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30 N. Michigan Ave.
Suite 2020
Chicago, IL 60602
www.Landmarks.org

August 30, 2019

(SENT VIA EMAIL)

Ms. Abby Monroe
Coordinating Planner
City of Chicago,
Department of Planning and Development

RE: Response to request for comments on the Assessment of Effects to Jackson Park Historic District and Midway Plaisance

Dear Ms. Monroe,

Landmarks Illinois is writing to provide its comments regarding the Assessment of Effects (AOE) to the Jackson Park Historic District and Midway Plaisance associated with proposed road and park changes to accommodate the Obama Presidential Center (OPC). As a consulting party, we have several comments and questions in regards to this phase of the Section 106 review process.

The city, state and federal agencies have acknowledged an “Adverse Effect” finding in the AOE due to changes to the following:

- Cultural landscape
- Spatial organization of roadways
- Spatial organization of contributing resources such as:
 - Cheney-Goode Memorial
 - Statue of the Republic
 - English Comfort Station

An adverse effect finding in the AOE is also due to inclusion of new elements in the park including the OPC buildings and plaza, and due to removal, replacement, or alteration to historic resources including:

- Women’s Garden
- Western Perimeter Playground
- Eastern end of Midway Plaisance

Failure to Document Consideration of Avoidance of Adverse Effect

Landmarks Illinois agrees with the adverse effect findings stated above. However, at the August 5th, 2019 consulting parties meeting releasing the AOE Report published July 2019, the city’s presentation only posed considerations for minimization and mitigation. The Section 106 process, with a finding of adverse effects, first calls for the development of measures to

avoid the adverse effect by either cancelling or making significant changes to the project. Second to avoidance is minimization of the adverse effect, and mitigation as *the last option* if avoidance and minimization are not feasible. The AOE Report includes in Section 5.0, pages 51-52, a description of the minimization and mitigation efforts by the Federal Highway Administration (FHWA) and the National Park Service (NPS) in collaboration with the City of Chicago. Our concerns hinge on the important fact that the consulting parties were not consulted in the discussion, or development of, avoidance or minimization efforts. We call for a series of meetings that would focus on: 1) avoidance; 2) minimization; and then, 3) mitigation. Each step must be given full and transparent consideration and include the consulting parties. Otherwise, this Section 106 process is nothing more than a *fait accompli*. This is particularly troubling when a review under Section 4(f) of the U.S. Department of Transportation Act [1966] (discussed below) requires that avoidance measures be thoroughly investigated, but which remains largely unaddressed.

Examples of Avoidance Measures

As it relates to avoidance, Landmarks Illinois requests that the following actions be considered and implemented:

Eastern End of the Midway Plaisance

While the Area of Potential Effect (APE) was extended to include the entire Midway, as we had recommended in our January 5, 2018 letter, we do not agree that the eastern end of the Midway Plaisance should be offered for Urban Park Recreation and Recovery (UPARR) grant recreational land replacement. The intent of UPARR recreation replacement should be to provide recreational space where it does not currently exist, not on existing park property. Reuse of an existing park greenspace is not replacement. Not only does this deny the opportunity to create new park land in an area underserved by existing passive and active green and/or recreational space, but causes an additional adverse effect on the eastern end of the Midway Plaisance. The Plaisance was intended to be an open, green, passive and scenic vista creating an axial connection between Jackson and Washington Parks. We recommend the UPARR recreation replacement be moved to another geographic area where little accessible parkland currently exists and is in most need, such as West Woodlawn, Parkway Gardens, Greater Grand Crossing or Chatham. The eastern end of the Midway Plaisance should remain open and free of new landscape design and obstructions, as was intended in the *1909 Plan for Chicago*.

Midway Plaisance twin roadways that buffer the Midway's connection into Jackson Park.

