

# Save the Midway!

August 30, 2019

Ms. Arlene K. Kocher  
Division Administrator  
Federal Highway Administration  
3250 Executive Park Drive  
Springfield, IL 62703

cc: Ms. Abby Monroe, Public Participation Officer, City of Chicago, Department of Planning and Development (DPD), [abby.monroe@cityofchicago.org](mailto:abby.monroe@cityofchicago.org)

RE: *Obama Presidential Center Mobility Improvements to Support the South Lakefront Framework Plan City of Chicago, Cook County, Illinois*

Dear Ms. Kocher,

Save the Midway is a group of local residents, city park-users, national environmentalists, preservationists and friends of open public land. We agree with many of your findings regarding Jackson and Midway Parks and the Women's/Perennial Garden, i.e., that these areas would suffer adverse effects if the current plans are allowed to move forward as proposed. We would like to offer some suggestions to avoid adverse effects to the Midway and the Women's/Perennial Garden, and to describe adverse effects that your report omitted and offer some suggestions to avoid these effects.

## **A. UPARR PROGRAM**

The ACHP indicates in their August 22, 2019 comments to the Section 106 AOE that "...it remains unclear from the Effects Report if the proposed undertaking will result in the properties (i.e., Jackson Park and the Midway) no longer being listed in the NRHP." STM finds it unacceptable that the City's UPARR conversion plan could jeopardize the Midway's NRHP listing.

STM believes it is necessary and achievable for NPS and FHWA to protect the historic integrity of the Midway and Jackson Park in the course of this undertaking.

The City says in the AOE that the "selected UPARR replacement site adheres to criteria set forth by the NPS, which generally considers sites proximate and of similar quality and use to the area of proposed conversion." However, the UPARR statute 36 CFR Part 72.72(b)(1)(ii) states that "Replacement property need not be necessarily be directly adjacent to or close by the converted site." And Part 72.72(a) requires only that a conversion should provide "opportunities of reasonably equivalent location and usefulness."

STM proposes that:

1. To avoid any adverse effect to the east section of the Midway, the City should remove the playground and the UPARR designation from the plan for the east section, and leave the

east section as primarily an open flexible meadow as designed by F. L. Olmsted in his *Study of Design for the Midway Plaisance—Alternative*, 1894 (Olmstead Archives, NPS).

2. The City should work with local community organizations to create new parkland on empty lots or other City owned property within the area to provide more neighborhood parks. We note that the City's targeted area on the Midway is near other current and planned play areas and would thus be redundant. Such redundancy would not be the case in some neighborhoods close to the Midway.
3. The City should place the UPARR designation on the new parks and playground.

## **B. OTHER ADVERSE EFFECTS TO THE MIDWAY**

The City's current plans, as noted in your report, destroy the historical significance of the Midway as part of Olmsted's South Park System primarily by destroying its integrity as an open meadow with flexible use. We find the City's current proposal to build fences, pour concrete, and to re-landscape offensive for the following reasons:

- It violates the City's promise via the ordinance that gave the land for the OPC to its citizens that new parkland would be created to compensate for the land given to the OPC;
- It seeks to fulfill its UPARR obligations via a loophole: rather than truly creating new parkland to compensate for play areas lost to OPC, it plans to claim it has created new parkland by adding formal structures that will destroy the historic nature of the eastern panel of the Midway.
- To destroy the integrity of a park on the National Register of Historic Places to avoid creating new parkland in a City short on greenspaces but rich in empty lots is offensive. That such a plan was done without community input—most especially—without the prior consultation of the local park advisory council would seem to violate the very reason the City of Chicago was forced in 1982 by a federal consent decree to create local park councils. (We are pleased to see that the City has met with the advisory council but nevertheless question creating such plans without consultation.) We note that at the 5 August 106 consulting party meeting, the City indicated that it was currently *only* considering the eastern panel of the Midway as “replacement” parkland.

The AOE report implies that filling in a natural occurring wetland on the Midway is an improvement. We challenge this conclusion and ask that this action also be categorized as an adverse effect.

Our suggestions to avoid the adverse effects on the Midway are as follows:

- Expand the area of the Midway by reopening the embankment underpass according to the original Olmsted plan and take no measures in the plans for the space that would preclude such a restoration.
- The City should not fill in the space of the ephemeral wetland but should rather enhance it. It should be respected 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.

### **C. THE WOMEN'S/PERENNIAL GARDEN**

While we agree with the AOE report's findings that many of the historical aspects of the park will be destroyed (its historical materials, its role within the symmetry of both Jackson and Midway Parks, etc.), and while we applaud the City's efforts to make this park more accessible to all, we note that the AOE report neglects to find and report a central historical aspect of this park that will be destroyed if current plans proceed: it was designed in 1936 by a noted female landscape designer, May E. McAdams. Any "expansion" of this park, any change to its current footprint, any destruction of the trees and plants is therefore a destruction of a historical design and would in essence erase the work of a woman, Ms. McAdams, by Michael Van Valkenburgh, a man. We find it ironic that at a time of greater advocacy for women's history (as evidenced, for example in the *New York Times* regular publication of "overlooked" obituaries to showcase prominent, yet forgotten women), the City and OPC are planning to obliterate the legacy of one such woman. That the location of this garden is on the site of the Women's Pavilion of the 1893 World's Fair (designed by Sophia Hayden, the first woman to graduate from the architecture program of MIT) only serves to highlight this irony. We find such plans therefore not only to be an adverse effect not fully articulated in the AOE, but also deeply offensive.

We note further that removing the Women's Perennial Garden from its status as public parkland and conveying it to a private foundation threatens to alter its historical significance. The current plans of the OPC call for this garden to lose its separate nature by incorporating it into the OPC campus—further diminishing the prominence and independence of a woman's design. Thus, the current plans erase the accomplishments of Ms. McAdams's designs as well the celebration of those designs through the existence of a completely separate park. In short, the OPC plans for this space will destroy its monumental status by incorporating and thereby erasing Ms. McAdams's design into that of Mr. Valkenburgh's.

Our suggestion to avoid these adverse effects:

- 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. If this is not possible, then we request that the current landscaping be completely respected and remain intact.
- We suggest that the City add a ramp and some walkways around the current garden as required to make it ADA accessible.

We are appending pictures from 1945 and today to show the current integrity of the original design and to remind everyone of the beauty of the space.



*Photo 19: View of Perennial Garden (extant) looking northwest, 1945, Chicago Park District Records: Photographs, Special Collections, Chicago Public Library*

from Section 106 HPIR 07/27/18, p39



photos 2019 by Doug Shaeffer



Sincerely,

Michael McNamee and Karen Rechtschaffen

Co-chairs

Save the Midway

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