP identified in the HPI³ and the APE limits are shown on **Exhibit B-1**.

Wildlife and waterfowl refuges are defined as properties that are part of the National Wildlife Refuge or other publicly owned land that serve as locations for land conservation or management of endangered species, wildlife and waterfowl resources and their habitats. The U.S. Fish and Wildlife Service (USFWS) is the government agency dedicated to the conservation, protection and enhancement of fish, wildlife and plants, and their habitats and oversees the National Wildlife Refuge System. According to the USFWS database and shown on **Exhibit B-2**, there are no National Wildlife Refuges present within or nearby the project study area.

As part of the 2006 *Chicago Wildlife and Nature Plan*, the Chicago Department of Housing and Economic Development inventoried nearly 100 open space locations to produce the Chicago Nature Areas Directory. The Nature Areas Directory provides information on approximately 3,800 acres of existing and natural habitats and 920 acres of potential habitat restoration sites within the city limits.⁵ Three natural areas are

³ https://www.chicago.gov/content/dam/city/depts/dcd/supp_info/jackson/hpi-report.pdf

⁴ https://www.chicago.gov/content/dam/city/depts/dcd/supp_info/jackson/2018-03-27-APE_Historical_Overall_halfmile_website.pdf

⁵ City of Chicago. Nature Areas Directory.

https://www.cityofchicago.org/city/en/depts/dcd/supp_info/nature_areas_directory.html

located within Jackson Park and are further described in Section 4.1.3. There are no identified natural areas located within the Midway Plaisance.

Table 2 provides a list of all Section 4(f) properties identified within the study area and NHPA APE boundary. The table indicates if a use of the Section 4(f) property is anticipated by any of the alternatives under consideration; properties which may be used by an alternative are further discussed in this section.

Table 2: Section 4(f) Properties

Property Name	Section 4(f) Property Type	Officials with Jurisdiction (OWJ)	Section 4(f) Use Required (Alternative(s) requiring use)
Jackson Park	Park/Recreational Land	CPD	Yes (Congestion Management Process Strategies, Alternatives 2, 3, 4, 5, 6, 7, 8, 9A, 9B)
Midway Plaisance	Park/Recreational Land	CDOT, CPD	Yes (Alternative 9A)
Jackson Park Historic Landscape District and Midway Plaisance	Historic Property	SHPO, ACHP	Yes (Congestion Management Process Strategies, Alternatives 2, 3, 4, 5, 6, 7, 8, 9A, 9B)
Chicago Park Boulevard System Historic District ⁶	Historic Property	SHPO, ACHP	Yes (Congestion Management Process Strategies, Alternatives 1, 2, 3, 4, 5, 6, 7, 8, 9A, 9B)
Island Terrace Apartments (6430 S. Stony Island Avenue)	Historic Property	SHPO, ACHP	Yes (Alternative 1)
Hyde Park High School/Academy (6220 S. Stony Island Avenue)	Historic Property	SHPO, ACHP	Yes (Alternative 9A)
Jackson Park Terrace Historic District	Historic Property	SHPO, ACHP	Yes (Alternative 1)
Stony Island State Savings Bank/ Stony Island Arts Bank (6760 S. Stony Island Avenue)	Historic Property	SHPO, ACHP	No
William H. Dexter Three-Flat (1549 E. 65th Place)	Historic Property	SHPO, ACHP	No
Hyde Park-Kenwood Historic District (includes part of ICRR viaduct)	Historic Property	SHPO, ACHP	No

⁶ Contributing resources of the CPBS Historic District which are not individually listed or eligible for the NRHP that are impacted by the listed alternatives include the mixed-use building at 6450-60 S. Stony Island Avenue/1554-56 E. 65th Street and the apartment building at 6516-6520 S. Stony Island Avenue/1556-1558 E. 65th Place.

Property Name	Section 4(f) Property Type	Officials with Jurisdiction (OWJ)	Section 4(f) Use Required (Alternative(s) requiring use)
South Shore Country Club Historic District	Historic Property	SHPO, ACHP	No
South Shore E. 67th Street Apartment Historic District	Historic Property	SHPO, ACHP	No
Residences at 6700 S. Crandon Avenue	Historic Property	SHPO, ACHP	No
Shoreline Apartments	Historic Property	SHPO, ACHP	No
Residences at 2201-2211 E. 67th Street	Historic Property	SHPO, ACHP	No
Leonard L. Graff House (6700 S. Euclid Avenue)	Historic Property	SHPO, ACHP	No
Dr. Paul Schutz House (6701 S. Bennett Avenue)	Historic Property	SHPO, ACHP	No
Morris N. Fox Three-Flat (6700 S. Bennett Avenue)	Historic Property	SHPO, ACHP	No
Residences at 6701 S. Constance Avenue	Historic Property	SHPO, ACHP	No
Tower Court Apartments (6700-08 S. Constance Ave./ 1801-11 E. 67th St. / 6701-11 S. Cregier Ave.)	Historic Property	SHPO, ACHP	No
Hyde Park East Historic District	Historic Property	SHPO, ACHP	No
Bret Harte Elementary School	Historic Property	SHPO, ACHP	No
Windermere East Hotel/Apartments	Historic Property	SHPO, ACHP	No
Jackson Towers	Historic Property	SHPO, ACHP	No
Promontory Apartments	Historic Property	SHPO, ACHP	No
The Flamingo on the Lake	Historic Property	SHPO, ACHP	No
Jackson Shore Apartments	Historic Property	SHPO, ACHP	No
Shoreland Hotel	Historic Property	SHPO, ACHP	No
Promontory Point Historic District	Historic Property	SHPO, ACHP	No
Helstein House	Historic Property	SHPO, ACHP	No
Residence at 5812 S. Blackstone Avenue	Historic Property	SHPO, ACHP	No
Stein Building	Historic Property	SHPO, ACHP	No
Johnson House	Historic Property	SHPO, ACHP	No
Center for Continuing Education (1301-1311 E. 60th Street)	Historic Property	SHPO, ACHP	No

Property Name	Section 4(f) Property Type	Officials with Jurisdiction (OWJ)	Section 4(f) Use Required (Alternative(s) requiring use)
Public Administration Building (Chapin Hall) (1313 E. 60th Street)	Historic Property	SHPO, ACHP	No
St. Paul’s Universalist Church/ Shankman Orthogenic School (1375 E. 60th Street)	Historic Property	SHPO, ACHP	No
University of Chicago Power Station (6053 S. Blackstone Street)	Historic Property	SHPO, ACHP	No
62nd Place Firehouse (1405-07 E. 62nd Place)	Historic Property	SHPO, ACHP	No
Pridmore & Stanhope – designed Greystone (6243 S. Woodlawn Avenue)	Historic Property	SHPO, ACHP	No

Exhibits that identify aspects of the Section 4(f) resources can be found in **Appendix B** and are specifically referenced in the following sections.

4.1 Jackson Park

Jackson Park is a 551.52 acre park and recreation area that is generally bounded by 67th Street to the south, Stony Island Avenue to the west, 56th Street to the north and Lake Michigan to the east. Roadways within Jackson Park are owned by the Chicago Department of Transportation (CDOT), function as a transportation use, and are not considered Section 4(f) property. The limits of CDOT ownership lie within the roadway footprint from back-of-curb to back-of-curb, but also include the boulevard appurtenances behind the back-of-curb. The remainder is owned by the CPD and classified as Section 4(f) property. The property boundary can be found on **Exhibit B-3**. Any Section 4(f) use within Jackson Park as a park and recreation area would also result in Section 4(f) use of the NRHP listed Jackson Park Historic Landscape District and Midway Plaisance and CPBS Historic District.

4.1.1 Officials with Jurisdiction

For Jackson Park, the official(s) with jurisdiction (OWJ) include:

1. The CPD because it is the agency that owns most of and administers Jackson Park and is empowered to represent the agency on matters related to Jackson Park.

4.1.2 Park and Recreational Function

Jackson Park includes a variety of recreation areas that are open, public spaces. General areas of active recreation within Jackson Park are highlighted on **Exhibit B-4**. Active recreation uses include an 8-lane outdoor track, five soccer/football fields, two standard baseball diamonds, six softball/junior baseball

diamonds, four basketball courts, twenty-four tennis courts (twenty active courts), two bowling greens, a dog park (uses four of the twenty-four tennis courts), and the Jackson Park Fieldhouse fitness center and gymnasium. Golf facilities, including a driving range and an 18-hole golf course, are highlighted on **Exhibit B-5**.

With a shoreline along Lake Michigan, several water-based recreation opportunities are provided within Jackson Park, including beaches and harbors, as highlighted on **Exhibit B-6**. Along the Lake Michigan shoreline are two public beaches at 59th Street and 63rd Street. The 59th Street Harbor, Jackson Park Inner Harbor and Jackson Park Outer Harbor provide over 365 boat slips. Access points to the Lake Michigan Water Trail for non-motorized boating are provided at the 63rd Street Beach and the Inner Harbor. Other recreational use (such as fishing, canoeing, etc.) of the West Lagoon, East Lagoon, and Columbia Basin is currently restricted.

Passive recreation amenities of Jackson Park are highlighted on **Exhibit B-7**. These uses include seven playgrounds, twelve picnic groves, two formal gardens, one community production garden, and three natural areas (further discussed in Section 4.1.3). The Iowa Building, located northeast of the MSI, is a combination comfort/shelter station with a small open courtyard in the center. Picnic grove locations, accounting for more than half of permitted spaces within the park, are shown on **Exhibit B-8**.

4.1.3 Natural Areas

Three natural areas as listed in the Chicago Habitat Directory are located within Jackson Park: the Paul H. Douglas Nature Sanctuary, the Bobolink Meadow, and the 63rd Street Beach Dune. The natural areas are shown on **Exhibit B-9** and further discussed in the following sections. A summary of each location from the Chicago Habitat Directory can be found on **Exhibits B-10a** through **B-10c**.

4.1.3.1 Paul H. Douglas Nature Sanctuary

The Paul H. Douglas Nature Sanctuary generally encompasses the Columbia Basin (south of the MSI), the Wooded Island, habitat islands, and the East and West Lagoons within Jackson Park. It is 57.62 acres in size and contains forest/woodland, riparian/water edge, and aquatic habitats. The sanctuary was named for the Illinois senator who played a vital role in the preservation of the Indiana Dunes National Lakeshore and other important natural areas in the 1960s.

The Paul H. Douglas Nature Sanctuary provides a natural area for native plant and wildlife species as well as a space for local residents and visitors to enjoy these unique features of Jackson Park. Jackson Park plays an important role in the refuge of migratory birds. Migratory birds are abundant during the spring and fall and over 250 species have been sighted. Fish within the lagoons are a source of food for migratory birds. Recreational boating or canoeing is prohibited within the lagoons and Columbia Basin.

Within and surrounding the Wooded Island is an existing trail system for walkers and bicyclists connected by two bridges on the north and south ends of the island. Several overlooks surrounding the lagoons are present for visitors to enjoy views of the water, plants and wildlife. The Japanese Garden, also known as the Osaka Garden or the Garden of the Phoenix, is present on the northeastern side of the Wooded Island. The Japanese Garden is home to a double pond surrounded by a trail system that traverses the pond by

a Moon bridge, as well as a shelter and the Torii Gate at its entrance. Bicycling is not permitted within the Japanese Garden. The Skylanding sculpture, the first large-scale public commission by Yoko Ono, was recently installed on the island in 2016.

The 2018 SLFP, found in Appendix I, proposes enhancements within and adjacent to the Paul H. Douglas Nature Sanctuary, including additional trails within the Osaka Garden on the Wooded Island and a potential bayou connecting the East and West Lagoons to the Jackson Park Inner Harbor. It should be noted the 2018 SLFP is a long-range plan for Jackson and South Shore Cultural Center Parks and funding sources for all of the intended improvements have not been identified. The 2018 SLFP is discussed further in Section 4.1.6.

Vehicular traffic is not permitted within the property itself, however, parking lots on the northeast and southwest corners of the property are available for visitor access. The existing trail system within Jackson Park provides connections surrounding and within the property. Two bridges on the north and south ends of the Wooded Island provide access for visitors to the island.

4.1.3.2 Bobolink Meadow

The Bobolink Meadow is located along the eastern edge of the East Lagoon, across from the Paul H. Douglas Nature Sanctuary. The meadow is named after an Illinois grassland bird that once nested in the space. It is 5.39 acres in size and contains prairie/grassland space for wildlife and plants. To the north of the Bobolink Meadow is Bobolink Woods, which provides separation between the meadow and park facilities (i.e. parking lot and tennis courts). The Bobolink Meadow was previously leased by the United States Army as a Nike missile base between 1956 and 1971. Upon removal in 1971, the CPD repurposed the space for native plant species and wildlife.

Bobolink Meadow provides habitat for wildlife and native plants. Recreational use of the space is intended for bird watching, walking, and nature study. Within Bobolink Meadow exists a mulch trail for pedestrian travel. At the southern end of the Bobolink Woods exists an overlook to the East Lagoon.

As part of the 2018 SLFP, the CPD plans for an expansion of the Bobolink Meadow to the east by narrowing the existing driving range that borders the meadow today. Additional trails are proposed within the expanded meadow. The 2018 SLFP is discussed further in Section 4.1.6.

A parking lot serving the Bobolink Meadow is located north of the facility. The parking lot can be accessed via Lake Shore Drive and Science Drive, then continuing south around the Music Court and across the Music Court bridge. Pedestrian trails connect from the parking lot through Bobolink Woods to Bobolink Meadow.

4.1.3.3 63rd Street Beach Dune

The Jackson Park 63rd Street Beach Dune is located on the easternmost side of the 63rd Street Beach along Lake Michigan. It is 3.01 acres in size and includes freshwater lake shoreline and dune habitat. The area provides habitat for invertebrates, fishes, and potentially mudpuppies. Native dune grasses including marram grass, little bluestem grass, and prickly pear cactus are in the restored dune area as well as some pockets of the state endangered sea rocket. This natural area is used during the migration seasons by

waterfowl, and several species of shorebirds have been observed here including the Tricolored Heron and the Federally endangered Piping Plover.⁷

The Casino Building of the 1893 World’s Columbian Exposition was located on the 63rd Street Beach Dune. An adjacent Casino Pier was constructed as a breakwater. The Casino Building no longer exists, but the Casino Pier has been rebuilt several times and remains in place today.

All encompassed in the 63rd Street Beach area is the natural area for the Beach Dune, the 63rd Street Bathing Pavilion, a playground, and public beach area. Access to the Lake Michigan Water Trail for non-motorized water recreation is located just west of the dune area. The 63rd Street Beach is also a partial site for the World Basketball Festival (estimated 5,250 in attendance in 2014). This festival does not impact the natural area of the dune. See **Exhibit B-17**.

A parking lot east of the Lake Shore Drive and Hayes Drive intersection allows for vehicular access to the facility. The Lakefront Trail is present along the eastern edge of the site, allowing for north-south pedestrian and bicyclist access. An underpass north of the Lake Shore Drive and Hayes Drive intersection provides east-west access to the beach from Jackson Park.

4.1.4 Access

As shown on **Exhibits A-1a** and **A-1b**, Jackson Park is located on the South Side of Chicago, Illinois. Primary vehicular access routes include Lake Shore Drive (U.S. Route 41) and Stony Island Avenue which connect Jackson Park to the City’s Central Business District to the north and the Chicago Skyway (Interstate 90), a major expressway to the south. As mentioned in Section 2.2, 57th Drive acts as a primary route carrying traffic from Lake Shore Drive to Cornell Drive, a 6-lane principal arterial, through Jackson Park. Collector roadways within the park include Hayes Drive and Marquette Drive. Visitors to Jackson Park can access both free and paid surface parking lots. MSI visitors have access to an underground parking structure as well as nearby metered parking lots. Free street parking is primarily provided along Stony Island Avenue, Hayes Drive, and Marquette Drive. Existing bridges carry Lake Shore Drive over the 59th Street Harbor Inlet and Jackson Park Harbor as well as Hayes Drive over the northern portion of the Jackson Park Inner Harbor. A map of the existing roadway configuration, parking facilities, and roadway bridges is provided on **Exhibit B-11**.

The Chicago Transit Authority (CTA) provides transit access to Jackson Park via local and express bus routes as well as the Metra Electric Railway line. See **Exhibit B-12**. The Metra-Electric line station is located west of Jackson Park along the North Midway Plaisance at 59th Street. The “Jeffery Jump” express bus line (J14) provides non-stop service from a stop at Jeffery Drive/67th Street to Columbus Drive/11th Street, just south of downtown. Nine other CTA routes provide access to, within, and surrounding the park.

Bicyclist and pedestrian access and circulation facilities are shown on **Exhibit B-13**. The Lakefront Trail, a regional trail within the City, is located east of Lake Shore Drive. Pedestrian underpasses at 57th Drive, 59th Street, 63rd Street, and Marquette Drive provide access for users between the park and lakeside. Other grade separated pedestrian facilities include the Music Court Bridge, the Clarence Darrow Bridge, and

⁷ Chicago Park District. <https://www.chicagoparkdistrict.com/parks-facilities/jackson-park-natural-areas>

bridges to the north and south of the Wooded Island. The Clarence Darrow Bridge is currently closed to all traffic due to its poor condition. Improvements to this structure are currently under preliminary design and environmental review as part of a separate federally funded project. Several other trails and bicycle routes are present to provide circulation within the park. Several at-grade crossings, both marked and unmarked, of the park and surrounding roadway network are present. **Exhibit B-13** shows locations where bicycle racks are present, as well as bicycle share stations, part of the City’s DIVVY bicycle share program.

4.1.5 Usage⁸

Jackson Park experiences visitors from all over the globe as well as regional and nearby locals to its attractions and institutions. **Exhibit B-14** shows global use areas within Jackson Park, specifically the MSI, which attracted 1.5 million visitors in 2016. City and regional use areas of Jackson Park are primarily centered on recreation, including golf, boating, birding, and basketball, as highlighted on **Exhibit B-15**. La Rabida Children’s Hospital also attracts city and regional use to its facility. Local use areas of Jackson Park are highlighted on **Exhibit B-16**. These areas include picnic groves, beaches, harbors, gardens, playgrounds, and athletic facilities.

Jackson Park is a host to special events throughout the year, including the Chicago Half Marathon (estimated 13,000 in attendance in 2017), the Chosen Few music festival (estimated 30,000 in attendance in 2017), the World Basketball Festival (estimated 5,250 in attendance in 2014), and Bike the Drive (estimated 20,000 in attendance in 2015). Facilities and areas used for these events can be seen on **Exhibit B-17**.

Jackson Park is host to a large number of CPD program participants, including 150 in seasonal sports, over 500 in extended and early bird camps, 450 in basketball and 870 junior lifeguards. Greater use of the active recreation facilities is observed due to the flexibility of playing fields. Nearby schools and neighborhoods are frequent users of facilities along Stony Island Avenue. In 2016, over 24,000 rounds of golf were played at the Jackson Park Golf Course, accounting for approximately 15% of golf rounds played in Chicago parks that year. Usage of the harbors within the park varies with harbor occupancies ranging from approximately 40% (Jackson Park Inner Harbor) to over 80% (Jackson Park Outer Harbor). Membership is not required to dock in the harbors. Users that are yacht club members reside in various areas within the City limits, surrounding Illinois counties, and neighboring states.

Open recreation spaces adjacent to active recreation spaces allow for multi-generational use within Jackson Park. Over 1,500 Natural Area Stewards volunteered to maintain and restore natural areas in Jackson Park in 2016. The Wooded Island experiences over 1,000 youth visitors through CPD programs each year.

⁸ *South Lakefront Framework Plan*. Chicago Park District, 2018. **Appendix I**.

4.1.6 Existing and Planned Facilities

Existing facilities within Jackson Park are depicted on **Exhibit B-18a** (as mapped in the 2018 SLFP). A summary table of the existing facilities, including their location and description, is included in **Table B-18b**.

As noted in Section 2.0, the CPD presented an update of the SLFP to the CPD Board of Commissioners in April 11, 2018. During the creation of the framework plan, a public engagement program was conducted to ensure the plan addressed the community’s desires and needs. The proposed vision for these parks is available in the 2018 SLFP on the SLFP website at www.southlakefrontplan.com and shown on **Exhibit B-19**.

The roadway, bicycle and pedestrian improvements under consideration for the Proposed Action were developed to be consistent with the plans in the 2018 SLFP. The proposed roadway improvements are intended to support the future vision of Jackson Park while accommodating traffic needs as a result of the roadway closures. It should be noted the 2018 SLFP is a long-range plan for Jackson and South Shore Cultural Center Parks and funding sources for all of the intended improvements have not been identified.

4.1.7 Relationship to Similar Properties in Vicinity

Jackson Park has distinct advantage of its lakeside location. It is the third largest park by acreage within the limits of the CPD, following fellow lakeside locations, Lincoln Park and Burnham Park.

At several points throughout its history, plans for Jackson Park have been considered in conjunction with other parks on the South Side of Chicago. In the original 1871 South Park Plan, Jackson Park was considered the Eastern Division of the three-park system which also encompassed what is now known as Washington Park and the Midway Plaisance. The site of the 1893 World’s Columbian Exposition included both Jackson Park and the Midway Plaisance. These two parks together are included as one listing on the NRHP.

