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April 13, 2018

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

RE: OPC Archaeology Report and Comments about Jackson Park

Dear Ms. Monroe:

1. We attended the second Section 106 Consulting Parties meeting and have reviewed the *Section 106 Archaeological Properties Identification Report: Obama Presidential Center (OPC) Mobility Improvements to Support the South Lakefront Framework Plan (SLFP), Cook County, Illinois*. Throughout the report, it is clear that the archaeological resources were only evaluated using National Register Criterion D. However, *National Register Bulletin 36: Guidelines for Evaluating and Registering Archeological Properties* states explicitly, "It is important to consider the applicability of criteria *other than D* when evaluating archeological properties" (22). As such, it appears to us that these archaeological resources were not adequately evaluated, especially given that Jackson Park is listed on the National Register under Criteria A, B, and C. It is reasonable to think that such resources may maintain sufficient integrity of location, setting, materials, feeling, and association to be considered National Register eligible under one or more of Criteria A, B, or C. Moreover, destruction of said archeological resources would constitute an adverse effect, in our opinion, and this should be acknowledged and appropriate mitigation measures undertaken where direct or indirect effects to these occur from construction related activities.

2. Please review and include the attached comments from A.I.A. Emeritus Charles E. Gregersen titled, "A Personal Historic of Jackson Park," in the public record of these Section 106 proceedings. Mr. Gregersen is an authority on the World's Columbian Exposition, and we believe his comments regarding the history of Jackson Park should be useful as the Obama Foundation considers interventions into its unique and irreplaceable cultural landscape.

Should you need additional information or clarification, don't hesitate to contact me by phone at (812) 606-4999 or by email at markcassello@pnmps.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Cassello', is written over a white background.

Mark Cassello, President

Pullman National Monument Preservation Society



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April 19, 2018

Abby Monroe
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Re: Jackson Park
Section 106 Historic Properties Inventory Report Comments

Dear Ms. Monroe,

Thank you for this opportunity to review the Section 106 Historic Properties Inventory Report for the Federal Undertakings In and Adjacent to Jackson Park dated March 15, 2018. As you are aware, the Chicago Park District is the property owner of Jackson Park and has a continued vested interest in the park and its landscape.

Attached to this letter is the Park District's full list of comments in regard to the DRAFT HPI Report. We offer the following highlights of the comments:

Period of Significance

The Park District questions the park's proposed period of significance as listed in the report and believes it to be too broad (1875 – 1953). We have provided detailed comments regarding rationale for revisions to both the start date and the end date of the period of significance. The Park District emphasizes that the criteria for establishing a period of significance should be based upon significant contributions to the landscape design of the park; whereas, the date of departure from design principles should not be the indicator of the end of the park's period of significance.

Contributing Resources

The Park District respectfully requests that several of the contributing features listed be removed from the list. A feature that existed or was constructed within the park's period of significance does not automatically make it a contributing feature. Itemizing park elements such as parking lots, fire hydrants and concrete foundations does not contribute to the park's design or its historic significance.

One Size Fits All

Park landscapes are complex and ever evolving. Jackson Park is 593 acres and nearly 150 years old. To apply a landscape integrity analysis of the entire park without distinguishing between specific zones results in broad-reaching statements that don't apply to the entirety of the park landscape. Where possible, the Park District urges your team to re-evaluate the

landscape integrity in sections or through the use of diagrams to distinguish between intact and disrupted historic elements.

We look forward to continued coordination with the City in regards to these comments.

Sincerely,

A handwritten signature in black ink that reads "Heather Gleason". The signature is written in a cursive, flowing style with a long horizontal flourish at the end.

Heather Gleason

Director, Department of Planning & Construction

Attachments: Section 106 CPD Review Comments dated 4/19/2018, historic photographs

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

Section 106 Draft Historic Inventory Report Comments

CPD Full List of Comments

April 19th, 2018

1. Page 1 – Section 1.0
Regarding the statement, “other changes in Jackson Park identified in the South Lakeshore Framework Plan (e.g., changes to the golf course) do not require any federal approval.” Some of the proposals in the South Lakefront Framework Plan may require federal review if they come to fruition.
2. Page 1 – Section 1.0
The Framework Plan referenced should be called the South Lakefront Framework Plan.
3. Page 3 – Section 2.1.1
This does not reference the 1930’s general plan of the park which we’ve often used as a guide to the elements actually constructed from the 1895 plan and an indicator of the park at that time.
4. Page 3 – Section 2.1.1
Last sentence indicates “Despite alterations that largely occurred between the late 1950s and 1980s, Jackson Park and the Midway Plaisance retain historic integrity.” Is this statement appropriate at this location? Feels like a conclusion or summary but there is a lot more information feeds into the statement.
5. Page 16 – Section 2.1.1.9
Ho-o-den is misspelled.
6. Page 25 – Section 2.1.1.15
Regarding the statement, “between 63rd and 67th streets, the 1895 Plan called for an even larger 60-acre field that would be surrounded by an equestrian path encircling ‘the whole south end of Jackson Park’”. Are there details of the proposed location for the equestrian path? Please clarify the sections constructed.
7. Page 25 – Section 2.1.1.15
For such a detailed report, stating “sometime in the late 1980s or 1990s CPD installed a new oval track” is a broad time frame. It seems like this can easily be confirmed from aerial photos versus such a generalization.
8. Page 31 – Section 2.1.1.17
Regarding the harbors, clarify that Jackson Park Yacht Club is located in Outer Harbor. Reference to South Shores Yacht Club is missing the “s”.
9. Page 33 – Section 2.1.1.18
La Rabida is listed to have “had many additions over the years” but the additions are not detailed. This should be included.
10. Page 35 – Section 2.1.1.19
Regarding the Cheney-Goode Memorial, “In 2016, the Jackson Park Advisory Council began discussing a future fund raising project to restore the memorial.” Do not call out fundraising efforts. There are many such efforts underway in the park.

11. Page 53 – Section 2.1.1.24

Use a more recent aerial image.

12. Page 54-59 – Section 2.1.2 Regarding the “Period of Significance”

- a. The period of significance is too broad as listed (1875 – 1953). CPD questions the first listing at 1875. Records indicate that only the northern section of the park from the 1875 plan was implemented, so a period of significance of 1875 does not apply to the rest of the park. After the completion of the WPA work, we would suggest that the park’s period of significance is over.
- b. The rationale for the selection of 1953 is not sufficiently explained. A statement repeated on pages 55 and 116 contradicts this determination: “The early 1950s represented the first broad-scale departure from the design principles established by the 1895-97 Olmsted, Olmsted & Eliot Plan. These changes included the installation of a Nike missile base, significant infill of water features, the loss of historic structures, an argument can be made that not every separate contributing feature can define the period of significance of the park. For example, while several significant sculptures (Cheney Goode Bench, 1932; Maseryk, 1952; Linne, 1976) are qualified to be identified as contributing resources, neither together nor separately are they significant enough to establish the end point to the period of significance. It seems obvious that the 1893 World’s Fair and later events respecting the Fair and public recreation are the most important criteria for establishing the period of significance. Several other dates appear to be stronger options for the end of the period of significance:
 - **1906** could be a valid date since that was when the entire park was improved by Olmsted, Olmsted & Eliot’s Revised General Plan for Jackson Park.
 - **1922, 1927 or late-1930s** if it is determined that Promontory Point (earliest construction in 1922, named in 1927, constructed through the late 1930s) is a compelling candidate. While technically outside of the physical boundary of Jackson Park, it might be argued that this is a significant contributing feature defining the end of the period of significance because of its compliance to Burnham’s vision. (These dates would be ruled out if Promontory Point is determined to be beyond the official boundary, as suggested by the statement, “Remove Promontory Point” on page ii of the Executive Summary.)
 - **1940** could also be identified as the end date for the period of significance due to the WPA Landscape Projects when “most historic views of the museum were either intact or reinstated.”

13. Page 55- 56 – Section 2.1.2 Regarding Contributing Resources

- a. The list of contributing resources appears to be a list of elements found in the park within the timeframe for the period of significance. All elements built during the period of significance, if maintains its “historic appearance”, meet the criteria for contributing resource in this report. These elements do not represent character defining features of significance for the park landscape.
- b. In regards to roads, drives, and paths as contributing resources – While many of the roads contribute to the park’s character, as mentioned throughout this report, the roadway modifications over time have also been a detraction from the historic landscape. If this item were to be listed as a contributing resource, the Park District thinks it needs to be more specific in both the manner it’s listed.
- c. Provide the location of the tennis courts (JP16).
- d. The Park District suggests that parking lots and tennis courts be reclassified as “non-contributing features” with the understanding that although they are still important amenities that are necessary to providing critical functions and services, they will not be recommended to be removed entirely. Although built within the “period of significance”, these elements do not “reflect the property’s

significant historic context themes”. Relocation and modification of these elements should be a possibility, but “contributing resource” designation inhibits this consideration. While these amenities certainly support adjacent facilities (ie parking lots next to contributing structures) and provide critical resources (tennis courts, railroad tracks), perhaps there should be a separate statement or category explaining that this group of items can in certain cases be modified without diminishing their essential function. The resources we suggest be reclassified include the following:

- MSI West Lot
 - Bowling Green Parking Lot
 - Museum Shores Yacht Club Parking lot
 - Tennis Courts
 - Hayes Drive Northeast Parking lot
 - 63rd Street Beach Parking lot
 - Tennis Court near S. Stony Island and Service Yard
 - Tennis Courts and Ballfields (near Hayes and Cornell)
 - Golf Shelter Parking lot
 - Jackson Park Yacht Club Parking lot
 - Southern Shore Yacht Club Parking Lot
- e. The Maintenance Building should not be considered contributing resource or of any significance.
 - f. The ICRR Viaducts and Embankments should not be considered contributing resource or of any significance.
 - g. The remnant of the paved beach should not be considered contributing resource or of any significance.
 - h. The concrete footing from Ho-o-den repairs should not be considered contributing resource or of any significance.
 - i. The fire hydrant should not be considered contributing resource or of any significance.
 - j. The brick utility building should not be considered contributing resource or of any significance.
 - k. Add descriptions for what makes every item a possible contributing resource (ie the Ksuga Lanterns are not mentioned elsewhere in the report beyond Appendix B).
 - l. We agree that the golf courses are significant, but recommend being specific regarding what about the golf course makes it a contributing resource. The golf course has changed over time from its installation in 1899 to today (same comment for other recreational facilities).

14. Page 59 – Section 2.1.2

Last two sentences in the Setting paragraph are an incomplete thought. “As these features remain and continue to be enjoyed today, and, the sense of transition from neighborhood to park remains, Jackson Park retains good integrity of setting. While largely still intact, in some areas, Jackson Park’s setting has been disrupted by widened roadways.” Is there good integrity or isn’t there? If it varies, then the Park District suggests more specifically referencing the areas with good integrity versus those with compromised integrity.

15. Page 60 – Section 2.1.2

Regarding the GLFER project- “replanted” not “is replanting”.

16. Page 60 – Section 2.1.2

Discussion of the integrity of Jackson Park indicates the roadway alterations have had an impact on the park’s overall integrity, but the Park District would also argue the loss of the understory has had an effect on the design and setting as well.

17. Page 62 – Section 2.1.2

Figure 7 – This diagram is confusing and appears to be trying to do too much, many comments:

- The historic roadway alignment is only shown when it's been altered, so there is no way of knowing which roads are still following their historic alignment and which ones altered.
- There are several sections of roadway not shown or illustrated – Cornell between 67th and 65th, Portions of Hayes Drive, Richards Drive, Midway Plaisance.
- Marquette Drive's alignment is not an original alignment of the 1895 plan.

18. Page 64 – Section 2.1.2

The Park District strongly disagrees with the statement that parking lots that were constructed within the period of significance should be considered a contributing resource.

19. Page 64 and General to the Report

There is no mention of the Stony Island widening that eliminated the double row of poplars (Photo attached). This significantly changed the integrity of the landscape on the western perimeter. Olmsted's park designs including Jackson transition from urban edge along Stony Island to a formal landscape planting found in the double row of trees before transitioning to the more naturalistic landscape found with the berms and informal tree planting before arriving in the parkland which was intended as a respite from busy urban life.

20. Page 65 – Section 2.1.2

Regarding the statement, "The Western Perimeter includes the Midway..." The perimeter also includes tennis and basketball. We are assuming baseball and track and field is included in the outdoor recreational area.

21. Page 67 – Section 2.1.2

The Park District thought there was more detail on who designed the perennial garden than what's been provided. The report only references "in-house landscape architects".

22. Page 68 – Section 2.1.3

The report references historic aerial photographs, but the photos aren't included in the report.

23. Page 68 – Section 2.1.2

Is there visual evidence of old sand courts?

24. Page 69 - Section 2.1.2

Regarding the statement, "sometime in the late 1980s or a new oval track was installed" is a broad time frame. This seems like this can easily be confirmed from aerial photos versus such a generalization.

25. Page 69 – Section 2.1.2

Regarding the statement, "Today the Western Perimeter includes..." The perimeter also includes playgrounds, comfort station, and ball fields.

26. Page 70 – Section 2.1.2.2.1

Regarding the statement, "edged by a paltry parkway and sidewalk". This seems unnecessarily qualitative. Recommend listing widths as opposed to making such a judgment.

27. Page 71 – Section 2.1.2.2.2

Regarding the statement, “lopped off” again seems like regraded or removed as a result of major roadway work is more appropriate.

28. Page 71 – Section 2.1.2.2.2

The Park District thinks it’s still possible to diagram the intact locations of the berm. The Park District suggests adding to report.

29. Page 73 – Section 2.1.2.2.3

It’s mentioned earlier in the report but worth mentioning again. Landscape architecture is contextual and Olmsted’s design is no exception. Much of Olmsted’s landscape design was centered on existing mature oak trees (pre-settlement stands) with the recognition that the Fair’s landscape would be relatively new and could not possibly reflect the full vision at the time. As a result, the park design including the planting plan was shaped around the existing trees. These have as much significance as the planted / designed landscape and should be mentioned.

30. Page 73 – Section 2.1.2.2.3

Regarding the statement, “Today, only a small number of mature trees remain” – What is small? What is mature? We think you can provide a count of the perimeter trees while also stating how many are above a certain size for better context than making a broad sweeping statement.

31. Page 75 – Section 2.1.2.2.4

The Park District would not consider the concrete and wood benches of any historical significance or contributing feature of the park, this further emphasizes the statement that the period of significance is too broad for the park.

32. Page 75 – Section 2.1.2.3

Regarding the statement, the “loss of the gently rolling berms”- There are sections with the berm still present.

33. Page 77 – Section 2.1.3.3

The Park District is not aware of a fitness center in South Shore Cultural Center.

34. Page 77 – Section 2.1.3.3

Regarding the statement, “original 9-hole golf course”. The golf course was altered over time, not sure what is meant by “original”.

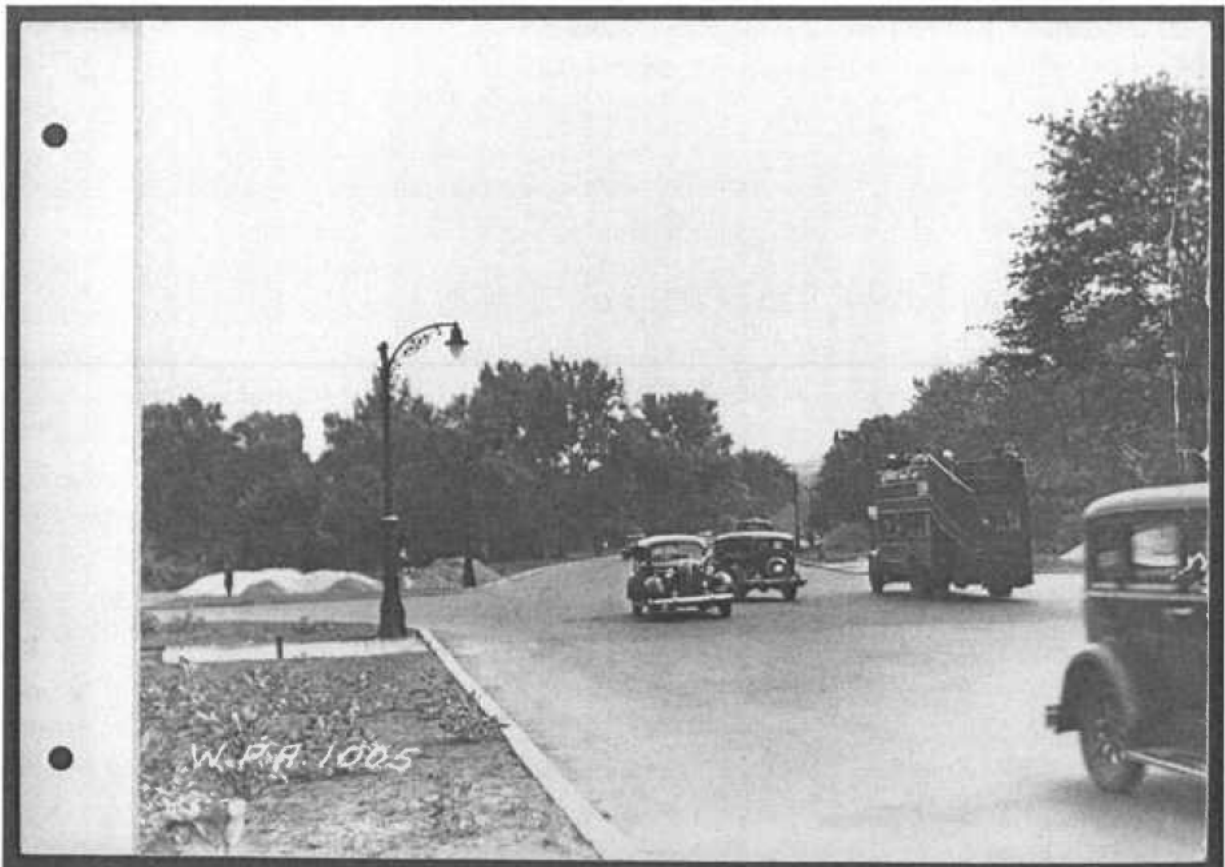
35. Page 116 – Section 4.1.1

The Park District disagrees with the period of significance. This section again argues that the period of significance is established by when there is a departure from design principles as opposed to significant contributions to the landscape design of the park. There are more important criteria for establishing a period of significance.

36. Page 116 – Section 4.1.1

The reference to the U505 feels out of context to this report. It’s a collection element within a building and not visible from the park. Why is this mentioned?

37. Correct the spelling for Chicago Park District throughout rather than Chicago Parks District.





SOUTH PARK SYSTEM - CHICAGO
JACKSON PARK
LINE OF CHICAGO PARKS - NORTH SIDE - 1910

Chicago
Landscape
Architecture
1910



April 19, 2018

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

RE: (i) Section 106 process for the OPC Mobility Improvements to Support the SLFP project referencing NPS, FHWA, USACE as requiring the project to comply with NEPA Section 106, NHPA of 1966 and Section 4(f) of the Department of Transportation Act of 1966 (Executive summary Archaeological Report (xi) and (ii) Report to document Historic Properties within the APE in accordance with two Federal undertakings by the NPS and the FHWA, requiring compliance with NEPA and Section 106 of the NHPA of 1966 (Executive Summary Historic Properties Identification Report (p.i)

Dear Ms. Monroe, Ms. Gorski and Mr. Sadler:

The descriptive section above highlights the dilemma of responding to the Obama Presidential Center proposals and their impact on historic Jackson Park. The executive summaries and the reports (one still in draft form) to this process seem to have inconsistent and inarticulate concepts about what is being reported on and reviewed and for what purpose. The references to the South Lakefront Framework Plan are particularly inapposite since that plan is not now at a stage where it can be assessed. Chicago Park District (CPD) Superintendent Mike Kelly, in presenting the SLFP to the CPD Board of Commissioners on April 11, stressed that it was a work in progress, a set of concepts if you will, that might never come into being in any of its details and surely would be meaningfully modified before it was ready for consideration and approval by appropriate agencies. He further stressed that there was no funding lined up for most of the major concepts in the plan such as the golf courses reconfiguration, road changes and underpasses and so forth. And, not inconsequentially, the plan even in its current configuration did not exist in a way that would enable the two major reports currently under discussion in these Section 106 processes to have considered it. The CPD Board of Commissioners did not take a vote to approve the SLFP. In short, the SLFP could never have been part of the plans that are at the center of this review process since it did not exist; and may not exist in reviewable form for decades. The only project in the SLFP (other than possibly the OPC) that is arguably ready for review is the proposed Track and Field facility located between Stony Island Ave., South Cornell Dr. and East Hayes Dr. on the South. Further, there is meaningful lack of clarity as to whether the proposed road closures being reviewed are being proposed to meet the parameters of the OPC or the nascent and nebulous golf course concepts which are so deeply dependent on private and state funding.

The period of significance chosen for the HPI report from 1871 – 1953 seems inappropriately and arbitrarily limited. Major and critical alterations to Jackson Park and its roadways, trails and lakefront have been implemented since 1953 that surely need to be respected and protected. For example a major set of connectors and landscape enhancements were made both east and west of Lake Shore Drive to improve access to the 57th Street Beach and areas north and south of it in 2004. Further, the incorporation of the South Shore Cultural Center and its campus into the CPD and its partial historic restoration were all accomplished since 1953—in the 1970s. Meaningfully more analysis of the lakefront park enhancements and historic preservation efforts north and south of Jackson Park post 1953 need to be carefully considered in assessing the impact of the OPC. Ironically, President Barack Obama was brought in to mediate an historic challenge to the integrity of the lakefront in an area popularly known as “The Point.”

