

August 29, 2019

Ms. Abby Monroe
Public Participation Officer
Department of Planning & Development
City of Chicago
121 N. LaSalle Street, 10th Floor
Chicago, IL 60602

RE: Comments to Assessment of Effect to Historic Properties: Proposed Undertaking in and Adjacent to Jackson Park

Dear Ms. Monroe:

We have reviewed the Assessment of Effect (AOE) to Historic Properties: Proposed Undertaking in and Adjacent to Jackson Park related to the impact of the proposed Obama Presidential Center (OPC) which was publicly released on July 29, 2019. In addition to the comments Ward Miller and Mary Lu Seidel of Preservation Chicago shared at the August 5, 2019 OPC Section 106 Consulting Parties meeting, we submit for your consideration our comments to the AOE report.

The historic public parklands of Jackson Park, the Midway Plaisance and Washington Park were designed by Frederick Law Olmsted and Calvert Vaux, with additions by Alfred Caldwell, May McAdams and others of national and world recognition. The significance of Jackson Park, Midway Plaisance and the South Shore Cultural Center are monumental and well known to most audiences, including national and international scholars of architectural landscape design, historic landscapes and cultural heritage. The sites are listed on the National Register of Historic Places, and certain features, structures and buildings of both park sites are designated Chicago Landmarks. These designated Chicago Landmarks within the boundaries of the two parks include the Museum of Science and Industry building, constructed as the Palace of Fine Arts in 1893, along with the Columbia/Darrow Bridge and the landscape features of the park surrounding the MSI building and bridge. The South Shore Cultural Center building, the Club Building, the Gatehouse, Stable, Pergola, and several outdoor terraces are also part of the Chicago Landmark designation.

The 500-acre Jackson Park was designed by Frederick Law Olmsted, perhaps the most famous landscape designer of the 19th century and widely considered to be “the father of American landscape architecture.” Jackson Park was also the site of one of the most important events in Chicago’s history and arguably one of the most important cultural events of the 19th century, the World’s Columbian

Exposition of 1893. Jackson Park is connected via the Midway to Washington Park and then to Chicago's Emerald Necklace of great parks and boulevards, forming one of the most magnificent networks of urban parkland in the country.

Avoid & minimize

With the Section 106 process, the first goal should be to avoid any adverse effects. If avoidance is not possible, the second default is to minimize adverse effects. Finally, if minimization is not possible, the path of last resort is to mitigate the adverse effects of a development. This AOE report is focused exclusively on mitigation, openly bypassing avoidance and minimization. In the public Section 106 process, City and CDOT representatives continued to reiterate that the intention of this report is to consider only mitigation. Without any further discussion of the other issues with this report, it should be re-written to instead focus on real and viable avoidance and minimization strategies.

Within the study area, there are seven historic districts and 29 historic individual properties that are listed or are eligible for listing on the National Register of Historic Places. A viable, suitable and acceptable avoidance option would be to move the OPC to private land near Washington Park. This location would still be a great boon for Woodlawn and the South Side, and it would not require the level of acrobatics to maneuver around as the historic Jackson Park area. Placing a 235-foot-tall building and campus in the center of the incredible history that is in and surrounds Jackson Park, closing off Olmsted-designed roadways and clear-cutting old growth trees is insensitive to and disregards all the people and all the years that went into retaining what is still remains intact around Jackson Park.

The AOE report cites how well-preserved the park has been through the 125 years it has been in Chicago. Why does the City of Chicago, the Chicago Park District and the Obama Foundation now want to negatively impact 125 years of diligent stewardship? Section 3.3.1 (Page 21) of the report states: "As community needs have changed, alterations to the park have been necessary to sustain its purpose, but the park continues to retain historic integrity because the overall effect of previous alterations retained consistency with the original design principles." The changing community needs in the coming century can also be met while also retaining the historic integrity of Jackson Park. Also Section 3.3.1 (Page 22) of the report states: "In aggregate, the majority of alterations to the historic property over time have been consistent with the original design principles applied by the firm of Frederick Law Olmsted, Sr. As established by the Section 106 Historic Properties Identification Report (HPI) dated March 15, 2018, the combination of changes made to date do not impair the integrity of the existing character-defining features reflecting the original design principles." Again, after 125 years of continued maintenance and care of the historic integrity of Jackson, avoidance seems like the most logical action to take in addressing the adverse effects on this historic area.

