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 <u>SavetheMidway.org</u> <u>SavetheMidway@gmail.com</u>