The twin roadways on the north and south sides of the Midway Plaisance that connect into Jackson Park are a key original design feature of Frederick Law Olmsted's park circulation system. The current OPC campus site plan calls for the elimination of the southern road along the Midway Plaisance east of Stony Island Avenue. We recommend the OPC campus be shifted south toward the Jackson Park

track and field by the necessary measure to avoid elimination of this section of road that also flanks the Women's Garden and either retain the roadway as is, or hardscape using universal design principles to accommodate pedestrian and other individual active transportation modes (bicycle, scooter, skateboard, rollerblades, etc.).

The Women's Garden

This important Works Progress Administration (WPA) -era perennial garden, the first Chicago Park District woman-designed landscape, should be left intact, not destroyed and then recreated with alternative landscape features. Technology for water retention is advanced enough today that water runoff can be accommodated utilizing the design of the OPC Plaza and Entry Grove, the Forum Building, the Library Building, and the Program, Athletic and Activity center green roofs and permeable pavers. Should this treatment endangered archives, artifacts, or activities underneath, there is also planned green space, such as the Woodland Walk, the Entry Garden, the Lagoon View Lawn, the Wetland Walk, and the Great Lawn that provide ample water recapture and retention areas. Destroying the significant historic feature of the Women's Garden can be avoided.

Methods to Minimize the Adverse Effect

As it relates to minimization, we believe the following should also be implemented:

Real estate speculation and displacement

In our January 5, 2018 letter, looking to the recent example of The 606 trail on Chicago's northwest side, we noted the risk of real estate speculation that will invariably result in displacement and demolition. While The 606 is a valued and accessible amenity, it has caused documented displacement of low-income residents through speculative developments. As we previously stated, there is an opportunity to plan ahead to assure that the OPC does not have the same unintended impact. We strongly encourage that the city explore programs to ensure the preservation of the existing mixed-income community and create opportunities for its existing residents to remain and to invest, particularly relating to housing in the Woodlawn community. Programs, such as the creation of community land trusts or a housing preservation fund, which may curb displacement and encourage building rehabilitation over demolition should be prioritized.

Historic roadways and circulation patterns

FHWA and the Chicago Department of Transportation (CDOT) are proposing to expand Lake Shore Drive, Hayes Drive, and other intersections to accommodate diverted traffic from the closed Cornell Drive. The following should be considered concerning road widening:

- While Cornell Drive was widened over the years, there has been a circuit drive around the park since its original Olmsted design. A minimization effort would be to retain some aspect of this historic road for vehicular traffic, such as narrowing the road. A mitigation effort could include memorializing the roadway alignment in an expanded pathway utilizing alternate hardscape material, to set it apart from the other new design features, and providing interpretive activities and signage about how people felt moving through and around Jackson Park. Through our conversations at Section 106 meetings with Black residents living near the park, few felt welcome, understood how to navigate or use the park, or felt they had access to its history (because of a lack of signage). These important stories could be told using interpretive methods.
- Hayes Drive, and the southern portion of Cornell Drive that would remain open, will require appropriate traffic-calming measures so as to protect the expected experience of park-goers visiting the museum campus and the natural setting. Jersey barriers and high-speed traffic diminish the experience of being in Jackson Park.
- Existing historic resources should not be moved or locations altered for the proposed expansion of Hayes Drive, such as the Statue of the Republic which just celebrated the 100th anniversary of being its current location in 2018. The AOE report states of the proposed Hayes Drive and triangular road intersection reconfiguration, “the realignment will introduce visual elements that diminish the integrity the Statue of the Republic.” This impact could be avoided by maintaining and redesigning the traffic circle, and keeping the Statue in situ. Traffic circles have been deployed by departments of transportation nationwide as more efficient for the flow of vehicles than stop lights.

Mitigation Measures

As previously stated, the consulting parties should not be asked to present mitigation measures at this time, since we have not contributed to the discussion of avoidance and minimization. In the event our request for additional consultation is denied, and for the purposes of this response’s deadline, we suggest mitigation measures here.

