



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

**Illinois Division**

September 24, 2018

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

In Reply Refer To:  
HDA-IL

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

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

Dear Mr. Nelson:

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

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

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

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

Sincerely,

Catherine A. Batey  
Division Administrator

## Enclosure

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

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

ORIGINATOR: SMF

**LOCATION IN E FILE:** [\\FHWSPIWFS010VH.ad.dot.gov\Electronic\\_FileRoom\CH12 - Projects\Cook County\NEPA - Obama Presidential Center and South Lake Front Plan](\\FHWSPIWFS010VH.ad.dot.gov\Electronic_FileRoom\CH12 - Projects\Cook County\NEPA - Obama Presidential Center and South Lake Front Plan)



# United States Department of the Interior

National Park Service  
1849 C Street NW  
Washington, DC 20240

IN REPLY REFER TO:

September 24, 2018

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

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

Dear Mr. Fuller:

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

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

Sincerely,

Joel Lynch



# Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

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SEP 11 2018

Preservation Services

September 11, 2018

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

### IHPA REVIEW

H/A \_\_\_\_\_  
AC Carrie Jax 9/11/18  
AR \_\_\_\_\_  
File \_\_\_\_\_

## *Archaeological Resource Identification & National Register Eligibility*

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

Dear Dr. Leibowitz:

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

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

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

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

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

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

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

Sincerely,



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

**CONCUR**

By:   
Deputy State Historic Preservation Officer

Date: 9-12-18

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23 Stadium Dr. • Champaign, IL 61820  
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## Memorandum

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

### Summary of National Register Recommendations

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

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

### Project Background

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

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

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

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

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

#### Principles of NRHP Evaluation Using Archaeological Evidence

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

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

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

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

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

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

#### Evaluation and Recommendations:

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

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



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

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

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

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

## ISAS Testing Results and Data – Evaluation of NHRP Significance

### **Survey methodology**

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

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

### **Revisited Sites**

#### **11CK1105**

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

## **11CK1106**

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

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

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

## **11CK1107**

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

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

### **New sites**

#### **11CK1289**

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

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

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

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

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

### **11CK1290**

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

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

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

## **11CK1291**

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

## **11CK1292**

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

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

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

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

### **References Cited**

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**Table 1**  
**Summary of Field Investigation Results**

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

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



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

N

0 200 400 600 800 Meters

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




	APE Final
	Obama Presidential Library and Garage
	Roads





Figure 2. Archaeological Site Locations.



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



0 0.15 0.3 0.45 0.6 Kilometers

0 0.15 0.3 0.45 0.6 Miles

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