In reading the draft HPI, the conclusion is inescapable that the scale and scope of the OPC is totally inconsistent with any possible maintenance of the historic integrity of Jackson Park and its Olmsted roots. Not even the travesty of the Nike Base placements in Jackson Park in the 1950’s so deeply distorted the historic integrity of the park as would come about if the currently proposed OPC is implemented. During the Columbian Exposition of 1893, the proposed site of the OPC was the location of the largest building at the fair, The Manufactures Building. Following the close of the World Columbian Exposition of 1893, Olmsted’s plans and concepts to restore the site to a landscape of park were implemented. We have respected that concept for 123 years.

Another critical and arbitrary limit to the reports is the selection of the APE. Extensions of the APE to the South, North and West, areas likely to be meaningfully impacted by the OPC, should it be constructed at the proposed site in Jackson Park, would seem to be necessary. The commercial and transportation impacts of the proposed OPC would surely effect meaningful parts of the city west of Washington Park including not just the whole of Washington Park but the historic stretch of Garfield Blvd. to the Expressway. Also the numerous historic buildings between the raised rail lines and South Shore Drive between 47th Street and 75th Street will no doubt be subject to numerous new challenges to their historic integrity arising from the infrastructure pressures generated by activities at the OPC.

Perhaps nowhere are the shortcomings of this review process clearer than in the lack of consideration of alternate plans for the OPC’s location to mitigate the negative historic impacts and promote public accessibility. The proposed road closures beg questions about the OPC’s transportation access; those closures will only worsen an already complex transportation arena. The review of the proposed road closures does not incorporate any meaningful analysis of the need for adequate public transportation to the center both for visitors and local community members. Arguably the reports and analysis should address the possibility of alternatives and their positive impacts. (See “U. of C. Buys 26 properties on South Side Ahead of Obama Library Decision,” Sam Cholka, //dnainfo.com/cgucagi/about-us/ourteam/editorial-team/sam-cholka Dec. 10, 2014 and “What price must Chicago pay for Obama library?” Renee Loth, Boston Globe, 3/5/2015.)

It would seem to be critical to return to the drawing boards and clarify what is appropriately up for review in this process.

Sincerely,



Juanita Irizarry
Executive Director

The Beman Committee, Incorporated

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A PERSONAL HISTORY OF JACKSON PARK, CHICAGO, IL
by Charles E. Gregersen, A.I.A. Emeritus & President of The Beman Comm. Inc.

I am a 75 year old, life long resident of Hyde Park Township on the Far South Side of Chicago. to which my maternal grandparents immigrated to from Sweden in 1889. My grandfather was one of the workman who built the World's Colombian Exposition, and my grandmother worked in a candy concession there throughout its course. As such Jackson Park has always been very dear to all of us as both a place of recreation and a constant reminder of that great event in 1893 in which our family participated. Ever since my childhood, I have been fascinated with the exposition and have become recognized as an authority on the subject. In fact among my various published works is an article entitled "The Principle Remnants of the World's Columbian Exposition"¹

During the 1940s, it was the habit of my aunts, uncles and parents to take me and my sister for lengthy walks on Wooded Island almost every weekend. I may have been only a very small child, but I still have memories of walking on the porches of the Japanese Ho--o-den and seeing its barren foundation after its destruction by arson following the end of World War II. Fascinated as I was of Columbus's voyage to America, my father often took me to the Yacht Harbor to see the 1893 Spanish reproduction of his flagship, the Santa Maria, by then shorn of its masts, as well as to the Museum of Science and Industry (the restored former Palace of Fine Arts and later Field Columbian Museum). In those days ALL THESE THINGS WERE FREE! There were no exorbitant two hour parking meters or equally exorbitant museum admission fees. The park was free and open, not just for the tourists or the few lucky to live next to it, but for all of Chicago's citizen tax payers to enjoy as its creators intended it to be! The only monument to a politician that I can recall in the park was a little painted wood sign identifying the long since vanished "Senator Paul H. Douglas Nature Preserve" on what was still an isolated little island immediately south of Wooded Island known as "Hunter's Camp" during the exposition.

Jackson Park is a National Treasure and is recognized as such by its listing on the *National Register of Historic Places*. I frankly become absolutely incensed every time I read of Hyde Park, Woodlawn and South Shore residents acting as though Jackson Park is their own private playground. I and my family have been paying taxes for well over a century to maintain that park. **Jackson Park belongs to us just as much as it does to anyone living next to it, and I am getting tired of being treated by the City like an out of town tourist every time I go**

¹ In David J. Bartuca, *The World Columbian Exposition, A Centennial Bibliographic Guide*, pp. 273-287.

there. In fact, since we don't have as much access to the park due to our distance from it, we have been subsidizing with our taxes the ability of these nearby residents to enjoy it themselves. Now to what I know of the:

HISTORY OF JACKSON PARK

As far as I know, Jackson Park enjoys the distinction of being the only one of Frederick Law Olmsted's numerous parks whose design was continuously revised by him throughout the length of his career.

In 1871 just before the Great Chicago Fire in October of that year, the firm of Olmsted and Vaux (who had already been working in the area to lay out the garden suburb of Riverside) had prepared a plan for the South Park Commissioners for Washington and Jackson Parks to be connected by a canal running down the center of a broad open space they dubbed "The Midway Plaisance." By the early 1880s plans show that roughly three quarters of Washington Park and roughly a third of Jackson Park at its north end had been completed according to their plan.

In spite of minor revisions to accommodate the construction of Charles B. Atwood's Palace of Fine Arts of the World's Columbian Exposition of 1893, now the Museum of Science and Industry (the "Museum"), the general configuration of the lagoons and drives at this end of the park remains as laid out in 1871. As part of this work, an octagonal refreshment pavilion was built just to the northwest of where the Outer Drive crosses the North Inlet which connects the north end of the park's lagoons with Lake Michigan. This was in use during the exposition but seems to have vanished soon after.

In 1888, John Root designed a more substantial park pavilion at 56th Street and the Lake. An addition was built to the west end of this building to convert it into the Iowa State Building for the exposition. At its close this was demolished returning the building to its original appearance except that a flagpole added to the conical roof of its corner turret was left in place. This building was demolished sometime in the 1920s or 30s to make way for expansion of the Outer Drive along the Lakefront. The Joliet stone pavilion standing near its site is not as often reported "The Iowa Building" but rather its 1930s replacement.

The most noteworthy legacy of the exposition in this part of the park, aside from the Museum, was the German Building, which became a very popular and picturesque park refectory facing the Lake just north of the North Inlet bridge. Like so many of the exposition's building, it was mostly made of wood framing covered with "staff" a very rigid form of stucco which would ultimately contribute to its complete destruction by fire in 1925.

At the northwest corner of the park was a small linear lagoon called the "North Pond." This seems to have been fed by ground water since it was not connected directly to the other lagoons. The present extension of 57th Street into the park was originally carried across this lagoon by a frequently illustrated cast iron bridge. Its resemblance to a number of bridges in New York's Central Park designed by Calvert Vaux, suggests that he was also the designer of this bridge. Adjoining the bridge at its southwest corner was a small but ornate watchman's

guard house, which seems to have been gone by the time of the exposition. This lagoon was ultimately filled in, leaving only a slight depression in the ground to show where it once was.

The only structures remaining in the park from this first phase of its design are the stone abutments of what is today called the "Clarence Darrow Bridge." It is my understanding that the bridge received this name because it was from it that Darrow's cremated remains were, per his Will, poured into the lagoon because he regarded the views from it as the most beautiful in the world. In past years, I could agree with that, but today these views have been spoiled by over cutting of the trees to the south of it and an ugly high rise which spoils the view of Atwood's masterpiece to the north.

The bridge was originally supported by two massive wood trusses which separated the carriage driveway from the outer pedestrian walks. These survived the exposition but were later replaced with steel beams supporting a concrete deck. The substantial cast iron newel posts and intermediate balusters installed with the new deck were salvaged from other bridges that had been built as part of the exposition. These were designed, like the museum by Atwood, as chief designer for Daniel Burnham as "Director of the Works" of the exposition. I have long suggested to anyone who would listen that these should be preserved and used as models for new railings for the steel bridges which now lead to Wooded Island as an appropriate reminder that Jackson Park was the site of the greatest world's fair ever held.

In the 1950s when I was a teenager, I wrote a letter to the Editor of *The Chicago Tribune*, which as I recall was published, complaining of a proposal to route the proposed expansion of Cornell Drive south of the Museum which would have called for destruction of the Darrow Bridge. I don't know whether my letter had anything to do with it, but in due time that proposal was dropped and the road was rerouted in only a slightly expanded manner north of the Museum where it up to now has in no way defaced the park or hindered traffic. The bridge may have escaped destruction once, but I have heard rumors that rather than being preserved as a monument to both Darrow and Olmsted, it may will be a casualty of the proposed Obama Library.

It was not until 1890 when plans began to be formed for the forthcoming World's Columbian Exposition that Olmsted was again consulted about how the proposed site at Jackson Park should be configured. John Root had already proposed an arrangement for the site which called for arranging the principle buildings around a rectangular basin at the south end of what was then still undeveloped park land. In the end Olmsted would rework Roots concept into a much grander formal landscape of terraces, canals, bridges and fountains to form the exposition central feature: the grand basin of The Court of Honor.

Olmsted, did not, however, entirely abandon the essence of his 1871 scheme for the central part of the park, an informal landscape of lagoons and small mostly inaccessible islands surrounding what he now appropriately called Wooded Island. It is thus, the central roughly one third of the park, which is the legacy his planning has left of the exposition.

The only structures which survived from the exposition in this part of the park where, the Japanese Pavilion, known as the Ho-o-den, in honor of a historic temple at Uji which its three pavilions only vaguely resembled and three iron bridges, most likely again designed by Atwood, which connected Wooded Island to the rest of the park.

During the early 1930s, around the time of the Century of Progress World's Fair, a major renovation was undertaken of the Ho-o-den which included the construction of a new concrete foundation under each of the three pavilions. Alas shortly after the end of World War II, the Pavilion was destroyed by arson in two separate fires.

As grand as the Pavilion was at the time of the exposition, no effort was made at that time to create a historically appropriate landscaped setting for it. This was rectified as part of the renovation with the construction of what is today, following its restoration in the 1980s, the beautiful Osaka Garden.

Of the numerous iron bridges built for the exposition only two remained in their original position connecting the narrow island known originally as Hunter's Camp and years later as the "Senator Paul H. Douglas Nature Preserve" to Wooded Island on the north and the mainland on the south. During the 1950s when the "Nature Preserve" was eradicated, these bridges were removed and the present bridge at the south end of Wooded Island was erected in place of the northern one.

Olmsted viewed his parks as places where natural beauty was to be presented to the masses with the intent of elevating their intellect and spirit. This had been the attitude of the South Park Commissioners and those in the other "divisions" of the city, who competed with each other in developing beautiful landscapes. A pleasant stroll through the parks had never been enough, however, to justify the expense of creating them. They also had to be places where the masses could have fun away from the drudgery of their working lives. Thus boating on the lagoons, playgrounds of various sorts (baseball fields, tennis courts, etc.) and refreshment facilities were also part of park programs. Once the different park jurisdictions were merged to form today's Chicago Park District, the attitude changed. The museums, which were under private management anyway and the extensive inventory of field houses had to be maintained, but funding for the Park District and its activities began to reflect the racial makeup of the city. Lincoln Park on the affluent predominately white North Side could still have its Zoo, conservatory and formal gardens well maintained and even expanded, but on the rapidly ghettoizing South Side things were different. When money was spent, it was to essentially to keep its lower class minority inhabitants busy "playing ball and out of trouble." In Washington Park the grand conservatory was demolished and its adjoining formal sunken garden was laid waste. In both Washington and Jackson Parks, the boat houses and refreshment facilities were closed down. In Jackson Park, the Nature Preserve was wiped out and the lagoon to the south of it was filled in ostensibly to provide room for more baseball fields. On Wooded Island, "The Rose Garden" and the site of the Ho-o-den were abandoned together with its adjoining Japanese garden. Were it not for neighborhood activists like the late George Coolley we wouldn't even have the Osaka Garden.

During the exposition, another iron bridge, this time a much larger three arched one ran directly east from the north end of Wooded Island connecting it to the site of the Fisheries Building. After the exposition it was relocated to run directly north from the north tip of the island. This bridge was removed in the 1960s. All three of these iron bridges featured the same iron guard rails designed by Atwood which can now only be found on the Darrow Bridge,

Before Olmsted began his career as a landscape architect, he traveled to Europe where he was most impressed by the work of Sir Joseph Paxton and particularly of his recently completed park in the southern London suburb of Sydenham which surrounded his recreation of his most famous structure, the Crystal Palace. Beginning a decade later with New York's Central Park, Olmsted adopted Paxton's approach of surrounding a central formal more or less Italianate element with informal English Garden features. At the exposition, his plan for the site north of 63rd Street which at the moment still survives relatively intact followed the latter approach while the Court of Honor which took up most of the land to the south was obviously the formal element.

When called upon after the exposition to redesign the park, Olmsted returned to the intent of his 1871 plan. Although that plan called for a formal element (much like Central Park's Bethesda Terrace and in fact named "The Lagoon Terrace") situated just to the east of what is now the south end of Wooded Island, he was forced to significantly modify the design due to what the exposition had left both above and below the ground.

With the Museum and its terrace now permanent features of the park and everything connected with the Court of Honor destroyed by fire, he recognized that a formal element already existed which enjoyed a position much like that which Paxton's Crystal Palace had in its park. To reinforce this element, he proposed to redefine the informal so-called "Columbian Basin" as an oval shaped water feature surrounded by ornate stone retaining walls with a fountain at each end. The formal terrace at the south front of the museum was rebuilt in the 1930s when reconstruction of the Museum was completed, but the Basin remains as it was in 1893.

It was that part of the park south of 63rd Street which was most affected by Olmsted's plans of 1895. Whereas the 1871 plan called for a rather heavily forested area in the southwest corner, it was the construction of the 1893 buildings, most notably the heavy brick and concrete foundations of boilers, stationary steam engines and generators in Machinery Hall, which determined that this corner of the park would be given over to the open fields of the Golf Course which exists there to this day.

After the exposition the frame and staff reproduction of the La Rabida Convent, where Columbus had stayed before his first voyage, was left standing. In time, a children's hospital was established in the building which was destroyed by fire in 1922. Ten years later the present children's hospital, retaining the name of the 1893 building, was established somewhat south of its site.

Today the lower parts of the granite sea wall which surrounded the original La Rabida site are the only significant visible relics of the exposition still surviving in

the park. While much of the brick and iron which supports the Museum was part of the 1893 building, all of its visible exterior stone and terra cotta dates from Julius Rosenwald's reconstruction,

In Central Park, Olmsted had to get vehicular traffic across a park so long and wide that it virtually divided Manhattan in half. His solution was to separate the internal mostly foot traffic from these crossing roads by an elaborate system of bridges. In Olmsted's lifetime, laying out Jackson Park presented barely any traffic issues. For one thing, it was on the Lake Front and separated nothing. If fill had not been dumped into Lake Michigan at least three decades later to facilitate the construction of the Outer Drive (which now runs from roughly one end of the city to the other) no change would ever have been needed in the park's original traffic patterns.

But here we are. Today the Outer Drive splits off into three arteries. Two, Yates Avenue and Jeffrey Boulevard, are essentially side streets leading into residential areas. Only Stony Island Avenue (a boulevard laid out in the middle of nowhere before the Chicago Fire of 1871) is the broadest of the three and the only one which is essentially commercial and connected to major highways (the Chicago Skyway at 71st Street and I-94 at 95th Street). Access to it through the park is by way of Cornell Drive, which although widened in the 1960s is still roughly located where Olmsted put it. In my youth access to the Outer Drive from Stony Island was by way of a narrow and dangerous five way intersection at the southwest corner of the park. That problem was solved when the north and south lanes of Cornell Drive were split and the three block long bottle neck of Stony Island was widened to the full width of the original boulevard to the south which up until then stopped at 70th Street. The idea that all three roads will meet together in the middle of the park instead of at its northeast corner as they do today will in my opinion, only increase traffic to an unacceptable level at its most unacceptable point: the Beach House at the Lake Front. Before public funds are allocated to make any changes in traffic patterns in Jackson Park, I suggest that it would be wise to have the Obama Foundation submit a certified accounting to establish that it has all the funds necessary to build its so-called library.



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

April 17, 2018

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

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

Dear Ms. Monroe:

Thank you for another opportunity to comment on the 106 Review process following the March 29, 2018 meeting. As we said in our previous letter to you, "The Hyde Park Historical Society takes very seriously the preservation of the important historic resources' in Jackson Park." We continue to be concerned about the Obama Presidential Center plans for entirely removing a section of Cornell Drive and are confused about the OPC's intentions for the Women's Garden. In addition, we urge more diligent attention be paid to remaining archaeological evidence, especially regarding Louis Sullivan's World's Columbian Exposition Transportation Building.

Cornell Drive:

The current intention of the City to entirely remove a section of Cornell Drive remains insensitive to the historic character of Jackson Park, and it is not the only solution to mitigate traffic near the OPC. A narrower two-lane road with protected bike lanes and pedestrian paths would restore Olmsted's safe, leisurely passage through the park for all – cars, bikes and pedestrians. Even if this restored park road were paved in historic brick it would be considerably cheaper than what is being proposed. Leaving Cornell as a roadway should also reduce the scope of the proposed widening of Stony Island Avenue, a project that currently would demolish the remnant berms along the east side of Stony Island Avenue between 57th and 63rd Streets intended in the Olmsted plan to muffle traffic noise before it enters the park. This berm was finally executed by Alfred Caldwell in 1939 and is now heavily wooded. Retaining Cornell Drive would also eliminate the need to widen southbound Lake Shore Drive, a project that would destroy much valuable parkland and plant material.

Women's Perennial Garden:

It has been mentioned that the OPC now intends to retain the Women's Garden albeit with some disruption/modification. One account says that the garden will be completely taken apart during construction and then reassembled at a later date. This seems unnecessary and wasteful. It also

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appears that the surrounding terrain will be redesigned with a severely undulating grade. This will obscure sight lines both to and from the garden. We ask that clear plans be presented to the public before any decisions are made that would damage this important historic feature of Jackson Park.

Archaeology:

The OPC buildings will be constructed on the site of Louis Sullivan's World's Columbian Exposition Transportation Building. Recent test diggings have revealed historic material. Given the historic importance of Sullivan's building and the entire site of the World's Columbian Exposition, we ask that the excavations for the OPC be supervised by an archaeologist who would monitor the work to preserve historic material.

Thank you very much for your time and attention.

Respectfully,

Michal Safar

Michal Safar, President
Hyde Park Historical Society

Jackson Park Watch

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April 18, 2018

Eleanor Gorski, Department of Planning and Development

John Sadler, Department of Transportation

City of Chicago

Via Email: eleanor.gorski@cityofchicago.org, john.sadler@cityofchicago.org,
dpd@cityofchicago.org

Re: Section 106 Review of the OPC Mobility Improvements to Support the SLFP Update

Dear Ms. Gorski and Mr. Sadler:

As a consulting party to the Section 106 review of the “OPC Mobility Improvements to Support the SLFP Update,” we write to comment on the draft Historic Properties Identification Report that was posted on March 19 and presented at the second public meeting on March 29. Beyond specific comments about that draft report, we have concerns about the overall process for the Section 106 and related federal reviews and the project definitions that are guiding those reviews. We address some of those concerns here, but have also submitted a separate letter, dated April 18, that focuses on issues relating to the full National Environmental Policy Act (NEPA) review process. The two letters are complementary and concerns expressed in each inform the other

I. Misrepresentations of the nature and import of the South Lakefront Framework Plan

We find fault with the consistent misrepresentations of the origin and timing of the 2018 South Lakefront Framework Plan (SLFP) to create a false narrative used to deflect scrutiny of decisions about proposals that were developed prior to its inception, to wit, the proposals to construct the Obama Presidential Center (OPC) in Jackson Park, to make major changes in the Jackson Park roadway system to accommodate the proposed design of the OPC, and the closely related proposal by the Chicago Parks Golf Alliance (CPGA) to merge and expand the existing golf courses in Jackson Park and South Shore.

Here are the facts:

- The siting of the Obama Presidential Center (“Library” at the time) in Jackson Park was announced 7/27/16.
- The golf course merger project was announced 12/18/16.
- The design of the OPC, including the intent to close Cornell Drive, was announced 5/3/17.
- The full-blown plan for road closures and realignments and the expanded golf course design plan were unveiled 6/22/17.

- It was only on 6/22/17, when the fully developed proposals for all three projects – the OPC, the Chicago Department of Transportation (CDOT) road changes, and the CPGA golf project -- were already in place, that the Park District launched the South Lakefront Framework Plan process, with the stated intent of “updating” the pre-existing 1999-2000 Jackson Park/South Shore Framework Plan, a plan that did not include any of these projects.

This after-the-fact South Lakefront Framework Plan, a plan only presented to the Park District Board as final on April 11, 2018, has consistently been cited in a wide variety of official documents to create the misleading public impression that these three major, costly, and disruptive projects are somehow the result of and required by the SLFP; that is a fiction.