In more recent history, planning efforts by the CPD have included Jackson Park within a system of South Side parks which are collectively considered in the SLFP. The SLFP was originally authorized in 1999 and included a vision for Jackson Park and South Shore Cultural Center Park and their function as a whole. The 2018 SLFP provided an update on recommendations for Jackson Park and South Shore Cultural Center Park which includes the construction of the OPC and the roadway adjustments described herein.

4.1.8 Elements Affecting Ownership

Two institutions within Jackson Park currently have formal agreements with the CPD to occupy land: the MSI (21.21 acres) and La Rabida Children’s Hospital (2.83 acres). The limits of the agreement boundaries for these properties are shown on **Exhibit B-20**. Elsewhere within Jackson Park, various agreements with the CPD are in place for specific facilities, such as the Jackson Park Yacht Club and South Shores Yacht Club.

4.1.9 Other Characteristics

CPD has received funding sources from both the National Park Service and the USACE for improvements within Jackson Park. These include grant funds from UPARR program, administered by the National Park Service, and funds from the Great Lakes Fishery and Ecosystem Restoration (GLFER) program, administered by USACE. Description of these funds are programs are described below.

During the early 1980's, Jackson Park received UPARR program funds from the Heritage Conservation and Recreation Service (now transferred to the National Park Service).

A provision of the UPARR Act is meant to keep the recreation areas or facilities receiving UPARR grant assistance in recreation use unless certain conditions are met to replace that recreational opportunity (formerly Section 1010 of the Act; now 54 U.S.C. §200507). That provision states the following:

“No property improved or developed with assistance under this chapter shall, without the approval of the Secretary [delegated to the National Park Service], be converted to other than public recreation uses. The Secretary shall approve such a conversion only if the Secretary finds it to be in accord with the then-current local park and recreation recovery action program and only on such conditions as the Secretary considers necessary to ensure the provision of adequate recreation properties and opportunities of reasonably equivalent location and usefulness.”

Additionally, UPARR conversion regulations were developed under 36 C.F.R. §72.72. The National Park Service must review and approve changes of use to assure compliance with legal requirements as well as the terms and conditions of the grant. 36 C.F.R. §72.72(d). The Section 1010 boundary that encompasses the limits of the UPARR restriction can be found on **Exhibit B-21**.

As part of an effort to restore important bird, fish and wildlife habitat within the natural areas of Jackson Park, the CPD and the USACE entered into an agreement to initiate a 5-year ecological restoration project authorized through the Water Resources Development Act, Section 506, GLFER. The project aims to create or enhance nearly 147 acres of native habitat within the park and along the Lake Michigan shoreline. The project includes 24 acres of new natural areas and the installation of over 600,000 native plants that will increase the biological diversity of the park and provide critical habitat and beautiful scenery for park visitors. Additionally, to improve access and circulation throughout the park, the project includes installation of overlooks along the water's edge, new crushed stone pathways, and the reconstruction of existing pathways on Wooded Island. Project design started in May 2014 and construction began in January 2015. Improvements surrounding the lagoons, and the areas north of Hayes Drive and west of Lake Shore Drive are complete. In general, all the areas north of Hayes Drive have been planted, along with the removal of invasive plant species. The areas south of Hayes Drive have had the invasive plant species removed, but proposed replacement plantings have not been installed. The GLFER project boundary is shown on **Exhibit B-22**.

Flooding problems within the park have not been identified. Various shoreline types are present along Lake Michigan including beaches, breakwaters, and revetment walls. The condition of these shoreline types varies within the study area.

Jackson Park also accounts for a large tree population within the City. Tree surveys were conducted adjacent to areas of contemplated improvements; approximate 51% of the park was surveyed and counted over 5,000 trees, see **Exhibit B-22a**. These trees serve multiple purposes for Jackson Park as recreational resources for users, habitat for wildlife, and contributors to the historic landscape of the park.

4.2 Midway Plaisance

The Midway Plaisance is an 83 acre park and recreational area generally bounded by 60th Street to the south, Stony Island Avenue to the east, 59th Street to the north, and Cottage Grove to the west. The boundary can be found on **Exhibit B-23**.

4.2.1 Officials with Jurisdiction

For the Midway Plaisance, the OWJ include:

1. CDOT because it (through the City of Chicago) owns and administers the Midway Plaisance and is empowered to represent the agency on matters related to the Midway Plaisance.
2. The CPD because it manages recreational functions and activities within the Midway Plaisance.

4.2.2 Park and Recreational Function

Recreation areas within the Midway Plaisance include temporary soccer/football fields within the center of the Midway Plaisance between Cottage Grove Avenue and Dorchester Avenue. A refrigerated ice/skating rink and warming hut is used year-round and located between Ellis Avenue and Woodlawn Avenue. The CPD manages and programs these recreational areas. The remainder of the Midway Plaisance is open space that includes the University of Chicago’s Winter Garden, trails, and monuments. These facilities are not under the ownership of the University; these gardens were a collaboration between the CPD and the University. See **Exhibit B-24**.

4.2.3 Access and Usage

As shown on **Exhibits A-1a** and **A-1b**, the Midway Plaisance is located on the South Side of Chicago, Illinois. It connects Washington Park to the west and Jackson Park to the east. Primary vehicular access routes to and through the Midway Plaisance include a network of connected principal arterials. The North Midway Plaisance and South Midway Plaisance are two-lane, one-way roadways that connect to Payne Drive/Morgan Drive through Washington Park and Cornell Drive through Jackson Park. Payne Drive/Morgan Drive provides east-west access to the Jane Adams (I-90/I-94) Expressway and Cornell Drive provides north-south access to Stony Island Avenue and the Chicago Skyway (I-90). Woodlawn Avenue, a collector roadway, and Cottage Grove Avenue, a minor arterial, provide north-south access for local traffic to the Midway Plaisance.

Visitors to Midway Plaisance can access free on-street parking along both sides of the North and South Midway Plaisance roadways. Free on-street parking is also provided on bordering and surrounding roadways to the park, including 59th Street, 60th Street, Ingleside Avenue, Ellis Avenue, University Avenue, Woodlawn Avenue, Dorchester Avenue, Blackstone Avenue, and Stony Island Avenue. The Metra Electric railway, which crosses through the park, is carried via an overpass viaduct. Existing roadway bridges carry Ellis Avenue, Woodlawn Avenue, and Dorchester Avenue. A map of the existing roadway configuration, parking facilities, and bridges is provided on **Exhibit B-25**.

The CTA provides a part time transit service (Route 2) through the Midway Plaisance along 60th Street. Hyde Park bus routes (Route 171, 172, and 192) circulate through the Midway Plaisance along Ellis Avenue, 60th Street, Dorchester Avenue, and 59th Street. Several bus routes operation along Stony Island Avenue to the east (Routes 6, 15, and 28) and Cottage Grove Avenue to the west (Route 4). The Metra Electric commuter rail provides daily access at the 59th Street station to downtown. See existing transit accommodations on **Exhibit B-26**.

Bicyclist and pedestrian access and circulation facilities are shown on **Exhibit B-27**. Several paths and sidewalks are provided within and adjacent to the Midway Plaisance to provide access to facilities and the surrounding University of Chicago campus buildings. According to Chicago's *Streets for Cycling 2020*, bicycle routes are planned along North and South Midway Plaisance to connect to future routes along Stony Island Avenue and Best Drive. Pedestrian and bicyclist bridges are present along Ellis Avenue, Woodlawn Avenue, and Dorchester Avenue. **Exhibit B-27** shows locations where bicycle racks and DIVVY bike share stations are present.

Regional visitors to the Midway Plaisance would primarily be drawn by the adjacent University of Chicago facilities. Use of the facilities primarily consists of City and local visitors that would participate in recreation activities on the athletic fields or visit the ice/skating rink.

4.2.4 Existing and Planned Facilities

Existing facilities within the Midway Plaisance are depicted on **Exhibit B-28a**. A summary table of the existing facilities, including their location and description, is included in **Table B-28b**. Adjacent to, but outside the limits of the Midway Plaisance, are several facilities for the University of Chicago to the north and south. The presence of the adjacent University facilities draws students and visitors to the Midway Plaisance.

In 2000, coordination between the CPD, the University of Chicago, and local community members resulted in the publishing of the Midway Plaisance Master Plan, as shown on **Exhibit B-29** (available on the Midway Plaisance Advisory Council website, <http://midwaypac.org/visit-the-park/history>).

To fulfill requirements of the UPARR Act, administered by the National Park Service, the east end of the Midway Plaisance is planned to be utilized for recreational replacement land as a result of lost recreation use in Jackson Park from the construction of the OPC. A conceptual plan for the site is shown on **Exhibit B-29a**. The City will engage in a public process to discuss the design in detail once the National Park Service federal review process is complete. The National Park Service action is not subject to Section 4(f) requirements because it does not require FHWA approval nor is it a transportation project with a transportation purpose.

4.2.5 Relationship to Similar Properties in Vicinity

Similar to Jackson Park, the Midway Plaisance has been designed in consideration of a system of parks on the South Side of Chicago. It has historically acted as the connection between Jackson Park (originally known as the Eastern Division) and Washington Park (originally known as the Western Division). Plans for

the Midway Plaisance were included in Frederick Law Olmsted's 1871 Original Plan for South Park. Along with Jackson Park, it was host to the 1893 World's Columbian Exposition.

The Midway Plaisance is included with Jackson Park as one listing on the NRHP.

4.2.6 Elements Affecting Ownership

There are no identified elements that affect the ownership of the Midway Plaisance. Recreation programs within the Midway Plaisance, such as uses of the athletic fields, are coordinated through the CPD. The CPD independently manages and programs events within the Midway Plaisance.

4.3 Jackson Park Historic Landscape District and Midway Plaisance

Jackson Park Historic Landscape District and Midway Plaisance was nominated for the NRHP in 1972. Noted areas of significance include: landscape architecture, architecture, science, sculpture, and urban planning which were evaluated to establish a period of significance from 1875 to 1968. The limits of CDOT ownership lie within the roadway footprint from back-of-curb to back-of-curb, but also include the boulevard appurtenances behind the back-of-curb. The remainder is owned by the CPD (aside from the 19.3 acres comprising the OPC site owned by the City of Chicago) and classified as Section 4(f) property. The property boundary can be found on **Exhibit B-3**. Any Section 4(f) use within Jackson Park or Midway Plaisance would result in Section 4(f) use of the NRHP listed Jackson Park Historic Landscape District and Midway Plaisance.

4.3.1 Officials with Jurisdiction

For the Jackson Park Historic Landscape District and Midway Plaisance, the OWJ include:

1. The SHPO because the Jackson Park Historic Landscape District and Midway Plaisance is listed on the NRHP.
2. The Advisory Council on Historic Preservation (ACHP) because the Jackson Park Historic Landscape District and Midway Plaisance is listed on the NRHP and the ACHP is participating in Section 106 consultation.

4.3.2 Historic Significance⁹

Jackson Park and the Midway Plaisance are historic properties that are jointly listed on the NRHP as the Jackson Park Historic Landscape District and Midway Plaisance. Jackson Park, the Midway Plaisance, and Washington Park together were originally conceived as a single landscape known as the South Park, with the Midway Plaisance as a linear stretch of park between Jackson on the east and Washington Park on the west. Soon after the Illinois Legislature established the South Park Commission in 1869 to create and maintain the site, the newly-appointed commissioners hired Frederick Law Olmsted, Sr. (1822-1903) and

⁹ Historic Property Identification Report: Federal Undertakings In and Adjacent to Jackson Park. May 2018.

his partner Calvert Vaux, the nationally renowned designers of New York’s Central Park, to lay out the entire 1,055-acre park.

4.3.2.1 Jackson Park

Prior to its development, the Jackson Park site was marked by its flat, boggy conditions. Although discouraging to Olmsted, he believed that Lake Michigan, the “one object of scenery near Chicago of special grandeur or sublimity”, was a tremendous asset. Water provided the unifying theme for Olmsted & Vaux’s original plan. The designers sought to transform the Eastern Division’s marshy ground into a series of interior waterways that would connect with the lake and provide a magnificent landscape ideal for boating. Olmsted & Vaux completed the original plan for South Park in 1871; however, problems with land acquisition and the loss of legal documents in the Great Fire delayed implementation of the Eastern Division.

Only minimal improvements had been made when the commissioners officially named the park in honor of President Andrew Jackson in 1880. That still remained the case a decade later when Chicago was selected as the site for the 1893 World’s Columbian Exposition. Olmsted helped identify the site for the fairgrounds. Stressing the importance of Lake Michigan as the backdrop for the 1893 World’s Columbian Exposition and recognizing that Jackson Park remained largely unimproved, Olmsted suggested building the exposition there. He then worked closely with architects Daniel H. Burnham and John Wellborn Root on what would become his second plan for Jackson Park. They designed a gleaming campus of classical buildings with a formal Court of Honor basin, interconnected lagoons, and a natural-looking Wooded Island. As most of the monumental buildings and sculptures were made of white-washed plaster, the fairgrounds became known as the “White City.”

More than 27 million visitors attended the 1893 World’s Columbian Exposition in Jackson Park over a six-month period in 1893. After it closed, Olmsted’s firm—then Olmsted, Olmsted & Eliot—began redesigning the site to return it to park. Remaining true to the unrealized original plan, this scheme included an expansive interlinking lagoon system that preserved the Wooded Island. Among the few remaining features of the 1893 World’s Columbian Exposition were the Fine Arts Palace (later the Museum of Science and Industry) and the Wooded Island’s Japanese Pavilion, known as the Ho-o-den.

Jackson Park continued to evolve. In 1899, the South Park Commissioners installed the first public golf course west of the Alleghenies there. To celebrate the 25th anniversary of the 1893 World’s Columbian Exposition and Illinois’ centennial of statehood, a smaller bronze version of the fair’s iconic Statue of the Republic was erected near the golf course in 1918. The following year, commissioners expanded the park with a new beach following recommendations by the Olmsted Brothers. Made of landfill, the new 63rd Street Beach opened in 1919 with an impressive towered bathing pavilion designed by South Park Commission in-house architects.

In 1934, the Great Depression spurred the consolidation of the South Park Commission and 21 other independent park agencies into the CPD. George T. Donoghue (1884–1962), a professional engineer who had headed the South Park Commission since 1926, became the CPD’s General Superintendent. He and other South Park Commission professionals had recently been working on restoring Jackson Park’s historic Ho-o-den and designing an adjacent Japanese garden. The CPD received Works Progress Administration (WPA) funding to complete these projects and undertake several others in the park, including the creation of the Perennial Garden, construction of two combination shelter/comfort stations, maintenance/service

yard building, and one comfort station. WPA funds also supported several roadway widenings and other traffic-related projects, meant to accommodate Chicago's increasing numbers of automobiles.

Although Jackson Park changed little during the World War II era, after the war, the park was substantially impacted by major events and projects. In 1946, the Ho-o-den was destroyed by fire and the garden soon fell into a state of deterioration. Between the mid-1950s and 1960, the federal government installed a Nike missile site in the park and, to make up for lost recreational space, the CPD filled in part of Jackson Park's historic lagoon system to create ball fields. The CPD also erected a Modern field house designed by consulting engineer Ralph Burke.

Between the 1960s and the end of the 20th century, community activists requested additional sports and recreational facilities in Jackson Park. These organizations and individuals inspired the creation of the Paul H. Douglas Nature Sanctuary, the rehabilitation of the Japanese Garden and helped establish the Bobolink Meadow on the former Nike Missile Site. Many roadway improvements were made during this time including a substantial improvement to S. Cornell Drive, changing it from a gently curving 40-foot wide roadway to an 80-foot widened and straightened roadway.

The 21st century brought additional park improvements. The CPD completed an \$8 million restoration of the 63rd Street Bathing Pavilion in 2000, and the nearby Casino Pier underwent major improvements several years later. CDOT and Illinois Department of Transportation (IDOT) worked together on an ambitious South Lake Shore Drive Reconstruction Project that included new medians, barriers, and underpasses, improved ADA accessibility, new bicycle paths, and reconfigured lanes stretching from E. 23rd Street to E. 67th Street.

4.3.2.2 Midway Plaisance

With Lake Michigan as a backdrop, Olmsted & Vaux used water as the guiding theme for the Midway Plaisance original plan of 1871. With the Eastern Division (Jackson Park) fronting onto Lake Michigan, the designers envisioned an intricate system of planted lagoons that would flow into a circular turning basin at the east end of the Midway Plaisance. From here, water would flow into a long canal down the center of the Midway, and link with a small lagoon called the Mere in the Western Division (Washington Park).

Olmsted & Vaux named this center landscape the Midway Plaisance. The French word "plaisance," which roughly translates to "pleasure," is generally associated with boating. In addition to providing for boating, the broad linear park space would serve as a pleasure drive for visitors in carriages, on horseback, or on foot. Despite the importance of the canal to the overall design of the park system, its construction was put on hold due to financial problems after the Great Fire of 1871.

Two decades later, Olmsted helped select Jackson Park and the Midway Plaisance as the site for the 1893 World's Columbian Exposition. The Illinois Central Railroad (ICRR), which would play an important role by bringing thousands of visitors to the fairgrounds, constructed a new elevated viaduct over the Midway to minimize congestion for crowds at street level.

Olmsted worked closely with architect Daniel H. Burnham to transform the largely unfinished park into the gleaming "White City." The fair authorities decided to use the Midway Plaisance as the site of amusements, restaurants, foreign villages, and ethnological exhibits. As these attractions were allowed

to charge visitors additional ticket fees, they helped the fair become a financial success. The most iconic attraction on the Midway was the world's first Ferris wheel, which stood 264 feet tall. Each twenty-minute ride made two revolutions and cost fifty cents per customer (the same as a full day admission ticket to the fair).

More than 27 million people visited the fair during its sixth month season in 1893. After the 1893 World's Columbian Exposition closed, the South Park Commissioners hired Olmsted's firm, then known as Olmsted, Olmsted & Eliot, to transform the fairgrounds back into useable park. Emphasizing the success of the electric launches, gondolas, and other types of boats at the exposition, Olmsted recommended that his vision for the Midway Plaisance canal should move forward. The commissioners agreed and instructed him to create a revised plan that would include the cost of the gondolas. They formally adopted the plan in 1894.

The Park Commissioners allocated funds to begin an initial phase of construction while negotiations were underway with the ICRR for permission to extend the waterway across the railroad right-of-way. Some digging took place, leaving a depressed trench at the center of the Midway. But, at the time, transforming the Jackson Park fairgrounds back into usable park was the priority, and the canal was becoming an expensive proposition. In addition to excavation costs, the project would require a series of locks to address the extreme differences in the elevations of the park lagoons and fluctuating water levels of Lake Michigan. Along with initial trenching, the commissioners installed sewers, drives, walks, and bridle paths; reconditioned the wide center lawn; and planted more than 500 elm trees in straight rows lining the driveway.

By the turn of the 20th century, the Midway Plaisance was a popular spot for ice skating and sledding in the winters and strolling and bicycling in the summers. Architect Henry Ives Cobb had created the original plan for the adjacent University of Chicago campus, and designed some of the institution's earliest Gothic buildings. Coach Amos Alonzo Stagg had his track team train for relay races on the Midway.

In 1908, preeminent sculptor Lorado Taft (1860-1936), who lived in the neighborhood and worked from his nearby Midway Studio, envisioned an ambitious plan to beautify the Midway Plaisance with a central canal that would be crossed by sculptural bridges and flanked by a pair of monumental fountains. Taft's 1922 *Fountain of Time* (at the western end of the Midway Plaisance within Washington Park) was the only part of his plan ever realized. A decade later, community members dedicated a commemorative bench and sundial just east of the Midway viaduct honoring two important South Side women, Flora Sylvester Cheney (1872–1929), a political activist, reformer, and legislator, and her longtime friend Katherine Hancock Goode (1872–1928), one of the first women to serve in the Illinois Senate.

After the consolidation of the CPD in 1934, further improvements to the Midway Plaisance and Jackson Park, between S. Stony Island Avenue and S. Cornell Drive, included the creation of the Perennial Garden on the site of what had been intended as the circular turning basin. Over the next several decades, the Midway Plaisance underwent few changes, other than the installation of the *Thomas Masaryk Monument* in 1955. The Midway gained its final sculpture in 1976, when Lincoln Park's *Carl von Linne Monument* was relocated here.

In the 21st century, the Midway Plaisance has benefitted from additional improvements. In 2000, the CPD built a refrigerated ice-skating rink, in the center of the Midway. The 2005 Allison Davis Garden, designed by landscape architect Peter Lindsay Schaudt and located on the west end of the Midway, mirrors the historic Perennial Garden at the east end (within Jackson Park). It pays homage to renowned social anthropologist Allison Davis (1902 – 1983), a pioneering scholar and the University of Chicago’s first tenured African-American professor. A few years later, the CPD and University of Chicago also worked together on two additional gardens on the north side of the Midway Plaisance, the Winter Garden and the Readers’ Garden. The Midway Crossings, a 2011 streetscape project, features bridge-like crossings with enhanced lighting which create the allusion of water in the center of the Midway, although the canal has never existed.

