



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 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.'"