For example:

- In the Section 106 Historic Properties Identification Report dated March 15, 2018, the concluding sentence of paragraph 1 of 1.0, Introduction and Description of Undertaking, says “Specifically, the decision to locate the Obama Presidential Center in Jackson Park, road closures in Jackson Park, and other changes in Jackson Park *identified in the South Lakeshore Framework Plan....*” (Italics added) This phrasing erroneously implies that the South Lakeshore Framework Plan was the driver of decision-making on these projects, while in fact it was premised on their being in place.
- The CDOT application to the Chicago Plan Commission for “Various Roadway and Intersection Modifications,” dated January 10, 2018, states in IV. Brief Description of the Proposal: “Transportation improvements to support the update to the Chicago Park District South Lakefront Framework Plan which includes construction of the Obama Presidential Center along Stony Island Avenue within Jackson Park....” Here again the clear but erroneous implication is that the South Lakefront Framework Plan preceded and somehow required the construction of the Obama Presidential Center in Jackson Park, while in fact the decision to locate the OPC in the Park and to make the road changes included in the CDOT application, preceded the development of the updated SLFP.
- Yet another and very significant example of this misrepresentation can be found in the February 8, 2018 draft “Purpose of and Need for Action - Federal Highway Administration” statement at https://www.cityofchicago.org/content/dam/city/depts/dcd/supp_info/jackson/fha-purpose.pdf. At 1.1 the document states “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 as described in the 2018 South Lakefront Framework Plan.” Again, the “planning and development objectives” referred to in the document were in place before the 2018 South Lakefront Framework Plan process was launched. This misrepresentation is then used to allege that the baseline for the current federal reviews, rather than the situation that now exists, is instead the situation that would obtain if the proposed OPC had already been built and all of the proposed roadwork already completed.
- Additionally, the City is maintaining two separate but closely related websites as a part of the review by the Chicago Plan Commission and the on-going mandated federal reviews of the OPC and roadway proposals. In very similar terms, text on both sites misleadingly asserts that the South Lakefront Framework Plan requires the construction of the Obama Presidential Center in Jackson Park, the related major road changes, and the golf course

expansion/merger project. See https://www.cityofchicago.org/city/en/depts/dcd/supp_info/jackson-park-improvements.html and https://www.cityofchicago.org/city/en/depts/mayor/supp_info/obama-presidential-center.html.

We ask that the Section 106 draft reports, City websites, and all other documents related to the federal reviews of the proposals to construct the Obama Presidential Center and the related roadway changes be corrected to reflect the fact that the South Lakefront Framework Plan did not and does not authorize or require the projects under review.

II. Section 106 Review – Scope and Terminology

The proposed definitions of the Area of Potential Effects and the Period of Significance for the Section 106 review as presented in the Draft Historic Properties Identification Report (March 15, 2018) and at the March 29, 2018 Public Meeting raise concerns as do descriptions of specific features of the park.

- Area of Potential Effects (APE)

According to the Department of Planning and Development (DPD) materials distributed at the March 29 meeting, the definition of the APE for the architecture/landscape review was based on “the study area used in the South Lakefront Framework Plan Update with the addition of buildings fronting Jackson Park and properties within a ½ mile radius viewshed of the proposed OPC museum tower.” In addition, it was explained that, in response to consulting party input, the APE was expanded to include the entire Midway Plaisance to reflect the area included in the 1972 nomination of Jackson Park and the Midway Plaisance for the National Register of Historic Places.

The Executive Summary for the draft Historic Properties Identification (HPI) Report provides a slightly different rationale for the definition of the APE: “Areas of Potential Effects (APEs) were delineated to include any direct or indirect impacts to historic properties that may occur as a result of the federal undertakings” (p. i), and the report notes that requests to modify the APE “were considered and evaluated based on three criteria: consideration of the development history that could be linked to Jackson Park, the likelihood of direct impacts as a result of potential construction, and the likelihood of indirect visual impact as a result of the construction of the OPC Tower” (p. ii).

Each of these rationales presents some problems of interpretation and application. The reliance on the study area being used in the South Lakefront Framework Plan Update (which is basically defined by the boundaries of Jackson and South Shore Parks) yields an APE that does not recognize that the road construction and reconfiguration within the park will have major impacts far beyond the park boundaries. The neighborhoods of South Shore (including the historic district of the Jackson Park Highlands) and of Hyde Park north of 56th Street will be particularly affected as a result of the proposed road configurations (closure of Cornell, Marquette, and EB Midway Plaisance east of Stony Island; rerouting of traffic via Lake Shore Drive, Stony Island and Hayes). The traffic study on which CDOT has based its plans has several issues, including but not limited to the fact that it does not adequately account for how drivers may divert from CDOT-preferred routes by exiting Lake Shore Drive north of 57th Drive to cut through Hyde Park. Similarly, there is not sufficient attention in the CDOT plans to address the impact on South Shore of the likely additional traffic

diversions on Jeffrey Blvd. or on 67th Street or on other cross streets as drivers cut through to and from Stony Island.

There also seems to be inconsistency in applying the three criteria defined in the draft HPI report. During the March 29 meeting, Eleanor Gorski responded to a question about why the South Shore neighborhood or at least the Jackson Park Highlands was not added to the APE by saying that it had been determined that these areas were beyond the limit for visual impact of the OPC tower. But she did not address the other two criteria, both of which certainly apply to South Shore and the Highlands, and which fully support their inclusion in the APE. The symbiotic relationship between the Park and the development of these neighborhoods is obvious. As noted in the preceding paragraph, these areas (among others) will be impacted directly as a result of the potential road construction. The changes in traffic flow in the park will directly affect traffic movement through these neighborhoods – particularly along Jeffrey Blvd. and 67th Street but also along South Shore Drive and Stony Island and smaller cross streets.

It seems particularly appropriate and important to expand the APE to include South Shore at least to 71st Street and all of Hyde Park in the APE because, as also noted in the draft HPI report (p. 2), determinations made during the Section 106 review feed into and inform the subsequent federal reviews. The proposed road work will have potentially adverse effects in a broad swath of the south side beyond the park proper that should be considered as part of the NEPA and Section 4(f) reviews.

An additional concern about inconsistencies regarding the APE defined for the Section 106 review relates to the South Shore Cultural Center (SSCC) and to proposed changes linked to the proposed golf course merger and expansion. As explained on p. 2 of the draft HPI report, the SSCC is included in the APE only “to accommodate potential improvements for pedestrian underpasses.” However, these “potential improvements for pedestrian underpasses” are prompted only by the proposed golf course project, and not by the plans for the OPC. Likewise, the proposed closure of Marquette Drive between Stony Island Avenue and Richards Drive is an “improvement” related only to the golf course project and not to “OPC mobility” issues. Either these golf project-specific changes should not be included in the proposed work to be evaluated by the Section 106 review and other federal reviews (and commensurately that proposed work should be removed from consideration of performance at this time) or the South Shore Cultural Center and the golf course project should be *fully* integrated into the review, with an expanded list of contributing resources and an expanded APE.

- Period of Significance

The discussion of the definition of 1871-1953 as the Period of Significance for this review (draft HPI report, p. 54) references the National Register nomination form submitted in 1972 for Jackson Park and the Midway Plaisance, which checked only the “19th Century.” As the proposed time period indicates, however, the significant dates for Jackson Park extend well beyond the 19th century. Yet, the proposed end date to guide the current review seems an arbitrary demarcation: it is not a neat 50 years ago such as is the minimum standard for inclusion in the National Register, and it is not a true divide between a pristine Olmsted design and one where changes have occurred. A more or equally appropriate and obvious end date for the Period of Significance would be 1968,, consistent with the minimum standard for inclusion in the National Register.. Certainly there were

important happenings in Jackson Park between 1953 and 1968. Why, for instance, is not the installation of the Nike missile base itself a notable, if lamentable, event, worthy of recognition as a marker of its time just as the 1893 World's Columbian Exposition was a reflection and achievement of its particular historic moment. The puzzlement created by the 1953 date leads to concerns about the accuracy and completeness of the Section 106 review generally, as noted below in our discussion of the Jackson Park Landscape Integrity Analysis.

We note that the 1972 National Register nomination, in responding to the instruction to “Describe the present and original physical appearance,” stated: “Except for minor changes here and there, and a few major ones such as the filling-in of part of the lake along the south pier, the Park and the Midway still conform to the essentials of both the 1895 and 1871 plans.” [We would also note that the National Register nomination presented in two places on the City's website <http://www.tinyURL.com/JPimprovements> is only the initial version, submitted on July 17, 1972; the revised version submitted on November 9, 1972 presents a fuller statement of the importance and description of Jackson Park and Midway Plaisance and includes the assessment quoted above.]

- Jackson Park Landscape Integrity Analysis

Undue Focus on Roadways

In its Jackson Park Landscape Integrity Analysis, the draft Historic Properties Identification report states that “Overall, Jackson Park generally possesses a high level of integrity” (p. 59). It concludes (p. 60) by repeating that “Jackson Park generally retains a high level of integrity.” This assessment is buttressed by the December 10, 2012 letter from Anne E. Haaker, then Deputy State Historic Preservation Officer, to Peter Bullock of the U.S. Army Corps of Engineers, with regard to the USACE plans for an ecological restoration project in Jackson Park, which said in part:

“As currently designed, the park retains a great deal of its integrity. While some of the original features have been modified, or removed, the remaining defining characteristics such as the overall plan developed by Olmstead, Olmstead, and Elliot (*sic*) as depicted on the 1905 map must be respected. These include, but are not limited to, the Golden Lady statue, the Osaka Garden, the current roadway configuration, the beach house, and the configuration of the lagoons.”

Notwithstanding this very positive assessment, the draft HPI report goes on to single out the impact of roadway alterations as requiring particular attention. We question some critical aspects of this analysis of landscape integrity. At the March 29th meeting, it was candidly admitted by the City that the 1953 date in many respects was arbitrary, at a minimum subject to significant debate. We agree that the 1953 date is both arbitrary and wrong. It is not consistent with any applicable guidelines or prior reviews of Jackson Park, whether for the National Register nomination or subsequent reviews by others such as the Illinois Historic Preservation Agency. Instead, it appears to have chosen as way of providing justification to the proposed road closures, which it fails to do. By choosing 1953 as the end of its proposed period of significance, the draft report excludes the impact of the Nike base and the permanent changes it created in the landforms and water features of the Park from its analysis of landscape integrity. At the same time, in contrast, its analysis of road changes includes all changes from 1895 through to the present, regardless of when they occurred (see the chart on p. 63). Consideration of the dates of the various changes in conjunction with the map depicting those

changes (p. 62) shows that many changes in road design now presented as having a negative effect on landscape integrity occurred well before 1953; the change in the intersection between Cornell Drive and Hayes Drive (1935) is a case in point. We question why the significant changes to the integrity of the landscape in the Park that occurred due to the Nike base are excluded from this analysis while all roadway changes, regardless of date, appear to be included.

We would observe that, whatever there is to say about challenges to the integrity of the Jackson Park Landscape to date, the current proposed undertaking to close Cornell Drive between 59th and 63rd Streets and to make a series of significant road changes in order to accommodate the resulting traffic dislocations is far and away the most intrusive, destructive, and harmful challenge to the integrity of the Jackson Park of anything to date save the installation of the Nike base in the Park.

- Analysis of Western Perimeter

We notice in the treatment of the Western Perimeter, a particularly important topic given the proposal to erect the Obama Presidential Center in this area, some surprising use of language that create misleading impressions and inaccurate statements. We provide several examples of such text and ask that the final report present a more accurate and balanced assessment of these important points.

- On p. 64 the draft HPI report asserts: “It [Cornell Drive] was widened and realigned several times between the 1930s and early 1970 in a manner that *severely diminished* the historic integrity of the Western Perimeter. Other roadway alterations were made in a *more sympathetic manner*.” (Italics added for emphasis) This paragraph goes on to claim that the recent Hayes Drive realignment adjacent to S. Lake Shore Drive “... mirrors the historic alignment” and “has had a much less dramatic impact on the park’s integrity,” a claim which appears arbitrary, since the new alignment departs substantially from the original (see map, p. 62). This description is both inaccurate and inconsistent with earlier assessments.
- On p. 69, the draft HPI report asserts: “Between the early 1960s and 1980s both S. Cornell Drive and S. Stony Island Avenue were widened substantially to handle much heavier loads of traffic. ... Other roadways were moderately widened, but generally following their historic alignments.” In fact, both Cornell Drive and Stony Island Ave. continue to follow their historic alignments quite closely. Further, the Traffic Impact Study prepared by Sam Schwartz as the basis for the CDOT roads proposal presents an assessment of Stony Island Avenue that differs substantially from that of the heavily traveled road the draft HPI report suggests: “Stony Island Avenue is a two-lane, minor arterial roadway, with on-street, unregulated parking provided on both sides of the street south of 60th Street and north of 59th Street.” Again, the juxtaposition of “substantially” and “moderately” above also sets up a false contrast between what has occurred with roadways adjacent to the Western Perimeter in comparison to road changes in the rest of Jackson Park.
- On p. 70, paragraph 2, it is a significant exaggeration to assert that “...Cornell Drive was altered to become a much straighter and wider roadway.” It is inaccurate to say that “S. Stony Island Avenue was also widened to provide two northbound lanes and three southbound lanes along the west edge of the park.” This configuration occurs only at the far southern end of the Park.
- On p. 70, in paragraph 3, it seems an obvious overstatement and surprising use of terms to assert that “The western edge of Jackson Park, previously characterized by a wide lawn and

double row of trees, gave way to traffic lanes edged by *a paltry parkway and sidewalk.*”[Italics added]

- On pp. 70-71, the language creates the impression that Olmsted’s berms, a signature design feature, no longer exist. “While some of these historic landforms remain today, many have been substantially altered. The entire S. Stony Island landscape edge was lopped off as a result of major roadway work conducted in the last 50 years.” In actuality, the western side of Jackson Park from 60th Street virtually all of the way to 67th Street still features berms that differentiate the park within from the sidewalk and traffic on the park’s exterior. These berms define the western edge of the site for the OPC, but would be “lopped off” to accommodate the proposed widening of Stony Island under the CDOT proposal. We note as well that the proposed Obama Presidential Center site would eliminate all signs of the original Olmsted design on that acreage, significantly altering the character of the Park not only in that immediate area but beyond.

Overall landscape integrity of Jackson Park: The central assessment presented in the draft HPI report is that Jackson Park today continues to have a high level of integrity. However, there are repeated references to the damage resulting from widening of the roadways and in particular Cornell Drive. The logical solution to the situation would be to narrow Cornell Drive and add traffic calming features as was proposed by the Park District itself as recently as 2016. It is not the logical solution to close the roadway completely and thereby trigger a wave of new road widenings and new loss of parkland, not only along Lake Shore Drive on the eastern edge of the park but in particular on the western edges of the Park, the very Western Perimeter itself.

III. Section 106 Review – Historic Properties Identification

Contributing Resources

According to the draft Historic Properties Identification report dated March 15, 2018, a contributing resource is a building site, structure, or object that:

“adds to the historic associations, historic architectural qualities, or archaeological values for which a property is significant because it was present during the period of significance, relates to the documented significance of the property, and possesses historic integrity or is capable of yielding important information about the period.” (p. 54)

In accordance with that, we ask for consideration or reconsideration of the decisions made regarding the inclusion of the following properties in the list of Contributing Resources:

- Cornell Drive and the terminus of the Midway Plaisance. Given the proposed determination that the 1895 Olmsted plan is the standard for the Section 106 evaluation, it seems appropriate and important to recognize and review all of the elements of the 1895 roadway design that are now in the park. The draft report states that in general “Roads, drives, and paths” are contributing resources (p. 55). However, we request specific recognition of Cornell Drive and the terminus of the Midway Plaisance between Stony Island Avenue and Cornell Drive in Jackson Park as contributing resources. They were central elements of the 1895 design and remain major features to the present day. The fact that Cornell Drive was widened and somewhat realigned in the 20th century does not obliterate its importance or

diminish its value as a reminder of Olmsted's design, and its altered state rather calls for an opportunity to restore, in full or in part, the roadway to its original purpose as the key to circulation through the park. Such an opportunity is now at hand to correct CDOT's prior mistake in widening the roadway beyond what was needed. Midway Plaisance, in contrast, has not suffered the same kind of alterations as Cornell Drive and retains the Olmsted imprint in full. To obliterate east-bound Midway Plaisance is a violation of the underlying principles of this Section 106 review.

- The Frederick Douglass Boulder. While the Frederick Douglass Boulder itself does not date back to the period of significance, it satisfies the criteria for designation as a contributing resource because it both "relates to the documented significance of the property" and "is capable of yielding important information about the period" in its reference to Frederick Douglass' historic appearance at the 1893 World's Columbian Exposition.
- The Great Auto Race Boulder. While the Great Auto Race Boulder itself does not date back to the period of significance, it satisfies the criteria for designation as a contributing resource because it both "relates to the documented significance of the property" and "is capable of yielding important information about the period," in its recollection of this important historic event.
- The Paul Douglas Nature Sanctuary. While designation of the Paul Douglas Nature Sanctuary on Wooded Island took place in 1977 and does not itself date back to the period of significance, it satisfies the criteria for designation as a contributing resource because it both "relates to the documented significance of the property" and "is capable of yielding important information about the period," in its reference to Olmsted's desire and determination to maintain the Wooded Island in a relatively natural state during and after the 1893 World's Columbian Exposition. The nature sanctuary on Wooded Island has been a feature of Jackson Park throughout the period of significance though it was not given its current designation until 1977. Given that the Wooded Island is not itself designated a contributing resource, it seems appropriate that the Paul Douglas Nature Sanctuary be so recognized, just as the current Japanese Garden, also located on the Wooded Island, is recognized as a contributing resource to recall the existence of the original garden.
- Lorado Taft's "Fountain of Time" (1920). The 1972 nomination of Jackson Park and Midway Plaisance to the National Register included the "Fountain of Time" as one of the key features of the Midway, the western terminus of the mile-long vista with the monument to Thomas Masaryk at the eastern end. As the nomination form noted, Taft's studio, a Chicago and National Historic Landmark, is located along the southern edge of the Midway. It seems appropriate and important to recognize the statue as a contributing resource to the Midway Plaisance and to assess the visual impact of the proposed OPC tower from that perspective.

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

Sincerely,

Brenda Nelms and Margaret Schmid
Co-presidents
Jackson Park Watch

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



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April 19, 2018

(SENT VIA EMAIL)

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

RE: Response to request for comments on the Historic Properties Inventory (HPI) and Archaeology Reports and preliminary eligibility determinations

Dear Ms. Monroe,

Landmarks Illinois is writing to provide its comments regarding the Historic Properties Inventory (HPI) and Archaeology Reports and preliminary eligibility determinations in the APE associated with proposed road changes to accommodate the Obama Presidential Center (OPC). As a consulting party, we have several comments and questions in regards to this phase of the Section 106 review process.

While the APE was extended to include the entire Midway, as we had recommended in our January 5, 2018 letter, we are disappointed that it is not extended to 71st St. to the south, and to include a larger area of Woodlawn. It may not be anticipated that these areas will experience direct visual or audible adverse effects, ground disturbances, change in public access, traffic patterns or land use due to the road reconfigurations or the OPC during its operation, however, we contend that there is the risk of real estate speculation that will invariably result in displacement and demolition.

We noted this concern in our January 5, 2018 letter, looking to the recent example of The 606 trail on the northwest side. While The 606 is a valued and accessible amenity, it has caused documented displacement of low-income residents through speculative developments. As we previously stated, there is an opportunity to plan ahead to assure that the OPC does not have the same unintended impact. With measures in place, the OPC can instead strengthen the existing mixed-income community and create opportunities for its existing residents to remain and to invest. Therefore, an expansion of APE boundaries into Woodlawn and south to 71st St. would allow further evaluation of potential historic districts and other mitigation measures that may curb displacement and encourage building rehabilitation over replacement. The Section 106 mitigation process is where these measures can be developed.

In regards to the evaluation of the HPI, archeology reports and preliminary eligibility determinations, our comments are summarized below.

HPI Period of Significance

Landmark Illinois (LI) requests that the period of significance in the HPI, currently recommended to be 1875-1953, be extended to 1968. In our view this is more logical for the following reasons:

- As stated by the National Park Service, generally properties eligible for listing in the National Register are at least 50 years old. Ending the period of significance at 1953 denies the opportunity for any properties built between 1953 and 1968 to be considered for National Register designation, or events of social significance to be acknowledged, despite qualifying for consideration based on the 50-year rule. (See below)
- There is precedent in past successful National Register nominations within the Chicago Park District to extend the period of significance to 50 years prior to the nomination date. This is the case with Washington Park and most of the major parks within the system.

HPI Contributing and Non-contributing Resources within Jackson Park and the Midway Plaisance

We are in agreement with the identified contributing and non-contributing resources with the exception of the following:

- In 1956, the federal government installed a NIKE missile site in Jackson Park's lawn tennis area. Because the running track and some ball fields were considered too close to the site, the north and south bayous were filled and a large ball field meadow was created. While it is noted that this action impacted the historic integrity of the park, the social history for this action – preparation for a nuclear attack – should not be ignored. This historic change in Jackson Park, dictated at the time by a policy mandate of the federal government, in fact lends itself to additionally qualify Jackson Park for listing in the National Register under Criterion A (sites associated with events that have made a significant contribution to the broad patterns of our history), not just Criterion C.
- Jackson Park Field House – built in 1957, this mid-century building was designed by Ralph Burke, who died before its completion. He was a municipal engineer who spent most of his career doing major infrastructure projects for the city of Chicago, including the master planning for O'Hare International Airport. <http://www.library.northwestern.edu/libraries-collections/transportation/collection/o-hare-at-50/research-materials/ralph-h-burke.html>

Archeological Reports

We concur with the findings in the archeological reports. However, during site preparation for construction, which will occur in the areas of the former Transportation and Women's Buildings from the World's Columbian Exposition, we would request that a designated archeologist be on call in the event there is need

for further evaluation of any potential Fair-related building materials unearthed during excavation.