4.3.3 Access and Usage

Accessibility and usage of Jackson Park and the Midway Plaisance are described in Sections 4.1.4 and 4.1.5 and Section 4.2.3 respectively.

4.3.4 Existing and Planned Facilities

Existing and planned facilities in Jackson Park and the Midway Plaisance are described in Section 4.1.6 and Section 4.2.4 respectively.

4.3.5 Relationship to Similar Properties in Vicinity

The historic relationship between Jackson Park, the Midway Plaisance, and Washington Park are discussed in Sections 4.1.7 and 4.2.5.

4.3.6 Elements Affecting Ownership

Elements affecting ownership in Jackson Park are discussed in Section 4.1.8. There are no elements that affect ownership of the Midway Plaisance.

4.3.7 Other Characteristics

The CPD has received funding sources from both the National Park Service and the USACE for improvements within Jackson Park. These include grant funds from the UPARR program, administered by the National Park Service, and funds from the GLFER program, administered by USACE. Descriptions of these funds are discussed in Section 4.1.9.

4.4 Island Terrace Apartments

The Island Terrace Apartments are located at 6430 S. Stony Island Avenue in the Woodlawn neighborhood of Chicago, Illinois. This property was deemed individually eligible for listing on the NRHP under Criteria A and C as evaluated in the HPI and concurred upon by the SHPO. The property is privately owned by Island Terrace, LLC and can be seen on **Exhibit B-30**.

4.4.1 Officials with Jurisdiction

For the Island Terrace Apartments, the OWJ include:

1. The Illinois SHPO because the Island Terrace Apartments are considered eligible for listing on the NRHP.
2. ACHP because the Island Terrace Apartments are considered eligible for listing on the NRHP and the ACHP is participating in Section 106 consultation.

4.4.2 Property Description

The Island Terrace Apartment building is a 21-story property that contains 241 one-, two-, and three-bedroom units for low and moderate income residents. Community amenities on the property include: a business center, an underground gated parking garage, a community room, a fitness center, and a laundry facility.¹⁰ The modernistic building was built in 1969 and designed by the architectural firm Dubin, Dubin, Black & Moutoussamy.

To the west of the property are recreational fields associated with the nearby Mount Carmel High School. North of the Island Terrace Apartments is a vacant lot. To the south is a two-story mixed-use commercial and residential property. Jackson Park and the Jackson Park Fieldhouse are located across Stony Island Avenue from the property.

The Island Terrace Apartments can be seen below in **Photo 1**.

¹⁰ Island Terrace Apartments. <http://www.islandterraceliving.com/community>.



Photo 1: Island Terrace Apartments, 6430 S. Stony Island Avenue, view looking southwest from Stony Island Avenue of the north and east facades

4.4.3 Historic Significance¹¹

The history behind the development of the Island Terrace Apartments not only captures the role of the federal government in modernizing the nation’s housing stock, it also tells the story of one of the first African-American architects to become a partner in a major firm.

John Moutoussamy, a talented African-American architect, struggled through several jobs in the early 1950s before he was hired at PACE Associates in 1956. While working on the Lawless Gardens, a mixed community of low-rise and high-rise buildings that would go on to win numerous awards, Moutoussamy developed a relationship with John Black and later joined his firm. He was named a partner in 1966. Throughout his career at the firm, he formed important relationships through the firm’s connections to eventually become an active board member for the Art Institute and the Zoning Board of Appeals.

During the housing crisis occurring in Chicago in the mid-1960s, the Island Terrace Apartments was the first project by Dubin, Dubin, Black & Moutoussamy built to take advantage of Section 236 of the Fair Housing Act of 1968, which provided mortgage financing for apartment developers. It was the first federally-subsidized high-rise near Jackson Park and it overcame the cultural bias of high-rise living by providing this opportunity to African-Americans. It was designed to bring modern, urban lifestyle to moderate-income residents; Dubin, Dubin, Black & Moutoussamy understood the Federal Housing

¹¹ Historic Property Identification Report: Federal Undertakings in and Adjacent to Jackson Park. Island Terrace Apartments Historic Resource Survey Form. February 2018.

Authority restrictions on room sizes, materials, and many other features which helped them to succeed in their ability to provide quality housing.

The Island Terrace Apartments was seen as a solution to Chicago's South Side affordable housing crisis and adapted the views that luxury high-rise apartments were only available to the wealthy. It was constructed during an important point in history for the nation's housing crisis and marked an important time for the Dubin, Dubin, Black & Moutoussamy firm.

4.4.4 Access

Two driveway access points along Stony Island Avenue provide vehicular access to the property's gated parking facilities. Bus stops for CTA Routes 6, 15, and 28 are located at the corners of Stony Island Avenue/65th Street and Stony Island Avenue/64th Street for access to public transportation. A public sidewalk is present along the west side of Stony Island Avenue for bicyclist and pedestrian access to the property. The entrance to the property from the sidewalk is on the east side of the building.

4.4.5 Relationship to Similar Properties

In its immediate block, the Island Terrace Apartments is a dominant high-rise that stands over 15 stories higher than adjacent buildings. Properties of similar height in the nearby neighborhoods include the Jackson Park Terrace high-rise apartments (2 blocks to the north), Vista Homes (5 blocks to the north), and Good Shepard Manor (5 blocks to the south).

The Island Terrace Apartments were the first of several properties developed to bring high-rise living to the affordable housing community. Many other new high-rise developments were constructed in the surrounding area during the 1960s, including the Oglesby Tower Apartments (6700 S. Oglesby Avenue), Crandon House Apartments (6701 S. Crandon Avenue), and the Quadrangle House (6700 S. South Shore Drive).

4.4.6 Other Characteristics

As it was originally intended for, the Island Terrace Apartments provides housing for low-income residents. Today, the property is entered into a project-based Section 8 rental assistance (PBRA) program with the U.S. Department of Housing and Urban Development (HUD) in order to maintain affordable rental opportunities for low-income persons¹². This program controls rental costs for low-income tenants by requiring tenants to contribute to rental costs based on 30% of their household income. As part of this arrangement, Island Terrace, LLC receives rental subsidies for some or all of its apartments.

¹² Affordable Housing Online. Island Terrace Apartments. <https://affordablehousingonline.com/housing-search/Illinois/Chicago/Island-Terrace-Apartments/10008758>

4.5 Jackson Park Terrace Historic District

The Jackson Park Terrace Historic District is generally bound by 60th Street/E. Public Way to the north, the Metra Electric Railway to the west, 61st Street to the south, and Stony Island Avenue to the east in the Woodlawn neighborhood of Chicago, Illinois. The complex was constructed in 1974 by Whitley-Whitley Architects and Planners. This historic district was deemed eligible as part of a historic district under Criterion A and C for listing on the NRHP as evaluated in the HPI and concurred upon by the SHPO. The property is privately owned by Jackson Parkside Apartments and can be seen on **Exhibit B-31**.

4.5.1 Officials with Jurisdiction

For the Jackson Park Terrace Historic District, the OWJ include:

1. The SHPO because the Jackson Park Terrace Historic District is considered eligible for listing on the NRHP.
2. The ACHP because the Jackson Park Terrace Historic District is considered eligible for listing on the NRHP and the ACHP is participating in Section 106 consultation.

4.5.2 Property Description

The Jackson Park Terrace rental housing complex is approximately 7.8 acres in total size and includes a 19-story residential high-rise and 24 three-story apartment buildings. Trees and open space on the property give the complex a park-like feel. The community complex is bordered by the Metra-Electric Railway to the west, open space/public parking to the north, residential properties to the south, and Jackson Park to the east.

The complex is divided into four quadrants by Public Way and Harper Avenue. Public Way wraps around the northern and western perimeter of the complex. The center east-west roadway is also named Public Way. Harper Avenue is the north-south dividing roadway. These roadways are generally only used to circulate within the housing complex; they are not throughways for traffic nor do they provide routes for cut-through traffic. On-street parking is available along each of the roadways within the complex. An off-street parking lot is available in the northwest corner of the southeast quadrant.

The 24 three-story buildings are irregularly grouped into two or three building clusters which connect either by touching corners or a second story covering above a connecting sidewalk. Paved walkways are present throughout the complex and provide connections from entryways to parking spaces and roadway sidewalks. Although the complex buildings appear from street level to be two-stories high, some first floor apartments are sunken below grade. One of the 24 three-story complex buildings is shown in **Photo 2**.



Photo 2: Jackson Park Terrace Housing Complex, three-story complex building, looking west from E. Public Way toward north façade

The 19-story Jackson Parkside Apartments high-rise is located in the northern half of the southwest quadrant. A three-story extension of the high-rise also containing apartment units is located to the south. There are entrances on the north and south ends of the building which access a first floor lobby. A small terrace with a raised lawn, circular drive and vegetation is near the south entrance and extension. The high-rise building can be seen below in **Photo 3**.



Photo 3: Jackson Park Terrace Housing Complex, 19-story Jackson Parkside Apartment high-rise, looking northwest from Harper Avenue toward south façade

4.5.3 Historic Significance¹³

The 322-unit mixed-income community of Jackson Park Terrace represented a major achievement in the rebuilding and revitalization of Chicago’s Woodlawn neighborhood after years of deterioration and neglect.

Redevelopment plans by the nearby University of Chicago called for displacement of thousands of Woodlawn residents in the early 1960s. The Woodlawn Organization protested such plans and negotiated with the Chicago Department of Urban Renewal (DUR) to advance low and moderate income housing developments. Together with the Woodlawn Community Development Corporation (WCDC), The Woodlawn Organization-WCDC received funding to plan the Jackson Park Terrace community in 1974 and hired the African-American owned firm Whitley-Whitley Architects and Planners. During its planning and development stages, Jackson Park Terrace received funds from the Illinois Housing Development Authority to maintain affordable housing opportunities for low-income residents. The range of units offered for notably lower rental rates, as well as moderate finishes and amenities, rendered Jackson Park Terrace a major success.

The Jackson Park Terrace community was and continues to be an important symbol of community empowerment and provider of affordable housing. It was a product of an important time period in the local Woodlawn history, including the wave of urban renewal, history of African-Americans, and the Civil

¹³ Historic Property Identification Report: Federal Undertakings in and Adjacent to Jackson Park. Jackson Park Terrace Historic Resource Survey Form. February 2018.

Rights Movement. It was planned and design by the prominent African-American led architecture firm, Whitley-Whitley and embodies the characteristics of a distinctive type, period, design, and artistic value.

4.5.4 Access

An access driveway from the center Public Way allows vehicles to enter the complex from Stony Island Avenue. Recently, driveway access from the northern Public Way to Stony Island Avenue was closed and has been replaced by a community gardening area. Several sidewalk connections in the complex connect entryways to public sidewalks and parking lots. Public sidewalks are provided along the west side of Stony Island Avenue and the north side of 61st Street, bordering the complex. Bus stops for CTA Routes 6, 15, and 28 are located at the corners of Stony Island Avenue/61st Street and Stony Island Avenue/S. Midway Plaisance for access to public transportation. Connections to CTA routes 2, 59, and 170 are also provided at Stony Island Avenue/S. Midway Plaisance. A transit stop at 59th Street/N. Midway Plaisance for the Metra-Electric Railway is located one block north of the complex.

4.5.5 Relationship to Similar Properties

The Jackson Park Terrace three-story buildings are similar in height and size to their immediate surrounding residences, both on the east and west sides of the Metra-Electric Railway and to the residents south of the property. The 19-story high rise is similar in height to the Vista Homes residences in Hyde Park, just one block north of the Jackson Park Terrace community and the Park Shore East Apartment high-rise, two block to the south also in Woodlawn.

Similar to other properties in the Woodlawn neighborhood developed in the 1960s and 1970s, Jackson Park Terrace community provides housing for low to moderate income residents.

4.5.6 Other Characteristics

The Jackson Park Terrace is entered into a PBRA program with HUD in order to maintain affordable rental opportunities for low-income persons¹⁴. This program controls rental costs for low-income tenants by requiring tenants to contribute to rental costs based on 30% of their household income. As part of this arrangement, Jackson Parkside Apartments receives rental subsidies for some of its apartments. The Jackson Park Terrace also receives funding through the Low Income Housing Tax Credit program¹⁵. Through this program, afforded to those whose household earning is less than 60% of the area median income, rental rates are controlled to not exceed the tax credit maximum as designated for that area.

¹⁴ Affordable Housing Online. Jackson Park Terrace. <https://affordablehousingonline.com/housing-search/Illinois/Chicago/Jackson-Park-Terrace/10008731>

¹⁵ U.S. Department of Housing and Urban Development. LITC Database. <https://lihtc.huduser.gov/>

4.6 Hyde Park High School/Academy

4.6.1 Officials with Jurisdiction

For the Hyde Park High School/Academy, the OWJ include:

1. The SHPO because Hyde Park High School/Academy is considered eligible for listing on the NRHP.
2. The ACHP because Hyde Park High School/Academy is considered eligible for listing on the NRHP and the ACHP is participating in Section 106 consultation.

4.6.2 Property Description

The high school is located on Stony Island Avenue across the street from Jackson Park and is bordered by E. 62nd Street to the north, E. 63rd Street to the south, and S. Harper Avenue to the west. The building is three stories, with an additional gabled fourth-story.

The building includes 348,478 square feet of space which houses 87 classrooms, 11 science labs, 7 Technology labs, technical labs, teleconference lab, two radio/TV studios, computer recycling center, 2 gymnasiums, media resource center, fitness room, health/dance room, and a full service cafeteria. Access to a baseball diamond, track, football/soccer fields is located across the street within Jackson Park.

The Hyde Park High School/Academy can be seen below in **Photo 4**.



Photo 4: Hyde Park High School/Academy looking Southwest from S. Stony Island Avenue

4.6.3 Historic Significance¹⁶

In 1911, the large new Hyde Park High School building was built after much overcrowding at the S. Kimbark Avenue location. The new high school was among Arthur F. Hussander’s first major projects after his appointment as “acting architect.” Located just west of Jackson Park and south of the Midway Plaisance, the large stately public building soon became a visual landmark for the entire South Side. As students from a broad geographic area including Woodlawn, Kenwood, and Hyde Park attended, the school also played an important role in the social histories of those community areas.

Enrollment grew throughout the 1930s to a student body of more than 4,000. To help alleviate overcrowding, an addition was completed at the south side of the structure in 1939. (This addition was the work of Board Architect John C. Christensen and his staff.)

Since its early history, the student body had included some percentage of African-American pupils. Those numbers grew in the late 1940s and early 1950s, at a time when Chicago Public School administrators, Parent Teacher Association representatives, and community members considered Hyde Park High School a model of harmonious racial integration. In 1959, Reverend

Carl Fuqua, executive secretary of the NAACP’s Chicago Branch, announced that Melba Patillo would attend summer school at Hyde Park High School. Patillo, was one of “nine Negro children who were integrated into Little Rock’s Central High School in September of 1957.”

Rather than following the Supreme Court’s order to integrate the school, Arkansas’s governor closed the school down. The NAACP underwrote her costs to spend the summer in Chicago and attend the high school so that she could meet graduation requirements and attend college.

By the late 1960s, Hyde Park High School’s racial balance changed. With African American families moving into Woodlawn and the opening of Kenwood High School approximately 1.5 miles to the north, Hyde Park High School became a “predominantly African American high school.” In the mid- 1970s, CPS designated the school as a magnet and renamed it Hyde Park Career Academy. Twenty years later, the focus shifted to college preparation and an International Baccalaureate program was developed at the school.

Throughout its history, Hyde Park High School has maintained high academic standards and been known for excellence in its arts and sports programs. A recent website developed by Dan

Holder, a former Chicago teacher and assistant principal, reports that an impressive number of noteworthy Chicagoans attended Hyde Park High School. Famous alumni of the school, both black and white, made important contributions to many fields. Examples include: Illinois Poet Laureate Gwendolyn Brooks (1917 – 2000), early aviator Amelia Earhart (1897 – ?), Olympic swimmer and diver Jane Fauntz (1910 – 1989), musician Minnie Riperton (1947 – 1979), Nobel prize-winning economist Paul Samuelson (1915 – 2009) and musician Herbie Hancock (b. 1940).

¹⁶ Historic Property Identification Report: Federal Undertakings in and Adjacent to Jackson Park. Hyde Park High School/Academy Historic Resource Survey Form. February 2018.

4.6.4 Access

Two access driveways on Harper Avenue allows vehicles to enter the parking lot for the school. Several sidewalk connections in the complex connect entryways to public sidewalks and parking lots. Public sidewalks are provided along the west side of Stony Island Avenue, the north side of 63rd Street, the east side of Harper Avenue, and the south side of 62nd Street. Bus stops for CTA Routes 6, 15, and 28 are located at the corners of Stony Island Avenue/62nd Street and Stony Island Avenue/63rd Street. A bus stop for CTA Route 63 is also located at Stony Island Avenue/63rd Street. A transit stop at 63rd Street/Dorchester Avenue for the Metra-Electric Railway and the Metra-South Shore Line is located two blocks west of the school.

4.7 Chicago Park Boulevard System (CPBS) Historic District

The CPBS Historic District is a 26-mile stretch of contiguous parks and boulevards including parks, squares, boulevards and significant adjoining properties. The CPBS Historic District roughly spans from W. Logan Boulevard on the north and the Kennedy Expressway to E. 67th Street and S. South Shore Drive on the south as shown in **Exhibit A-4**. The district includes 19 boulevards, 6 squares, 8 parks, and 2,096 adjacent buildings from the period of significance that face the parks, boulevards and squares and contribute to the significance of the system. The CPBS Historic District covers a vast geographic area and includes a total of 2,136 contributing resources.

The portion of the CPBS Historic District potentially impacted by the proposed improvements generally includes 59th and 60th Streets between Cottage Grove and Stony Island Avenues, streets that surround Jackson Park (56th, 67th and Stony Island), as well as the entirety of the Jackson Park Historic Landscape District and Midway Plaisance. Roadways within the CPBS Historic District are already in transportation use and therefore any changes to those roadways are not considered a Section 4(f) use, so long as the changes occur within the existing roadway footprint.

4.7.1 Officials with Jurisdiction

For the CPBS Historic District, the OWJ include:

1. The SHPO because the CPBS Historic District is listed on the NRHP.
2. The ACHP because the CPBS Historic District is listed on the NRHP and the ACHP is participating in Section 106 consultation.

4.7.2 Property Description

The CPBS Historic District is an extensive park, square and boulevard system that extends approximately through the south and west sides of the City. The portion of the CPBS that is directly affected by the proposed action includes Jackson Park, Midway Plaisance, and contributing properties along Stony Island Ave. Detailed park and recreation functions of Jackson Park and Midway Plaisance are described in Section 4.1.2 and Section 4.2.2.

Contributing resources which are not individually listed or eligible for the NRHP include the mixed-use building at 6450-60 S. Stony Island Avenue/1554-56 E. 65th Street and the apartment building at 6516-6520 S. Stony Island Avenue/1556-1558 E. 65th Place.

The mixed-use building at 6450-60 S. Stony Island Avenue/1554-56 E. 65th Street is a three-story corner structure that includes storefront spaces on the first story and apartments above them. The housing units are known today as Chaney-Braggs Apartments and managed by the Woodlawn East Community and Neighbor non-profit organization. The property includes a total of 24-affordable units with 17 one-bedroom apartments, 2 two-bedroom apartments, and 4 single-occupancy units. The building was designed by architect William H. Lautz and constructed in 1925.

The apartment building at 6516-6520 S. Stony Island Avenue/1556-1558 E. 65th Place is a three-and-a-half story corner structure. Today, the multi-family structure contains 15 rental apartments. Most are two-bedroom units and there are some one-bedroom units. The building was designed by architects Ernest. J. Ohrenstein & Edward G. Hild and constructed in 1916.

Both buildings are located south of the Island Terrace Apartments, on the west side of Stony Island Ave. There is a vacant lot between the properties and a vacant lot south of 6516-6520 S. Stony Island Ave. The Jackson Park Fieldhouse is located across S. Stony Island Avenue to the east of the properties.



Mixed-use building at 6450-60 S. Stony Island Avenue looking west from S. Stony Island Avenue towards the east façade



Apartment building at 6516-6520 S. Stony Island Avenue/1556-1558 E. 65th Place.

4.7.3 Historic Significance¹⁷

The CPBS historic district is nationally significant as the first comprehensive system of greenways for a major city in the United States and is associated with many prominent early landscape architects. The system was created to foster healthful, livable neighborhoods and to spur residential development in what was then the outskirts of the City. The district is also significant at the local level for Architecture, representing the types and styles of buildings constructed in Chicago from 1869 through 1942, and for Landscape Architecture as a designed landscape that expresses a comprehensive artistic quality unlike any other in Chicago. The architectural streetscapes along the boulevards are identified in the nomination as a “frame” to the landscaped medians and parks upon which they sit, and in turn these landscaped spaces were the focal points for their neighborhoods. The buildings framing the CPBS Historic District exhibit a wide variety of architectural styles that distinguish them from buildings outside the CPBS and that express the stylistic development of Chicago.