Section 3.3.2.1 (Page 22) of the report details the extensive adverse effect the OPC will have on Jackson Park. "The undertaking will have an adverse effect to Jackson Park Historic Landscape District and Midway Plaisance because it will alter, directly or indirectly, characteristics of the historic property that qualify it for inclusion in the National Register.

- "The changes alter the legibility of the design of the cultural landscape in ways that diminish the overall integrity of spatial organization in the property as a whole. . .

- “[T]hey diminish the historic property’s overall integrity by altering historic, internal spatial divisions that were designed as a single entity.
- “The undertaking impacts the overall historic road network.
- “The undertaking alters the shape, form, and function of the historic primary entrance to the property.
- “Spatial organization and the landscape setting of some contributing resources (Cheney-Goode Memorial and Statue of the Republic) are transformed in ways that are inconsistent with the Secretary of Interior’s Standards for the Treatment of Historic Properties.
- “The undertaking removes, replaces, or otherwise alters historic resources and landscape features within portions of the historic property. New materials with modern functions differ from historic materials at a scale and intent that does not conform to the Secretary of the Interior’s Standards.
- “The size and scale of new buildings within the historic district diminish the intended prominence of the Museum of Science and Industry building and alter the overall composition and design intent of balancing park scenery with specific built areas.
- “The combined changes diminish the sense of a particular period of time within the historic property and impact the integrity of feeling.”

This is not one small adverse effect on a large park, but a substantial and large adverse effect on Jackson Park. This development on the parkland that will have a devastating effect on the entire landscape. Historic properties can be modified to meet the needs of the 21st Century, but this heavy-handed destruction is not how it should be accomplished. Avoidance and minimization strategies can guide a plan that will bring jobs and economic growth to the South Side without destroying a historic asset in the process. If we were in a completely land-locked area, that would be one issue. However, no one has made the claim recently that there is a shortage of vacant land in and around Woodlawn on which an extraordinary Obama Presidential Center can be built without destroying Jackson Park.

Section 3.5.1 (Page 46) on methodology reiterates the incredible stewardship that have witheld the test of time for 125 years: “[T]he HPI includes extensive analysis of how Jackson Park and Midway Plaisance have undergone substantial change over time while maintaining historic value and function.” We should continue this legacy of great stewardship by focusing instead on avoidance, preservation and restoration of existing features.

Section 5.0 (Pages 51-52) of the report’s attempt at “efforts made to minimize or avoid impacts” reads more like minimization and mitigation at best. Making the building taller is indicated as a way to reduce its footprint, which appears to ignore the Olmsted plan to have the Museum of Science and Industry be the most prominent building in the park. Although taking “approximately 3%” of the parkland, the OPC plan as proposed will have a devastating impact on the historic integrity of Jackson Park – integrity that has stayed intact for 125 years.

The AOE report’s conclusion in Section 6.0 (Page 53-54) focuses yet again on mitigation – with no mention of minimization or avoidance. “The City continues to investigate other potential mitigation strategies that will be further developed as part of the next stage of the Section 106 process, addressing adverse effect. . . . Measures necessary to mitigate adverse impacts from the Federal actions will be

incorporated in to the action and are eligible for FHWA funding when (1) the impacts for which the mitigation is proposed result from the Federal action; and (2) the proposed mitigation represents a reasonable public expenditure after consider the impacts of the action and the benefits of the proposed mitigation measures.”