Preliminary Eligibility Determinations

We are in agreement with the proposed Hyde Park East Historic District, a South Shore E. 67th Street Apartments Historic District and the individual properties identified in APE Sub-Area II-A and APE Sub-Area II-B as eligible for listing in the National Register of Historic Places. We propose the following additions:

- The proposed South Shore E. 67th Street Apartments Historic District should extend farther south to 71st St., as the same character of apartment buildings are continuous.
- Many Greystones, large apartment complexes and some single-family houses dating to the late-nineteenth and early-twentieth centuries were categorized as “not eligible” in APE Sub-area II-B. With the exception of Chapin Hall, it appears that all properties coded green or yellow in the Chicago Historic Resources Survey (CHRS) in this area were determined not eligible for listing in the National Register of Historic Places. The rationale for this determination is not clear. It generally is acknowledged that the CHRS survey, completed in the Woodlawn community in the 1980s, often missed or included only selective examples of a style and many buildings that could have been coded orange were not. Many of these properties categorized as “not eligible” in the 6100-6230 S. Dorchester, 6021-6239 S. Kimbark, 6122-6223 S. Kenwood and 6101-6233 S. Woodlawn blocks, as well as the church at 1200 E. 62nd St., should be reevaluated.

Jackson Park Landscape Integrity Analysis

Western Perimeter - Character Defining Features Analysis

While we agree there has been more compromise in the western part of Jackson Park than other areas, there are remnant berms, roadways and plantings that should be recognized and distinguished. Particularly important are the WPA-era Perennial Garden and the Midway Plaisance twin roadways that buffer the Midway’s connection into Jackson Park. While Cornell Drive was widened over the years, there always has been a circuit drive around the park and some aspect of this historic path should be recognized. Alignment of the Midway roads, Cornell Drive as a circuit road and the Perennial Garden are important historic features in the area of the proposed projects. We are aware that other organizations such as OpenLands have made additional comments regarding topography and physical land features (both landscape and circulation patterns) and we defer to their expertise from an open space perspective.

Key features identified in Jackson Park’s 1895 design through later important phases, such as the 1930s/WPA-era, should be integrated into the OPC site, landscape design and road reconfiguration planning. The Chicago Park District and its consultants with the Army Corps of Engineers insured that that 2013-initiated

4/19/2018

Great Lakes Fisheries and Ecosystem Restoration (GLFER) project met the Secretary of Interior Guidelines for Cultural Landscape Rehabilitation and balanced ecological needs with historic preservation goals. We seek the same care toward the setting and landscape design of the OPC, the road planning, the Jackson Park Golf Course and, as recently announced, the framework plan for the South Lakefront. The GLFER project is still underway and to be completed by the fall of 2019 according to the Corps of Engineers.

We look forward to participating in the ongoing Section 106 process and making further comments regarding identified adverse effects and proposing mitigation suggestions based on future presentations.

Sincerely,



Bonnie McDonald
President

Cc: Matt Fuller, FHWA
Rachel Leibowitz, SHPO
Eleanor Gorski, DPD
John Sadler, CDOT



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Aga Simmons

April 19th, 2018

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

Dear Ms. Monroe:

The National Association for Olmsted Parks (NAOP) is the only national organization solely dedicated to preserving the Olmsted legacy by providing the advocacy, research, and education needed to protect, restore, and maintain these exemplary parks and landscapes. NAOP continues to be concerned by the institutional expansion of the Obama Presidential Center (OPC), both physically and visually, and the perception that historic Jackson Park is a disused and dilapidated park that will benefit only from the insertion of the OPC. While NAOP is committed to working proactively toward an appropriate and thoughtful design solution, NAOP remains concerned that the legacy of the Jackson Park and the Midway is still not being fully considered during the Section 106 review process.

Since the first public meeting to discuss the Section 106 process in December 2017, NAOP has been following the process. NAOP appreciates the inclusion of the Midway as a component of the Area of Potential Effect (APE) not only as a valuable tool for evaluating the effects of the OPC, but also as a tangible recognition of the inherent connectivity of Washington and Jackson Parks, via the Midway, by the original Olmsted design. This action formally recognizes the larger infrastructural and design characteristics of the Chicago South Park System that remain today as evidenced by an interconnected system of walks, paths, drives and view relationships. This action reaffirms our commitment for a full consideration of the historic circulation and view relationships that define Jackson Park and the Chicago South Park System.

In compliance with our responsibilities as a designated consulting party to the National Historic Preservation Act, Section 106, and the National Environmental Policy Act reviews underway for Jackson Park, the National Association for Olmsted Parks offers the following commentary for the public record.

Advisory Council

Eleanor Ames
Portland, ME

Kathleen Conner
Seattle, WA

Julie Crockford
Boston, MA

Rolf Diamant
Woodstock, VT

Robert Doyle
Oakland, CA

Erin Gallentine
Brookline, MA

Kathleen Galop
Manchester Center, VT

Betsy Shure Gross
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John Karel
Ste. Genevieve, MO

Anne Knight
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Larry McCann
Victoria, BC

Rosemarie Murane
Denver, CO

Christine Edstrom O'Hara
San Luis Obispo, CA

Ed Orser
Baltimore, MD

Elizabeth Barlow Rogers
New York, NY

I. Comprehensive planning rather than fragmentary

- *We remain concerned that the current process concerning the historic landscapes adversely affected by the several projects under review is considering these sites in a fragmentary rather than a holistic manner.*

From the outset, Jackson Park, the Midway and Washington Park were conceived by Olmsted and Vaux as the South Park, an integrated whole unit of inextricably linked park experiences. Designed to reflect, yet enhance, the intrinsic character of the land with the “sublimity” of its lakeside setting, this innovative park design was intended to provide the city with notable scenery and several differing recreational opportunities, yet all artistically balanced, interrelated to each other and character-defining of the Chicago landforms.

Even after the lakefront site had been modified to accommodate the Chicago World’s Fair, this comprehensive landscape vision was continued with the 1895 Olmsted, Olmsted & Eliot General Plan for Jackson Park and its implementation, which now added the golf course. Among the features of this plan was the network of drives and paths, etc., which linked areas of the parks in ever changing “passages of scenery,” so characteristic of the Olmsted aesthetic. (see below)

Subsequent projects over the decades have, for the most part, respected the historic integrity of these significant historic linked parkscapes, as noted in their listing on the National Register of Historic Places in 1972 and the updated nomination documentation from the 1995 study produced by the Chicago Park District. The importance of this latter document (not currently included in the current record) should not be overlooked as it reflects:

1. research into materials not available in the 1972 process; and
2. the Secretary of Interior’s Standards of Treatment for Historic Properties, with Guidelines for the Treatment of Cultural Landscapes, the standard protocols used to assess and protect historic landscapes against destructive alterations.

However, the current projects—the Obama Presidential Library; its ancillary structures; and the golf course amalgamation --are being considered in a piecemeal approach, not reflective of the above-mentioned protocols, resulting in the potential of irrevocable damage to the unity of these major components of our national cultural patrimony.

II. Protection of Character-Defining Features: Circulation System

- *Particularly notable among these Olmsted principles is the importance of the balanced interrelated elements of the circulation system. These not only provide real access to and through the linked sites but visually and spatially reinforce the varied characters intended to define the diverse areas of the parks. Both the*

curvilinear form and the reinforcing vegetation associated with these drives and paths are essential contributing factors. These character-defining features are currently at risk in the proposals under consideration.

Therefore, NAOP recommends that Cornell Drive and Hayes Drive be identified as historic resources within Jackson Park. Cornell Drive and Hayes Drive need to be evaluated as original contributing park features and not as part of the region's transportation infrastructure. In addition, Lake Shore Drive needs to be evaluated as an independent historic resource. NAOP recommends a new section within Section 2.1.1 of the "Historic Properties Report" to discuss the Circulation System both within Jackson Park and its connection to the Midway and Washington Park and the larger circulation system within Chicago.

- The walks, drives and bridle paths that were designed for Jackson Park, The Midway and Washington Park were an essential and integral part of the South Park experience. The kinesthetic relationships each circulation system had with the landscape created by the "passages of scenery" and landscape were a hallmark of Olmsted and Vaux park planning. They represent a significant investment in park design and engineering as roads "more agreeable than the best stone or concrete roads."¹ The drives and avenues designed for "pleasure carriages" continue to inform the circulation pattern of the parks. While many have been repurposed for different uses, including non-pleasure through traffic, they are no less significant to the historic design feature of the parks than the land, plant, water and architectural features traditionally considered as a part of the Section 106 process. The argument that closing the drives will add parkland negates the historic roll of the drives as a desirable park feature.

III. Protection of Character-Defining Features: Vistas and Sight-lines

Given that the current plan under review does not contain either final scale or exact location of the structures under consideration, it is problematic to offer definitive commentary. However, given the generally flat topography of the site and the very deliberate choreography of articulated sight-lines and interrelationships intended by the Olmsted firm planning, it is clear that any structural additions to this heritage park should give critical attention to protecting the original design intent. In particular, this includes not obstructing planned views within and without the park, nor creating destructive shadow patterns which will affect both vegetative health and the intended artistry of diverse vistas.

- No architectural terminus (such as a library tower) should punctuate the Midway suggesting any axial relationship between Jackson Park and The Midway. The

¹ Report. To the Chicago South Park Commission, March, 1871, Olmsted Vaux & Co. –Papers of FLO, Supplementary Series, Vol 1, p. 221.)

Midway was designed as a visually fluid and physically seamless intersection between the two park units.

The National Association for Olmsted Parks appreciates the opportunity to submit the above comments and concerns as a designated consulting party to the National Historic Preservation Act, Section 106, and the National Environmental Policy Act reviews underway for Jackson Park and the resources identified in the APE.

Sincerely,



Arleyn A. Levee, Hon
Co-Chairs, National Association for Olmsted Parks



ASLA Lucy Lawliss, FASLA

cc: Eleanor Gorski, Chicago Department of Planning and Development; Rachel Leibowitz, Illinois State Historic Preservation Office; Matt Fuller, Federal Highway Administration; Juanita Irizzary, Friends of the Parks; Charles Birnbaum, The Cultural Landscape Foundation; Margaret Schmid, Jackson Park Watch; Ted Haffner, Openlands; Michael McNamee, Save the Midway!; Lisa Dichiera, Landmarks Illinois; Ward Miller, Preservation Chicago; Betsy Merritt, National Trust for Historic Preservation



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April 13, 2018

Ms. Eleanor Gorski
Deputy Commissioner of Planning, Design and Historic Preservation
City of Chicago Department of Planning and Development
121 N. LaSalle Street, 10th Floor
Chicago, IL 60602

Dear Ms. Gorski:

In addition to the comments we recently provided regarding certain aspects of the environmental study process under the National Environmental Policy Act (NEPA), we offer the following comments that specifically relate to the Section 106 Historic Properties Identification Report (Section 106 Report). While we don't reiterate the NEPA process points here, it is important to recognize that our Section 106 comments nevertheless hinge upon the critical disconnect between the unduly narrow purpose and need statement for the project, and the unstated fact that all proposed roadwork, rather than just road improvements resulting from road closures, is to accommodate the Obama Presidential Center. In this sense, we note that many of the arguments regarding impacts set forth herein are causally related to, and would not occur but for the Obama Presidential Center project. This holds true for every comment below, except for the first comment pertaining to the project's Area of Potential Effect. Therefore, we respectfully submit the following comments with this context in mind.

I. The Area of Potential Effect (APE) Excludes Neighborhoods that Would Be Impacted by the Obama Presidential Center Project.

The Section 106 Report states that requests were "made for modifications to the Historic Architecture/Landscape APE. These requests were considered and evaluated based on three criteria: consideration of the development history that could be linked to Jackson Park, the likelihood of direct impacts as a result of potential construction, and the likelihood of indirect visual impact as a result of the construction of the OPC Tower," Section 106 Report, p. ii. Yet, the Historic Properties Identification Report prepared for FHWA and the National Park Service rejected designating Jackson Park Highlands and/or the South Shore Neighborhood as part of the APE. While we agree that the APE does not need to include the full area of both neighborhoods, with the acknowledged impacts, the APE should extend to portions of these neighborhoods. Simply, the range of road alternatives carrying traffic into and out of portions of South Shore are reduced from five to three, due to the proposed closures. Given that the proposed closures, ensuing circulation patterns, and traffic issues will almost certainly impact these neighborhoods, the decision to exclude at least the portion of South Shore as indicated from the APE seems illogical given criteria two highlighted above. Therefore, we recommend that the portion of South Shore bounded north to south between 67th and 71st Streets and east to west between Cregier Avenue and

Stony Island be included as indicated by the diagram below, as these meet the criteria in the Section 106 Report.

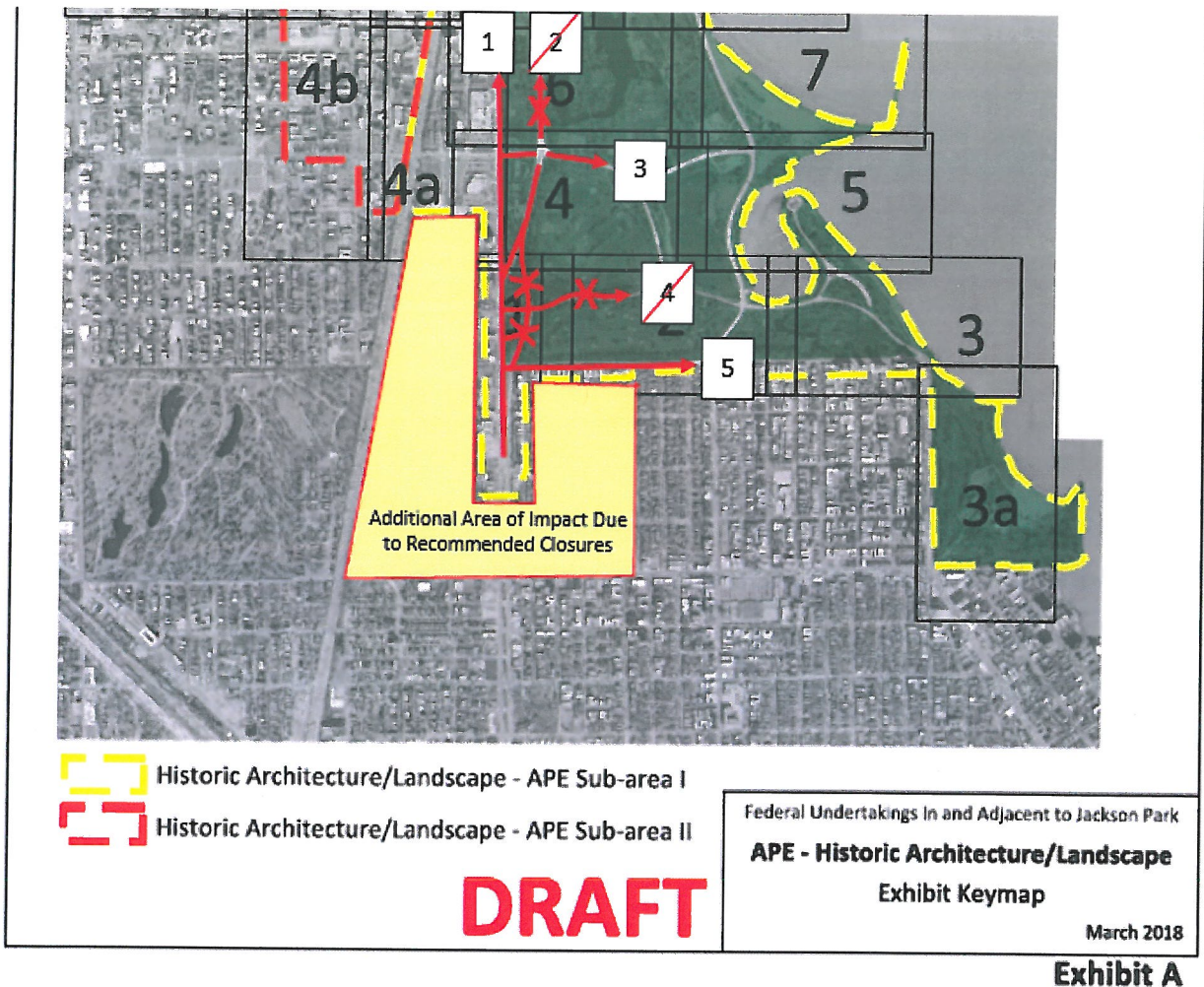


Figure 1: Diagram Supporting Revised APE

II. The Section 106 Report Landscape Integrity Analysis Omits or Overlooks Central Historic Features While Simultaneously Including Impairments of Jackson Park

Section 2.1.2 of this report describes that it is both helpful and necessary to understand and examine the historic landscape’s contributing and non-contributing resources as well as the site’s *character-defining features*. The document states that character-defining features “are the distinctive components of the landscape which contribute to its physical character and may include: topography; circulation; spatial relationships and views; plantings and planting design; and structures, buildings, and site furnishings. Other ephemeral qualities of the landscape such as seasonal change, and the play and light and shadow, may also be considered.” In relation to these character-defining features, Openlands has the following specific comments.

- Landscape Evolution of the Western Perimeter and Circulation, Sections 2.1.2.1 & 2.1.2.2.1: We are concerned that several vital historic elements, such as roads and connections, are not included in the section on circulation as well as the Figure 7 diagram. For example, the connections to 57th Street on the west side of the park, as well as the connections to the Midway

Plaisance have not been indicated in red and should be. As witnessed in Figures 3-6, and Figures 11-14 of the document, these roads are continually present throughout the history of the park plans, except for the 1871 and 1893 plans.

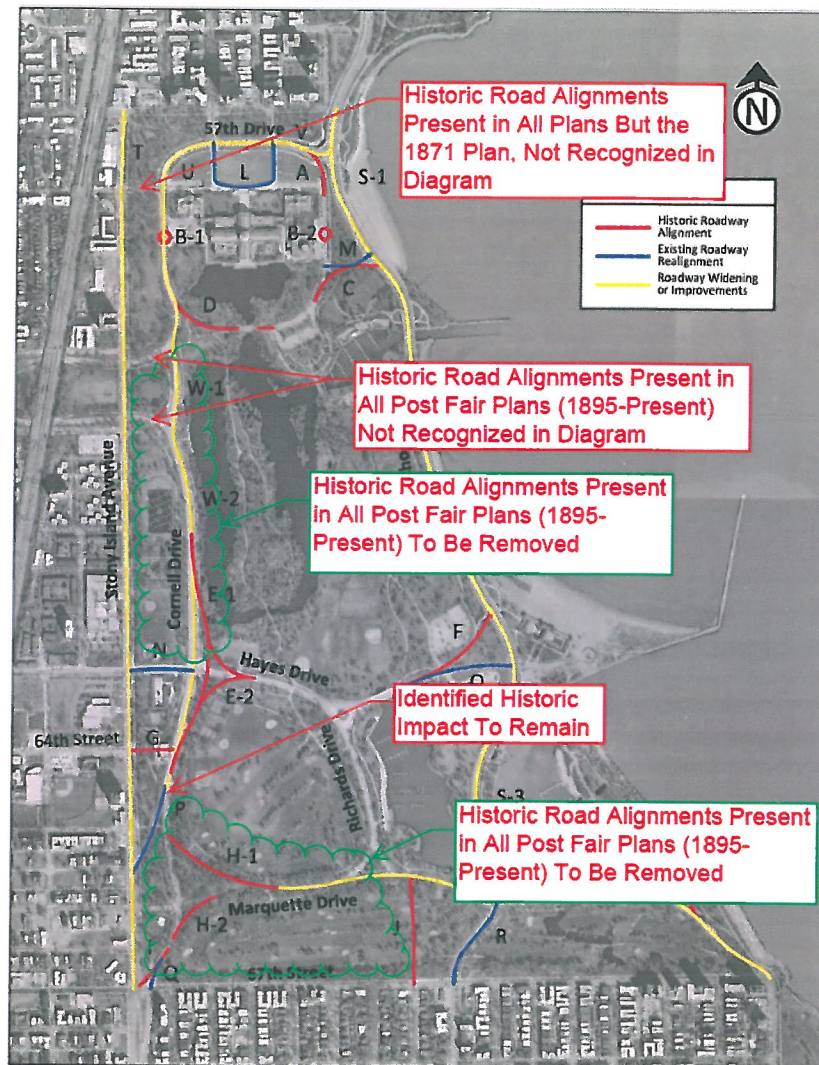


Figure 7: Jackson Park Historic Roadway Changes

Figure 2: Diagram Indicating Missing Information to HPI Report Figure 7

This oversight results in a major omission of the historic road alignment at the terminus of the Midway Plaisance, which alters its intended character and sense of place. The FHWA roadway project proposes to remove the southernmost east bound lane of the Midway where it connects into Jackson Park, removing not only an important and a historic symmetrical component of the plan, but also an important physical connection. It is precisely this connection that serves as a defining feature, for it behaves as both terminus to the Midway, as well as a crucial intersection and arrival point into Jackson Park. In removing this portion of road for ease of accommodating the northerly adjustment of the OPC site, a logical, important, and historically significant pattern of flow, views, and a manner of experiencing the park is lost. Ironically, the report describes this precise area on page 75 as “the area within the Western Perimeter that retains the highest level of integrity. The proposed spatial reorganization will alter the integrity of this important moment as

well as create significant traffic bottlenecks, which have not been suitably studied or convincingly vetted as part of the NEPA and Section 106 processes. With the severity of impacts, Openlands recommends that the diagrams and findings in the Section 106 Report be revised to consider and protect these valued historic features.

Furthermore, the Section 106 report states that “[t]he southbound lanes of S. Cornell Drive were rerouted across the southwest corner of the park. Other roadways were moderately widened, but generally following their historic alignments. As a result of these projects, the landscape of the Western Perimeter was substantially altered.” This contradiction results in acknowledging and protecting certain Section 106 resources while not protecting other historic features that have the same critical import. There are other examples of this omission. The Section 106 Report proposes the closure of the historic route of Cornell Drive at the southwestern corner of the park, while allowing the spur between Cornell and Stony Island, identified as an impact, to remain. A comparison of Figures 14 and 15 illustrate this contradiction, when juxtaposed to the proposed closures.