The period of significance for the district is 1869 to 1942 and encompasses the years legislation was passed establishing the system through the end of substantial improvements to the system. As noted in its nomination, the CPBS Historic District “goes beyond the story of the parks alone and beyond the narrative of a single segment of Chicago’s continuous park and boulevard system. It attempts to view the city’s park and boulevard system more holistically.” The NRHP nomination for the district notes that the integrity of individual resources and landscape features varies, but the historic district overall retains a high level of integrity.

As noted in Section 4.0, Jackson Park and the Midway Plaisance are historic properties that are jointly listed on the NRHP as the Jackson Park Historic Landscape District and Midway Plaisance. The Jackson Park Historic Landscape District and Midway Plaisance is a contributing resource to the CPBS Historic District.

¹⁷ Historic Property Identification Report: Federal Undertakings In and Adjacent to Jackson Park, May 2018. Addendum to the Section 106 Historic Properties Identification Report, January 2020.

Detailed descriptions of the historic significance of Jackson Park and Midway Plaisance are provided in Section 4.2.3.

Both contributing properties at 6450-60 S. Stony Island Avenue/1554-56 E. 65th Street and 6516-20 S. Stony Island Avenue/1556-1558 E. 65th Place are significant due to their architectural style and ties to development of and social history of the Woodlawn community.

Woodlawn had a sparse population when it was first annexed to Chicago in 1889. But, shortly thereafter, when nearby Jackson Park was selected as the site of the World's Columbian Exposition, the community grew quite rapidly. The area had attracted thousands of new residents by the time the World's Columbian Exposition opened in 1893. The area didn't lose any allure in the years after the exposition closed.

By the 1910s, Stony Island Avenue had become a major north-south route for all types of traffic, extending from E. 57th Street for many miles, deep into the South Side. It was soon lined with stores, banks, businesses and low-rise apartment buildings. The real estate activity along the street was a precursor to the boom that soon happened in the 1920s in both Woodlawn and to the southeast in the South Shore community.

The building at 6516-6520 S. Stony Island Avenue/1556-1558 E. 65th Place was built by South Sider J.E. Metzger as an investment, spending an estimated \$45,000 on it. He hired architects Ohrenstein & Hild to design the building. The duo of Ernest J. Ohrenstein (1867-1930) and Edward Garfield Hild (1885-1935) produced a large collection of buildings in the 1920s, including a Craftsman style bungalow at 3649 N. Avers in the Villa District (listed on the NRHP). The building has handsome primary facades fronting onto both Stony Island Avenue and E. 65th Place. The deep red of the brick facades has attractive trim of contrasting pale cream of limestone ornamentation. The cream-colored brick is laid in simple geometric patterns that outline the windows and provide accents at the corners and in the parapets. Two entrance doors on the S. Stony Island Avenue with accompanying sidelights and transom windows stand within exuberant brick and limestone surrounds.

The building at 6450-60 S. Stony Island Avenue/1554-56 E. 65th Street is a fine example of the Classic Revival style designed by the talented, but largely forgotten, Chicago architect William H. Lautz (1891-1973). Lautz designed many single and multi-family dwellings and commercial buildings, including a number of structures listed on the NRHP in the South Park Manor Historic District and other districts. The building was built by South Shore mason A.C. Larson in 1925 and completed in April 1926 at an estimated cost of \$150,000. With a prominent curve at its northeast corner, the tan brick building is enlivened with fine limestone details.

4.7.4 Access and Usage

The CPBS Historic District is an extensive park, square and boulevard system that extends through the south and west sides of the City. The portion of the CPBS Historic District that is directly affected by the proposed action includes Jackson Park, Midway Plaisance, and contributing properties along Stony Island

Ave. The access and usage features of these two park resources are described in detail in Section 4.1.4 and 4.1.5 for Jackson Park, and in Section 4.2.3 for the Midway Plaisance.

Contributing properties can be accessed by automobiles via S. Stony Island Avenue, E. 65th Place, and E. 65th Place. Bus stops for CTA Routes 6, 15, and 28 are located at the corners of Stony Island Avenue/65th Street and Stony Island Avenue/64th Street for access to public transportation. A public sidewalk is present along the west side of Stony Island Avenue for bicyclist and pedestrian access to the properties.

4.7.5 Existing and Planned Facilities

The CPBS Historic District is an extensive park, square and boulevard system that extends through the south and west sides of the City. The portions of the CPBS Historic District that are potentially impacted by the proposed action includes Jackson Park, Midway Plaisance, and contributing properties along Stony Island Ave. The existing and planned facilities of the two park resources are described in detail in Section 4.1.6 for Jackson Park, and in Section 4.2.4 for the Midway Plaisance. There are no known facility plans for the contributing properties along S. Stony Island Avenue.

4.7.6 Relationship to Similar Properties in the Vicinity

The CPBS Historic District consists of eight parks and six squares connected by 19 different boulevard sections that form an arc through the south and west sides of the City. Jackson Park and the Midway Plaisance have been designed in consideration of this system of parks, squares and boulevards. Further details regarding Jackson Park and the Midway Plaisance is included in Sections 4.1.7 and 4.2.5, respectively.

The contributing property at 6450-60 S. Stony Island Avenue remains as one of the few low-rise mixed-use buildings found along S. Stony Island Avenue today. Historically, there were many similar buildings with storefronts on the street level and flats above. One of the only other remaining examples on Stony Island is located several blocks to the south at 6922-26 S. Stony Island Avenue. Built in 1928, that structure is also three stories tall and has a prominent curve at the corner of its two primary facades.

Historically, many well-designed brick low-rise apartment buildings similar to the contributing property at 6516-6520 S. Stony Island Avenue existed along S. Stony Island Avenue and nearby side streets such as E. 65th Place, E.65th Street, and E. Marquette Road. However, many of these structures were demolished in the 1980s and \1990s. The sites of most of these early 20th century structures are now vacant lots. While very few low-rise apartment buildings remain on S. Stony Island Ave. today, there are several on nearby side streets. These include the building directly west of this property, a 1911 low-rise at 6516-6520 S. Stony Island Avenue which is a contributing resource to the CPBS Historic District, and the William H. Dexter three-flat, which was built in 1912, across the street at 1549 E. 65th Street and is listed on the NRHP.

4.7.7 Elements Affecting Ownership

The elements affecting ownership of the portion of the CPBS Historic District within the project limits are the same as those for Jackson Park and Midway Plaisance (see Sections 4.1.8 and 4.2.6). The remaining CPBS Historic District may have other “elements affecting ownership” but these elements are not relevant to this 4(f) analysis because there is no proposed use outside of Jackson Park and Midway Plaisance, which are coincident with the CPBS Historic District.

5.0 Avoidance Alternatives

A document titled “Alternatives to be Carried Forward” (ATBCF) is included in **Appendix C** and includes additional detail for each alternative in this Section 4(f) evaluation. The Section 4(f) evaluation summarizes information from the ATBCF, and updates it where necessary, to describe the avoidance alternatives considered (described in Section 5.0) and additional alternatives evaluated (described in Section 6.0).

The ATBCF was prepared in April 2018 to evaluate alternatives and coordinate with resource and regulatory agencies as required by Illinois’ National Environmental Policy Act (NEPA) NEPA-404¹⁸ merger process. In Illinois, the FHWA and IDOT follow a NEPA-404 merger process when an Environmental Assessment also requires an individual section 404 permit. The NEPA-404 merger process ensures the resource and regulatory agencies can provide input on purpose and need, alternatives to be carried forward, and the preferred alternative prior to any decisions being finalized. The ATBCF documents the alternatives that were evaluated, alternatives that were dismissed and the rationale for dismissal, and the alternatives that will be studied in more detail in the NEPA process. The ATBCF continues to inform and support the FHWA’s decision making process although the National Park Service is serving as the lead for the NEPA process.

Alternatives that avoided permanently incorporating Section 4(f) land into a transportation facility were considered first and are further discussed in Sections 5.1 and 5.2. The avoidance alternatives included:

- No-Action Alternative
- Congestion Management Process Strategies

These alternatives consider construction of the OPC site and roadway closures as previously approved by the City, but do not include modification of the existing roadway footprint. Because the project area is surrounded by 4(f) properties, these are the only avoidance alternatives. See **Appendix B** for all 4(f) properties in the project area.

5.1 No-Action Alternative

The No-Action Alternative¹⁹ considers future conditions that assume the following:

- The OPC site is constructed within Jackson Park as proposed by the City. The OPC site can be found on **Exhibit A-2**. No FHWA approval is required for the OPC site to be constructed.
- The City closes roadways within Jackson Park, Chicago, Illinois to implement a portion of the SLFP, as described in Section 2.1 and depicted on **Exhibit A-3**. No FHWA approval is required for the roadways to be closed by the City.

¹⁸ Federal Highway Administration, Illinois Division, NEPA/404 Merger Process, https://www.fhwa.dot.gov/ildiv/docs/nepa-404_merger_process_information.pdf

¹⁹ The “No-Action” Alternative for the Section 4(f) Evaluation is consistent with Alternative B in the Environmental Assessment (EA). Alternative B in the EA is FHWA’s No-Action Alternative for purposes of the NEPA evaluation. The EA was made available to the public for review on September 28, 2020 under the lead of the National Park Service.

- No roadway improvements are made in response to changed conditions caused by the roadway closures.

The No-Action Alternative is a condition in which regional improvements anticipated as part of the 2040 Regional Transportation Plan²⁰ are implemented, but no project specific improvements are undertaken. It provides a baseline condition by which all other alternatives are measured to determine if the benefits of a particular Build alternative outweigh the impacts that would result from that alternative. The no-build assumptions include local land use and land management decisions made by the City to close roadways and locate OPC in Jackson Park, which is within the City’s authority to do. These local land use and land management decisions described in the “No-Action” alternative are consistent with the 2018 SLFP, which was developed with a coordinated public engagement effort by CPD to determine the vision for Jackson Park and South Shore Cultural Center. These local land use and land management decisions are outside of FHWA’s control or jurisdiction and are pre-requisites for FHWA to take action for the transportation project. Without the decision to close roads by the City, there is no need for FHWA to consider action to mitigate traffic impacts from road closures.

5.1.1 Evaluation

While the No-Action Alternative would not convert any Section 4(f) land to a transportation use, nor would it involve any potential temporary use of Section 4(f) properties, it does not provide sufficient pedestrian and bicyclist accommodations to improve access and circulation to and within Jackson Park. See **Exhibit 4** in **Appendix C**. Unacceptable vehicular operational performance within the study area results from the No-Action Alternative.

The results of the traffic operational analysis for the No-Action Alternative are shown on **Exhibit 6** in **Appendix C** and summarized in **Table 3**. As shown in the table, eleven signalized intersections and a stop sign controlled intersection within the roadway network experience a LOS F and/or operate over capacity during either the morning or the evening peak hour. Roadways experiencing the greatest traffic impacts include Stony Island Avenue during the A.M. peak hour and Lake Shore Drive during the P.M. peak hour. Stony Island Avenue currently has only one travel lane in each direction north of 65th Street, and does not have available capacity for the amount of anticipated Cornell Drive traffic diversions during the A.M. peak hour. Similarly, Lake Shore Drive under existing conditions only has two southbound travel lanes south of 57th Drive, and the diverted Cornell Drive traffic during the P.M. peak hour exceeds the available capacity of the roadway.

²⁰ In October 2018, the Chicago Metropolitan Agency for Planning (CMAP) formally adopted their *ON TO 2050* regional plan. In accordance with the adoption of the new regional plan, year 2050 traffic projections were obtained from CMAP and the traffic analyses were re-evaluated to ensure that traffic impacts would not significantly increase under year 2050 traffic volumes. This sensitivity analysis is discussed in Section 4 of **Appendix J**. The results of the sensitivity analysis found that while traffic volumes do increase over 2040 levels, the conclusions reached from the 2040 traffic analyses do not change for any of the alternatives under 2050 traffic volumes. It was therefore concluded that the original 2040 analyses are still valid for environmental review purposes.

The traffic analysis results indicate that under the No-Action Alternative, many intersections will experience considerable increases in delay and operate over capacity, resulting in unacceptable operational performance within the study area as shown in **Table 3**. Paired with insufficient pedestrian and bicyclist accommodations within Jackson Park, the No-Action Alternative is not feasible and prudent because it (1) compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need; and (2) it results in unacceptable safety or operational problems. The No-Action Alternative does not meet the project’s Purpose and Need and it would not be reasonable to continue with the project considering the stated Purpose and Need.

Table 3: 2040 No-Action Alternative Intersection Levels of Service

Intersection	Intersection Level of Service and Delay (sec./veh.)	
	A.M. Peak Hour	P.M. Peak Hour
Lake Shore Drive		
• Marquette Dr	C (22)	C (24)
• Hayes Dr	F (**)	F (**)
• Science Dr	B (19)	F (**)
• 57 th Street	B (13)	F (**)
Stony Island Avenue		
• 67 th St	F (**)	F (**)
• Marquette Dr	D (50)	B (15)
• 65 th Pl	F (**)	C (30)
• 64 th St *	F* (**)	F* (**)
• 63 rd St/Hayes Dr	F (**)	F (**)
• 60 th St	C (20)	B (12)
• Midway Plaisance (EB)	B (13)	C (31)
• Midway Plaisance (WB)	F (**)	C (32)
• 59 th St	F (**)	C (24)
• 57 th St	F (**)	F (**)
• 56 th St *	D (32)	D (31)
Cornell Drive/57 th Drive		
• 67 th St	Closed	
• Marquette Drive	Closed	
• Hayes Dr	F (**)	F (**)
• Midway Plaisance (EB)	Closed	
• 57 th St/MSI Drop off	F (**)	D (54)
• Hyde Park Blvd	C (23)	B (20)
67 th St		
• East End Ave *	B (12)	B (14)
• Cregier Ave *	B (13)	B (13)
• Jeffery Ave	B (20)	B (19)
• South Shore Dr	B (17)	B (19)

Intersection	Intersection Level of Service and Delay (sec./veh.)	
	A.M. Peak Hour	P.M. Peak Hour
Marquette Dr		
• Richards Dr (West)	<i>Closed</i>	
• Richards Dr (East)	<i>Closed</i>	
• La Rabida Entrance	B (14)	A (7)
Richards Drive		
• Marquette Dr (North)	<i>Closed</i>	
• Hayes Dr *	A (9)	B (15)
56 th St		
• Hyde Park Blvd *	B (12)	B (12)
• Everett Ave *	A (8)	A (7)

*Indicates All-way Stop-Controlled Intersection

** Indicates one or more movements operate over capacity ($v/c > 1$). These intersections are listed with a Level of Service F per the Highway Capacity Manual definition.

5.2 Congestion Management Process Strategies

Congestion Management Process (CMP) Strategies involve ways to reduce congestion in a transportation network that do not involve major construction and do not provide additional through capacity for single-occupancy vehicles. Improvements as part of this alternative consist of re-timing and/or modernization of signalized intersections within the study area. Proposed trails and underpass locations are provided within Jackson Park, in addition to curb extensions along Stony Island Avenue to enhance access to the park. See **Exhibit 7** in **Appendix C**.

5.2.1 Evaluation

CMP Strategies does not permanently convert Section 4(f) land to a transportation use, but involves 2.7 acres of temporary use of Section 4(f) land to construct trail connections along Cornell Drive and Hayes Drive as well as pedestrian underpasses at the following locations: Cornell Drive/Hayes Drive intersection, along Hayes Drive between Richards Drive and Lake Shore Drive, along Jeffery Drive between Marquette Drive and 67th Street, and the South Shore Drive/67th Street intersection.

The results of the traffic operational analysis for the CMP Alternative are shown on **Exhibit 9** in **Appendix C** and summarized in **Table 4**. As shown in the table, the CMP strategies had limited effectiveness in improving traffic operations, as eleven intersections within the roadway network experience a LOS F and/or operate over capacity during either the morning or the evening peak hour.

Table 4: 2040 CMP Alternative Intersection Levels of Service

Intersection	Intersection Level of Service and Delay (sec./veh.)	
	A.M. Peak Hour	P.M. Peak Hour
Lake Shore Drive		
• Marquette Dr	C (35)	C (24)
• Hayes Dr	C (35)	F (**)
• Science Dr	A (3)	F (**)
• 57 th Dr	B (17)	F (**)
Stony Island Avenue		
• 67 th St	F (**)	F (**)
• Marquette Dr	F (**)	B (15)
• 65 th Pl	D (46)	C (30)
• 64 th St	F* (**)	F* (**)
• 63 rd St/Hayes Dr	F (**)	F (**)
• 60 th St	Right-in/Right-out	
• S Midway Plaisance (EB)	C (22)	B (18)
• N Midway Plaisance (WB)	F (**)	C (31)
• 59 th St	Right-in/Right-out	
• 57 th St	F (**)	F (**)
• 56 th St *	D (32)	D (30)
Cornell Drive/57 th Drive		
• 67 th St	Closed	
• Marquette Drive	Closed	
• Hayes Dr	A (2)	F (**)
• S Midway Plaisance (EB)	Closed	
• 57 th St/MSI Drop off	F (**)	D (53)
• Hyde Park Blvd	C (24)	B (20)
67 th St		
• East End Ave *	B (12)	B (14)
• Cregier Ave *	B (13)	B (13)
• Jeffery Ave	C (20)	B (19)
• South Shore Dr	B (10)	B (19)
Marquette Dr		
• Richards Dr (West)	Closed	
• Richards Dr (East)	Closed	
• La Rabida Entrance	A (6)	A (7)
Richards Drive		
• Marquette Dr (North)	Closed	
• Hayes Dr	A* (9)	B* (14)
56 th St		
• Hyde Park Blvd *	B (12)	B (12)

Intersection	Intersection Level of Service and Delay (sec./veh.)	
	A.M. Peak Hour	P.M. Peak Hour
• Everett Ave *	A (8)	A (7)

*Indicates All-way Stop-Controlled Intersection

** Indicates one or more movements operate over capacity ($v/c > 1$). These intersections are listed with a Level of Service F per the Highway Capacity Manual definition.

CMP Strategies Alternative is not feasible and prudent because it (1) compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need; and (2) it results in unacceptable safety or operational problems.

There is no feasible and prudent avoidance alternative to the use of land from the Section 4(f) property(ies).

6.0 Additional Alternatives Evaluated

As Section 5.0 demonstrated, there are no feasible and prudent alternatives that avoid the use of Section 4(f) resources. Additional alternatives were evaluated and considered in an effort to minimize Section 4(f) impacts and meet the project’s Purpose and Need.

The following alternatives are analyzed in this section:

- Alternative 1 – Alternative Avoiding Parkland Use and Widen Stony Island Avenue
- Alternative 2 – Operational Changes to Roadways
- Alternative 3 – Mobility Improvement – Widen Lake Shore Drive
- Alternative 4 – Mobility Improvement – Widen Stony Island Avenue
- Alternative 5 – Mobility Improvement – Reconfigure Hayes Drive
- Alternative 6 – Mobility Improvement – Widen Lake Shore Drive and Widen Stony Island Avenue
- Alternative 7 – Mobility Improvement – Widen Lake Shore Drive and Reconfigure Hayes Drive
- Alternative 8 – Mobility Improvement – Widen Stony Island Avenue Reconfigure Hayes Drive
- Alternative 9 – Mobility Improvement – Widen Lake Shore Drive/Widen Stony Island Avenue /Reconfigure Hayes Drive

The alternative analysis aimed to incrementally improve operations and available transportation capacity in order to minimize permanent use of Section 4(f) resources. As part of the analysis, intersections within the project area were evaluated for a LOS, which is a quantitative concept developed to characterize degrees of congestion as perceived by motorists. Letter designations A through F have been correlated to quantitative measures based on the amount of delay experienced. Level A represents the best conditions and Level F the worst. Per the *Highway Capacity Manual*, an intersection is also considered to operate at an LOS F if one or more movements operate over capacity, which is characterized by more vehicles arriving at the intersection than can be served by a specific movement during the analysis period. This is commonly evaluated using the volume-to-capacity (v/c) ratio. By definition, a movement exceeds its available capacity when the v/c ratio exceeds a value of one. Intersections operating at a LOS F are considered to have a failing LOS.

The subsequent sections describe the alternatives evaluated to minimize Section 4(f) impacts and meet the project’s Purpose and Need. To evaluate each alternative, potential permanent uses were calculated for each alternative, along with conceptual level potential temporary use.

6.1.1 Alternative 1 – Alternative Avoiding Parkland Use and Widen Stony Island Avenue

Alternative 1 aims to avoid any permanent or temporary Section 4(f) use of Jackson Park, the Midway Plaisance, and the Jackson Park Historic Landscape District and Midway Plaisance while providing improvements to reduce congestion from the roadway closures. Although it avoids Section 4(f) use from three Section 4(f) properties, Alternative 1 involves 0.8 acres of permanent Section 4(f) use of three historic properties: the Island Terrace Apartments, Jackson Park Terrace Historic District and the CPBS Historic District. Section 4(f) use of these historic properties would result in demolition of the Island

Terrace Apartments, one building contributing to the Jackson Park Terrace Historic District, and two buildings contributing to the CPBS Historic District (6450-60 and 6516-20 S. Stony Island Avenue). These demolitions result in the loss of 286 residential units, of which 270 serve low-income and minority populations. The demolition of the 6450-60 S. Stony Island Avenue building also results in the displacement of 6 commercial businesses. Since the Jackson Park and Midway Plaisance property boundaries begin at the backs of roadway curbs along all roadways within and adjacent to the parks, any physical changes that require improvements beyond the existing back of curb in these areas would require incorporating Section 4(f) property into a transportation facility, resulting in a permanent use.

