



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