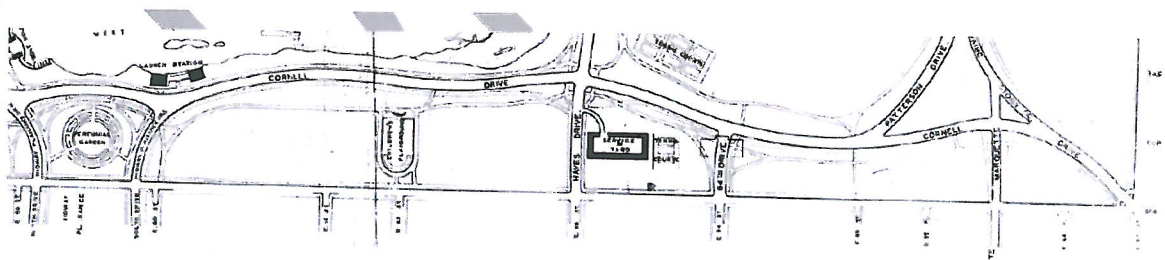


Figure 14: Western Perimeter - Jackson Park, [Chicago Park District], Revised, 1951 (note: figure oriented with north to left)

Figure 3: HPI Report Figure 14, For Reference



Figure 15: Western Perimeter - Current Aerial Photograph (Google Earth, April 2017)

Figure 4: HPI Figure 15, For Reference

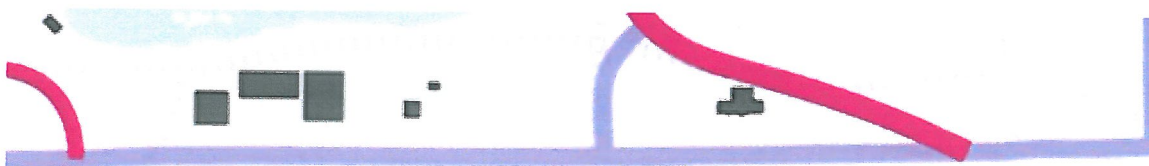


Figure 5: Chicago Park District Diagram of Proposed Road Closures at Western Periphery of Jackson Park

As indicated by these examples, while we support the goal of the Obama Presidential Center, the Section 106 study must accurately and fully assess and call for protecting all of these historic resources to meet the mandate of the statute and honor this important part of Chicago's heritage. It undermines both the study and the project to treat historic features of like importance in inconsistent ways.

- Topography, Section 2.1.2.2.2:

The Obama Presidential Center will alter the topography of Jackson Park. The historic park topography is an intentional design choice and distinguishing feature of this historic place. In describing the original plan of the design, Section 2.1.1.3 of the report indicates: "Olmsted's designs often took advantage of the unique characteristics of a site, even if he considered these natural qualities to be disadvantages. (Today, scholars refer to this as 'the genius of a place,' one of Olmsted's guiding design principals...). The landscape designers explained that the most 'obvious defect of the site' was 'that of its flatness.' But they managed to take advantage of this topography in their plan. They stated that 'the element of interest' that should be part of 'the park of any great city' would be 'a large meadowy ground of an open, free and tranquil character'" (p. 6). Openlands interpretation of this passage is primarily that flatness, or lack of topography, was not merely tolerated within the designs, but instead was embraced and came to be a central character-defining feature of the park.

In terms of elevation change, the general Park elevation differs by less than ten feet with the exception of overall topographical change of 15' from a low of an approximate elevation of 581 feet at the water's edge of the inner lagoon, to a highpoint elevation of approximately 596 feet surrounding the golf course clubhouse. Openlands recognizes that the proposed FHWA project does not significantly alter the topography of the site in and of itself. However, when viewed as necessary to accommodate the proposed Obama Presidential Center with its sledding hill and landscape covered buildings, the context of topography becomes a central and character-defining feature of the FHWA project and its impacts on the "flatness" of Jackson Park. In light of this, Openlands would appreciate information on how the Obama Presidential Center, with its approximate 30' or more change in elevation and topography, will honor and fit within the original design intent of the park?

- Landscape Scenery:

Openlands similarly is concerned that the proposed design for the center and supporting infrastructure will undermine the character of landscape scenery in Jackson Park. As described on page 17 in Section 2.1.1.10, "The Olmsted, Olmsted & Eliot Plan included 'three principal elements of the scenery' for Jackson Park: 'the Lake,' 'the Lagoons,' and 'the Fields.'" We appreciate that the Section 106 report recognizes:

"The ability to create a changing sequence of landscape scenes was one of the most brilliant aspects of the 1895 Olmsted, Olmsted & Eliot Plan. In a letter to President Donnersberger dated May 7, 1894, Olmsted emphasized the importance of the different treatments within the design composition. He asserted that to 'devise a comprehensive general design' each part of the 'park must be planned subordinately to and dependently upon every other part.'" Section 106 Report, p. 20.

Considering the deliberate choice with topography and balance of scenery, the Obama Presidential Center project, and resulting infrastructure should be designed to fit into and complement this interdependence and subordination of every other part. This point also underscores why the review process cannot be segregated to focus on different facets of the project, such as widening or altering roads. Narrowing the focus of the study project to this portion of road impacts may give the impression that there are minimal impacts to scenery. However, this partition will prevent us from resolving how the Obama Presidential Center, and all its related work, can fit into the intertwined and interdependent design of Jackson Park. Otherwise, the project, taken as a whole, undermines the historic intent and design by becoming the dominating feature of the park.

Furthermore, the addition of such a topographical change directly opposes one of the three principle design elements: that of the *field*. In discussing character-defining features of the park, the Section 106 Report states the primary notion of the field, the scenery, the views over the flatness and through the carefully located gaps in trees and shrubs are no longer dependent on every other part, but instead become subordinate to the Presidential Center project. Section 106 Report, p. 58. As a result, the FHWA project correspondingly rejects “the distinctive components of the landscape which contribute to its physical character and may include: topography; circulation; spatial relationships and views; plantings and planting design; and structures, buildings, and site furnishings” that constitute the previously mentioned historic integrity of a project. With this in mind, Openlands recommends that the Section 106 Report acknowledge impacts to these important elements of scenery and topography and evaluate how the project designs would avoid damage to these resources.

- The Structural Organization and Dominance of OPC Buildings Alters the Character and Design Intent of Jackson Park:

In discussing the Field Columbian Museum, now known as the Museum of Science and Industry (MSI), the Section 106 Report states:

"All other buildings and structures to be within the park boundaries are to be placed and planned exclusively with a view to advancing the ruling purpose of the park. They are to be auxiliary to and subordinate to the scenery of the park. This Art Building is to be on a different footing. Plantations, waters, roads and walks near it are to be arranged with a view to convenience of communication with the Building; with a view to making the Building a dominating object of interest, and with a view to an effective outlook from it, especially over the lagoons to the southward." Section 106 Report, page 23.

This reference is relevant on two accounts. First, it indicates that an important organizing principle of the design is for buildings within the park to be both auxiliary and subordinate to the scenery. Second, is that the MSI is an exception to this intention as “the dominant object of interest.”

Once again, constricting the scope of the project to road improvements reduces the appearance of conflicts. Since, however, the roads serve as the necessary vehicle to accommodate the Obama Presidential Center, the historic context referenced above is jeopardized by the project. The proposed OPC tower alone will become the dominating factor of the park, reaching more than 100’ taller than the MSI dome. Even if the buildings are predominantly covered by landscaping,

the topographical change resulting from covering the buildings alone will both become the dominating as well as objectively serve as a barrier, cutting the park off from the adjacent neighborhood. This needs to be considered and addressed as an impact to this Section 106 resource.

- Planting Design and Trees: Section 2.1.2.2.3:
In section 2.1.2.2.3, planting design is addressed in the same section as spatial organization and views: “The designers used planting design, spatial organization, and the shaping of views to create the landscape character they sought while also incorporating these functional elements.” Furthermore: “West of S. Cornell Drive, the landscape had a naturalistic planting design with mowed lawn, dense shrub masses, and irregularly planted trees. Scattered openings within the plantings provided areas for physical access as well as beautiful views of the West Lagoon, the Wooded Island, and the lagoon’s small islands.” The document indicates that the historic planting palette was comprised of oaks, lindens, ashes, maples, willows, and catalpas while the understory trees included dogwoods, redbuds and hawthorns, as well as a dozen or more species of shrubs.

While the proposed design of the Obama Presidential Center would certainly introduce a greater diversity of species than currently exist as well as to return the multi-layered canopy, the precise species remain to be seen. What is certain, however, is the association between planting design, spatial organization, and views will be altered in such a way as to permanently impact the design intent of the site. Through this project, no scattered openings and framed views of the lagoon will be had from street level, or anywhere other than the top of the proposed landscape covered buildings. Furthermore, while the introduction of the report indicates that trees are not to be treated as individual items, it should be noted that the ecosystem benefits of mature trees are far greater in terms of the mitigation of pollution, runoff, higher temperatures, and other climactic effects than those of immature trees. While the newly installed landscape will no doubt deliver future similar benefits, this will occur in two to four decades time. With this impact, the ecological benefits of the existing 400 plus mature trees will be lost precisely at the period where they will be needed most, which is now and in the coming decades.

III. Conclusion

With these comments in mind, we appreciate the opportunity to participate in developing this important study. Additionally, we echo our public comment made at the March 29th meeting lauding the Section 106 public process and the effort to undertake meaningful input and address legitimate issues with the project. We remain concerned that the rigor of this process has not been extended to other aspects of the review process. It is our hope as a consulting party not to derail either the process or the project(s). Rather, it is our goal to offer these comments for the public record to indicate our perceived flaws either in the project approach or in the contextual arguments within the report so that they may be addressed to make the overall result of the project better within the context of this important and treasured historic Park. Thank you in advance for your thorough review and thoughtful consideration of our comments.

Sincerely,



Gerald W. Adelmann

President and CEO

Preservation Chicago

Citizens advocating for the preservation of Chicago's historic architecture

Brad Suster

President

Jacob Kaplan

Vice President

Debbie Dodge

Secretary

Susannah Ribstein

Treasurer

Board of Directors

Stuart Berman

Cathie Bond

Debbie Dodge

Joyce Jackson

Emily Nielsen

Jack Spicer

Andrea Reed

Charles Vinz

Preservation Chicago

Citizens advocating for the preservation of Chicago's historic architecture

April 19, 2018

Ms. Abby Monroe, Coordinating Planner, Department of Planning and Development

Ms. Eleanor Gorski, Department of Planning and Development

John Sadler, Chicago Department of Transportation

City of Chicago

121 N. LaSalle Street

Chicago, Illinois 60602

Re: Jackson Park -Section 106 Process relating to the proposed park and mobility changes for the Obama Presidential Center-OPC, the South Lakefront Plans (SLFP) and proposed changes to the Jackson Park and South Shore Cultural Center Golf Courses.

Dear Abby Monroe, Eleanor Gorski and John Sadler,

Thank you for the opportunity to comment as part of the Section 106 Hearings on the many proposed changes to Jackson Park and the South Shore Cultural Center, as a Consulting Party to the process and plans.

We at Preservation Chicago are concerned about many aspects of the plans, which will impact the look, feel, and appearance of this amazing civic resource. It is in a sense difficult to separate all of the many components of these several legacy parks, relating to historic buildings and structures, features, vistas, trees and their relationship to this park, as the park is "a whole idea" and "a work of art," by the very best of the best in landscape architecture and design. Jackson Park is perhaps unparalleled in its vision as an urban park space and its relationship to the Lakefront and neighboring communities. It is both a Chicago and world treasure that should not be harmed.

Preservation Chicago feels strongly that the impact of the proposed changes to Jackson Park is significant and detrimental to the Frederick Law Olmsted and Alfred Caldwell landscapes, features of the park and its overall design. These plans as proposed will without a doubt, create a negative and adverse effect to these historic parks.

Designed by some of the country's most notable landscape architects, known the world over for their work, the proposed destruction of this 20-acre western section of Jackson Park has the potential to be both a long-term embarrassment to the City of Chicago and to the institution proposed for this site. Jackson Park and some of the adjoining areas

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within the APE-Area of Potential Effect, has the potential to be irrevocably harmed and mostly destroyed by these heavy-handed plans.

Jackson Park is a remarkable park, greenspace and open space, which is among Chicago's most important legacy parks and while some of its smaller structures and pathways have fallen into disrepair, it is far from being a distressed or needing to be "rediscovered" or reinvigorated as implied in some of the documents and presentations. Realizing this is a first-class city park, and far from an amusement and entertainment venue, we are concerned about the overall impact of all of the proposed plans on this significant park and its landscape features, including the following components:

1. The removal of Cornell Drive, an original Olmsted feature of Jackson Park, which should be considered for restoration to its original narrower proportions, versus a complete removal and a regrading of the 20-acre site. We are of the opinion that this is a significant feature of the park, which created an important north-south transverse access roadway and pathway through the park, winding through tree-lined spaces, alongside lagoons, meadows, with long vista views of the park and other wooded spaces.
2. A proposed tower in excess of 200' tall-which amounts to a 20-plus story building in height, even if the building contains about 10-12 floors. This visually tall and disturbing feature of the complex will also visually impact the park, its view sheds, and overall visual features from many directions, both from the Midway, within the park, and at the park's borders and formal entries. This larger feature and monumental building belongs on another nearby site, if this height is desired, as it would be by far, the tallest building ever constructed in a Chicago park, which is generally known for more human-scaled and formally proportioned buildings, employing Classical guidelines and not to overwhelm the naturalistic features. Also, the potential harm or loss and adverse effect on Alfred Caldwell's plantings at the park's western perimeter, with approximately 300 trees to be cut and destroyed, along with a raised berm, extending from about 60th Street southward. This green feature was added by Caldwell in the 1930s and meant to shelter the park and its visitors from the noise, traffic and bustle of busy Stony Island Avenue, and to create a calming and restful park experience. Alfred Caldwell's Lily Pool, also known as the Lincoln Park Lily Pool, on Chicago's North Side, has been a Designated Chicago Landmark, since 2002, signifying the importance of Caldwell's work in the Chicago Park system.
3. The impact on the golf course at Jackson Park, said to be the oldest course west of the Allegheny Mountains, with its pastoral settings and landscapes. Also, the potential loss of thousands of trees, many of them old growth, for the golf course fairway realignments between Jackson Park and the South Shore Cultural Center. Also the impact several fairways, ponds, plantings and greens designed by Alfred Caldwell and noted in drawings forwarded to Eleanor Gorski from the Chicago Park District archives and dating to the late 1930s. Some of these features are not addressed in the historic documents reports.
4. The loss of a fabulously large archeological site, tied to the World's Columbian Exposition-Chicago World's Fair of 1893, with thousands of artifacts uncovered

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- in seven coring sites. Certainly this site contains many foundations of World's Fair Buildings, including architect Sophia Hayden's Woman's Building and the nearby Children's Building, in addition to a host of building materials, fragments and ephemera from the Fair, which could lead to more insightful information and research on one of Chicago's most famous hosted events of all time, drawing 27.5 million people or 43% of the nation's population in 1893. Construction of new buildings on this site, with regrading and new foundations will destroy these features and objects forever.
5. The removal and or destruction of the principal western gateway and symmetrical roadways into Jackson Park at the Midway Plaisance, along with the Woman's Garden, which are significant features of the park

We ask that the City of Chicago reconsider all of these plans and encourage the Obama Foundation to relocate to another nearby site, where all of these features can be implemented in a way that would truly benefit a community and neighborhood, or a university. The site as proposed is essentially an extension of the University of Chicago Campus into Jackson Park and situated in Hyde Park, as the campus and community has grown southward in the past decade.

Respectfully, we cannot overlook the time and resources spent within the City's many departments, including but not limited to DPD-Department of Planning and Development, CDOT-Chicago Department of Transportation and the Chicago Park District, which must equate to thousands of hours of time and perhaps millions of dollars worth of expenditures on this project by the City and passed onto its citizens. All of that in addition to consultant's time, also perhaps absorbed by taxpayers for what will become a private museum in one of our historic parks – essentially on public parkland, which is free of cost. That is a tremendous price to pay and this could have all been avoided by locating this center across the street from Jackson Park or Washington Park, or near the Midway, on at least five other fine-quality nearby locations. This is an additional burden to consider when also including the potential costs of the proposed roadway reconfigurations, estimated to be perhaps far beyond the estimated \$175 million dollars and yet the project continues to grow in cost with each passing day.

The current site selected in Jackson Park has so much history, dating from the 1870s to today and perhaps this would be better suited to the west. Perhaps integrated into the South Side YMCA complex in the Woodlawn Community, with its many large parking lots, its vast green grass surfaces and areas around the building, as so many functions of the community buildings may already be part of other nearby institutions in Hyde Park. Please let us know how we can assist in such efforts if desired to pursue alternative sites.

Sincerely,

Ward Miller

Ward Miller, Executive Director



Illinois Department of Natural Resources

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

Bruce Rauner, Governor
Wayne A. Rosenthal, Director

FAX (217) 524-7525

Cook County

Chicago

New Construction of The Obama Presidential Center
"Section 106 Historic Properties Identification Report"
IDOT Seq #-20908, IDOT-Sec:-17-B-7203-00-Es
SHPO Log #021081017

April 19, 2018

Brad Koldehoff
Illinois Department of Transportation
Bureau of Design and Environment
2300 S. Dirksen Parkway
Springfield, IL 62764

Dear Mr. Koldehoff:

Thank you for submitting the draft of the "Section 106 Historic Properties Identification Report for Federal Undertakings In and Adjacent to Jackson Park, Cook County, Illinois," prepared by CivilTech and released on March 15, 2018. Please note that our office previously commented in a letter on March 28, 2018, on the archaeological Phase I reconnaissance report prepared by Tolmie and Branstner for the Illinois State Archaeological Survey. This letter is to comment only upon the draft architectural survey report referenced above. Our comments are required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties."

Staff has reviewed the draft document and its appendix and does not concur with the period of significance as proposed, which is stated on page 54 to be 1875–1953. Instead, the State Historic Preservation Office recommends a period of significance from 1875–1981 in order to include various events, milestones, and design changes to Jackson Park that reflect broad patterns of social history in Chicago and the neighborhoods surrounding the park and, in particular, may relate to the following National Register areas of significance under Criterion A: Community Planning and Development; Entertainment/Recreation; Military; Politics/Government; Social History; and Transportation. Jackson Park and the Midway Plaisance already are designated as significant for their landscape architecture, and the park includes contributing architectural resources under Criterion C.

While the current "50-year cutoff" date for the National Register of Historic Places is 1968, our recommended time period includes several significant changes and events outlined in this report, such as:

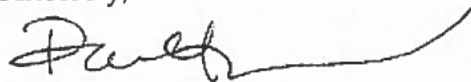
- 1952–1955, the commissioning and installation of the Masaryk statue on the Midway;

- 1957, the Chicago Park District's road changes and the construction of the excellent Jackson Park Field House, designed by Ralph Burke;
- 1954–1971, the U.S. Army's Cold War-era Nike missiles site, from their installation through removal;
- 1960s, the establishment and activities of the South Shore Commission, a civic group that sought to stem the tide of "white flight" and achieve a stronger racial balance within the community;
- 1968, the construction of the Lowenberg and Lowenberg-designed residential tower of 38 stories at 1700 E. 56th Street, which today remains the tallest building on the South Side of Chicago;
- 1971–1976, community activism, support, and participation – civic pride – as demonstrated by community groups planting native species at the former missile site to create what is now known as the Bob O' Link Meadow;
- 1972–1976, the City of Chicago (the Chicago Public Buildings Commission and, subsequently, the Chicago Park District) acquires the South Shore County Club and effectively desegregates the buildings, opening it for the first time to Blacks, Jews, and other minorities – making it a true public amenity and a "Palace of the People" (see page 102);
- 1976, the relocation of the Linné statue from Lincoln Park to the Midway Plaisance, where it remains today, and which recalls Lorado Taft's vision for a collection of statues to be placed along the Midway;
- 1977, the Chicago Park District dedication of the Wooded Island as the Paul Douglas Nature Center;
- 1980–1981, significant federal investment in Chicago and Jackson Park through the Urban Park and Recreation Recovery (UPARR) program; and continued civic pride and activism that resulted in the revitalization and rehabilitation of the Japanese Garden, which the City rededicated in a 1981 ceremony under Mayor Jane Byrne

Staff enjoyed reading the survey report and the inventory data included within the appendix document. We suggest careful reconsideration of many of these resources to be included as contributing to the districts already designated, or to districts proposed for future designation. If a detailed response to every contributing or non-contributing resource is needed, please let our office know, and staff will prepare a spreadsheet.

Many thanks for giving our office the opportunity to comment on this draft report. We assume that a report will be finalized at a future date and submitted for our consideration of eligibility and effects. If you have any questions, please contact me at (217) 785-5031 or rachel.leibowitz@illinois.gov.

Sincerely,



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



April 19, 2018

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

Dear Ms. Monroe,

As a designated consulting party to the National Historic Preservation Act Section 106 review and the National Environmental Policy Act (NEPA) review underway for Jackson Park, The Cultural Landscape Foundation (TCLF) is pleased to comment on the following recently released documents: The Draft Historical Properties Identification Report; the Archaeological Properties Identification Report; and the Draft Purpose and Need Statement. We note that TCLF submitted several questions during the Section 106-related public meeting on March 29, 2018, and although answers were supposed to be forthcoming “in a week or so” from that date, we have yet to receive them. Our questions sought clarity on many issues raised in the aforementioned documents, and we believe that a good-faith effort to answer them is fundamentally important to the proper conduct of the Section 106 review process.