This alternative provides additional lanes along Stony Island Avenue by widening the roadway to the west between 67th Street and 60th Street. One-way streets at North Midway Plaisance and 65th Place will be converted to two-way operation within the existing roadway footprint. Improving roadway capacity along Stony Island Avenue alone will not fully address the operational needs in the project area, as Alternative 1 results in almost a fifth (5 of 26) of the intersections failing intersection levels of service. Intersections failing LOS are as follows:

- Lake Shore Drive and Hayes Drive
- Lake Shore Drive and Science Drive
- Lake Shore Drive and 57th Drive
- Stony Island Avenue and N. Midway Plaisance (WB)
- Stony Island Avenue and 56th Street

To minimize Section 4(f) use to Jackson Park and the Jackson Park Historic Landscape District and Midway Plaisance, this alternative proposes only minor bicyclist and pedestrian improvements. ADA and crosswalk improvements will only occur at widened or modernized intersections. Curb extensions will be provided at 9 of the 20 intersections and one midblock crossing. Pedestrian refuge islands will be provided at only 5 of the 20 intersections and one midblock crossing. Though pedestrian access and circulation would be improved along Stony Island Avenue, Alternative 1 would not improve pedestrian and bicycle access and circulation within Jackson Park, and park users would be subject to heavy traffic flows along Hayes Drive, Jeffrey Drive, South Shore Drive/67th Street. Also, in order to avoid impacts to parkland, improvements to the trail network that would improve connectivity would not be constructed.

6.1.2 Alternative 2 – Operational Changes to Roadways

Alternative 2 attempts to accommodate diverted traffic flows through intersection improvements along Stony Island Avenue between 67th Street and 65th Street and at the Hayes Drive/Richards Drive intersection. Improvements also include retiming of existing traffic signals along Stony Island and Hayes Drive.

This alternative will improve pedestrian and bicycle access and circulation by grade separating pedestrian and bicycle movements from heavy traffic flows along Hayes Drive, Jeffrey Drive and South Shore Drive/67th Street, providing new trails along Cornell Drive and Hayes Drive, as well as installing curb extensions and refuge islands along Stony Island Avenue.

Alternative 2 converts 0.6 acres of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District to a transportation use by converting and widening one way streets along North Midway Plaisance and southbound Cornell Drive to two-way operation, and by reconfiguring the Hayes Drive/Richards Drive intersection. This alternative also involves 2.7 acres of potential temporary use of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and the CPBS Historic District to construct trail connections along Cornell Drive and Hayes Drive as well as four pedestrian underpasses.

However, these improvements alone will not address the operational needs in the project area, as Alternative 2 results in almost a quarter (6 of 26) of the intersections failing intersection levels of service. Intersections failing LOS are as follows:

- Lake Shore Drive and Hayes Drive
- Lake Shore Drive and Science Drive
- Lake Shore Drive and 57th Drive
- Stony Island Avenue and 67th Street
- Stony Island Avenue and Marquette Drive
- Cornell Drive/57th Drive and Hayes Drive

6.1.3 Alternative 3 – Mobility Improvement – Widen Lake Shore Drive

Alternative 3 proposes to convert 2.0 acres of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District overlap with Jackson Park by adding an additional southbound through lane along Lake Shore Drive between 57th Drive and Hayes Drive. Intersection improvements to accommodate the additional lane are proposed at 57th Drive, Science Drive, and Hayes Drive with Lake Shore Drive. The 59th Street Inlet bridge is proposed to be widened to accommodate the additional travel lane. This alternative also involves 2.6 acres of potential temporary use of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District overlap with Jackson Park to construct trail connections along Cornell Drive and Hayes Drive as well as four pedestrian underpasses.

This alternative will improve pedestrian and bicycle access and circulation by grade separating pedestrian and bicycle movements from heavy traffic flows along Hayes Drive, Jeffrey Drive and South Shore Drive/67th Street, providing new trails along Cornell Drive and Hayes Drive, as well as installing curb extensions and refuge islands along Stony Island Avenue.

Alternative 3 attempts to accommodate diverted traffic flows on portions of Lake Shore Drive, Hayes Drive, Cornell Drive and Stony Island Avenue. Also included is realigning and signaling the Hayes Drive intersection with Richards Drive. However, these improvements alone will not address the operational needs in the project area, as Alternative 3 results in 4 of the 26 intersections failing intersection levels of service. Intersections failing LOS are as follows:

- Lake Shore Drive and Hayes Drive
- Stony Island Avenue and 67th Street

- Stony Island Avenue and Marquette Drive
- Cornell Drive/57th Drive and Hayes Drive

6.1.4 Alternative 4 – Mobility Improvement – Widen Stony Island Avenue

Alternative 4 proposes to convert 3.1 acres of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District overlap with Jackson Park to a transportation use by adding one northbound and one southbound through lane on Stony Island Avenue between 65th Street and 60th Street and by adding one northbound lane between 67th Street and 65th Street. This alternative widens Stony Island Avenue to the east into Jackson Park to avoid any building removals. This alternative also involves 2.7 acres of potential temporary use of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District to construct trail connections along Cornell Drive and Hayes Drive as well as four pedestrian underpasses.

This alternative will improve pedestrian and bicycle access and circulation by grade separating pedestrian and bicycle movements from heavy traffic flows along Hayes Drive, Jeffrey Drive and South Shore Drive/67th Street, providing new trails along Cornell Drive and Hayes Drive, as well as installing curb extensions and refuge islands along Stony Island Avenue.

The objective of Alternative 4 is to mitigate the impacts of traffic pattern and volume changes resulting from the roadway closures by redistributing traffic that currently uses Cornell Drive onto Stony Island Avenue. Alternative 4 would involve capacity improvements along Stony Island Avenue and its connector roadways to 57th/Cornell Drive that are needed to accommodate the diverted traffic volumes. Under this alternative, Stony Island would be widened to the east to avoid impacts to residences and commercial buildings that were affected by widening to the west under Alternative 1. However, these improvements alone will not address the operational needs in the project area, as Alternative 4 results in 4 of the 26 intersections failing intersection levels of service. Intersections failing LOS are as follows:

- Lake Shore Drive and Hayes Drive
- Lake Shore Drive and Science Drive
- Lake Shore Drive and 57th Drive
- Cornell Drive/57th Drive and Hayes Drive

6.1.5 Alternative 5 – Mobility Improvement – Reconfigure Hayes Drive

Alternative 5 converts 1.5 acres of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District to a transportation use by reconfiguring Hayes Drive at the Richards Drive and Cornell Drive intersections, and by converting and widening one way streets along North Midway Plaisance and southbound Cornell Drive to two-way operation. Alternative 5 also proposes to remove parking along Hayes Drive to provide two lanes in each direction. Hayes Drive will also be realigned at the Hayes Drive/Cornell Drive/63rd Street intersection to provide a through movement for predominant travel. This alternative also involves 3.7 acres of potential temporary use of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District to construct trail connections along Cornell Drive and Hayes Drive as well as four

pedestrian underpasses. This alternative will improve pedestrian and bicycle access and circulation by grade separating pedestrian and bicycle movements from heavy traffic flows along Hayes Drive, Jeffrey Drive and South Shore Drive/67th Street, providing new trails along Cornell Drive and Hayes Drive, as well as installing curb extensions and along Stony Island Avenue and pedestrian refuge islands at the Hayes Drive and Richards Drive intersection.

The mobility improvement that converts Hayes Drive to a 4-lane roadway in this alternative attempts to accommodate diverted traffic flows primarily on Hayes Drive as well as on portions of Cornell Drive and Stony Island Avenue south of 63rd Street. Also included is realigning and signalizing the Hayes Drive intersection with Richards Drive as well as reconfiguring the Hayes Drive/Cornell Drive/63rd Street intersection to accommodate predominant travel patterns as a through movement. Under Alternative 5, the majority of diverted traffic is expected to utilize Lake Shore Drive, Hayes Drive, Cornell Drive and Stony Island Avenue. However, these improvements alone will not address the operational needs in the project area as almost a fifth (5 of 26) of the intersections have failing intersection levels of service. Intersections failing LOS are as follows:

- Lake Shore Drive and Hayes Drive
- Lake Shore Drive and Science Drive
- Lake Shore Drive and 57th Drive
- Stony Island Avenue and 67th Street
- Stony Island Avenue and Marquette Drive

6.1.6 Alternative 6 – Mobility Improvement – Widen Lake Shore Drive and Stony Island Avenue

Alternative 6 proposes to combine Alternatives 3 (Widen Lake Shore Drive) and 4 (Widen Stony Island Avenue) to attempt to address congestion issues experienced in the two alternatives individually. This alternative converts 4.5 acres of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District overlap with Jackson Park to a transportation use to construct an additional southbound travel lane along Lake Shore Drive, to widen Stony Island Avenue between 67th Street and 59th Street, to convert and widen one way streets along North Midway Plaisance and southbound Cornell Drive to two-way operation, and to reconfigure the Hayes Drive/Richards Drive intersection. This alternative also involves 2.6 acres of potential temporary use from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District overlap with Jackson Park to construct trail connections along Cornell Drive and Hayes Drive as well as four pedestrian underpasses.

This alternative will improve pedestrian and bicycle access and circulation by grade separating pedestrian and bicycle movements from heavy traffic flows along Hayes Drive, Jeffrey Drive and South Shore Drive/67th Street, providing new trails along Cornell Drive and Hayes Drive, as well as installing curb extensions and refuge islands along Stony Island Avenue.

Alternative 6 combines the features of Alternatives 3 and 4 to mitigate the impacts of traffic pattern and volume changes resulting from the roadway closures. The primary objective of Alternative 6 is to redistribute traffic that currently uses Cornell Drive onto Stony Island Avenue and Lake Shore Drive without affecting other roadways located within Jackson Park. However, these improvements alone will not address the operational needs in the project area as 2 of the 26 intersections have failing intersection levels of service. Intersections failing LOS are as follows:

- Lake Shore Drive and Hayes Drive
- Cornell Drive/57th Drive and Hayes Drive

6.1.7 Alternative 7 – Mobility Improvement – Widen Lake Shore Drive and Reconfigure Hayes Drive

Alternative 7 proposes to combine Alternatives 3 and 5 to attempt to address congestion issues experienced in the two alternatives individually. This alternative converts 3.2 acres of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District to a transportation use to construct an additional southbound travel lane along Lake Shore Drive, to reconfigure Hayes Drive at the Lake Shore Drive, Richards Drive and Cornell Drive intersections, and to convert and widen one way streets along North Midway Plaisance and southbound Cornell Drive to two-way operation. This alternative also involves 3.6 acres of potential temporary use from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District overlap with Jackson Park to construct trail connections along Cornell Drive and Hayes Drive as well as pedestrian underpasses at four locations.

This alternative will improve pedestrian and bicycle access and circulation by grade separating pedestrian and bicycle movements from heavy traffic flows along Hayes Drive, Jeffrey Drive and South Shore Drive/67th Street, providing new trails along Cornell Drive and Hayes Drive, as well as installing curb extensions and along Stony Island Avenue and pedestrian refuge islands at the Hayes Drive and Richards Drive intersection.

Alternative 7 provides mobility improvement that widens Lake Shore Drive between 57th and Hayes Drives, reconfigures Hayes Drive between Stony Island Avenue and Lake Shore Drive, and attempts to accommodate diverted traffic flows on portions of Lake Shore Drive and Hayes Drive. This alternative also includes improvements to Cornell Drive south of Hayes and Stony Island Avenue south of Cornell. The majority of diverted traffic is expected to utilize Lake Shore Drive, Hayes, Cornell and Stony Island Avenue with the Alternative 7 roadway improvements. However, these improvements alone will not address the operational needs in the project area as 2 of the 26 intersection have failing intersection levels of service. Intersections failing LOS are as follows:

- Stony Island Avenue and 67th Street
- Stony Island Avenue and Marquette Drive

6.1.8 Alternative 8 – Widen Stony Island Avenue and Reconfigure Hayes Drive

Alternative 8 proposes to combine Alternatives 4 (Widen Stony Island Avenue) and 5 (Reconfigure Hayes Drive) to attempt to address congestion issues experienced in the two alternatives individually. Alternative 8 converts 3.9 acres of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District to a transportation use to widen Stony Island Avenue between 67th Street and 59th Street, to reconfigure Hayes Drive at the Richards Drive and Cornell Drive intersections, and to convert and widen one way streets along North Midway Plaisance and southbound Cornell Drive to two-way operation. This alternative also involves 3.7 acres of potential temporary use from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District to construct trail connections along Cornell Drive and Hayes Drive as well as pedestrian underpasses at four locations.

This alternative will improve pedestrian and bicycle access and circulation by grade separating pedestrian and bicycle movements from heavy traffic flows along Hayes Drive, Jeffrey Drive and South Shore Drive/67th Street, providing new trails along Cornell Drive and Hayes Drive, as well as installing curb extensions and along Stony Island Avenue and pedestrian refuge islands along Stony Island Avenue and at the Hayes Drive and Richards Drive intersection.

The primary objective of Alternative 8 is to redistribute traffic that currently uses Cornell Drive onto Stony Island Avenue and Hayes Drive without affecting other roadways located within Jackson Park. Also included in the improvements is realigning and signaling the Hayes Drive intersection with Richards Drive. However, these improvements alone will not address the operational needs in the project area as 3 of the 26 intersections have failing intersection levels of service. Intersections failing LOS are as follows:

- Lake Shore Drive and Science Drive
- Lake Shore Drive and 57th Drive
- Stony Island Avenue and 67th Street

6.1.9 Alternative 9 – Mobility Improvement – Widen Lake Shore Drive and Stony Island and reconfigure Hayes Drive

Alternative 9 proposes to combine Alternatives 3 (Widen Lake Shore Drive), 4 (Widen Stony Island Avenue) and 5 (Reconfigure Hayes Drive) to attempt to address congestion issues experienced in the three alternatives individually. This alternative converts 5.6 acres of Section 4(f) land from Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District to a transportation use to construct an additional southbound travel lane along Lake Shore Drive, to widen Stony Island Avenue between 67th Street and 59th Street, to reconfigure Hayes Drive at the Lake Shore Drive, Richards Drive and Cornell Drive intersections, and to convert and widen one way streets corresponding to North Midway Plaisance and southbound Cornell Drive to two-way operation. This alternative also involves 3.6 acres of potential temporary use from Jackson Park, the Jackson Park Historic

Landscape District and Midway Plaisance, and CPBS Historic District to construct trail connections along Cornell Drive and Hayes Drive as well as pedestrian underpasses at four locations.

This alternative will improve pedestrian and bicycle access and circulation by grade separating pedestrian and bicycle movements from heavy traffic flows along Hayes Drive, Jeffrey Drive and South Shore Drive/67th Street, providing new trails along Cornell Drive and Hayes Drive, as well as installing curb extensions and along Stony Island Avenue and pedestrian refuge islands along Stony Island Avenue and at the Hayes Drive and Richards Drive intersection.

The primary objective of Alternative 9 is to combine alternatives to redistribute traffic that currently uses Cornell Drive onto Lake Shore Drive, Stony Island Avenue and Hayes Drive without affecting other roadways located within Jackson Park to achieve acceptable levels of service. The mobility improvement that improves Lake Shore Drive and Stony Island Avenue and which reconfigures Hayes Drive into a 4-lane roadway attempts to accommodate diverted traffic flows on all three of those roadways. Also included is realigning and signalizing the Hayes Drive intersection with Richards Drive. Improving capacity along Lake Shore Drive, Stony Island Avenue and Hayes Drive fully addresses the operational needs in the project area. All major intersections would operate at desirable Levels of Service with limited traffic congestion. Therefore, Alternative 9 fully meets the project purpose of accommodating changes in travel patterns resulting from closing roadways in Jackson Park and improving pedestrian and bicyclist access and circulation to and from Jackson Park.

6.1.10 Alternatives Summary

Table 5 summarizes each alternative's impacts to Section 4(f) properties and its ability to meet the purpose and need. Alternatives 1-8 do not fully satisfy the purpose and need for the project and they compromise the project to a degree that it is unreasonable to proceed with any of the Alternatives 1-8. Therefore, Alternative 1-8 were dismissed from further analysis. As shown in **Table 5**, only Alternative 9 accomplishes both criteria of the Purpose and Need and is therefore carried forward for detailed analysis.

Table 5: Preliminary Alternatives Summary

Alternative Description	Purpose & Need Criteria		Carry Forward for Detailed Analysis	Section 4(f) Impacts	
	Improves bicyclist and pedestrian access and circulation	Accommodates changes in travel patterns		Total Acreage	Properties Impacted
Alt 1 - Avoid Parkland Use and Widen Stony Island	No	No <i>5 failing intersections</i>	No	0.8	<ul style="list-style-type: none"> Island Terrace Apartments Jackson Park Terrace Historic District Hyde Park High School CPBS Historic District
Alt 2 - Operational Changes to Roadways	Yes	No <i>6 failing intersections</i>	No	3.3	<ul style="list-style-type: none"> Jackson Park Jackson Park Historic Landscape District and Midway Plaisance CPBS Historic District
Alt 3 - Widen Lake Shore Drive	Yes	No <i>4 failing intersections</i>	No	4.6	<ul style="list-style-type: none"> Jackson Park Jackson Park Historic Landscape District and Midway Plaisance CPBS Historic District
Alt 4 – Widen Stony Island Ave	Yes	No <i>4 failing intersections</i>	No	5.8	<ul style="list-style-type: none"> Jackson Park Jackson Park Historic Landscape District and Midway Plaisance CPBS Historic District
Alt 5 - Reconfigure Hayes Drive	Yes	No <i>5 failing intersections</i>	No	5.2	<ul style="list-style-type: none"> Jackson Park Jackson Park Historic Landscape District and Midway Plaisance CPBS Historic District
Alt 6 – Widen LSD/ Widen Stony Island	Yes	No <i>2 failing intersections</i>	No	7.1	<ul style="list-style-type: none"> Jackson Park Jackson Park Historic Landscape District and Midway Plaisance CPBS Historic District
Alt 7 – Widen LSD / Reconfigure Hayes	Yes	No <i>2 failing intersections</i>	No	6.8	<ul style="list-style-type: none"> Jackson Park Jackson Park Historic Landscape District and Midway Plaisance CPBS Historic District
Alt 8 - Widen Stony Island/ Reconfigure Hayes	Yes	No <i>3 failing intersections</i>	No	7.6	<ul style="list-style-type: none"> Jackson Park Jackson Park Historic Landscape District and Midway Plaisance CPBS Historic District
Alt 9 - Widen LSD/ Widen Stony Island/ Reconfigure Hayes	Yes	Yes	Yes	9.2	<ul style="list-style-type: none"> Jackson Park Jackson Park Historic Landscape District and Midway Plaisance CPBS Historic District

7.0 Least Harms Analysis

After the preliminary alternatives were narrowed to determine which alternative should be carried forward for detailed analysis, Alternative 9 was refined based on further design studies and additional efforts to avoid or minimize a transportation use of Section 4(f) resources, including additional detail for potential temporary uses. Sub-alternatives of Alternative 9 were investigated to explore further opportunities to reduce permanent conversion of Section 4(f) land to transportation use. All improvements along Lake Shore Drive will occur to the west of the existing roadway to avoid impacts to the Pitcher’s (Dune) thistle, a native federal endangered species. As Section 4(f) land is present at the backs of curb along both sides of Lake Shore Drive, widening to the east would equally impact Section 4(f) land. The reconfiguration of Hayes Drive is generally contained within the existing roadway footprint. Therefore, analysis of sub-alternatives was focused on reducing use of Section 4(f) resources along Stony Island Avenue. Alternative 9A proposes to widen Stony Island Avenue to the west and Alternative 9B proposes to widen Stony Island Avenue to the east. Detailed descriptions and evaluations of the sub-alternatives are provided in the Preferred Alternative documentation in **Appendix D**.

Appendix D - Alternatives Studied in Detail was prepared on April 18, 2018 to describe the proposed rationale for a selecting a preferred alternative for highway improvements and coordinate with resource and regulatory agencies as required by Illinois’ NEPA-404 merger process. The preferred alternative documentation describes the rationale for identifying a preferred alternative for highway improvements that best balances environmental impacts and achieves appropriate transportation performance. The preferred alternative documentation serves to coordinate with the resource and regulatory agencies and does not finalize the decision-making process. Rather, the information contained in the preferred alternative documentation is brought forward into the NEPA documentation, and updated as necessary, for formal public and agency review and comment prior to FHWA making a final decision on a preferred alternative at the conclusion of the NEPA process. The information in the preferred alternative documentation continues to inform the FHWA’s decision making process with respect to highway transportation improvements although the National Park Service is serving as the lead for the NEPA process.

Both sub-alternatives consider the same cross-section along Stony Island Avenue to provide the necessary facilities to meet the project’s Purpose and Need while attempting to minimize Section 4(f) use.