Interpret Jackson Park’s women’s history through multimedia methods and on-site signage:

- The Women’s Garden, built in 1936 and designed by May McAdams, should not only be preserved (see avoidance section above), but interpreted with appropriate signage that notes its significance as the first woman-designed public landscape in the city, and that tells the story of McAdam’s career.
- The Cheney-Goode Memorial, dedicated in 1932, should be given a prominent location, conserved and interpreted with appropriate signage. The Chicago

Park District's website states, "The Cheney-Goode Memorial is one of Chicago's few early monuments dedicated to women who played a significant role in the city's history. It honors two accomplished women who lived on the city's South Side, Flora S. Cheney and Katherine H. Goode." Few people know this monument exists or the role these women played in Chicago and Illinois politics.

- The location of the Woman's Building from the World's Columbian Exposition of 1893 should be interpreted where appropriate at the OPC so that its prior existence on the site is understood.

Invest in, repair and maintain historic buildings and structures in Jackson Park, including:

- Iowa Building comfort station in the northeast corner of Jackson Park at 56th Street.
- Darrow Bridge, constructed in 1880 and designed by Daniel Burnham and John Wellborn Root, built as the Columbia Bridge and dedicated by Mayor Richard J. Daley as the Clarence Darrow Memorial Bridge in 1957.
- 9th hole golf shelter, circa 1912, designed by the D.H. Burnham & Co.
- Cecil Partee golf shelter building, circa 1900.
- The English Comfort Station, 1936, designed by E.V. Buchsbaum.

Additional concerns, requiring a response, include:

1. The Chicago Park District and its consultants with the Army Corps of Engineers ensured that that 2013-initiated Great Lakes Fisheries and Ecosystem Restoration (GLFER) project met the Secretary of Interior Guidelines for Cultural Landscape Rehabilitation and balanced ecological needs with historic preservation goals. We previously understood that the GLFER project was still underway and to be completed by the fall of 2019 according to the Corps of Engineers. What is the status of this effort and has its completion been stalled due to the current OPC planning?
2. It is still not clear if FHWA plans to conduct a Section 4(f) process for the OPC proposal, in coordination with a National Environmental Policy Act (NEPA) process. Such a review is required here. Often the outcomes of Section 4(f) have impact on Section 106 of the National Historic Preservation Act, and vice-versa. How will recommendations from 4(f) and NEPA studies be integrated with Section 106 outcomes?
3. While it has been continuously stated that the golf course project is a distinct and separate project from the OPC, the two projects will be equally benefitting from the same infrastructure changes, and it seems inconceivable that the planners of both projects are not in communication. What is the planned regulatory review for the golf course project, and when will these

reviews take place as it relates to the timing of OPC's Section 106 and NEPA reviews?

We echo the serious concerns raised by the Advisory Council for Historic Preservation (ACHP) in its recently issued comments. Some of those comments raised questions regarding the meaningful nature of the process being implemented and the timeline moving forward. We believe that an inclusive and transparent process is of the utmost importance for the public and the successful development of the OPC. Consistent with the concerns raised by the ACHP we encourage at least three different sessions in the future on the adverse effects, one devoted solely to the issues of avoidance, a second to minimization, and a separate one related to mitigation.

Lastly, there has been much reported in the press (as well as during the August 5th, 2019 meeting) relative to the start of construction at the OPC. The ongoing federal review process requires that no construction begin on the project as it remains subject to review – in essence, the whole point of engaging in a review process that would permit adverse effects to be avoided, minimized or otherwise mitigated. We would appreciate confirmation that no physical alterations to Jackson Park will be made for purposes of the construction and development of the OPC site (including all related roadwork) until the federal review processes have been completed, including Section 106, Section 4(f), and NEPA.

We look forward to participating in the ongoing Section 106 process and making further comments regarding the AOE draft and reviewing all avoidance, minimization and mitigation suggestions.

Sincerely,



Bonnie McDonald
President & CEO

Cc: Matt Fuller, FHWA
Arlene K. Kocher, FHWA
Lee Terzis, NPS
Nate Roseberry, CDOT
Heather Gleason, CPD
Eleanor Gorski, DPD
Samir Mayekar, City of Chicago
Brad Koldehoff, IDOT
Anthony Rubano, SHPO
Jaime Loikinger, ACHP