Draft Historical Properties Identification Report (HPI)

Section 2.0 (“Historic Context Statements”) of the HPI is missing two critical statements regarding the historical context of Jackson Park and the Midway Plaisance: The first statement is that Jackson Park, the Midway Plaisance, and Washington Park (the South Park System) together comprise the only intact park system designed by Frederick Law Olmsted, Sr., and Calvert Vaux outside of New York State. The second statement is in regard to the 1895 redesign of Jackson Park by Olmsted, Olmsted & Eliot, which occupies a special place in the history of landscape architecture as perhaps the nation’s earliest large-scale brownfield-remediation project, as has been recognized in very recent scholarship.¹ These facts provide crucial context about the history and significance of Jackson Park and the Midway Plaisance and should be included in the HPI, which is meant to elucidate such key information.

Section 1.1 (“Historic Architecture/Landscape Area of Potential Effects”) of the HPI states that “potential **indirect visual effects** of the OPC” (emphasis added) have in part determined the boundaries of both subareas I and II of the Area of Potential Effects (APE), further noting in the latter case that “APE Sub-Area II captures potential **indirect visual effects** of the OPC site west of the Illinois Central RR up to one-half mile radius beyond the tallest building proposed for the OPC site” (emphasis added). This section of the HPI clearly indicates, then, that the potential visual effects of OPC buildings were of prime importance in establishing the APE. Citing the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*, among other documents, Section 2.1.3 (“Jackson Park Landscape Integrity Analysis”) of the HPI further highlights the potential importance of visual and spatial relationships as character-defining features of Jackson Park:

In order to fully analyze a designed historic landscape, it is helpful to identify not only its contributing and non-contributing resources, but also the site’s character-defining features. These are the distinctive components of the landscape which

*contribute to its physical character and may include: topography; circulation; **spatial relationships and views**; plantings and planting design; and structures, buildings, and site furnishings (emphasis added).*

What is, however, missing in Section 2.1.3 and the subsequent analysis of Jackson Park's historical integrity is a corollary discussion of the park's generally flat topography and the various panoramic views to Lake Michigan. These character-defining features of the park were the basis for Olmsted's design, which gives access to water via a system of lagoons that also visually connects with views of the lake.² Although those facts are included in certain sections of the HPI that present a narrative history of the site,³ they are not explicitly considered in any analysis of the park's overall historical integrity. Given the fundamental importance of visual and spatial relationships in the various analyses outlined in the *Secretary of the Interior's Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes*, one would have expected those terms to permeate any discussion of historical integrity, whether in regard to particular features or to the park as a whole.

Related to this issue, the extent to which the HPI isolates the western perimeter of Jackson Park and characterizes it as having low historical integrity is also noteworthy:

One area of the park in which the landscape integrity has been somewhat comprised is the Western Perimeter... The majority of the NPS Federal undertaking is proposed to occur within the Western Perimeter of Jackson Park, which is the evaluation of converting UPARR parkland from recreational to non-recreational use. Therefore, the following section includes a detailed landscape integrity analysis for this area including its historic development and its character-defining features (p. 64).

First, the relevance of where "the majority of the NPS Federal undertaking is proposed to occur" is greatly diminished by the physical nature of the 235-foot-high tower planned as part of the Obama Presidential Center (OPC); what is far more relevant is the degree to which the tower and other parts of the OPC—newly introduced elements that would impact visual and spatial relationships far beyond their footprint—will adversely affect (directly, indirectly, and cumulatively) the historical resources within the APE. Second, while the HPI reports that Jackson Park "generally retains a high level of integrity" (p. 60), it surprisingly concludes that the historical integrity of the western perimeter of the park is categorically low (see Section 2.1.2.3: "Western Perimeter-Summary of Integrity"). That difference is chiefly attributed to "the impact of roadway projects and loss of plantings throughout the area" (p. 75). But by that logic, the southern perimeter, northern perimeter, eastern beachfront, West Lagoon, Wooded Island, and other areas of the park must also be regarded as having low historical integrity because they are in equal proximity to roads that have been widened and are areas that have also experienced a loss of plantings.

Indeed, the HPI repeatedly indicates that widened roadways have especially detracted from the park's integrity: "...some of the roadway system modifications have diminished the landscape's integrity of design in some areas." (p. 59); "...Jackson Park's setting has been disrupted by widened roadways." (p. 59); "...some roadway alterations have diminished this feeling [of being far away from the hectic urban environment]" (p. 60); "roadway alterations have had an impact on the park's overall integrity..." (p. 60); "[Cornell Drive] was widened and realigned several times between the 1930s and early 1970s in a manner that severely diminished the historic integrity of the Western Perimeter" (p. 64).

The report thus gives the impression that the park's historical integrity is intact *despite* its roadways. But that is at odds with the opinion of the Illinois Historic Preservation Agency as expressed in official comments related to the Ecological Restoration of Jackson Park in accord with its duties under the Section 106 of the National Historic Preservation Act. In a letter dated December 10, 2012, Deputy State Historic Preservation Officer Anne E. Haaker wrote that the Jackson Park's roadway configuration is a defining characteristic of the park's 1905 plan that must be respected:

*As currently designed, [Jackson Park] retains a great deal of its integrity. While some of the original features have been modified, or removed, the remaining defining characteristics such as the overall plan developed by Olmstead, Olmstead, and Elliot as depicted on the 1905 map must be respected. These include, but are not limited to, the Golden Lady statue, the Osaka Garden, **the current roadway configuration**, the beach house, and the configuration of the lagoons (emphasis added).*

This leaves one to wonder how, in fewer than six years, one of Jackson Park's defining characteristics, specially noted by the Illinois Historic Preservation Agency as deserving of protection, became a feature that substantially detracts from the park's historical integrity.

We also note that Section 2.1.1.23 ("Restoration Efforts Begin 1980 to Early 1990s") of the HPI refers to only one UPARR grant related to Jackson Park, but our understanding is that at least one additional UPARR grant also pertains to the park. Although the Section 106 process is about to enter the phase of assessing the effects of the OPC and federal undertakings, no document provided to consulting parties to date has included the applicable Section 1010 Project Boundary Maps and/or other descriptive documentation approved by the Department of the Interior during the UPARR application process, making consultation on those points quite difficult, to say the least. It is our further understanding that the OPC and/or City of Chicago have yet to submit a programming plan to the National Park Service regarding whether some portion of OPC facilities would meet the recreation usefulness standard of the UPARR program. Absent that submission, we must assume—and indeed expect—that plans are underway to accommodate the full extent of recreational space potentially displaced by the OPC, rather than some portion of it. Clearly no portion of the OPC campus can reasonably be considered a substitute for public recreational space, because presidential libraries, let alone presidential "citizenship campuses," are, after all, deeply ideological spaces that some self-selected portion of the population will naturally avoid—a point clearly made by OPC architect Billie Tsien, who, in a recent public forum, said that "nobody" would agree to design the Trump Presidential Library.

Archaeological Properties Identification Report (APIR)

We are genuinely surprised and troubled that the APIR offers an evaluation of the Area of Potential Effects' National Register of Historic Places eligibility solely under Criterion D. Such a methodology is woefully inadequate because it fails to analyze the archaeological materials under the full range of criteria that reflect the significance of Jackson Park. The Advisory Council on Historic Preservation (ACHP) has given specific guidance regarding the criteria for such archaeological assessments, but that guidance has not been followed in this case. The ACHP's *Section 106 Archaeology Guidance* (p. 25, item 37) clearly states that an archaeological site can be "eligible under Criteria A, B, C, and D" and goes on to say:

The ACHP's Section 106 regulations call for the federal agency to consider how all of the National Register qualifying characteristics of a historic property may be affected by the undertaking [36 CFR § 800.5(a)(1)]. Accordingly, when conducting its evaluation, a federal agency should determine the full range of criteria that may apply to a property (emphasis present in the original document).

To acquire even the most cursory sense of the larger significance of Jackson Park that qualifies it for consideration under additional criteria, one need go no further than the HPI, which explicitly emphasizes the park's key role in the broader historical movement of reform-era recreational planning: "One of the most significant aspects of the 1895 Plan was that it included one of the Olmsted firm's first open-air gymnasiums (**an amenity that would soon influence park development throughout the nation**)" (p. 67, emphasis added). The HPI also makes abundantly clear that Jackson Park was the site of the World's Columbian Exposition, whose influence in shaping the cultural life of the nation is very well known. Likewise, there can be little doubt of the renown of Frederick Law Olmsted, Sr., whom the HPI says is "recognized today as the 'Father of American Landscape Architecture'" (p. 5).

In other words, the HPI itself makes a strong case that the archaeological evaluation for Jackson Park should also have been carried out under Criteria A and C as a site "associated with events that have made a significant contribution to the broad patterns of our history" (Criterion A) and that "represents the work of a master" (Criterion C). Until the archaeological materials are fully evaluated under the additional criteria, the APIR must be regarded as incomplete and, therefore, unready for further substantive review or comment.

Draft Purpose and Need Statement

Section 1.3.4 ("Obama Presidential Center (OPC)") of the Purpose and Need Statement introduces the University of Chicago's proposal to locate the OPC on Chicago's South Side and directs the reader to Exhibit 1b; but Exhibit 1b is a map of Jackson Park, not the University of Chicago proposal. Given that the proposal is thus introduced as a supporting document for the Purpose and Need Statement, which is itself a foundational element of the Section 106 review, it is highly unusual that the proposal has not been included as an exhibit or addendum to the document. Furthermore, its absence impedes the fullest possible understanding of both the purpose of and need for the actions now under consideration. **We therefore request that a copy of the University of Chicago proposal be made available to all consulting parties immediately.**

In closing, we look forward to responses to all the issues and questions raised heretofore. We take seriously our obligations and duties as an official consulting party to the Section 106 and NEPA review processes, which we believe are best served by complete transparency.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founder, President, and CEO, The Cultural Landscape Foundation

cc: Eleanor Gorski, Chicago Department of Planning and Development; Rachel Leibowitz, Illinois State Historic Preservation Office; Matt Fuller, Federal Highway Administration; John Sadler, Chicago Department of Transportation; Juanita Irizzary, Friends of the Parks; Margaret Schmid, Jackson Park Watch; Ted Haffner, Openlands; Arleyne Levee and Lucy Lawliss, National Association for Olmsted Parks; Michael McNamee, Save the Midway!; Lisa Dichiera, Landmarks Illinois; Ward Miller, Preservation Chicago

¹ O'Donnell, P. and Gregory De Vries, "Entangled Culture and Nature: Toward a Sustainable Jackson Park in the Twenty-First Century," in *Change Over Time*, Vol. 5, No. 2 (Fall 2015), 248-265.

² Bachrach, J.S., "Jackson Park Design Evolution," Chicago Park District, Department of Research and Planning (Sept. 1995), p. 1.

³ E.g., Section 2.1.1.11 ("The Lake Shore"): "Olmsted asserted that the 'finest thing about the Park is unquestionably the view of Lake Michigan, which is obtained from the shore.'"; Section 2.1.1.3 ("Original South Park Plan"): "[Olmsted] and Vaux wrote that there was '...but one object of scenery near Chicago of special grandeur or sublimity, and that, the lake, can be made by artificial means no more grand or sublime.' They believed that dramatic views of the lake would make up for the site's other deficits, stating the 'lake may, indeed, be accepted as fully compensating for the absence of sublime or picturesque elevations of land.'"

Abby Monroe

From: DPD
Sent: Monday, April 16, 2018 2:22 PM
To: Abby Monroe
Subject: Fw: public input for the OPC federal reviews

From: Ira Abrams <[REDACTED]>
Sent: Friday, April 13, 2018 9:16 AM
To: DPD; Mayor Emanuel; Rebekah Scheinfeld; Michael Kelly
Subject: public input for the OPC federal reviews

To Whom it May Concern:

I am writing to register my opposition to planned public lands changes related to the proposed Obama Presidential Center and especially its Golf Course.

My primary concern is that the massive changes to historically significant, well-used, popular grounds and arteries will have no benefit in terms of greater use of the parks or meaningfully greater economic activity in the neighborhoods or the city as a whole.

These changes are being pushed forward without a serious needs-analysis or a meaningful demonstration that they will result in more use of the parkland or even an economic benefit to nearby neighborhoods or the city at large.

The changes that are being proposed are boring and cheap. They will degrade a very attractive greenspace. They will also preclude existing uses of the grounds by favoring small groups who, at any rate, already have access to the space.

Building baseball diamonds on the Midway adds nothing meaningful to the space but does detract from it from numerous user viewpoints. Upgrading the existing golf course similarly is just not a serious project from any point of view except that of a small number of high-income users who already have access to good greens.

While I support the construction in this location of an Obama Presidential Center, I do not believe that as proposed it will be enough of an economic boon to justify the realignment of and desecration of the historical and popular area in which it is being located.

The OPC has from the start been conceived as an opportunity to make unjustified, unnecessary and unwise changes in a space that does not need those changes. It could have been otherwise. The OPC could have been seen as a way to make the most of the existing community resources and parks. It is the opposite of that. It simply appropriates and makes more or less arbitrary changes in the community to serve far away or hypothetical communities.

The level of insensitivity involved in the conception of this project is evident at every turn. The golf course is the most obvious affront. It takes away access to golf for South Side residents, has no prospect of economic viability, and serves only far away constituencies. It is, effectively, a subsidy for suburbanites.

No one has asked for baseball diamonds on the Midway Plaisance, but the OPC publicity machine dutifully drums up support for baseball diamonds to support its argument that these are needed.

How have we come to this point of absurdity where we are looking for valueless, unwanted changes that can be made in the parks to justify the valueless and unwanted changes that are proposed for the parks?

We already have a thriving, community-supported farmers' market; but the OPC is now promising a nearby new farmers' market. This would appropriate the existing markets' purpose and resources, effectively wiping out the current community-supported one in favor of a market that has no roots in the neighborhoods.

Why? These cannot be the values of President Obama as we knew him and voted for him! We have a thriving park, a thriving set of communities, and a sense of civic engagement in protecting and developing this. The OPC is a direct affront to the sense that our voices matter at all in civic planning. I can't imagine that President Obama would be happy to know this.

Thank you for your consideration,

Mr. Ira Abrams

██████ S. Kenwood Ave., ██████
Chicago IL 60615

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April 17, 2018

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

Re: Comments on the Section 106 Archaeology and Historic Properties Inventory Reports

Thank you for the opportunity to comment on the amazing and most informative body of research amassed for the NEPA/NHPA (Section 106) review process. I attended the Section 106/CDOT review meeting on March 29 as a Consulting Partner for the Rosalie Villas Homeowner's Association and as a private citizen and 50-year resident of Hyde Park. I want to open my statement by stating that I fully support the construction of the Obama Presidential Center in Jackson Park and found nothing in your thoughtful and detailed assessment that caused me to change my mind. In fact, I believe design goals proposed by the Obama Foundation and Chicago Department of Transportation not only respect Olmsted's design principles but also offer remedies to poor design decisions that may have diminished the Olmsted legacy over the past 50 years.

My first thought as I read the Section 106 reports was: History doesn't stop happening; it continues to be made with every decision made or not made. We are fortunate to know a lot about the history of Jackson Park and particularly the two pivotal events that informed both the development of the park and the growth of the City of Chicago. The first was Olmsted's 30 year+ involvement with the development of the South Park System and the site for the 1893 Columbian Exposition. His work became the standard for future urban park development including then-revolutionary principles of landscape design and the concept of parks as democratic and inclusive spaces available to all. The second is the landmark 1893 Columbian Exposition which heralded the rebirth of Chicago after the devastation of the 1871 Chicago Fire. In future years I hope the creation of the Obama Presidential Center will be seen as another such historic event, both for its celebration of America's first African-American president but also heralding the rebirth of the south side of Chicago, economically and as the birthplace of a new movement to train and empower youth to be the next generations of this City's and Country's leadership.

But the primary purpose of this assessment is how the process of creating new history affects what we might lose of the past, as it specifically relates to how the OPC might affect the preservation of Jackson Park as a National Historic Site representative of the Olmsted legacy. I would suggest that the planning for the OPC acknowledges and respects Olmsted design principles and may in fact remedy some of the problematic changes made outside of the park's period of significance that have negatively affected the historical integrity of the Park.

I was taken by the report's discussion of the seven aspects for assessing integrity: location, design, setting, materials, workmanship, feeling, and association. I believe that the OPC

planning team understood the importance of these qualities and applied them thoughtfully in their design.

Examples include:

The OPC is sited on the Western Perimeter of the park, which the report cites as the most compromised section of the park given post-1953 roadway projects, changes to site purpose and functionality, and loss of plantings throughout the area.

The OPC offers a minimal building footprint, taking up only 2.6 of the 19.3 acres of parkland making up its site. The building clustering, including the museum tower sited in proximity to the Museum of Science and Industry (formerly the Field Columbian Museum), is located in the area of the park that Olmsted specifically designed and landscaped to emphasize the “architectural harmony” of the Field Columbian Museum building and its surroundings including “plantations, waters, roads, and walks near it.”

The campus layout proposes a densely planted landscape that includes at least one landscaped roof and introduction of more trees and plantings than currently exist on the site. The multi-level landscape plan references the rolling berm concepts and planted transition edges used in Olmsted’s designs for that area.

Finally, the proposed closing of Cornell Drive as a multi-lane highway offers the opportunity to reunify the western perimeter with the rest of the park and re-create an attractive and safe roadway for pedestrians and non-vehicular traffic. In doing so, it helps mitigate, if not erase, one of the more terrible design errors that have marred Jackson Park since the 1960’s.

I believe that the siting of the OPC offers minimal loss of integrity to Jackson Park as a whole and as a significant historical site. The thoughtful and respectful application of many of Olmsted’s guiding principles to the Center’s design revitalizes and expands the use of an undervalued area of the park. The project is a win-win for the south side of Chicago and its people by introducing change with a purpose and in doing so creating new history on a strong past.

Thank you.

Mary Anton

██████████ South Harper Avenue

Email: bmaa@uchicago.edu or ██████████

From: [DPD](#)
To: [Abby Monroe](#)
Subject: Fw: Public Input for the OPC Federal Reviews
Date: Friday, April 06, 2018 12:48:58 PM

From: Nancy Baum [REDACTED]
Sent: Friday, April 6, 2018 11:47 AM
To: DPD
Cc: Mayor Emanuel; Rebekah Scheinfeld; Michael Kelly
Subject: Public Input for the OPC Federal Reviews

I think it is a terrible idea to put a baseball mound at the East End of the Midway Plaisance. Yes, something should go there, but not that. A baseball mound is not for everyone. The nearby neighbors should think about what would make sense for that area which is swampy and unusable now. Maybe a very nice playground with park benches around. Maybe a meditation garden. What is happening to the perennial garden?

Nancy B. Baum
5221 S. Blackstone
Chicago 60615
[REDACTED] (U can text me)
[REDACTED]

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From: [DPD](#)
To: [Abby Monroe](#)
Subject: Fw: public input for the OPC federal reviews
Date: Friday, April 06, 2018 12:48:35 PM

From: John "Jay" Ellison [REDACTED]
Sent: Friday, April 6, 2018 10:17 AM
To: DPD
Cc: Rebekah Scheinfeld; Michael Kelly
Subject: public input for the OPC federal reviews

As a resident of the South Shore (Jackson Park Highlands), I write to voice my strong support for the OPC and CDOT plans to build the OPC and change the streets in the area of Jackson Park. I am a bike commuter and would love to see more opportunities for safe, non-motorized traffic in the park area. I also believe that the economic benefit, and the cultural additions, to the South Side from the OPC and the golf course will be significant, and I really do want my tax dollars to support these endeavors.

Unfortunately, the meetings that take place where I can voice my support are often at times I cannot attend. Nevertheless, I am trying to follow the discussion and the results of the planning meetings.

I hope you will take my full and complete support into consideration and also consider that many of the negative voices are not members of our community.

Sincerely,

John Ellison
[REDACTED] S Constance Ave.
Chicago, IL 60649

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From: [DPD](#)
To: [Abby Monroe](#)
Subject: Fw: Jackson Park Improvements and Archaeology
Date: Tuesday, April 17, 2018 1:22:19 PM

From: Graff, Rebecca S. <graff@mx.lakeforest.edu>
Sent: Tuesday, April 17, 2018 12:45 PM
To: DPD
Subject: Jackson Park Improvements and Archaeology

Dear Department of Planning and Development:

I am pleased to be able to submit public comment on the Obama Presidential Center Project and its relation to Jackson Park. I am an assistant professor of anthropology at Lake Forest College. Previously, as was a doctoral student at the University of Chicago, I excavated in Jackson Park for my dissertation research on the 1893 World's Columbian Exposition in 2007 and 2008. I was the first person to perform archaeological excavation in Jackson Park, and through that work we found the remains of the Ohio State Building—over 50 large columns, urns, and volutes of plaster staff, found in a defunct Fair-era utility trench next to the MSI.

I was on proposal for work at the Obama Center that became moot once ISAS took over the archaeological side. I visited the ISAS archaeologists and looked at the artifacts at their Elgin office. You may have seen my comments in the *Chicago Tribune* article the Blair Kamin wrote about this, and I also gave comment at the meeting via webinar that took place at the University of Chicago. I share this to set up my personal and professional investment in this process.

As I mentioned in that meeting, while we have an extensive documentary record of the World's Columbian Exposition, there are groups of people whose experiences are consistently left out of official narratives. These groups include laborers and other members of the working class, women, children, and people of color. I believe their histories are important in our understanding of Chicago and urban life in America. My own great-grandfather got a job in 1892 as a laborer at the Fair—a job that was beneficial to himself and his family, all recently arrived immigrants.

I was not surprised to hear that powers in Springfield did not think that further archaeological mitigation was necessary in Jackson Park. But what I do find surprising is that the large public interest in the 1893 Fair is not being harnessed and integrated into this project. I am 100% certain there are more extensive remains of the Fair in Jackson Park—particularly in the sites affected by the Obama Center Project—that have interpretative power, filling in the stories of those who lives are not enshrined in in the archives of the Chicago History Museum or the Special Collections

Research Center at the University of Chicago.