Impacts associated with the two alternatives were further refined from the Alternatives Studied in Detail analysis as more detailed development of the design has been completed. A summary evaluation table of the alternatives is provided on **Table 6**.

Table 6: Least Harms Analysis Evaluation Summary – Alternatives Studied in Detail

Criterion	Impact Measure	Alternative 9A	Alternative 9B
Floodplain Impacts	Acre-Feet	0.032	0.032
Wetland Impacts	Acres Filled	0.0	0.0

Criterion	Impact Measure	Alternative 9A	Alternative 9B
Permanent Waterway Impacts	Acres Filled	0.040	0.040
Parking Loss - On-Street	Number of Spaces	161	161
Section 4(f) Use	Total (Acres)	26.7	28.7
	Permanent Use (Acres)	3.9	5.2
	Temporary Use (Acres)	22.8	23.5
	Properties Impacted	(1) Jackson Park (2) Midway Plaisance (3) Jackson Park Historic Landscape District and Midway Plaisance (4) CPBS Historic District (5) Island Terrace (6) Jackson Park Terrace (7) Hyde Park HS	(1) Jackson Park (2) Midway Plaisance (3) Jackson Park Historic Landscape District and Midway Plaisance (4) CPBS Historic District
Residential Displacements	Number of units	286	0
Commercial Displacements	Number of units	6	0
Proposed Right-of-Way Acquisition (in addition to 4(f))	Acres	0.7	0
Archaeological Sites listed/eligible for the NRHP Effected		No	No
Historic Properties Demolished	Number of NRHP listed properties	1	0
	Number of contributing properties	3	0
Noise Impacts	Number of receptors impacted	10	10
Trees Removed	Number of trees	250 to 300	350 to 400
Pedestrian & Bike Safety and Mobility			

Criterion	Impact Measure	Alternative 9A	Alternative 9B
Pedestrian underpasses	Number of underpasses	5	5
Refuge islands	Number of locations	8	8
Curb extensions	Number of locations	9	9
Signalized intersection modernization	Number of locations	6	6
Convert intersection from stop-controlled to signalized	Number of locations	2	2
Additional Trails		Yes	Yes
Vehicular Safety			
Signalized intersection modernization	Number of locations	6	6
Convert intersection from stop controlled to signalized	Number of locations	2	2
Exclusive turn lanes provided at intersection	Number of locations	9	9
Provide additional capacity	Number of locations	15	15

*Acreage of impact for land included in two or more 4(f) resources is not duplicated. Impact is considered total area converted or occupied, regardless of number of properties impacted.

Table 6 above shows the total Section 4(f) land converted to transportation use. **Table 7** below shows the amount of Section 4(f) land converted from each Section 4(f) property for each alternative. Because of overlapping boundaries of the Section 4(f) properties, any Section 4(f) use of Jackson Park or the Midway Plaisance also results in a Section 4(f) use of the historic properties of Jackson Park Historic Landscape District and Midway Plaisance and the CPBS Historic District. Therefore, the use of land from Jackson Park and Midway Plaisance, as shown in **Table 7**, is also reflected as a use from Jackson Park Historic Landscape District and Midway Plaisance and CPBS Historic District, in **Table 7**. There is no additional use of the Jackson Park Historic Landscape District and Midway Plaisance or CPBS Historic District for Alternative 9A and 9B outside of the use that is coincident with the use from Jackson Park and Midway Plaisance.

Table 7: Least Harms Analysis Evaluation Summary – Section 4(f) Land Use

Section 4(f) property	Alternative 9A			Alternative 9B		
	Perm Use (acres)	Temp Use (acres)	Total Use (acres)	Perm Use (acres)	Temp Use (acres)	Total Use (acres)
Jackson Park	2.9	22.8	25.7	5.2	23.4	28.6
Midway Plaisance	0.1	0.0	0.1	0.0	0.1	0.1

Section 4(f) property	Alternative 9A			Alternative 9B		
	Perm Use (acres)	Temp Use (acres)	Total Use (acres)	Perm Use (acres)	Temp Use (acres)	Total Use (acres)
Jackson Park Historic Landscape District and Midway Plaisance	3.0	22.8	25.8	5.2	23.5	28.7
CPBS Historic District	3.2	22.8	25.8	5.2	23.5	28.7
Island Terrace Apartments	0.1	0.0	0.1	0	0	0
Jackson Park Terrace	0.3	0.0	0.3	0	0	0
Hyde Park High School/Academy	0.3	0.0	0.3	0	0	0

Both Alternative 9A and 9B include components to achieve acceptable operations and improve bicyclist and pedestrian access and circulation within Jackson Park, therefore meeting the Purpose and Need for the Proposed Action and are evaluated in the Least Harms Analysis. These two alternatives that meet the Purpose and Need were evaluated based on the least overall harm factors found at 23 CFR 774.3(c).

The remaining two alternatives use Section 4(f) property and therefore this section evaluates them to determine which alternative causes the least overall harm in light of Section 4(f)'s preservation purposes. The least overall harm is determined by balancing the following factors:

- i. The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property);
- ii. The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;
- iii. The relative significance of each Section 4(f) property;
- iv. The views of the official(s) with jurisdiction over each Section 4(f) property;
- v. The degree to which each alternative meets the purpose and need for the project;
- vi. After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
- vii. Substantial differences in costs among the alternatives.”

Alternatives 9A and 9B are depicted on **Exhibit E-1** and **Exhibit E-2**, respectively. Seven Section 4(f) properties are evaluated for permanent and temporary use by Alternatives 9A and 9B: Jackson Park Historic Landscape District and Midway Plaisance, Jackson Park, the CPBS Historic District, the Midway Plaisance, the Island Terrace Apartments, Hyde Park Academy High School, and the Jackson Park Terrace

Historic District. Alternative 9A results in the permanent use of Jackson Park Historic Landscape District and Midway Plaisance, Jackson Park, the CPBS Historic District (including two contributing buildings at 6450-60 S. Stony Island Avenue, and 6516-20 S. Stony Island Avenue), the Midway Plaisance, the Island Terrace Apartments, and one contributing building of the Jackson Park Terrace Historic District. Alternative 9A also involves right-of-way acquisition from the Hyde Park Academy High School property, although no permanent impacts of the building itself are required. Alternative 9B results in the permanent use of Jackson Park Historic Landscape District and Midway Plaisance, Jackson Park, and the CPBS. Permanent uses resulting from improvements along Lake Shore Drive and Hayes Drive are equal between both Alternative 9A and 9B; differences in permanent uses of Section 4(f) properties are only observed along Stony Island Avenue. Both alternatives involved similar temporary uses of Jackson Park Historic Landscape District and Midway Plaisance and Jackson Park for construction staging, roadway grading, and proposed trails and underpasses.

Alternatives 9A and 9B are evaluated against the least overall harm criteria below:

- i. **The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property);**

Both Alternatives 9A and 9B will mitigate for 4(f) property permanent uses within Jackson Park through the addition of parkland within the closed roadway footprints of Cornell Drive from 63rd Street to 59th Street, Marquette Drive from Stony Island Avenue to Richards Drive, South Midway Plaisance from Stony Island Avenue to Cornell Drive, and northbound Cornell Drive from 67th Street to 65th Street.²¹ The additional areas will result in 7.7 acres of new parkland within the existing park space to be utilized for proposed trails and open green space that will enhance recreational uses and improve continuity of open spaces within Jackson Park. This new parkland space will also provide a more contiguous area in comparison to the slivers of land along the roadways that is proposed for permanent use.

Mitigation for the adverse effect to Jackson Park Historic Landscape District and Midway Plaisance and the CPBS Historic District was addressed through the Section 106 process. Mitigation efforts include: updating the National Register nomination for Jackson Park Historic Landscape District and Midway Plaisance, field documentation of existing conditions, preparation of a Cultural Landscape Report, development of interpretive materials, rehabilitation of the English Stone Comfort Station and the Statue of the Republic, a design review of the east end of the Midway Plaisance, and a planting review for required tree replacements. Mitigation measures are discussed in greater detail in Section 9.2.3.

By widening Stony Island Avenue to the west, Alternative 9A results in use of additional 4(f) properties, including the demolition of four buildings: the Island Terrace Apartments, one building contributing to the Jackson Park Terrace Historic District, and two buildings (6450-60 S. Stony Island Avenue, and 6516-20 S.

²¹ Chicago Park District Ordinance Number 18-2969-0214-9D1 entitled “Ordinance Authorizing the Acceptance of City Right of Way Property Located Within Jackson (Andrew) Park Consisting of Approximately 8 Acres,” Adopted by the Chicago Park District Board of Commissioners on February 14, 2018.

Stony Island Avenue) which contribute to the CPBS Historic District. Possible methods of mitigation could include collecting and preserving data from the historic buildings, develop National Register nominations for other properties or districts within the APE, and development of multimedia educational and interpretive materials related to historic properties or districts. Alternative 9A also requires the permanent use of the Midway Plaisance (0.1 acres). Replacement of this acreage within or adjacent to the site is limited due to the dense presence of the University of Chicago campus and private properties surrounding the park. However, the increase in parkland within Jackson Park would be appropriate mitigation for impacts to the Midway Plaisance.

Overall, Alternative 9A involves the permanent use of 0.1 acres of right-of-way from the Island Terrace Apartments, 0.3 acres of right-of-way from the Hyde Park Academy High School, 0.3 acres of right-of-way from the Jackson Park Terrace Historic District, 0.1 acres from the Midway Plaisance, 2.9 acres from Jackson Park, and 0.2 acres of right-of-way from the CPBS Historic District which is not within Jackson Park or Midway Plaisance. Because the two historic properties, the CPBS Historic District and the Jackson Park Historic Landscape District and Midway Plaisance, fully includes Jackson Park and Midway Plaisance within its boundary, any use of Jackson Park or the Midway Plaisance is also a use of these two historic properties. Therefore, the 3.0 acres converted to transportation use from Jackson Park and Midway Plaisance is also considered a use of the CPBS Historic District and the Jackson Park Historic Landscape District and Midway Plaisance. In total, there would be 3.9 acres of permanent Section 4(f) use with Alternative 9A.

Alternative 9B results in greater permanent use of Section 4(f) property relative to Alternative 9A (5.2 acres) and involves three Section 4(f) resources: Jackson Park, the Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District. The increase in use compared to Alternative 9A is largely along Stony Island Avenue in Jackson Park along the east side of the roadway between 67th Street and 59th Street and avoids use of all 4(f) resources to the west. The permanent uses from Alternative 9B of the 551.52 acres in Jackson Park result in less than 1% of the total park area. Alternative 9B results in the use of only one contributing resource to the CPBS Historic District (the Jackson Park Historic Landscape District and Midway Plaisance), compared to four contributing resources of the CPBS Historic District by Alternative 9A (the Jackson Park Historic Landscape District and Midway Plaisance, Hyde Park Academy High School, 6450-60 S. Stony Island Avenue, and 6516-20 S. Stony Island Avenue). Mitigation for impacts to Jackson Park Historic Landscape District and Midway Plaisance and CPBS Historic District as a historic property will be identified through the Section 106 process. Agreed upon Section 106 mitigation measures for addressing impacts to Section 4(f) historic properties will be described in the Final Section 4(f) evaluation.

ii. The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;

Jackson Park will continue to function as an open public park with recreational amenities after either Alternative 9A or 9B is implemented and mitigation efforts are completed. Addition of the bicycle and pedestrian facilities improve access to Jackson Park and contributes to the goals described in the CPD's 2018 SLFP. Through the addition of park space and new trails, these amenities and functions will be enhanced by proposed mitigation efforts.

Implementation of either Alternative 9A or 9B would diminish the historic integrity of the Jackson Park Historic Landscape District and Midway Plaisance and the CPBS Historic District, but each of these historic properties would continue to be listed on the NRHP.

Alternative 9A includes the demolition of the Island Terrace Apartments, one building within the Jackson Park Terrace Historic District, and two contributing buildings in the CPBS Historic District (6450-60 S. Stony Island Avenue, and 6516-20 S. Stony Island Avenue). Demolition of the Island Terrace Apartment building would make it no longer eligible for the NRHP. The Jackson Park Terrace Historic District's NRHP status would be substantially diminished with demolition of one of its buildings. The CPBS Historic District's NRHP status would be retained despite the demolition of two of the 2,096 contributing buildings.

iii. The relative significance of each Section 4(f) property;

Jackson Park includes a variety of recreation areas that are open, public spaces and several active recreation uses include an 8-lane outdoor track, five soccer/football fields, two standard baseball diamonds, six softball/junior baseball diamonds, four basketball courts, twenty-four tennis courts (twenty active courts), two bowling greens, a dog park (uses four of the twenty-four tennis courts), and the Jackson Park Fieldhouse fitness center and gymnasium. The property also includes golf facilities, inclusive of a driving range and an 18-hole golf course. With Jackson Park's proximity to Lake Michigan, water-based public recreation opportunities include the 59th Street and 63rd Street Beaches and 365 boat slips divided among the 59th Street Harbor, the Jackson Park Inner Harbor and the Jackson Park Outer Harbor. Passive recreation amenities include seven playgrounds, twelve picnic groves, two formal gardens, one community production garden, and three natural areas.

The Midway Plaisance provides a space for recreation including temporary soccer/football fields and a refrigerated ice/skating rink. Adjacent to ice/skating rink the warming hut is used year-round during various activities. The remainder of the Midway Plaisance is open space that includes the University of Chicago's Winter Garden, trails, and monuments.

The Jackson Park Historic Landscape District and Midway Plaisance was officially listed as a historic district in the NRHP in 1972. The nomination form indicated that the properties possess national and state significance, and represents the following areas of significance: architecture, landscape architecture, science, sculpture, and urban planning. The Section 106 HPI Report provided additional historic context for Jackson Park Historic Landscape District and Midway Plaisance, including the various phases of planning by the Olmsted firms and the development of the Western Perimeter as one of the nation's first outdoor gymnasias (HPI²² p. 24). While the entire park/landscape retains good integrity overall, the integrity of the Western Perimeter has been compromised. As stated in the HPI (HPI pp. 63-64): "The widening and straightening of S. Cornell Drive and S. Stony Island Avenue has reduced the historic character in this area. The loss of the gently rolling berms that sloped down to a lawn with double tree rows along S. Stony Island Avenue to the west, and wider green space with dense tree canopy along the previously curving Cornell Drive to the east, changed the character of this portion of the Western Perimeter." The Supplementary Analysis of Landscape Integrity provides additional detail about ways in

²² https://www.chicago.gov/content/dam/city/depts/dcd/supp_info/jackson/hpi-report.pdf

which the integrity of the Western Perimeter has been compromised. It states: “The middle and southern sections of the Western Perimeter continue broad patterns but have been modified by roadway projects, the addition of new facilities, and the loss of plantings. The general form of open fields surrounded by canopy trees remains in the area of the open-air gymnasiums but exhibits simplification and loosening in the arrangement of vegetation and circulation features. More recent changes such as the rubberized track and artificial turf field reflect historic use but the materials are not consistent with those present during the period of significance.” (HPI **Appendix F**²³, p. 35).

Listed on the NRHP in 1972 (along with Jackson Park) as a historic district, the Midway Plaisance possesses national significance relating to several historical themes. These include its association with Frederick Law Olmsted and its importance as the site of the 1893 World’s Columbian Exposition. The Section 106 Historic Properties Inventory (HPI) Report provided a landscape analysis of Jackson Park Historic Landscape District and Midway Plaisance (**Appendix F**²¹). The report indicates that the existing alignment of roadways and configuration of the Midway lawns were part of the Olmsted, Olmsted & Eliot Plan of 1895 and the Midway Plaisance possesses national significance and retains good integrity.

The CPBS Historic District is listed on the NRHP under Criteria A and C. The CPBS Historic District is a 26-mile stretch of contiguous parks and boulevards including parks, squares, boulevards and significant adjoining properties. The CPBS Historic District roughly spans from W. Logan Boulevard on the north and the Kennedy Expressway to E. 67th Street and S. South Shore Drive on the south. The District is known historically “as the first comprehensive system of greenways for a major city in the United States. It was created in response to the belief that it would not only foster healthful, accessible and livable neighborhoods, but would also spur residential real estate development in what was then the outskirts of the city. The CPBS Historic District is associated with the country’s most important early landscape architects and was one of the nation’s first major system and, thus, seminal in the creation of similar systems across the United States. The historic district also includes adjacent buildings that face onto the system that were built during the period of significance.

The Island Terrace Apartment Building was determined to be individually eligible for listing in the NRHP under Criteria A and C. Produced by the noteworthy architectural firm of Dubin, Dubin, Black, & Moutoussamy, the structure was one of the neighborhood’s first Modern high-rises designed to provide affordable apartments to moderate and low-income renters. Built in 1969, when more expensive high-rise rental apartments were being erected nearby in South Shore, the Island Terrace Apartment Building possesses strong local significance in relation to history of the Woodlawn community. The property retains a high level of architectural integrity by possessing the aspects of location, design, workmanship, materials, feeling and association. The property’s integrity of setting is low, due in part to previous projects to widen Stony Island Avenue.

²³ https://www.chicago.gov/city/en/depts/dcd/supp_info/jackson-park-improvements.html - 2018 Milestones: Historic Properties Inventory Appendices (FINAL)

The Jackson Park Terrace was determined to be eligible for listing as a historic district in the NRHP under Criteria A and C. Designed by renowned African-American planners and architects, Whitely-Whitley, the complex was developed by The Woodlawn Organization, a grass-roots organization that had been fighting against slum clearance programs and displacement of existing residents since the early 1960s. The 1974 complex, which provided affordable housing and numerous services to its tenants, possesses strong local significance to Woodlawn's community history. The complex retains a high degree of integrity of location, design, workmanship, materials, feeling, and association. The existing setting has been affected by previous development nearby, but the district still maintains its integrity of setting.

The Hyde Park Academy High School was determined to be individually eligible for listing in the NRHP under Criteria A, B, and C. Hyde Park Academy High School is located on the west side of Stony Island Avenue in the Woodlawn neighborhood. It currently houses over 700 students in grades 9-12. The school has a history of noteworthy alumni and retains excellent historical integrity. The property is not currently on the NRHP but has been identified as an eligible property in the HPI.

While both Alternatives 9A and 9B involve the same permanent uses within Jackson Park Historic Landscape District and Midway Plaisance and the CPBS Historic District for roadway improvements along Lake Shore Drive and Hayes Drive as well as implementation of bike/pedestrian facilities, they differ in their effects to historic properties along Stony Island Avenue. Alternative 9A, along the west side of Stony Island Avenue, involves the elimination of one historic building (Island Terrace Apartments) and diminishes the integrity and NRHP status of another historic property (Jackson Park Terrace) by demolishing one of its buildings. Demolition of the Island Terrace Apartment building would cause the property to no longer retain integrity to be considered eligible for the NRHP. Alternative 9A also involves the permanent alteration to a portion of the Midway Plaisance and the demolition of two contributing properties to the CPBS Historic District.

Alternative 9B only involves permanent use of a portion of Jackson Park's Western Perimeter along the east side of Stony Island Avenue, which has diminished integrity. Because Jackson Park Historic Landscape District and Midway Plaisance is part of the CPBS Historic District, it also involves a permanent use of the CPBS Historic District, coincident with the use of Jackson Park Historic Landscape District and Midway Plaisance. Alternative 9B would not result in a change in either Jackson Park or the CPBS Historic District's listing on the NRHP or their eligibility for the NRHP.

The Jackson Park Historic Landscape District and Midway Plaisance and the CPBS Historic District possesses national significance while the Island Terrace Apartments, Jackson Park Terrace, Hyde Park High School/Academy possess significance at the local level. FHWA considers the relative significance of Jackson Park and the Midway Plaisance and the CPBS Historic District to be greater than the relative significance of the Island Terrace Apartment Building, the Jackson Park Terrace Historic District, and Hyde Park High School because of the national significance of the Jackson Park and the Midway Plaisance from a historic property perspective and the importance of Jackson Park as a public park and recreation area to the public. Despite the comparatively higher level of significance for the park, Alternative 9A will cause more harm to historic resources than Alternative 9B. Alternative 9A will result in the destruction of the

Island Terrace Apartments and substantially diminish the significance and integrity of the Jackson Park Terrace, as well as demolish two contributing properties within the CPBS Historic District. Alternative 9B will cause much lesser impacts to the significance and integrity of Jackson Park Historic Landscape District and Midway Plaisance because it results in “sliver” takes of right-of-way from the western edge of Jackson Park that minimally affects the integrity of the Jackson Park Historic Landscape District and Midway Plaisance as a historic property and does not adversely affect the activities, features, and attributes that qualify Jackson Park as a Section 4(f) resource as a park and recreational area. Similarly, there is a minimal impact to the significance and integrity of the CPBS Historic District because in context of the size of the CPBS (26 mile long resource) the sliver takes of right-of-way in Jackson Park have negligible effect on the integrity of the CPBS Historic District.

iv. The views of the official(s) with jurisdiction (OWJ) over each Section 4(f) property;

As an OWJ of Jackson Park, the CPD is in support of the proposed transportation improvements, which are consistent with the plans presented in the 2018 SLFP.

