

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, with the exception of 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, at the very least, 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.

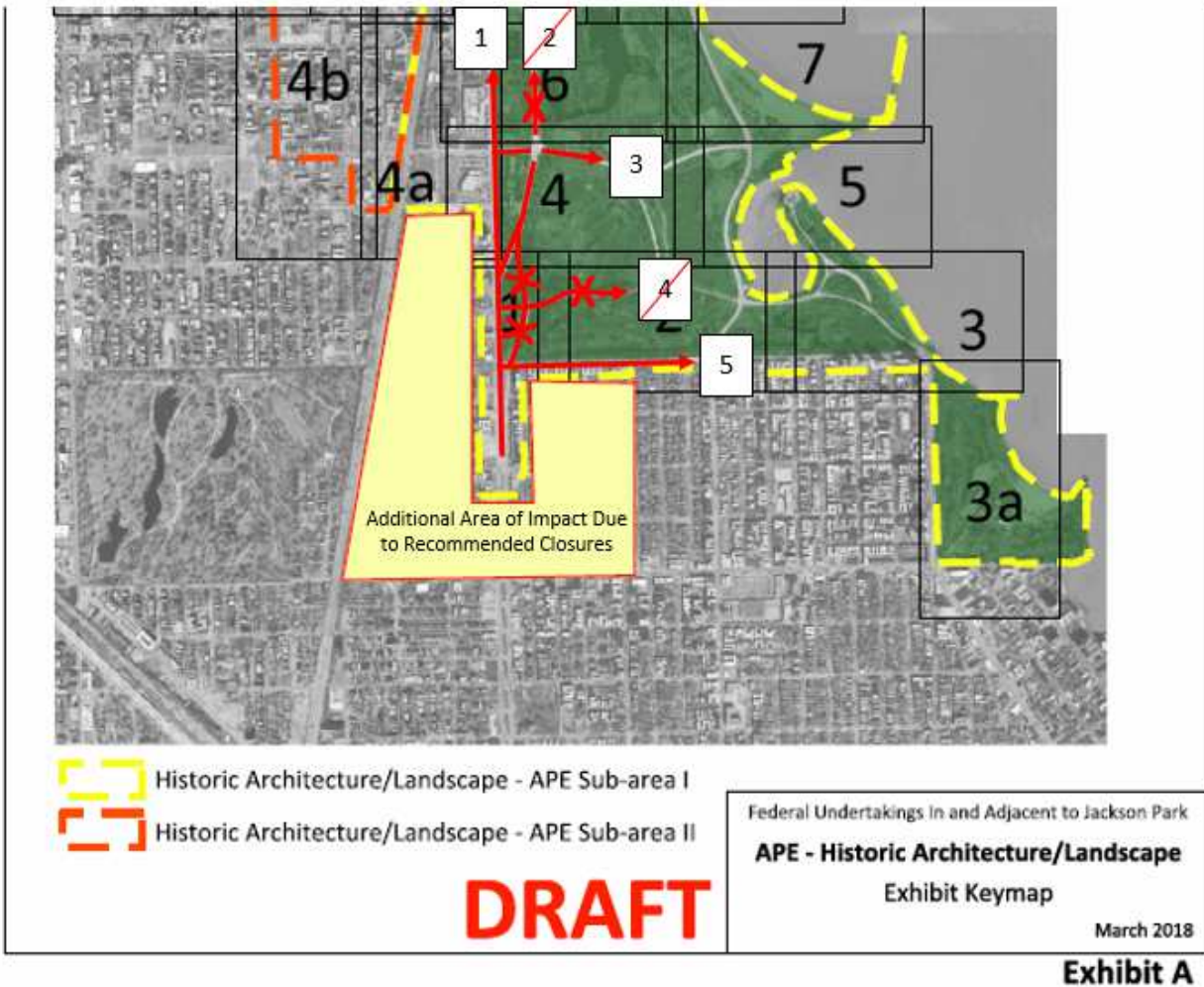


Figure 1: Diagram Supporting Revised APE

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, with the exception of 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

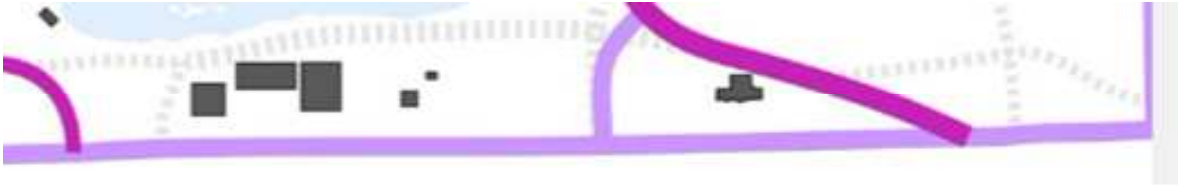


Figure 5: Chicago Park District Diagram of Proposed Road Closures at Western Periphery of Jackson Park

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 in order 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 of its related work, can fit into the intertwined and interdependent design of Jackson Park. Otherwise, the project 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 intriguing 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.