Cumulative Effect

It is important that as we review the adverse effects of the proposed Obama Presidential Center, we also consider the looming Tiger Woods PGA golf course proposed by merging the South Shore and Jackson Park golf courses. When Tiger Woods was in town in August 2019, he said he decided to take action on this site because President Obama asked him to. The connection of these two developments and their potential effect on Jackson Park would be undeniably devastating to the historic integrity of Jackson Park and Frederick Law Olmsted’s vision for this internationally renowned landscape, and they should be considered cumulatively. One may even consider that between these two proposed projects, Olmsted’s vision for Jackson Park may be completely changed and perhaps obliterated.

Traffic

There are many significant flaws in the traffic assumptions utilized in the AOE. An analysis of the CDOT traffic analysis study was conducted by Patrick E. Hawley in May 2018 and noted several significant flaws in the data assumptions. Traffic along major roadways and past nearby historic properties and districts is an important area of study, and these assumptions need to be as precise and accurate as possible. Relying on poor data in the City’s analysis of traffic impacts in Woodlawn does not do justice to the people who live, work and play in the area, and it does not do justice to the historic landscapes and properties that have been a physical anchor in the Woodlawn community for more than 100 years.

Cost

While the City of Chicago and the State of Illinois are facing considerable budget crises, this does not seem like the best time to be investing public money to meet the requests of a private development which is already proposed to be given the park land at no cost. The estimated costs to make all of these changes – including the widening of Lake Shore Drive, the widening of Stony Island Avenue and the closure of large sections of Cornell Drive -- are substantial and a burden that the city and state should not bear at this time.

UPARR concerns

The Urban Park and Recreation Recovery (UPARR) program requires that every acre of lost parkland in Jackson Park be replaced. While the primary replacement park location on the Midway Plaisance is problematic on its own, the calculation of total lost acreage is also flawed.

Section 1.1.1.3 (Page 3) of report indicates that the public library roof will include picnicking space to make up for picnicking areas being lost with the proposed OPC construction. When will this area be open and free to the public for use? Will it replace hour-for-hour the recreational uses that are proposed to be lost?

There are informal recreational areas currently existing at Jackson Park mentioned on page 3 of the AOE which will be lost if the OPC is constructed as proposed. Will the opportunities for informal recreational use around the proposed Obama Presidential Center be available for free to the public for the same number of hours and days as the current space, or will they be forever open and free except when private events and limited hours of operation prohibit it?

Section 1.1.1.3 (Page 4) of the report addresses the planned Program, Athletic and Activity Center: When will this space be open and free for the general public to use? How often will it be leased out for private use or used for OPC activities? Will this be a one-for-one replacement of lost recreational space in Jackson Park?

Section 1.1.1.3 (Page 4) details plans to replace lost parkland in Jackson Park with redevelopment of the Eastern Midway area. Following the UPARR standards for replacement parks, how is developing a park on land that is already dedicated open space an acceptable replacement? Page 24 of the report further addresses the negative effect using this dedicated open space for replacement park will have on the Midway Plaisance: "The requirement that equivalent recreation opportunities are provided within the replacement area would modify the historic character of the Midway Plaisance east of the railroad embankment and viaduct with the addition of physical features for a play area."

The Midway Plaisance is a distinctive feature of this unified park system designed by Olmsted connecting Jackson Park with the larger Midway Plaisance to the west and to Washington Park beyond. This is one cohesive design that should not be disturbed or altered.

Counting vacated roads in the park as replacement parks is an additional assault to an objective effort to comply with the UPARR requirements. Those roads as roads contribute to the park itself. Pulling up pavement, adding some surfaces and grass and calling it replacement park is an affront to the integrity of the UPARR requirements.

Road closures and alterations

While Section 1.2 (Page 5) of the report routinely talks of "improvements" to the roadway system to benefit the proposed OPC, we think it is more appropriate to call it "significantly altering a historic landscape and roadway system." These road alterations will negatively and permanently effect the historic integrity of Jackson Park, and the City of Chicago should instead focus on avoidance as a strategy to address those negative impacts.