CDOT and the CPD both act as the OWJ of the Midway Plaisance as a public park and recreational area. Alternative 9A involves permanent use of the eastern boundary of this site; which in turn, would impact the quantity of available replacement recreation. Alternative 9B, however, does not involve the permanent use of the Midway Plaisance and maximizes the available space for replacement recreation utility.

The OWJs for the historic properties include the SHPO and the ACHP. Coordination with the SHPO and ACHP occurred throughout the Section 106 process. The Draft Section 4(f) Evaluation was distributed to both the ACHP and SHPO for review on April 23, 2020. The ACHP formally declined the invitation to review the Draft Section 4(f) Evaluation in a response dated June 11, 2020. See **Appendix H**. The SHPO did not provide a formal response on the Draft Section 4(f) Evaluation.

v. The degree to which each alternative meets the purpose and need for the project;

Both Alternative 9A and 9B satisfy the Purpose and Need for the project equally.

vi. After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f);

By widening Stony Island Avenue to the west, Alternative 9A involves four property acquisitions requiring building demolition that results in the relocation of and assistance to all residents and tenants that occupy the building to equivalent and fair housing opportunities according to the Uniform Relocation Assistance and Real Property Acquisition Act (42 USC 61). Building demolition includes one two-story mixed residential/commercial building at 6450-60 S. Stony Island Avenue (24 residential units and 6 businesses, one apartment building at 6516-6520 S. Stony Island Ave (15 units), the Island Terrace Apartment building (241 units), and a single building residence in the Jackson Park Terrace Historic District (6 units). Relocation of this many residents would severely disrupt existing community cohesion. Proposed right-of-way acquisition from other non-historic private properties along the west side of Stony Island Avenue from 67th Street to 59th Street is also required (0.7 acres).

After mitigation efforts to relocate and provide assistance to these residents, tenants, and business owners, the community is left with fewer residential and business facilities available to the surrounding low-income and minority population, which are also along public transportation routes and adjacent to an open public park within a dense urban area.

Alternative 9B requires no residential relocations or acquisition of businesses.

Alternative 9A will require between 250 and 300 tree removals which would be replaced on a 1:1 ratio.

Alternative 9B will require between 350 to 400 tree removals which would be replaced on a 1:1 ratio.

vii. Substantial differences in costs among the alternatives.

The costs of constructing transportation improvements under Alternatives 9A and 9B are comparable, as the facilities are similar or identical in size and scale. However, Alternative 9A requires land acquisition from 27 parcels along the west side of Stony Island Ave including full acquisition and demolition of four multi-unit buildings which are historic or contribute to a historic district. Cost of acquisition, demolition and relocations associated with these four buildings is estimated to exceed \$35 million dollars.²⁴ Based on comments provided by the United States Department of Housing and Urban Development (USHUD), the exact replacement value for the single building in Jackson Park Terrace has not been separately assessed by USHUD; however, Jackson Park Terrace had an estimated replacement cost exceeding \$45 million when it was most recently refinanced with USHUD. Even if only one of the buildings of the property were to be taken pursuant to alternative 9A, the cost of condemning the premises, demolishing the property, and rehousing the affected families in affordable housing (if possible) would be considerable. Demolition of any units of Jackson Park Terrace violates the covenants of the Federal Housing Authority-insured mortgage and of the land lease from the University of Chicago to maintain 322 rental units at the property. Additionally, USHUD stated that though it does not have access to a recent appraisal of the Island Terrace property, its estimated replacement cost in 2012 was determined to exceed \$27 million. Since that time, the property has refinanced and performed renovations of building systems, and the surrounding rental market has strengthened considerably, resulting in the likely increase in property value.

Alternative 9B requires no acquisition of private property, therefore has no land acquisition cost.

The mitigation costs for Alternative 9B are also less than Alternative 9A, because the mitigation for impacts within Jackson Park are similar for both alternatives but Alternative 9A requires additional mitigation for the historic properties west of Stony Island.

²⁴The dollar amount noted is an estimate of the value of each property, building demolition, and the relocation of each business and resident. These costs were obtained through a preliminary market analysis using data available from public sources.

The cost of transportation improvements for Alternative 9B is approximately \$174 million dollars. The additional costs of proposed right-of-way, building acquisitions and mitigation associated with Alternative 9A make the total cost of Alternative 9A substantially higher than Alternative 9B.

7.1 Alternative with the Least Overall Harm

Table 8 shows a comparison of Alternatives 9A and 9B against the least overall harm criteria.

Table 8: Least Overall Harm Summary – Alternatives 9A & 9B

LEAST OVERALL HARM (LOH) SUMMARY			
CRITERION	Alternative 9A	Alternative 9B	LOH Alternative
Ability to mitigate adverse impacts to Section 4(f) properties	<ul style="list-style-type: none"> Demolished properties which are historic or contribute to a historic district (Island Terrace Apartments, Jackson Park Terrace building, 6450-60 S. Stony Island Avenue, 6516-6520 S. Stony Island Avenue) would be photo documented Net gain (+3.8 acres) in park/recreation land with closed roads right-of-way transferred to Jackson Park 	<ul style="list-style-type: none"> Roadways designed to minimize effects to Jackson Park as a public park, Jackson Park Historic Landscape District and Midway Plaisance as a historic district and CPBS Historic District as a historic district, Jackson Park Historic Landscape District and Midway Plaisance remains listed/eligible for NRHP and CPBS Historic District remains listed/eligible for NRHP Net gain (+2.5 acres) in park/recreation land with closed roads right-of-way transferred to Jackson Park 	Alt 9B
Remaining harm of 4(f) properties after mitigation	<ul style="list-style-type: none"> Net increase in park/rec land (+3.8 acres) after closed roads right-of-way transfers to Jackson Park Historic integrity of the Jackson Park Historic Landscape District and Midway Plaisance and CPBS Historic District is diminished and remains listed/eligible for the NRHP Permanent loss of one historic property (Island Terrace Apartments), no longer NRHP eligible Permanent loss of two contributing properties to the CPBS Historic District Substantially diminishes integrity of Jackson Park Terrace Historic District with demolition of one building, remains eligible for NRHP. 	<ul style="list-style-type: none"> Net increase in park/rec land (+2.5 acres) after closed roads right-of-way transfers to Jackson Park Historic integrity of Jackson Park Historic Landscape District and Midway Plaisance is diminished and remains listed/eligible for the NRHP and CPBS Historic District remains listed/eligible for NRHP 	Alt 9B

Relative significance of each 4(f) property	<ul style="list-style-type: none"> Island Terrace Apartments is NRHP eligible, locally significant, and demolished Jackson Park Terrace is NRHP eligible, locally significant, and one building is demolished. Hyde Park Academy High School is NRHP eligible, locally significant Midway Plaisance is listed on the NRHP, nationally significant CPBS Historic District is listed on the NRHP, nationally significant, and two buildings are demolished 	<ul style="list-style-type: none"> Jackson Park is a public park and recreational area with no adverse effect to its activities, features and attributes. Jackson Park Historic Landscape District and Midway Plaisance is listed on the NRHP, nationally significant, with sliver right-of-way acquisition. CPBS Historic District is listed on the NRHP, nationally significant, with sliver right-of-way acquisition from Jackson Park 	Alt 9B
OWJ views	<ul style="list-style-type: none"> CPD supports the project as it is consistent with their 2018 SLFP planning document. The City supports the project. ACHP and SHPO have not expressed views on this alternative. 	<ul style="list-style-type: none"> CPD supports the project as it is consistent with their 2018 SLFP planning document. CDOT supports the project. ACHP and SHPO have not expressed views on this alternative and have signed the MOA agreeing with the mitigation measures. 	Neutral
Degree that the alternative meets P&N	Meets P&N	Meets P&N	Neutral
Magnitude of impact after mitigation to resources not protected by Section 4(f)	<ul style="list-style-type: none"> 270 residential units displaced and relocated, community cohesion impact. 250-300 trees removed and replaced (neutral impact) 	<ul style="list-style-type: none"> 0 demolitions 0 residential units displaced 350-400 trees removed and replaced (neutral impact) 	Alt 9B
Substantial differences in costs	+\$35 million for property acquisition, demolition, and relocations for the apartment buildings and commercial/residential mixed-use building	N/A	Alt 9B

The following summary demonstrates Alternative 9B to be the alternative which causes the least overall harm:

Alternative 9B requires more conversion of Section 4(f) land (5.2 acres) to a transportation use compared to Alternative 9A (3.9 acres). Alternative 9B acquires permanent Section 4(f) land from Jackson Park, Jackson Park Historic Landscape District and Midway Plaisance, and the CPBS Historic District, while Alternative 9A acquires permanent Section 4(f) land from Jackson Park, Midway Plaisance, Jackson Park

Historic Landscape District and Midway Plaisance, the CPBS Historic District, the Island Terrace Apartment Building, the Jackson Park Terrace Historic District, and Hyde Park High School.

FHWA considers the relative significance of Jackson Park, the Midway Plaisance, Jackson Park Historic Landscape District and Midway Plaisance, and the Chicago Park Boulevard Historic District to be greater than the relative significance of the Island Terrace Apartment Building, the Jackson Park Terrace Historic District, and Hyde Park High School because of the national significance of the Jackson Park, Midway Plaisance, Jackson Park Historic Landscape District and Midway Plaisance, and CPBS Historic District from a historic property perspective and the importance of Jackson Park as a public park and recreation area to the public. Alternative 9B requires 5.2 acres from Jackson Park, and consequently the Jackson Park Historic Landscape District and Midway Plaisance and the CPBS Historic District because Jackson Park is coincident with Historic District these two historic properties, and no land from Midway Plaisance. Alternative 9A requires 2.9 acres from Jackson Park (which is coincident with Jackson Park Historic Landscape District and Midway Plaisance and the CPBS Historic District), 0.1 acres from the Midway Plaisance, 0.1 acres from the Island Terrace Apartments, 0.3 acres from Hyde Park High School, 0.3 acres from Jackson Park Terrace, and an additional 0.2 acres from the CPBS Historic District not within Jackson Park (3.9 total acres). Therefore, Alternative 9B requires 2.0 more acres from 4(f) properties than Alternative 9A. Alternative 9A has fewer tree impacts than Alternative 9B, however, tree impacts will be mitigated by replacement of trees in Jackson Park in cooperation with Chicago Park District.

However, the balance of the other factors weighs in favor of Alternative 9B causing the least overall harm. First, even though Alternative 9B converts 2.0 more acres from Section 4(f) land than Alternative 9A, the activities, features, and attributes of Jackson Park as a public park and recreational area will remain and will not be substantially diminished with Alternative 9B. Additionally, roadways that are closed will have their right-of-way transferred to the Chicago Park District, resulting in net increase in park/recreational land (2.5 acres). Jackson Park Historic Landscape District and Midway Plaisance and the CPBS Historic District and the CPBS Historic District both will retain their historic integrity and eligibility for the NRHP even after the conversion of Section 4(f) land to a transportation use.

In contrast, Alternative 9A results in the complete demolition of one historic property (Island Terrace Apartments), one building from the Jackson Park Terrace Historic District, and contributing buildings within the CPBS Historic District (the residential building at 6516-20 S. Stony Island Avenue, and the residential/commercial mixed-use building at 6450-60 S. Stony Island Avenue). The Island Terrace Apartments would no longer exist as a historic property. Demolition of 6516-20 and 6450-60 S. Stony Island Avenue would eliminate two contributing properties from the CPBS Historic District but not affect the district's historical integrity, while the removal of one building from the Jackson Park Terrace Historic District would substantially diminish that historic property's integrity. While mitigation could be completed for these impacts, such as photographs and written documentation, it would not fully compensate for the loss of these historic structures.

Second, Alternative 9A results in the displacement of 270 residential units in low-income and minority housing in the project area. The demolition of the Island Terrace Apartments, one building from the Jackson Park Terrace Historic District, 6516-20 and 6450-60 S. Stony Island Avenue would require the relocation of and assistance to all residents and tenants that occupy the buildings to equivalent and fair

housing opportunities according to the Uniform Relocation Assistance and Real Property Acquisition Act (42 USC 61). These relocations may be to communities outside of the immediate area which would severely disrupt existing community cohesion. Alternative 9B has no residential or commercial displacements.

Third, Alternative 9A requires acquisition of 27 parcels along the west side of Stony Island Ave. Full acquisition of five parcels associated with the three residential and one commercial/residential mixed-use building to be demolished exceeds \$35 million dollars in land and building value.²⁵

The mitigation costs for Alternative 9B are also less than Alternative 9A, because the mitigation within Jackson Park is similar for both alternatives but Alternative 9A requires additional mitigation for the historic properties west of Stony Island.

²⁵ *The dollar amount noted is an estimate of the value of each property, building demolition, and the relocation of each business and resident. These costs were obtained through a preliminary market analysis using data available from public sources.*

8.0 Impacts of Alternative 9B

The impacts of Alternative 9B - Mobility Improvements - Widen Lake Shore Drive/Widen Stony Island East/Reconfigure Hayes are detailed in this section, including acreage of land use, facilities and functions affected, highway traffic noise, access restrictions, closures and detours, and other anticipated impacts.

8.1 Acreage of Section 4(f) Land Use

The total conversion of Section 4(f) land to transportation use is 28.7 acres (5.2 acres permanent use, 23.5 temporary use).

All 5.2 acres of the permanent Section 4(f) use occurs within Jackson Park. Because the boundaries of (1) Jackson Park Historic Landscape District and Midway Plaisance and (2) CPBS Historic District overlap with Jackson Park, this Section 4(f) use also occurs within these two historic properties. The permanent conversion of 5.2 acres of Section 4(f) property is necessary to construct an additional southbound travel lane along Lake Shore Drive, to widen Stony Island Avenue to the east between 67th Street and 59th Street, to reconfigure Hayes Drive at the Lake Shore Drive, Richards Drive and Cornell Drive intersections, and to convert and widen one way streets along North Midway Plaisance and southbound Cornell Drive to two-way operation. Section 4(f) property begins at the back of curb along roadways within and adjacent to Jackson Park; therefore, any roadway widening within the park that is required to provide the necessary improvements to meet the project's Purpose and Need results in a permanent conversion of Section 4(f) land.

All 23.5 acres of the temporary Section 4(f) use occurs within either Jackson Park or the Midway Plaisance. Because the boundaries of (1) Jackson Park Historic Landscape District and Midway Plaisance and (2) CPBS Historic District overlap with Jackson Park and the Midway Plaisance, this temporary Section 4(f) use also occurs within these two historic properties.

In the Midway Plaisance, 0.1 acres of Section 4(f) temporary use is required to reconstruct the existing sidewalk along the west side of Stony Island Avenue.

In Jackson Park, 18.4 acres of Section 4(f) temporary use is required to construct trail connections along Cornell Drive, Marquette Drive and Hayes Drive as well as pedestrian underpasses at the following locations: Cornell Drive/Hayes Drive intersection, along Hayes Drive between Richards Drive and Lake Shore Drive, along Jeffery Drive between Marquette Drive and 67th Street, and the South Shore Drive/67th Street intersection. These trail connections and underpasses are a benefit to Jackson Park providing improved safety and connectivity within the public park areas and are consistent with the CPD plans, as documented in the 2018 SLFP.

Also in Jackson Park, approximately 5.0 acres of temporary Section 4(f) use results from temporary grading impacts along roadways and construction staging areas. Final size and location of staging areas will be refined through final design and is subject to change as necessary to accommodate park programming at the time of construction.

The temporary Section 4(f) uses described above which affect Jackson Park, Midway Plaisance, the Jackson Park Historic Landscape District and Midway Plaisance, and the CPBS Historic District will be (1) temporary in duration and less than the time for construction of the entire project; (2) the scope of the work is minor and the nature and magnitude of the changes to the Section 4(f) properties are minimal; (3) there are no anticipated permanent adverse physical effects nor will there be interference with the protected activities, features, or attributes of the Section 4(f) properties, on either a temporary or permanent basis; and (4) the land will be fully restored to a condition that is at least as good as that which existed prior to the project. While the Chicago Park District provided concurrence of these conditions, concurrence was not received from all OWJs, therefore, these temporary uses cannot be declared exempt from Section 4(f) approval and are subject to approval under 23 CFR 774.3(a).

The acreage and locations of the permanent and temporary uses of Section 4(f) lands can be found on **Exhibit F-1**.

Photographs of the existing conditions were collected where Section 4(f) uses will occur. A map indicating the location and orientation of each photograph is provided as **Exhibit F-2**. Photographs grouped by roadway corridor are provided as **Exhibits F-2a** through **F-2d**.

8.2 Facilities and Functions Affected

8.2.1 Property Function

The 5.2 acres of land in Jackson Park that will be converted to transportation use is open green space recreational land. New parkland space to be provided by closed roadway areas will provide a more contiguous area in comparison to the slivers of land along the roadways (5.2 Acres) that is proposed for permanent use. Temporary use areas (23.5 Acres) of the park are primarily open green space recreational land in addition to existing trails that will be improved by connections within proposed project. The transportation use of Jackson Park, together with the minimization and mitigation measures incorporated into the project, does not adversely affect the activities, features, and attributes that qualify Jackson Park for protection under Section 4(f) as a park and recreational area.

Because the boundaries of (1) Jackson Park Historic Landscape District and Midway Plaisance and (2) CPBS Historic District overlap with Jackson Park, the 5.2 acres of Section 4(f) use also occurs within these two historic properties. While the conversion of the 5.2 acres to transportation use from these two historic properties affects their historic integrity, both historic properties will retain their integrity-defining features and remain listed on the NRHP.

For locations that will be used temporarily during construction, the work will be coordinated with CPD to ensure access to the park's amenities will be maintained.

Easements will be established for utilities on CPD land. The easements will provide access to maintain utilities. The final acreage and locations are being coordinated with CPD.

8.2.2 Great Lake Fishery and Ecosystem Restoration (GLFER)

As part of an effort to restore bird, fish and wildlife habitat within the natural areas of Jackson Park, CPD and USACE entered into an agreement to initiate a 5-year ecological restoration project authorized through the Water Resources Development Act, Section 506, GLFER.

Alternative 9B results in an alteration of the existing GLFER project. Impacts to GLFER areas are identified in **Exhibit H-1a** and mitigation of these impacts are identified in **Exhibit H-1b**. Additional information regarding coordination of alterations of the GLFER project can be found in Section 10.2.1 of this document.

8.2.3 Tree Removals

This alternative results in the removal of 417 trees within Jackson Park. This removal accounts for less than 10% of the known tree population on the property. Tree removals associated with the transportation improvements are shown on **Exhibit F-3**.

Mitigation of these tree removals is discussed in Section 9.2.

8.2.4 Natural Areas

Alternative 9B will not use any land from any designated natural areas, as identified in Section 4.1.3.

8.2.5 Water Resource Impacts

The widening of southbound Lake Shore Drive will require modifications to the 59th Street Inlet Bridge, resulting in 0.04 acres of temporary and 0.04 acres of permanent impacts of Lake Michigan and its associated lagoons. See **Exhibit F-4a**. Minor repairs to a bridge on Hayes Drive over the South Lagoon are proposed. The minor repairs require a temporary impact of 0.20 acres due to the installation of cofferdams and dewatering during construction as well as area needed for access during the course of repairs. See **Exhibit F-4b**. Lake Michigan is considered to be a navigable water body under the jurisdiction of the USACE. The impacts described in this section must be coordinated with the USACE and will require a Section 404 Regional Permit. Permit requirements are being coordinated with the USACE. The Section 404 permit will be obtained during the detailed design stage of the project.

The 59th Street Bridge widening also results in a traverse encroachment of 0.03 acre-feet of fill within the 100-year floodplain. See **Exhibit F-4c**. This impact will not result in increased floodplain elevations or increase the risk of flooding in the area. Compensatory storage is not required. These impacts will require an individual permit, which requires public notice, to be obtained by the Illinois Department of Natural Resources, Office of Water Resources (IDNR-OWR) during the Phase II design stage.

Alternative 9B does not impact any wetlands identified within the study area.

8.2.6 Historic Significance

The historic landscape of Jackson Park is a primary contributor to listing of the Jackson Park Historic Landscape District and Midway Plaisance on the NRHP. Changes to the overall vehicular and pedestrian circulation networks within the park may deviate from historic plans and design principals. Topographic changes resulting from the proposed roadway configuration, including roadway widening, realignment, and vertical alterations, and proposed underpasses and trails may result in effects to characteristics of the historic landscape. Within the park, the proposed roadway changes are inconsistent with the Secretary of Interior (SOI) standards except for portions of the Hayes Drive realignment which are consistent with the SOI standards. The improvements along Lake Shore Drive, improvements of Stony Island Avenue, bicycle/pedestrian enhancements and other transportation improvements proposed are consistent with the SOI standards. Jackson Park Historic Landscape District and Midway Plaisance will remain listed on the NRHP after Alternative 9B is implemented and retains its integrity for the NRHP listing.

Jackson Park is one of many parks, squares, boulevards and significant adjoining properties in the CPBS Historic District. With Jackson Park's NRHP listing remaining intact after Alternative 9B is implemented, the CPBS Historic District will not experience decreased integrity as a result of the changes to Jackson Park and will remain listed on the NRHP.