I think doing more work can be timely and cost effective, especially because my own institution has funds for my undertaking urban archaeology projects such as this, in part because of their interest in offering experiential learning opportunities for students. I have led field schools in Chicago for UChicago, DePaul University, and Lake Forest College, with students from all over the country. These projects can also engage directly with community members and local students. For example, there are several elementary schools in Hyde Park I have already worked with around topics in Chicago archaeology in the past.

Other American cities regularly do this sort of engaged, community-based archaeological work, especially around important civic sites such as Jackson Park. I think Chicago is just as interesting, if not more, than these other cities and it would suit the mission of the Obama Presidential Center to engage with the site specifically to look toward the future of American urban experiences by situating the Center within this important history. I'm happy to supply other information, including the official site report that I registered with the Illinois State Museum in Springfield.

Thank you for your attention.

Sincerely,
Rebecca Graff

Rebecca S. Graff
Assistant Professor of Anthropology
Chair, American Studies Program
Chicago Archaeological Fellow
Department of Sociology and Anthropology
Lake Forest College
847.735.5255
555 N Sheridan Rd | Lake Forest, IL 60045

From: [Rebekah Scheinfeld](#)
To: [Abby Monroe](#)
Subject: Fwd: Obama Presidential Center -- pro
Date: Thursday, April 19, 2018 12:02:37 PM

See below. Typo in DPD address

Begin forwarded message:

From: Eleanor Hall [REDACTED]
Date: April 19, 2018 at 11:58:12 AM CDT
To: "dpd@ciityofchicago.org" <dpd@ciityofchicago.org>
Cc: "rahm.emanuel@cityofchicago.org" <rahm.emanuel@cityofchicago.org>, "Rebekah.Scheinfeld@cityofchicago.org" <Rebekah.Scheinfeld@cityofchicago.org>, "Michael.Kelly@chicagoparkdistrict.com" <Michael.Kelly@chicagoparkdistrict.com>, Obama FOundation <info@obama.org>
Subject: Obama Presidential Center -- pro

I am in support of the plans for the Obama Presidential Center and I hope it will be approved. It will be a wonderful addition to the city.

About preserving the Olmsted design: The National Trust for Historic Preservation website says, "Preservation is adaptive reuse....Historic preservation is not just about keeping old buildings around. It is about keeping them alive in active use and relevant to the needs of the people who surround them." The OPC is in keeping with that philosophy.

Central Park in NYC, an Olmsted design, has been extensively modified. In the 1930s 19 playgrounds and 12 ballfields were added.

I oppose the Community Benefits Agreement. Its principles are grandiose and unrealistic. There are around 20 principles, some of which could be an entire nonprofit in themselves (work with schools on curriculum and tutoring) and some of which are outside the Obama Foundation's control (restore original #1 bus route). **The OPC as planned would be a tremendous benefit to the community.**

I've signed the Obama Foundation's postcard, but I wanted to express my views more fully.

Eleanor Hall
[REDACTED] E. 55th Pl., [REDACTED]
Chicago, IL 60637



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From: [DPD](#)
To: [Abby Monroe](#)
Subject: Fw: public input for the OPC federal reviews
Date: Friday, April 13, 2018 8:55:48 AM

From: John Jacobsen [REDACTED]
Sent: Friday, April 13, 2018 7:23 AM
To: DPD; Mayor Emanuel; Rebekah Scheinfeld; Michael Kelly
Subject: public input for the OPC federal reviews

I wish to register my input regarding the planned changes to the South Side parks for the Obama Presidential Center and, especially, the Golf Course.

I oppose the placement of baseball diamonds on the Midway, and I especially oppose the development of the golf course which guts the core of the existing nature sanctuary and the outdoor recreational areas near the South Shore Cultural Center (butterfly sanctuary).

There are so few places inside Chicago where one can enjoy the peace and tranquility of a natural setting. My friends and I have seen, in or near Jackson park: great blue herons, Cooper's hawks, coyotes, deer; a wide variety of migratory ducks, geese, and other waterbirds; rare butterflies; and many other species not to be seen in the more developed areas of the City. Do we really need to jeopardize these areas and their inhabitants for the sake of a few wealthy golfers (most of whom will drive in from the suburbs, where plenty of other golfing arrangements can be made)? This does not seem to be in the interest of the community on Chicago's South Side; nor has sufficient community input been obtained from what I tell.

On a final note, please DO NOT allow the OPC to set up an alternative Farmer's Market near the existing, vibrant, and long-running 61st St. Famer's Market. The existing market serves the community exceptionally well and we like it just fine.

Many thanks,

Dr. John E. Jacobsen
[REDACTED] S. Cornell Ave. [REDACTED]
Chicago, IL 60615

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From: [DPD](#)
To: [Abby Monroe](#)
Subject: Fw: Thank you
Date: Monday, April 09, 2018 12:54:53 PM

From: Vera Mccurry [REDACTED]
Sent: Friday, April 6, 2018 5:03 PM
To: DPD
Subject: Thank you

I thank you for the excellent public meeting and online research on the Jackson Park and Midway Plaisance on Friday March 29th. The Logan Center was a great location. The day and timing of the meeting allowed most younger and older adults to fit this into their day. I am so pleased with the meticulous and thoughtful research and conclusions you have included in this detailed report. I treasure this newest addition to my Jackson Park Research.

Best,
Louise McCurry, JPAC

Sent from my iPhone

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From: [DPD](#)
To: [Abby Monroe](#)
Subject: Fw: Public input for the OPC federal reviews
Date: Monday, April 09, 2018 12:54:44 PM

From: David Laurenzo [REDACTED]
Sent: Friday, April 6, 2018 3:11 PM
To: DPD
Cc: Mayor Emanuel; Rebekah Scheinfeld; Michael Kelly
Subject: Public input for the OPC federal reviews

Back in the late 90s, the not so small mega chain Meijers was defeated by a small group of residents in Lisle, because they did not include the level of public participation required for that particular project. The case went on for 3 years and made its way to the Illinois Supreme Court:

“In 1999, residents sued Lisle to invalidate the village's annexation and rezoning of the property to make way for the store. Three years later, the Illinois Supreme Court upheld lower-court decisions voiding Lisle's actions, ruling that officials violated citizens' rights by not allowing them to question Meijer representatives at a public hearing. The legal wrangling quietly ended in November 2004 when Meijer declined to appeal the decision.”

Regarding the proposed Obama Presidential Library, the process is clearly being forced along and public participation being avoided as stated in a recent article: “First, the City departments have omitted the necessary first step of including public participation in developing the statement of "purpose and need" that defines the project for review. Second, they have instead drafted their own "purpose and need" statement without public input.”

Friends of the Parks is encouraged to file suit and challenge the process of the OPL. I believe the Meijers case and the Lucas case provide ample precedent. When the city finally understands Chicago parkland is there for citizens and not ex-presidents and mayors, we will have made significant process.

Chicago Dept. of Planning & Development Floor 10
City Hall
This is submitted in order to address 5106 concerns - GPP
OPC which are due 4/18/18 Thank you 4/16/18 SVM

In The November 1, 2017 issue of the Hyde Park Herald the article on the OPC says "The OPC will house a library holding the presidential archives, a museum focusing on the Obama presidency". This is false. It will not. However this is what has been given to the City to believe and as of February 10, 2018 this is what many people still believe and understand as what the OPC is conceived to be and will be: a presidential library holding the archives and artifacts of the term of office of Barack Obama as president of the United States. But the OPC is not and will not be the Obama Presidential Library.

As a matter of fact, the Obama Presidential Library as it is conceived of in the Code of Federal Regulations, the regulations of its building to be overseen by and the finished facility administered by the National Archives and Records Administration, is already in Illinois in a northwest suburb. We have been told early on in a Tribune article that it is in Hoffman Estates, we have been told in another source has that it is in Bolingbrook, Illinois in a vacant furniture mall. Another source, CBS Radio, told us still later that tons of furniture for the library had arrived by plane at O'Hare Airport.

Still later in a 9:30AM Sunday morning interview on CBS Radio Mr. Strautmanis, Spokesman for the Obama Foundation briefly responded to a question: "What about the Obama Presidential Library? which is in a northwest suburb?" that contract elements are still under consideration thus recognizing the factual existence of the Obama Presidential Library which exists in the northwest suburbs. Also recognizing the aegis of the National Archives and Records Administration under federal law over the Obama Presidential Library and obviously, that the OPC, the Obama Presidential Center, is not the Obama Presidential Library.

A presidential library is determined by federal law, the Code of Federal Regulations, to exist for every United States President. That president is to pay for the construction of his library, set up a foundation for the future maintenance and operation of the library, and after it is built it becomes the property of the National Archives and Records Administration of the United States government.

As to its construction there are specific laws and regulations governing the housing of federal documents and presidential libraries therefore the design of the construction of the library is definitely affected by these laws and regulations which are detailed in the U.S. Code of Federal Regulations and the NARA entry on the internet for presidential libraries. According to the National Archives and Records Administration regulations governing a presidential library no loan of its records or artifacts from a presidency—including that of Barack Obama --will be permitted to any space for exhibit elsewhere which does not conform to the same requirements in the laws and regulations for a presidential library.

These requirements prevented the Obama Presidential Library which holds the original documents and artifacts of President Barack Obama, i.e. U.S. archives, being put in either Washington Park or Jackson Park, in the City of Chicago, that is, the NARA regulations in conformity with the scientifically based Code of Federal Regulations governing the siting, layout and structure of a building destined to hold and protect the archives and artifacts of the tenure of a president of the United States did prevent either Washington Park or Jackson Park from being used as a site to hold the Obama Presidential Library.

And so, because the plans for an OPC—"Obama Presidential Center"-- do not conform to the stipulations in the law for presidential archives either there will never be a loan from NARA of any document or artifact from the Obama Presidential Library by NARA to any "OPC".

In view of the above the concept of a presidential center on the Chicago Lakefront for Chicago taxpayers to put money into the OPC is akin to "Buying the Brooklyn Bridge" a long time fraudulent proposal to newby investors in New York.

But is there anyone in construction or financing construction in Chicago who does not look into laws, ordinances, and regulations governing the site of their intended effort or even whether the size of a site fits the intended purpose for the facility they plan to put there?

The current choice of Jackson Park for the so-called OPC continues the lack of an intelligent use of park land: Except for the use of the natural forces of water and land and indigenous plants and animal habitat according to the natural characteristics of the site of the "swale" of 1871 by the original eminent landscape designer and the Army Corps of Engineers, a "swale" in 1871, which is illustrated in the graphics of the Section 106 materials presented to us, is still a "swale" in 2018. The natural border of this swale is still up to the railroad right-of-way which is why they built the railroad there in the mid - 1800s, Abraham Lincoln their lawyer, his law firm records still available.

We have in Jackson Park a beauty in park landscape design, grasses framing a Great Lake, overspill water held in lagoons around an island permitting indigenous plants and trees to grow on the island and on properly drained green space the natural efforts of the beavers in their natural habitat notwithstanding. Except for the plan of the landscape designer and the Army Corps of Engineers the periodic higher and higher water levels of the lake and the dam building activity of the beavers, etc. would make a swale again.

Furthermore, according to official studies in 1990 on the area of the lakefront from at least 56th Street to 63rd Street is the worst for weather along the whole of Lake Michigan Coastline: that means higher snow drifts; heavier rains and colder wind driven rains causing ice formation. Water from the lake has been observed one April at 47th Street blown overhead at Cornell Drive in sheets of water and snow to the railroad tracks. In addition, any water from rain and snow usually evaporates into the atmosphere and drains into the soil effecting a balance between the water in the water table and the water in the lake with lake water forcing inland where water is removed from the water table, seeking its own level as buildings affect the water level, lowering it, forcing the water from the lake to push inland. Currently the lakefront beneath the water level is reinforced by the Army Corps of Engineers otherwise the inherent force of the water would allow the lakefront water to go back to its original border toward the railroad, (e.g. at 53rd Street, at Hyde Park Blvd., somewhat short of the railroad station there and observed in February 1987 over the outer drive as far as the 53rd Street southbound exit curb); at the South Shore

Cultural Center, probably about 50 feet west at high water level. Photographs available, Woodson Archives, CPL)

High water level in the 20th Century increased in height with each high water period. (Report on the South Lakefront as far as 56th Street. 1990?)

As to the latest plan for the OPC submitted by the Obama Presidential Library Foundation [correct name?] rain and snow drainage water from the use of concrete raised above the current level of Jackson Park over 20 acres will flow off the concrete eastward melting and draining into the adjacent green space, into the lagoon, over the concrete driveways and right-of ways and into the lakefront. It will cause the need for constantly maintaining or changing the contours of the entire park area to counteract the forces of the water runoff of the buildings and areas of the OPC. The runoff will degrade the soil under the concrete substituting the plantings on the top of the concrete as shown on their latest plan) for the natural water and snow processes which the natural park land now provides to the soil, the root level of the land and surrounding shrubs and trees. Thus will be adversely affected the wildlife and growth of trees and indigenous plantings being gradually put in by the Army Corps of Engineer projects and food and habitat for birds. But we are in an international flyway. Therefore it will adversely affect several states in the United States, the provinces of Canada and Central and South America by depriving birds of food sources, shelter, resting, and even mating areas. The OPC will leave them only construction site grout and gravel and stones in place of their Great Lake Michigan. It could possibly affect their internal GPS devices and recovery of the natural airway of the monarch butterfly which used to attract thousands of monarch butterfly to follow the lakefront and the Illinois Central Railroad.

Blowing rain coats concrete facing with ice. Brick facings are affected by grout removal by ice; concrete splits with ice and plants grow up between sections. Runoff into Stony Island culverts will cause local flooding including into basement of adjacent housing and buildings. Increased run off of water into Stony Island and into the culverts will affect the underground pipes for water disposal and cause increase a likelihood of flooding into the flood prone south side streets under viaducts and elsewhere. Our sometime resident beavers will come back and put their order into the disordered nature again and again thus contributing to the decay and destruction of the present National Historic Register site of Jackson Park.

It is the milking of Woodlawn all over again and this time against the nature of Jackson Park.

And all of this is for what reason? What is the stated purpose of the OPC, if any, to begin with. Why is it called "presidential?" What is the stated purpose of the "library," or what is the stated purpose of the library in that spot? What is any stated purpose of any museum, again, in that spot? If my memory serves me, Obama himself said he does not need a museum building when he first saw the plans of the Obama Foundation and his reception of the entire design has been less than enthusiastic.

Any museum aspect associated with presidential archives and artifacts can be only a glassed in case at point of entry to a presidential library building, so who needs a tower for what he has in mind, which cannot include any presidential artifact or document per the above intentions of NARA.

The concept of a presidential library on a site too small, is in between two main highways was an error in planning which should have been obviated by a look at the internet under “ NARA, presidential libraries” which details the characteristics of a federal library

Who should have had the judgment or personal research knowledge or tourist attraction no-how for suitability of Washington Park or Jackson Park for a presidential library? Anyone who would be able to read the internet.

Rules and regulations of NARA with their sources in the Code of Federal Regulations of the United States are on the internet where there is a 2008 and a 2014 version under NARA: “Presidential libraries” where they have been readily available to all interested in considering space for a president library and any of its envisioned appurtenances on City of Chicago Park District land. A brief reading of these requirements of NARA, backed up by the appropriate sections of the Code of Federal Regulations would show to anyone there is no Chicago Park District land appropriate for the Obama Presidential Library and further, no one concerned with setting a facility on a piece of land in Chicago apparently looked at the land itself as to whether it was appropriate in size or location or institutional purpose of the facility they wanted to put there.

So after NARA protected the purposes of the land and put the presidential library elsewhere the above fiasco was followed by another fiasco.

It was assumed that land refused for one purpose was open to exploitation for a different purpose.

On land already dedicated to and used for another purpose someone decided they had the right to go ahead and make up a different concept for a different facility, without again, any statutory, ordinance, or even personal purpose/ rationale outlined for it to be put on the same land which did not measure up for use as a presidential library archive to begin with. And they called it the Obama Presidential Center, the OPC.

They choose public park land.

It is not logical thinking to assume they can choose to use that same public park’s land for a new and different purpose after they lost out on using that public park land under a previous (and also possibly questionable) ordinance and different purpose; also they have never addressed that fact that basically there is absolutely no similarity of the so-called Obama Presidential Center to what the earlier public hearings were held for: the use of Washington Park or Jackson Park for a presidential library. So the question is first, should any public park land be used at all for a private purpose, a presidential library which under the law is required to be built by that president and by that same president to be provided for in its ongoing maintenance with money in a private foundation and second what is the Obama Presidential Center?

The Obama Presidential Center is certainly not the legally required Obama Presidential Library which we were supposed to choose a public park for we know that, because the Obama Presidential Library

required by law is already in Bolingbrook, Illinois. The Obama Presidential Center is an entirely different thing and without a concept for what it is at all.

So without even dealing with the lack of a valid public hearings and against public interest and contrary to public laws, or ordinances for such a decision we can deal with the *idiot savant* approach to use of Jackson Park for an "Obama Presidential Center" which was present to begin with in the attempt to use Washington and Jackson Park without examining the sites of or public information on the purpose or regulations existing and necessary for an Obama Presidential Library as required by law.

To begin with, although there have been to date, January, 2018 several visions and versions of what the layout of this thing in Jackson Park will look like there has been no explicit purpose for it given for its presence in Jackson Park or anywhere else nor why it is requested that it exist there or anywhere especially in view of the fact it includes a monstrous "museum" which Obama himself said, as I understood when he first saw the plans for it, he did not need or want and in which there will be no possible presidential artifacts or documents.

The land is currently flat with a border in some areas sloping from Stony Island on its west side towards a drive, Cornell Drive, then to the water of a lagoon with an island in the middle of it further to the east and further east a another road, South Shore Drive, and then Lake Michigan. In their latest design for the area they have a rising terraced area leading to a 225 foot tower. This is very bad for Jackson Park. Why? The rest of the park and the lagoons will take water flowing off the rising landscaped area because it is being built on top of concrete. The water from colossal snows and rains inundates Jackson Park now. The flow toward lower land will damage adjacent park plantings and affect the natural appearance of the project of the Army Corps of Engineers to put in indigenous plants and trees. Water based plants are different from land based plants. The plants will not be able to keep the land from eroding with the flowing water, flowing toward South Shore Drive and toward Lake Michigan, also ultimately affecting the pilings and underpinnings of the Lakeshore protection structures put in place under the water line. It will also flow toward Stony Island. It will as water does, find some other place to take land away from a coastline, perhaps housing on 73rd and the Lake, perhaps up north already shored up against high water in February, 1987. AEC studies say the high water levels of the lake have been rising higher than the preceding mark every time it rises. This is over the period of the 20th Century. So there is no expectation of any change. A study of the South Lakefront in 1990 said it is the worst area for weather as to wind velocity and water levels on the coast in all of Lake Michigan, if I read the charts correctly. [I cannot find this 1990 report on the internet at the moment. But there is one going up to 56th Street which I have the citation for]. This led to the City ordinance banning buildings on the outer drive.

In their current plan for the OPC Cornell Drive is envisioned as removed in order to give the OPC more land. However, there is no back door to any of the facility's buildings which are west of Cornell Drive and if a back entrance/exit were put in it would cause the need for another road there in the same place as the current Cornell Drive which would most certainly be used by traffic trying to go south past to OPC or north past the OPC and therefore the reason for taking out Cornell Drive to begin with would be removed. These two problems with the architectural vision (dream?) there should be enough to show the plan of the OPC as unfeasible for the site in Jackson Park. I would think that the requirement for two

fire department trucks would probably be the same as what NARA requires for any Presidential Library. Certainly to get people out even if there are no presidential artifacts.

An overriding consideration is that any concept for an OPC on land in Jackson Park which land was originally presented for an Obama Presidential Library, but rejected by NARA for this purpose, has not been presented as such to the taxpayers in any hearing or to the City Council. Nor is there any confirming ordinance for an OPC now. Nor should there be.

The first hearings were shifty enough, but they were supposedly for the Obama Presidential Library. For the OPC there has been no hearing. In fact people have been led by the lack of information to think they, The Obama Foundation is talking about a presidential library! As late as November 1, the Hyde Park Herald spoke of the OPC as the Obama Presidential Library.

The concept of the OPC is still vague and undefined and has been touted to the public as the same as the Obama Presidential Library. ~~in~~ The Obama Presidential Center in Jackson Park has been touted in videos by the Obama Foundation as a kiddyland in Jackson Park which Obama says he wants to "Give back" to the citizens of the south side in spite of the fact that Jackson Park already is a park for children appropriately designed for local children of all age levels which design has long had the input of local parents, and experts in nature and childhood needs through the Jackson Park Advisory Council and other interested parties. Any building of any conceived OPC will interfere with these ongoing programs for Jackson Park;

In short, the Obama Foundation has jumped twice into situations requiring technical and engineering knowledge of the sites and ignored the existing knowledge although it exists on the internet for anyone to see: Washington Park and Jackson Park and the NARA regulations for presidential libraries; Jackson Park and existing studies on the South Lake front which to any sane person would prohibit building there due to weather and land type conditions. But frustrated by these conditions, they want more land to effect their purposes for the facility they have already drawn up plans for while making their own conditions which would ultimately frustrate use of their buildings and landscaping because their landscaping and raising of the level of the site on concrete above the level of the rest of the park and the coastline would cause their works to eventually float out into the lake without constant and expensive shoring up of the surrounding parks' land, lagoons, driveways. There is no proper allowance for their purpose of bringing in tourists. Even if we wanted the destruction of the park and allowed the Obama Foundation to build it, it is bad for their own purposes.