The Hayes Drive reconfiguration is reviewed in Section 3.3.2.2 (Page 25) of the AOE report.

"Realignment of the intersection of Hayes Drive with Richards Drive is not consistent with the Secretary of Interior (SOI) standards. . . .The new design of the roadway bypasses the Statue of the Republic that is the focus point of the historic intersection." We hold President Barack Obama in high regard, but it is incomprehensible to us why a center honoring his legacy has to do such harm to a historic asset that has been maintained for more than 125 years.

The closure of the portion of Cornell Drive north of Hayes Drive is reviewed on Page 27 of the AOE report. "For the removed portion of Cornell Drive north of Hayes Drive, the new walk approximates the existing road alignment near the West Lagoon and connects to the walk proposed as part of the OPC

development.” While the report finds this solution acceptable, it does not acknowledge the value of the vehicular access that Olmsted intended nor does it acknowledge the limiting factor for people with accessibility limitations who can best access the views of the park from a vehicle. A narrower Cornell Drive (pre-1960s conditions) with improved pedestrian and bicycle access would be the ideal compromise here.

The following bullet points are pulled from Section 3.3.2.3 (Page 29) of the AOE and illustrate the extent of the impact of road modifications recommended for the OPC:

- “Removal of historic roadways alters spatial organization of the overall park, reduces differentiation of landscape character areas within the historic property, and is not consistent with SOI standards that recommend the retention and preservation of historic land patterns and circulation systems.”
- “Closure of the Midway Plaisance between Stony Island Avenue and Cornell Avenue. . .removes an aspect of spatial organization that is fundamental to the historic design of Jackson Park and its connection to the Midway Plaisance.”
- “Closure of Marquette Drive. . .eliminates the historic, contributing triangular intersection with Richards Drive. . .The intersection and Marquette Drive approximately between S. Cregier Avenue and Lake Shore Drive demonstrate particularly strong expressions of historic landscape character related to the design of the property. The road closures alter contributing spatial organization and circulation routes.”
- “Closure of Cornell Drive north of Hayes Drive between 59th and 62nd Streets and the northbound portion of Cornell Drive south of Hayes Drive between 65th Street and 66th Place removes a road segment that contributes to the historic circulation network of the property.”

Shutting down roads may “prioritize pedestrians over vehicles as well as internal circulation with the historic property over commuter traffic through the property,” but it will substantially impair the historic character of the park and makes the park less accessible to people with disabilities who can best tour the park from a motorized vehicle. It is possible to narrow roadways and add design elements to slow traffic that do not mean cutting whole arteries out of a historic park design.

View sheds

It is essential that a proper above-ground-level analysis of the Obama Presidential Center’s impact is conducted to gain a complete perspective on the adverse effects of this proposed development.

At the August 5, 2019 Section 106 Consulting Party meeting, City of Chicago representatives indicated they did not have the technology to prepare visual impacts from different perspectives beyond the street-level shots in the AOE appendices. It is unbelievable that a city the size of Chicago does not have access to software that by even the highest estimates will cost between \$3,000 and \$5,000. With the amount of money the City of Chicago has already funneled into considering the OPC in a historic park surrounded by significant historic assets, \$3,000 does not seem like much to ask for if the City genuinely wants to assess this proposed project’s full impact.

This AOE is not acceptable if it doesn’t include well-done visual impact assessments of all the historic properties and districts near the proposed OPC. We are of the opinion that a 235-foot-tall tower will

negatively impact view sheds from almost every angle of Jackson Park and destroy the naturalistic features of the park. The view sheds would be severely impaired from not only within Jackson Park but also looking east from the Midway Plaisance. Careful consideration should be given to an enhanced view shed analysis that meaningfully depicts what this project's visual impact will be on the entire area.