8.3 Access Restrictions

The proposed improvement will maintain existing access points to park facilities from roadways within Jackson Park. Conversions of one-way streets at North Midway Plaisance and Cornell Drive to two-way traffic will accommodate traffic from roadway removals on South Midway Plaisance and northbound Cornell Drive.

8.4 Closures and Detours

Roadway closures that are considered as part of the No-Action Alternative are described in Section 2.1 and shown on **Exhibit A-3**. There are no proposed permanent roadway closures as part of FHWA's proposed action.

8.4.1 Conceptual Maintenance of Traffic During Construction

Maintenance of traffic during construction is proposed to occur in four phases over a period of approximately two years. Traffic is proposed to be maintained through a combination of roadway staging and temporary full closures requiring traffic detours. An IDOT Traffic Management Plan analysis of traffic delays during construction shows that the network will operate sufficiently when modifications to traffic signal timings and phasings are implemented.

Construction staging areas are proposed within Jackson Park in existing parking lots and grassy areas per coordination with CPD. Use of these areas will minimize impacts to park access and recreation uses, as shown in **Exhibit F-1**. These areas result in a temporary use of Jackson Park during construction. Construction phases are staggered to ensure ample parking opportunities for park users is maintained during roadway construction. Throughout the remainder of Jackson Park, construction staging can be accommodated within existing roadway footprints.

Temporary closures of paths may be implemented in order to construct proposed underpasses and trail connections. Detours of any path closure will be provided as needed during construction.

With the exception of the Hayes Drive boat launch, surrounding recreational amenities will be made accessible to the public during construction. The 59th Street Inlet Harbor widening may impact harbor operations during construction. Construction on the harbor will occur during winter and off-peak seasons. Access to the Hayes Drive boat launch will be prohibited for the duration of the construction due to its use for construction staging.

9.0 All Possible Planning to Minimize Harm

9.1 Design Measures that Minimize Use of Section 4(f) Property

Additional planning efforts were made to minimize the permanent incorporation of Section 4(f) lands into the transportation network for Alternative 9B, while continuing to provide facilities that do not compromise the safety of users. The minimization efforts reduced Section 4(f) use by 2.1 acres (see Table 9).

9.1.1 Roadway Footprint

These efforts are described below with the corresponding number of acres reduced:

Lake Shore Drive

- To provide a third southbound travel lane, an 11'-4" travel lane (versus a desired lane width of 12 feet) is proposed to minimize permanent use of Section 4(f) land while providing a safe and efficient travel lane.
- Intersection modifications at 57th Drive are contained to the existing roadway footprint.
- Turn lane widths at intersections are proposed to be 10 feet wide (versus a desired lane width of 12 feet) to minimize permanent use of Section 4(f) land.
- Additional turn lanes and storage at Science Drive and Hayes Drive are minimized to avoid excess capacity while providing sufficient operations.
- **Amount of Section 4(f) use reduced = 0.5 acres**

59th Street Lagoon Inlet Bridge

- To provide a third southbound travel lane along Lake Shore Drive, bridge widening and modifications are minimized to 11 feet 4 inches (versus 12 feet to provide a desired lane width).

Hayes Drive

- Parking along Hayes Drive will be removed to allow Hayes Drive to be reconfigured for two lanes in each direction with less than 2 feet of widening occurring between Richards Drive and Lake Shore Drive. Between Richards Drive and the proposed realignment of Hayes Drive, the removal of parking allows the improvement to remain within the existing roadway footprint.
- Turn lane widths at intersections are proposed to be 10 feet wide (versus a desired lane width of 12 feet) to minimize permanent use of Section 4(f) land.
- At the Richards Drive and Cornell Drive/63rd Street intersections, additional turn lanes and storage have been minimized to avoid excess capacity while providing sufficient operations.
- The proposed 5'-6" median barrier has been minimized (versus a desired 16-18 foot median) to decrease the total proposed cross-section width.
- The Hayes Drive curved realignment at Hayes Drive/Cornell Drive/63rd Street is optimized to reduce conversion of Section 4(f) land while providing a safe facility to accommodate through movements for predominant travel.
- **Amount of Section 4(f) use reduced = 0.6 acres**

Stony Island Avenue

- Additional through lanes are proposed to be 11 feet wide (versus a desired lane width of 12 feet) to minimize permanent use of Section 4(f) land while providing a safe and efficient travel lane.
- Turn lanes are proposed to be 10 feet wide (versus a desired lane width of 12 feet) to minimize permanent use of Section 4(f) land while providing a safe and efficient turn lane.
- Proposed medians typically shadow left turn lanes which are proposed to be 10 feet (versus a desired lane width of 12 feet) and have been minimized to decrease the total proposed cross-section width.
- Additional turn lanes and storage at intersections with Stony Island Avenue are minimized to avoid excess capacity while providing sufficient operations.
- **Amount of Section 4(f) use reduced = 0.9 acres**

A summary of these minimization efforts completed for Alternative 9B is included in **Table 9** and depicted on **Exhibit F-1**. This includes a comparison of the Section 4(f) uses associated with providing standard and/or desired design criteria versus the proposed design.

Table 9: Summary of Minimization Efforts (Alternative 9B)

Criterion	Impact Measure	Desired/ Standard Criteria	Amount of Section 4(f) Use reduced by design minimization efforts	Proposed Design
Section 4(f) Land Permanent Use (Jackson Park)				
Lake Shore Drive	Acre	1.8	0.5	1.3
Stony Island Avenue	Acre	3.3	0.9	2.4
Hayes Drive	Acre	1.7	0.6	1.1
Other Roadways	Acre	0.5	0.1	0.4
Total (Jackson Park)		7.3	2.1	5.2
Section 4(f) Land Permanent Use (Midway Plaisance)	Acre	0	-	0
Right-of-Way Acquisition from Historic Properties	Acre	0	-	0

9.1.2 Underpass Alternatives

Several alternatives for the Hayes Drive/63rd Street underpasses were investigated to minimize grading impacts, required path improvements, visual impacts and tree removals in the vicinity of the intersection. Initially, the alternatives considered variations of maintaining versus raising the profile of the roadway. While maintaining the existing roadway height minimized visual impacts within Jackson Park, it resulted in the greatest amount grading areas and tree removals, particularly trees of large diameter. Proposing the underpasses at existing grade and fully raising the roadway above them resulted in less grading and tree impacts, by comparison, however, the roadway would become a visual barrier obstructing views within Jackson Park. Visual, grading, and tree impacts were balanced by proposing a partially raised roadway (4 feet above existing grade) to construct the proposed underpasses.

Further analysis of alternatives for the proposed underpass configuration considered varying roadway radii values to either preserve historic alignments versus providing radii for proposed design speeds. Orientation and location of the underpasses was also considered. Ultimately, a proposed radius to meet design speed criteria and the placement of the underpasses on the north and south legs of the intersection resulted in a safer roadway improvement, while minimizing grading impacts, path improvements, and tree removals.

9.1.3 Landscape and Tree Removal Minimization Efforts

Minimization efforts were made to preserve the existing berm along the east side of Stony Island Avenue within Jackson Park, which is a feature of Olmsted's landscape design principles. Proposed variations in roadway cross-slopes along Stony Island Avenue help to minimize grading impacts outside of the roadway footprint. The sidewalk along Stony Island Avenue is proposed to be located along the back of curb to minimize intrusion into the park. The proposed path along the east side of the berm will be located parallel to the berm to also minimize grading and impacts to the berm.

Tree impact minimization efforts have also been made for new and reconfigured trails that have been designed in accordance with the 2018 South Lakefront Framework Plan. Where possible, proposed trails have been aligned within the footprint of existing roadways to be closed to provide safe, comfortable, and convenient biking and walking connectivity through the park with minimal tree removal.

In all cases, minimization efforts included reviewing the size, species and condition of existing trees, so that the preservation of large native species trees, and in particular Oak species, could be prioritized when possible.

Minimization of tree impact will continue to be refined through detailed design and construction coordination with CPD.

9.2 Mitigation Measures

In this section, preliminary mitigation measures are identified and coordination regarding mitigation measures to the permanent uses of Section 4(f) properties is ongoing. Additional mitigation measures will be considered through Section 106 consultation with consulting parties and the public and final mitigation measures for Section 4(f) use will be included in the Final Section 4(f) evaluation. Coordination with the following agencies will determine final mitigation measures that will be incorporated into the project:

- Chicago Park District (OWJ)
- City of Chicago (OWJ)
- State Historic Preservation Officer (OWJ)
- Advisory Council on Historic Preservation (OWJ)

9.2.1 Land Use Mitigation

The proposed improvements result in 5.2 acres of permanent use of Section 4(f) properties and 23.5 acres of temporary use of Section 4(f) land. Permanent uses will be mitigated through the transfer of closed roadway footprints of Cornell Drive from 63rd Street (Hayes Drive) to 62nd Street, Marquette Drive from Stony Island Avenue to Richards Drive, and northbound Cornell Drive from 67th Street to 65th Street from CDOT to CPD for incorporation into Jackson Park as parkland. The conversion of these areas from roadway to parkland will result in 7.7 acres of new parkland within the existing park space to be utilized for proposed trails and open green space that will enhance recreational uses and improve continuity of open spaces within Jackson Park. This new parkland space will also provide a more contiguous area in comparison to the slivers of land along the roadways that is proposed for permanent use. Land used for temporary use will be restored to at least as good condition as before construction and will remain under the ownership of CPD. Converting the existing roadways into parkland is part of the CPD's long range plan, as documented in the 2018 SLFP.

9.2.2 Preliminary Tree Mitigation Strategies

Tree removals associated with Alternative 9B will be replaced using a minimum 1:1 tree replacement ratio, as coordinated with CPD. This also meets requirements set forth by IDOT according to their policy on the preservation and replacement of trees²⁶.

Additionally, tree replacement will comply with the following CPD recommended replacement guidelines, in accordance with their design guidelines and standards²⁷:

- Plant replacement selection should be appropriate and sensitive to the historic palette (where required)
- Plant replacement layout should be aesthetically pleasing

²⁶ Illinois Department of Transportation Departmental Policies: D&E-18 Preservation and Replacement of Trees. March 4, 2014.

²⁷ Chicago Park District: Design Guidelines & Standards. 2010

- Landscape plantings in or adjacent to historic landscapes should preserve and enhance the historic design intent
- All new plantings should conform to and complement the existing plant palette and landscape style

Restoration of trees will be proposed first within Jackson Park and along Stony Island Avenue, where tree removals would occur. Along Stony Island and within the public parkway, rows of street trees spaced approximately 25' on center will be utilized to comply with the requirements the City's Landscape Ordinance. Where large existing shade trees are being removed, replacement shade trees will be installed with the intent of providing a comparable functional replacement. Within the park areas, shade and understory trees will be clustered together in natural groupings. The CPD desires a re-introduction of smaller understory and flowering trees to create layers of planting, which is a trait of Olmsted's picturesque style of design and an original feature of Jackson Park. To the extent possible, understory tree plantings will be utilized in select areas and grouped together to achieve this effect, with appropriate consideration given to maintaining sightlines and park access. Historical planting plans and letters will be reviewed and consulted as a guide for developing a plan for locating replacement trees, as well as guidance on species selection.

Preliminary tree replacements are shown on **Exhibit G-2**. The preliminary tree replacements shown in this exhibit are only to show a 1:1 replacement within Jackson Park is feasible. A plan showing exact locations of proposed replacement trees will be developed in coordination with CPD during the detailed design phase of the project.

9.2.3 Mitigation Measures for Section 106 Resources

Mitigation measures for Section 4(f) use of historic properties were identified through the Section 106 process. As part of a Memorandum of Agreement (MOA) between the FHWA, the Illinois SHPO, and the ACHP, these parties agree that the undertaking (as defined in the Section 106 documentation to include the actions evaluated in this Section 4(f) Evaluation) shall be implemented in accordance with the following stipulations in order to resolve adverse effects to historic properties:

Research and Documentation

- CDOT and the CPD, in consultation with the Illinois SHPO, will prepare an updated nomination of the Jackson Park Historic Landscape District and Midway Plaisance to the NRHP.
- CDOT and the Chicago Park District will prepare photographs and drawings documenting existing conditions on (a) the 19.3-acre site planned for the OPC, (b) the east end of the Midway Plaisance, and (c) the areas planned for traffic improvements in Jackson Park.
- CDOT and the Chicago Park District, in consultation with the SHPO, will prepare Part 1 (site history, existing conditions, and analysis/evaluation) and Part 2 (long-term preservation strategy) of a Cultural Landscape Report (CLR) for Jackson Park, consistent with federal guidance for cultural landscape reports in: Robert R. Page, Cathy A. Gilbert, and Susan A. Dolan, *A Guide to Cultural Landscape Reports: Contents, Process, and Techniques* (Washington, DC: U.S.

Department of the Interior, National Park Service, Cultural Resource Stewardship and Partnerships, Park Historic Structures and Cultural Landscapes Program, 1998).

Interpretation

- CDOT and the Chicago Park District will develop and implement a plan to install interpretive materials or carry out programs to commemorate and present the cultural and natural historical contributions of Jackson Park and its use by South Side residents.

Rehabilitation

- CDOT and the Chicago Park District will prepare a Historic Structures Report (HSR) for the English Stone Comfort Station and will rehabilitate it in light of the recommendation from the HSR.
- CDOT and the Chicago Park District will prepare a conservation assessment and rehabilitation plan for the Statue of the Republic and will implement the rehabilitation in phases.

Design Review

- CDOT and the Chicago Park District plan modifications to the east end of the Midway Plaisance consistent with SOI Standards for the Rehabilitation of Historic Properties with respect to standards 9 and 10, which address compatible new additions. CDOT and the Chicago Park District will provide the draft design for 45-day review and comment by the public and signatories, invited signatories, and concurring parties to the MOA concerning landscaping features and other character-defining elements of the design.

Planting Review

- CDOT and the Chicago Park District will ensure that planting plans detailing the species and placement of native plantings required in the GLFER mitigation areas are consistent with the original GLFER approval. USACE will be provided the final plans for review consistent with Section 408.

These stipulations are detailed in the Final MOA, included as **Appendix K**.

10.0 Coordination

Coordination documentation with OWJs, Federal agencies with encumbrances, and the public is included in **Appendix H**.

10.1 Officials with Jurisdiction

The Draft Section 4(f) evaluation was circulated to all OWJs on April 23, 2020. See **Exhibit H-1a**. Comments received from OWJs are summarized below.

For Section 4(f) historic properties, the ACHP and SHPO are the OWJ. Through the Section 106 process, a HPI has been reviewed by the CPD, ACHP, and SHPO to identify listed and eligible properties for the NRHP. A final HPI received SHPO concurrence on determinations of eligibility on July 10, 2018. The HPI was amended in January 2020 to include the CPBS Historic District as a newly listed property on the NRHP. The HPI was used to identify Section 4(f) historic properties. The conclusion of the Section 106 process will result in a Memorandum of Agreement (MOA). Consulting parties who have responsibilities for implementing mitigation measures, such as IDOT and the City of Chicago, will be invited to sign the MOA. The MOA will identify measures to mitigate adverse effects to historic properties. As appropriate, those mitigation measures will be included in the Final Section 4(f) evaluation to as measures to mitigate harm to the Section 4(f) historic properties.

10.1.1 Summary of Comments from OWJs

Responses and comments were received from the ACHP and CPD during the Draft Section 4(f) evaluation comment period. See **Exhibit H-1b**. A summary of the comments is below:

- The ACHP declined the invitation to review the Draft Section 4(f) evaluation, citing it is outside the scope of Section 106 of the NHPA and its implementing regulations.
- The CPD supports the proposed roadway improvements, acknowledging they will benefit the park by providing improved park cohesiveness, accessibility, and safety for all park users.
- The CPD recognized that the proposed roadway vacations and underpasses would benefit the park by adding parkland within the property and improving park cohesiveness.
- The Illinois State Historic Preservation Officer did not provide a response or comments on the Draft Section 4(f) evaluation.

Coordination with the OWJs will be ongoing through design and construction.

10.2 Federal Encumbrances

The implementation of Alternative 9B requires additional authorizations/approvals by the USACE and NPS. A summary of each agency's authority, associated impacts of Alternative 9B, and coordination efforts to date is provided in Sections 10.2.1 and 10.2.2.

The Draft Section 4(f) evaluation was circulated to all Federal agencies with encumbrances on April 23, 2020. See **Exhibit H-2a**. Comments received from Federal agencies with encumbrances are summarized in Section 10.2.3.

10.2.1 USACE Encumbrances

Coordination efforts with the USACE regarding impacts of Alternative 9B are ongoing. The widening of Lake Shore Drive and modifications to the 59th Street Inlet Bridge and repairs to the Hayes Drive bridge result in impacts to Section 404 waters under the jurisdiction of the USACE. As a result of these impacts, a Section 404 Regional Permit must be obtained during detailed design.

The USACE noted the impacts to the GLFER project will include a request to alter the project pursuant to the procedures of Section 408 (codified 33 USC 408). Section 408 approval will be obtained during detailed design.

Impacts to GLFER areas associated with Alternative 9B are identified in **Exhibit H-2b**. The widening of Lake Shore Drive to the west will result in permanent impacts to existing GLFER areas. Existing sand berms that are incorporated in the GLFER restoration in this area are set back from Lake Shore Drive; permanent impacts to these berms will be avoided. Temporary impacts to the front slopes of these berms will be restored in place following construction. Improvements at the Lake Shore Drive/Hayes Drive intersection, along Hayes Drive, and at the Hayes Drive/Cornell Drive/63rd Street intersection result in permanent impacts to GLFER areas. Temporary GLFER impacts at the 63rd Street underpass (beneath Lake Shore Drive) and along Hayes Drive will be restored in place following construction. Through coordination with the CPD and USACE, areas to replace permanently impacted GLFER areas were identified and are shown on **Exhibit H-2c**. Final coordination of these impacts and mitigation measures between CDOT, CPD and USACE is ongoing.

The requirements of the Section 404 and 408 processes will be satisfied independent of the Section 4(f) approval.

10.2.2 National Park Service Encumbrance

As noted in Section 4.1.9, recreational uses within Jackson Park are protected by regulations of the UPARR Act. The National Park Service has the authority to review the proposed changes within Jackson Park and ensure the requirements of UPARR, as well as NEPA and NHPA, are met.

The widening and use of park for transportation purposes is anticipated to result in a conversion of recreation use to non-recreation use under the definition of UPARR. By regulation, the conversion will require replacement of equal recreation utility. UPARR areas, amenities, conversions, and replacements have been coordinated with the National Park Service and are shown on Maps 1-6 in **Exhibit H-2d**. Specifically, the areas of UPARR conversion related to transportation improvements from Alternative 9B are shown on **Exhibit H-2d**, Map 4.

The National Park Service action is currently undergoing review under NEPA and NHPA. The requirements of the UPARR program will be satisfied independent of the Section 4(f) approval.

10.2.3 Summary of Comments from Federal agencies with encumbrances

Comments were received from the USACE, DOI, and HUD during the Draft Section 4(f) evaluation comment period. See **Exhibit H-2e**. A summary of the comments and substantive revisions is below:

- The USACE does not have a position on the proposed impacts.
- The USACE requested temporary impacts as a result of dewatering beneath Hayes Drive be discussed. This discussion is provided in Sections 8.2.5 and 10.2.1 of the Final Section 4(f) evaluation.
- The USACE requested clarification of the permanent and temporary impacts to GLFER areas, specifically berms along Lake Shore Drive. This discussion is expanded in Section 10.2.1 of the Final Section 4(f) evaluation.
- The DOI has no objections to the Draft Section 4(f) evaluation.
- The Department of HUD strongly opposed any alternatives that would demolish Jackson Park Terrace and Island Terrace Apartments, in whole or in part.
- The Department of HUD provided further financial implications of impacts to the Jackson Park Terrace and Island Terrace Apartments. This information is expanded in Section 7.0 of the Final Section 4(f) evaluation.

10.3 Public Coordination

The Draft Section 4(f) evaluation does not require public input; however, it was made available for public review on the City’s website. Comments received from the public are provided as **Exhibit H-3**. Comments received from the public are summarized below:

- Comments requested the FHWA consider a No-Action Alternative prior to roadway closures and construction of the OPC in Jackson Park. The roadway closures and the decision to locate the OPC in Jackson Park are local land use and land management decisions by the City and are not under the jurisdiction of FHWA and are therefore not subject to Section 4(f). See Section 2.1 for details of FHWA jurisdiction and actions subject to Section 4(f).
- Comments requested FHWA consider avoidance measures to avoid impacts that result from the construction of the OPC in Jackson Park and proposed roadway improvements. The roadway closures and the decision to locate the OPC in Jackson Park are local land use and land management decisions by the City and are not under the jurisdiction of FHWA and are therefore not subject to Section 4(f). See Section 2.1 for details of FHWA jurisdiction and actions subject to Section 4(f).
- Comments requested clarification of the construction sequencing. Conceptual maintenance of traffic during construction is detailed in Section 8.4.1. Detailed maintenance of traffic plans will be completed as part of the design phase.

FHWA’s response letters to public comments are provided as **Exhibit H-4** in **Appendix H**.