

January 5, 2018

Eleanor Gorski, Chicago Department of Planning and Development

John Sadler, Chicago Department of Transportation

City of Chicago

Via Email

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

Dear Ms. Gorski and Mr. Sadler:

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

Dear Ms. Gorski and Mr. Sadler:

Blacks in Green™ is a consulting party to the Section 106 review of the “OPC Mobility Improvements to Support the SLFP Update,” launched on December 1, 2017. We are filing our official comments to the changes proposed to the Area of Potential Effect designated for review, and to express concerns about the OPC process and certain incompatible design and usage applications which are contrary to the original framing language of the current review.

### **Insufficient Plan Process**

We must have a clear proposal that accurately reflects the placement of the OPC and other proposed alterations to the park, in order to be able to adequately and effectively evaluate and respond to the proposal. The current proposal for the OPC does not conform to the segment of Jackson Park that was set aside by City Ordinance O2015-192. The components of the proposal for the OPC are not finalized. The model displayed recently at the Obama Foundation presentation on its plan for a parking garage showed new or relocated elements for the OPC site differing from previous plans.

### **Misappropriated Framework Plans**

CDOT and other city agencies appear to have abandoned this 2016 plan and to focus on the 1999-2000 plan as the basis and justification for the changes being proposed to accommodate the Obama Presidential Center and other proposed changes to Jackson Park, even though such proposals are not included in the Framework Plan and supporting data for such proposals has not been provided for review and analysis.

- The Framework Plan *does not* call for closing Cornell Drive.
- Frequent references to the 1999-2000 Jackson Park/South Shore Framework Plan are used to justify changes that the City, the Park District, and the Obama Foundation wish to make to Jackson Park and its road system. The Framework Plan does not, however, support relied on the changes cited.
- The landscape architect (Heritage Landscapes) hired by Project 120 raised the idea of calming traffic on Cornell Drive by narrowing the lanes and/or adding a median; that proposal was again *not* included in the 2016 plan.

### **Expansion of Area of Potential Effect**

1. The full plan for the golf course project should be made public and the APE should include the entire golf course project and be examined for Archeological as well as Architecture/Landscape issues. Likewise, the entire golf course area should also be included in the NEPA and UPARR reviews.

2. The APE should include all of the Midway Plaisance, from Stony Island Avenue to Cottage Grove Avenue, for Archeological as well as Architecture/Landscape review. The tall main building of the Obama Presidential Center as designed and sited will have an inappropriate visual impact along the entire length of the Midway. In addition, the entire extent of the Midway will be affected by proposed traffic reconfigurations offered in connection with the Obama Presidential Center.

### **Additions to Historical Features of Jackson Park To Be Recognized**

- Monument to the Haiti Pavilion and to Frederick Douglass' participation in Columbian Exposition (by Bowling Green Clubhouse).
- Wooded Island and Paul Douglas Nature Sanctuary [current map tags only Japanese Garden on Wooded Island]
- Nike missile installation 1956-71 (driving range)
- 67<sup>th</sup> Street Beach
- Olmsted's design for pedestrian and traffic circulation throughout Jackson Park and the intersection of Jackson Park with the Midway Plaisance

Thank you for your response to these proposals and concerns.

Sincerely,

Naomi Davis

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**Naomi Davis, JD LEED GA**

*Founder & President*

[blacksingreen.org](http://blacksingreen.org)

[773-678-9541](tel:773-678-9541)

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