Historic landscape and trees

Jackson Park was one of Chicago's first, grand-vision Lakefront parks. Its pedigree design was always considered superior to any other park in the City of Chicago. Both scholars and Chicago residents considered Lincoln Park as secondary in design to the great and magnificent South Side and South Park System of Olmsted's vision and design. This was not only a professional opinion amongst scholars of landscape design, but also a popularist view among citizens of Chicago for decades and perhaps a century. It is only recently that this fact has been mostly forgotten.

The AOE report notes that the Women's Garden built in 1936-1937 and designed by May McAdams "will be replaced." Replacement of historic character after it is destroyed should be the last-resort strategy if nothing else works. This destruction and replacement is unacceptable. Avoidance and minimization should be thoroughly vetted first. While we fully support universally accessible design, there has to be a better way to improve accessibility in this garden feature without completely destroying it. The garden is not being destroyed to improve accessibility. It's being destroyed to accommodate the OPC which is then placating some critics by touting a universally accessible redesign. This women's garden was built on the location of the Woman's Building from the 1893 World's Fair designed by Architect Sofia Hayden, the only woman architect involved in the 1893 World's Fair buildings.

Section 3.3.2.3 (Page 31) of the report further details the devastation to Jackson Park's historic landscape and flora. "With the exception of the English Comfort Station building, the remainder of the contributing historic features south of the Perennial Garden/Women's Garden to 62nd Street will be removed or altered to accommodate the elements associated with the OPC. . . .The change to this portion of the historic property is not consistent with SOI standards that stipulate the need to preserve contributing historic features and discourage 'placing a new feature where it may cause damage to, or be intrusive in spatial organization and land patterns.'"

Section 3.3.2.3 (Page 32) notes Olmsted's intention that the Museum of Science and Industry be the "dominating object of interest" within Jackson Park. "Within the historic property, the comparatively low-lying Museum of Science and Industry building was intended as the only building to be a 'dominating object of interest' inside of Jackson Park and the Midway Plaisance. The proposed OPC Museum Building affects views within the historic property by drawing specific focus to an exceptionally prominent building."

Section 3.3.2.3 (Page 32) reviews the negative effect on historic vegetation in Jackson Park: "Construction of the OPC also changes existing historic vegetation in a way that is inconsistent with SOI standards which emphasize the retention, preservation, protection, and maintenance of historic material features. . . .the [OPC] design results in partial removal of Olmsted designed historic vegetation patterns including groves of canopy trees around the historic playing fields and regular rows of trees along the streetscape."

It is estimated that 408 trees will or already have been removed to make the OPC possible, with another 350-400 trees coming down for the proposed road reconfigurations. Looking at the cumulative effect of the OPC and a Tiger Woods golf course, it is estimated that an additional 2,000 trees will be felled for the golf course. In total, nearly 3,000 trees will be lost in a nationally significant historic park. That kind of deforestation is unacceptable.

Summary

Like the rest of Chicago, Preservation Chicago is ready to welcome the Obama Presidential Center to the South Side of Chicago. Avoidance and not mitigation should be the required first course of action under consideration. This AOE report needs to be done with that as its primary objective.

The traffic impacts and view shed impacts of the proposed Obama Presidential Center also need more thorough research and assessment.

If this project and others planned in the immediate future go forward as proposed, virtually nothing will be left of Frederick Law Olmsted's vision for Jackson Park. From the perspective of Chicago history, architecture and parks, that is unacceptable. The current proposal for the Obama Presidential Center in no way respects or contributes to the historic integrity that is Jackson Park, the Midway Plaisance and Washington Park.

We look forward to continuing this Section 106 process and seeing a better assessment produced going forward. If you have any questions or concerns about our comments, please feel free to contact Ward Miller directly at 773.398.6432 or via email wmiller@preservationchicago.org.

Sincerely,



Ward Miller
Executive Director



Mary Lu Seidel
Director of Community Engagement

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