Moreover, they want a museum but there are no presidential artifacts available to them. Why call it a presidential museum, then? What could be the pull for tourists? The same for any presidential library. They, tourists, can stay home and get any documents called up on a home computer. Associated reference tools? No space in the "library" for any such presidential or government or legal reference tools, too small. Obama can do a better job as a librarian? A librarian and a kiddyland creator, a teacher of politics in Chicago, the city which put him in; who needs it?

Sarah V. Martini
[redacted] S. East End Ave [redacted]
Chicago, IL 60615

From: [DPD](#)
To: [Abby Monroe](#)
Subject: Fw: Public input for the OPC federal reviews
Date: Monday, April 09, 2018 12:54:48 PM

From: William O'Neill [REDACTED]
Sent: Friday, April 6, 2018 3:26 PM
To: DPD
Subject: Public input for the OPC federal reviews

Forever Open, Free and Clear ?

The federal review process of the OPC apparently assumes **Open** means park land is open for exploitation and it is **Free** to those with enough political clout to **Clear** the land of existing public amenities.

The blatant hypocrisy of the review process ---- a presidential Center for a president whose claim to fame was bringing unity to a divided country---- has turned neighborhoods against city agencies and the electorate against policy makers.

Without regard to what may be publically accessible in an OPC sited in Jackson Park, the history of this arrogant and crude land grab will be an eternal albatross on any presidential legacy.

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From: [DPD](#)
To: [Abby Monroe](#)
Subject: Fw: public input for the OPC federal reviews
Date: Friday, April 13, 2018 8:55:40 AM

From: Susan Schlough [REDACTED]
Sent: Thursday, April 12, 2018 5:33 PM
To: DPD
Cc: Mayor Emanuel; Rebekah Scheinfeld; Michael Kelly
Subject: public input for the OPC federal reviews

Department of Planning and Development,

I am a resident of Hyde Park. I have several comments on the Obama Presidential Center and the

planning process that has been conducted so far:

1. The closing of Cornell Drive should not be done. Thousands of cars use Cornell Drive each day.

Diverting them to Stony Island will mean that people who have to enter Hyde Park via the Midway

will be caught in huge traffic jams at the intersection of the Midway and Stony Island.

Widening Stony Island will remove more valuable park land, and won't relieve the traffic congestion.

2. Nothing should be built on the Midway. Not a parking garage, not a baseball field, or anything

else the Obama Foundation suggests.

3. The South Lakefront Framework Plan was hastily produced and assumed from the start that

the Obama Presidential Center would be in Jackson Park, and that Cornell Drive would be closed

as part of its construction. The city needs to produce REAL South Lakefront Framework Plan that

starts from the beginning and asks if the OPC itself should be there. If the answer is yes, then

there should be an unbiased discussion about the need to link the Museum of Science and Industry

campus to the OPC, and whether pedestrian bridges will do the trick.

The entire process so far has the flavor of a political deal that has already been done behind the backs of the citizens who live in Hyde Park and Woodlawn.

Susan Schlough
[REDACTED] S Blackstone Ave
Chicago, IL 60637

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From: Jack Spicer
To: [Abby Monroe](#)
Cc: [Eleanor Gorski](#)
Subject: Jackson Park 106 Review APE / Promontory Point
Date: Sunday, April 15, 2018 7:29:38 PM

Abby —

Thank you very much for our earlier conversations about the inclusion of Promontory Point in the Jackson Park APE for the OPC project.

In the December 19, 2017 letter below we requested that Promontory Point be removed from the APE. After we subsequently talked on the phone we understood that the purpose of including the Point was only because of the possibility that the OPC building might infringe on views from the Point. Having come to understand that, we withdrew our objection and asked to be retained in the APE. As the record now stands it appears that we still object. Please correct that misrepresentation.

"The Community Task Force for Promontory Point and the Promontory Point Conservancy agree with your office that Promontory Point is included in the Jackson Park Section 106 Review Area of Potential Effect. We understand that the Point was only included because of the possibility that the OPC building might infringe on views from the Point. Having come to understand that, we withdraw our initial objection and ask to be retained in the APE."

Also, as the Point is in the APE we would like any construction projects planned or under discussion for Promontory Point Park to be made public as part of the Section106 process.

"The Community Task Force for Promontory Point and the Promontory Point Conservancy request that as the Point is in the APE as part of the Jackson Park Section106 Review process, that any future construction projects planned or under discussion for Promontory Point Park be made public as part of the Section106 process."

Thank you for all your help,
— Jack Spicer

Begin forwarded message:

From: Jack Spicer [REDACTED]
Subject: APE / Promontory Point
Date: December 19, 2017 at 11:37:21 AM CST
To: jack Spicer [REDACTED]

Eleanor —

I'm writing you on behalf of The Community Task Force for Promontory Point and of the Promontory Point Conservancy.

After reviewing the scope of the 106 Review being conducted for the Obama Presidential Center and Jackson Park, we would request that Promontory Point be

removed from the Area of Potential Effects, Historic Architecture/Landscape. Promontory Point is not even remotely effected by the OPC and is not within the bounds of Jackson Park.

As complicated as the Review has become, we would hope that the removal of Promontory Point would simplify the process. The Review is an important and promising process and we would be happy to help in any other way we would be able.

Best,
— Jack Spicer

From: Michael LaRonge
To: [Abby Monroe](#)
Subject: Re: Environmental Review for Jackson Park Improvements, City of Chicago, Cook County Illinois.
Date: Thursday, April 12, 2018 1:35:41 PM

Re: Environmental Review for Jackson Park Improvements, City of Chicago, Cook County Illinois.

Dear Ms. Monroe,

Pursuant to consultation under Section 106 of the National Historic Preservation Act (1966 as amended) as a Federally Recognized Native American Tribe the Forest County Potawatomi Community (FCPC) reserves the right to comment on Federal undertakings. Thank you for your participation in the process.

This response is regarding the project mention above. Tribal Historic Preservation Office (THPO) staff has reviewed the archaeological report provided for the project. Based on the materials recovered from the archaeological assessment it seems unlikely that road construction/restructuring activities will impact any intact archaeological material of interest to the Tribe.

Therefore, the FCPC THPO is pleased to concur with the findings of the draft archaeological report with two conditions. First, should the SHPO's finding differ the Tribe reserves the right to reconsider this opinion. Second, due to the presence of pre-contact archaeological material there exists a possibility, even though remote, that intact deposits or human remains maybe be exposed during construction. Thus the Tribe requests that an inadvertent discovery plan be made for the entire project which includes FCPC in any consultation regarding the treatment and disposition of inadvertent discoveries, prior to removal.

This comment was also filed with the Illinois Department of Transportation under project log #17080, FAU 2929/1520/2873, FAP 341, Jackson Park Roadway. Your interest in protecting Illinois' cultural and historic properties is appreciated. If you have any questions or concerns, please contact me at the email or number listed below.

Respectfully,

Michael LaRonge
Tribal Historic Preservation Officer
Natural Resources Department
Forest County Potawatomi Community
5320 Wensaut Lane
P.O. Box 340
Crandon, Wisconsin 54520
Phone: 715-478-7354
Fax: 715-478-7225
Email: Michael.LaRonge@FCPotawatomi-nsn.gov

From: Abby Monroe [mailto:Abby.Monroe@cityofchicago.org]
Sent: Monday, March 19, 2018 4:20 PM
Subject: Historic Properties Inventory and Archaeology Reports

Dear Consulting Parties,

I am pleased to distribute to you a draft of the Historic Properties Inventory (HPI) and Archaeology Reports. You can download the reports and appendices from the schedule table at the bottom of our existing web page:

www.tinyURL.com/jpimprovements

Hard copies will be made available for pickup at City Hall by request.

The purpose of these reports is to identify historic properties within the Area of Potential Effect (APE) both above and below ground. Historic properties include those that are listed on the National Register of Historic Places (NRHP) and those that are potentially eligible for listing. The Archaeology survey found no underground resources eligible or listed on the NRHP. The HPI categorizes above-ground properties within the APE by eligibility status. Both reports will be explained in detail at the upcoming Section 106 consulting parties meeting on March 29, 2018. However, we encourage all consulting parties to review them now in advance of that discussion.

At this time, we are seeking input from consulting parties and the public on the draft reports, specifically, our preliminary eligibility determinations. Please share these documents with any others who may be interested and send comments to DPD@cityofchicago.org by the 30-day comment **deadline of April 19, 2018**.

After the comment period concludes, input from the public and consulting parties will be considered and final eligibility determinations will be made by FHWA and NPS, in consultation with the Illinois State Historic Preservation Officer. Final reports will be posted on the project website and an email notification will be sent to consulting parties.

Thank you for your continued participation!

Warm regards,

Abby Monroe

City of Chicago, Department of Planning and Development
121 N. LaSalle, Room 1000, Chicago, IL 60602
abby.monroe@cityofchicago.org
Direct: (312) 744-9416

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March 29, 2018

From Gary M. Ossewaarde

Response and comment Re: Section 106 Jackson Park Improvements Review- Historic Properties Inventory Report and Archeology Report

Dear. Ms. Monroe and Section 106 Jackson Park Improvements Review team:

I am speaking for myself although I have much background and understanding of Jackson Park and serve as an officer and on the board of several relevant community organizations including Jackson Park Advisory Council, Hyde Park Historical Society, and Hyde Park-Kenwood Community Conference.

First, let me express my great pleasure in reading the reports. I find them well written and able to stand as an authoritative standard on the history and historical significance of Jackson Park notwithstanding that it stands on the shoulders of such giants and Victoria Raney and Julia Bachrach. Since the survey and reports were done to guide oversight of projects, they do not give equal attention to all parts of the park—I hope more of the park can be studied in depth and in their own right as time passes.

We must remember that the history, heritage, and importance of this park as a must be one of the benchmarks against which we measure impacts and mitigations. The whole park, and those who use it and communities that surround it an APE.

I am pleased that the reports find that the park has substantial integrity as an historic place. The diminutions noted should be viewed as a call and opportunity to restore or improve the park as a living space and resource living up to its legacy—including its legacy as a mixed use commons—for nature, quiet respite from urban life, passive and active recreation, and engagement with the Lake and other water spaces. Among diminutions that sorely need addressing are to the parks trails, landscaping and greenery, and shoreline.

The writers point out certain spaces and topics where we should look for potential adverse effects from disturbance or new structures, cover and uses and look for alternatives or mitigations. We should remember, though, that in addressing these there are other considerations and perspectives, many of them also subject to federal review, including environmental, urban recreational spaces, and circulation/highway related.

In addition, the Obama Presidential Center and the replacement-- or sharp reduction of-- certain roadways with additional and upgraded landscape, nature and paths that largely follow Olmsted's original curved paths and contours-- these could themselves be mitigations for spaces where there has been loss or deterioration and, with the mission and activation of the Center provide an enhancement of Jackson Park as one of the greatest commons in the world. And, the space will remain public, free, and open (including several floors in the Museum building) with enhanced access and circulation including to other parts of the park. It also will enhance and embrace rather than damage the nearby natural area. The plan as presently presented reduces air and noise pollution and more effectively manages water runoff, including

into the lagoon. It does not seem that these improvements and a return to Olmsted's idea would occur by merely narrowing rather than closing Cornell Drive.

The plan also rightly keeps the women's and perennial garden as designed and as a quiet respite and transition.

I do worry about substantial loss temporarily of mature trees in the site, even if much of the present cover is diminished, and the permanent losses along widened roads. Mitigation should include now tree and shrub plantings in the park or possibly also nearby where there has been tree loss.

I believe the inventory of eligible properties (and its covering the 1870s to 1953 is appropriate and complete, but again note that something that contributes historically may not in all respects contribute to the park, at least without major reworking—for example the railroad viaducts and the compromised maintenance building. And some dating to within the time period but deemed not eligible may add value in other ways. I am pleased that certain walls and other properties by LaRabida are proposed to be added.

Could be a suggested eligibility descriptive list by priority and urgency to at least stabilize, to help guide framework planning, possible nominations to the National Register or City of Chicago Landmarking, and allocation of funds for historic restoration projects?

And I hope there may be more guidance as to what an eligibility recommendation precludes and entails including for the South Framework Plan, such as for the future of the bowling green or tennis courts

I accept the finding that there is nothing underground in the main APE that would add substantial new knowledge but hope that there will be mitigating instructions regarding treatment and recovery of what is found during construction, including where disturbance/activity will be deeper such as for the parking garage and Museum building.

I hope that a substantial portion of the artifacts recovered will be placed in permanent exhibits about the park and its legacy, certainly in the Obama Center Museum and perhaps in the Museum of Science and Industry.

Response to Section 106 Historic Places and Archeology Reports meeting March 29.
Addition to March 29 filed comments. By Gary Ossewaarde

(A slightly corrected and amended copy of my March 29 written comments is attached to email.)

Comments were made by some of the attendees March 29 with which I disagree.

I believe you correctly pointed out that certain of the parallel and tandem processes must lead to local partner conclusions and approvals (for the OPC, CDOT changes, and replacement track and field) so that the federal reviews can proceed with their assessments and final recommendation. Also, these processes have been informing each other and involve extensive public comment including group and one-on-one engagement. The many processes provide the “many eyes” necessary to a “good result.”

You also answered to my satisfaction concerns about the UPARR recommendation for a replacement baseball field: this need not be a baseball field but could be other active recreation) and need not be at on the Midway. I am glad to hear that there will be a community planning process this summer for the recreation recommendations including where they might go and for the Midway. I am pleased that the city and park district want the east end of the Midway improved. I understand that the Obama Foundation has also been in discussion with the Midway PAC and has expressed interest in helping to plan whatever the PAC wants at the east end of the Midway.

I have already expressed my belief that removal of Cornell Drive and its replacement with bike and pedestrian trails that better follow parts of Olmsted’s original carriage road, rather than being an impact to be mitigated, will itself mitigate current problems of pollution, runoff including into the lagoon, noise, safety, interruption of connectivity, and disjunction with the adjacent nature sanctuary in this part of the park. With narrowing, we get little improvement with almost the same cost and don’t get the gains.

One mitigation for effects of more traffic and removed parking on Hayes Drive that would help persons using the Hayes athletic fields might be allowing parking midday and on weekends. This would work with the underpasses and intersection change at the Statue of the Republic.

I also believe that in many ways the OPC itself is an improvement (positive effect) to its site as public commons and that the welcoming landscape and the program will contribute to the park’s legacy as public space and teacher of history and add a forward- inspiring dimension to this multi-purpose park and the diverse neighborhoods that surround it.

I also disagree with the assertion made at the meeting that the whole set of processes and approvals puts the “cart before the horse” and that CDOT’s statement of purpose is self-serving and circular.

1. When the OPC was accepted for Jackson Park and the Obama Foundation pointed out that if Cornell Drive were closed, there could be an attractive, accessible museum campus and an expanded and enhance Nature Sanctuary, CDOT developed concepts that would accommodate

[page 1 GMO]

that while also achieving improvements CDOT had long envisioned for the park and neighborhoods, some suggested by the 1999 South Framework Plan. The road and trails design was, as is proper, made for the whole park and its neighbors. The statement of purpose set forth by CDOT is a necessary starting point—one does not plan to “do” with no purpose or direction—and was as much subject to public input as were the concept specifics developed by engineering studies.

2. With extensive studies and site and areal evaluation done and concept choices presented to the public for comment under multiple processes and perspectives, we have arrived at a point where formal approvals of concepts are needed. This is, *inter alia*, because according to laws and regulations, the “local partner” needs to “define” what it wants to do, so that reviews can proceed to conclusion. I point out that significant changes were made along the way in response to public input. Also, for the Lakefront Plan, the projects are penciled in—with a few exceptions, Framework Plan recommendations for the rest of the park stand on their own as individual recommendations and a park whole with or without the projects. Both the South Lakefront Plan that will go before the Park District in April (and the Plan Commission later since, in my view, it is more than an amendment) and the OPC and roadway et al projects that go before the Plan Commission in May be subject to changes including from the many federal reviews. Other concepts, should they become projects, will also be subject to input, approvals, and incorporation into the South Lakefront Plan.

As these many processes and reviews come together, we will not only have a good path for moving forward and directing funds through both a strong framework plan and transformational projects made as good as can be. And the review process will leave a foundational, guiding record of the park’s legacy—its history, archeology, and inventory of historic properties, including properties declared eligible to be considered for the National Register of Historic Places.

[page 2 GMO]

Save the Midway!

April 18, 2018

Eleanor Gorski, Department of Planning and Development

John Sadler, Department of Transportation

City of Chicago

Via Email: eleanor.gorski@cityofchicago.org, john.sadler@cityofchicago.org,
dpd@cityofchicago.org

Re: Section 106 Review of Adverse Effects and of the OPC Mobility Improvements to Support the SLFP Update, Draft Historic Properties Identification Report

Dear Ms. Gorski and Mr. Sadler:

Thank you for the opportunity to comment on various aspects of the ongoing 106 process.

Comments on the Draft Section 106 Historic Properties Identification Report (HPIR) of March 15, 2018.

1. As a Consulting Party to the Section 106 review, Save the Midway urges that the Draft Section 106 Historic Properties Identification Report of March 15, 2018, be amended, to add a section on Midway Plaisance Landscape Integrity Analysis, after Section 2.1.3 on "Jackson Park Landscape Integrity Analysis"; because the entire Midway Plaisance has been added to the preliminary Historic Architecture/Landscape APE.
2. The Draft HPIR describes the Great Lakes Fishery and Ecosystem Restoration project in Jackson Park: "Since that time, the CPD, and Project 120 worked with the US Army Corps of Engineers on a major 5-year \$7.4 million ecological restoration project to improve Jackson Park's landscape. Made possible by a federal Great Lakes Fishery and Ecosystem Restoration (GLFER) Grant, the project was carefully planned to respect the significance of the park's historic landscape. Heritage Landscapes, an East Coast firm that specializes in restoring Olmsted landscapes, served as the consultant for this project. As explained in a recent article in Chicagoland Gardening, the ambitious ecological restoration work 'aims to rectify years of insensitive changes and deferred maintenance, and revitalize the landscape to please both design-ophiles and environmentalists alike.' The idea of combining historic preservation and ecological sustainability goals is a new direction for landscape architects, ecologists, and preservationists and this project will likely provide a national model for similar efforts." (p46) We urge that the GLFER restoration in Jackson Park should be protected by, and made a standard for, any development in the South Lakefront Parks, including for any OPC mobility improvements to support the SLFP.

Comments on Potential Adverse Effects and Mitigation Suggestions

Women's Perennial Garden

1. The Women's Perennial Garden is a rare monument to women's architectural and landscape achievements: it is on the location of the original site of the Women's Pavilion of the World's Fair (designed by Sophia Hayden, the first woman to graduate from the architecture program of MIT) and the current landscaped park was designed by a noted female landscape designer, May E. McAdam. The current plans of the OPC call for this garden to lose its separate nature by incorporating it into the OPC campus and for it to be re-landscaped. The former erases its monumental status by incorporating it into another facility and thereby obliterating its status; the latter destroys the achievement and historical significance entirely. We request that the achievements of both women and women's history be respected and that the site remain separate public parkland and retain the original landscape design.

Midway Plaisance

2. Any plans for the Midway specifically should take into account its historical significance as part of Olmsted's South Park System and maintaining its integrity as an open meadow with flexible use. We encourage all parties to consider reopening the underpass according to the original Olmsted plan and to take no measures in the plans for the space that would preclude such a restoration.
3. Part of the panel on the Midway east of the railroad tracks is an ephemeral pond and should be respected in future plans as an ecological resource that promotes the richness of flora and fauna of the entire area. We suggest any future plans for the space respond to the natural environment and to enhance it. For example, the creation of a more permanent small pond with defined borders would honor the original Olmsted design which orients and unifies the 3 parks by the principle of water, connecting them in spirit and by viewscape to Lake Michigan; and would follow the guidelines of the current 2000 Midway Framework Plan which calls in part for a water feature on this panel. Such a pond would allow the current protected migratory waterfowl to continue using a part of the panel.
4. The planned height of the museum tower (the equivalent of a twenty-plus story building) will detract from the open/unobstructed views that Olmsted was championing. The building would truncate views from all directions, but would create a huge barrier from the Midway looking toward the lake and Jackson Park. Also, the shadows cast from the building would affect the feeling of unimpeded openness. One would constantly be aware of the towering monument directly across the street. We are further concerned about the plans to illuminate the building as a beacon of light. Not only will this create light pollution, but it will endanger the significant migrating bird population. A mitigation of this effect would be to significantly lower the height of the tower and not to illuminate it at night.

5. When the parks were originally proposed to the Obama Foundation for its site, the plans were to house the Presidential Library, run by the National Archives. Such plans would have required an endowment to ensure the financial upkeep and continuation of such a site. Such plans also would have guaranteed a sustainable public purpose for the parkland that has been given to a private foundation. The withdrawal of these plans raises two concerns for the parkland: 1) How much of the space given to OPC will be developed as commercial enterprises that will not be for the public good. Any commercial use of the public space that would preclude open use by the public is a net loss of public land. One of our overall concerns about the entire project is that too much of the open parkland is set to become over-programmed space—whether part of the OPC campus or surrounding it. To mitigate these concerns, new, additional parkland should be created elsewhere, i.e., new parkland entirely not simply enhancing (and hence over-programming) existing space. 2) The public would be harmed by giving up its interest in a sustainable public purpose for historic public parkland that has been given to a private foundation. The OPC project is a large campus with a high rise tower that will be costly to maintain. We suggest that as a mitigation of this concern that the Obama Foundation be required to produce an endowment significant enough to allay such concerns before building commences.

Sincerely,

Michael McNamee and Karen Rechtschaffen

Co-chairs

Save the Midway

SavetheMidway.org

SavetheMidway@gmail.com