

Assessment of Effects to Historic Properties

Proposed Undertaking In and Adjacent to Jackson Park
Jackson Park, Chicago, Illinois

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1.0 Introduction

This Assessment of Effects (AOE) report evaluates the potential effects to historic properties from the Obama Presidential Center (OPC) project and certain related Federal actions in and near Jackson Park (collectively, the proposed “undertaking”). As described more fully below, the undertaking comprises the construction of the OPC in Jackson Park by the Obama Foundation, the closure of roads to accommodate the OPC and to reconnect fragmented parkland, the relocation of an existing track and field on the OPC site to adjacent parkland in Jackson Park, and the construction of a variety of roadway, bicycle and pedestrian improvements in and adjacent to the park. The Federal actions proposed include the funding of roadway improvements and bicycle and pedestrian enhancements by FHWA; proposed amendment of the UPARR grant agreement and 1010 boundary by the NPS; and potential Section 404 permits and Section 408 permissions by the US Army Corps of Engineers. The City of Chicago (City) has approved the construction of the OPC project in Jackson Park. The Barack Obama Foundation (Foundation) is privately funding the construction and future operation and maintenance of the OPC.

The analysis presented in this report will be used as a basis for consultation between the Federal Highway Administration (FHWA), the National Park Service (NPS), the U.S. Army Corps of Engineers (USACE), the City, the State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), and other consulting parties concerning the effects of the Undertaking on historic properties that are listed or eligible for listing on the National Register of Historic Places (NRHP).

The FHWA is the lead agency for Section 106 compliance under the National Historic Preservation Act of 1966 (NHPA), 54 U.S.C. § 306108, and its implementing regulations (36 CFR Part 800). The Illinois Department of Transportation (IDOT), through a stewardship and oversight agreement with the FHWA, assists in reviewing the compliance of a project with environmental laws and conducts coordination with necessary state officials, including the State Historic Preservation Officer (SHPO). Although Section 106 review and NEPA review are distinct processes, they are being coordinated and are occurring in parallel for the Federal agency decision-making processes. The assessment of effects evaluates the effects from the undertaking based on the nature of the Federal actions and the scope of the Federal agency’s authority, as required by the Section 106 regulations. In this case, the ACHP advised FHWA and NPS to take an expansive approach in describing the effects of the non-Federal actions.

Consistent with 36 CFR 800.2(a)(3), the City of Chicago Department of Planning and Development (DPD) and the Chicago Department of Transportation (CDOT) developed the information, analyses, and recommendations in this report. Staff from IDOT meeting the Secretary of the Interior’s Qualification Standards reviewed the report and provided guidance to ensure the contents meet applicable standards and guidelines. Federal agency officials from NPS and FHWA provided guidance in preparation of the report and reviewed the contents to ensure it meets applicable standards and guidelines.

Section 106 compliance activities completed for the project to date include: initiating the Section 106 process; identifying consulting parties; delineating the Area of Potential Effects (APE); completing an archeological survey and preparing an Archeology Report; identifying and evaluating above-ground historic properties within the APE and preparing a Historic Property Inventory (HPI) report; making assessments of potential effect; and consulting with the SHPO, the ACHP, the consulting parties, and the

public, see Section 2.0 for a summary of the HPI activities. Section 4.0 summarizes public and agency coordination efforts to date.

The draft AOE was made available to the consulting parties and the public for a 30-day review and comment period beginning July 29, 2019 and ending August 30, 2019. A record of the comments received from the consulting parties is included in Appendix F. This final AOE considers and addresses the comments received from consulting parties and will be made available to the consulting parties and the public. It also presents an additional NRHP listed property, the Chicago Park Boulevard System Historic District; information regarding the district can be found in Section 3.6.

Consulting parties may either concur or object to the effect findings in this final AOE within 30-days of receipt of this document. If any objection is received on the effect findings within 30-days, FHWA may either consult with the objecting party to resolve the disagreement, or FHWA may request the ACHP provide its opinion on the objection. The FHWA will take into account the ACHP's opinion upon issuing its final decision regarding effects. Upon concluding the effects analysis, the FHWA, the NPS and the USACE will proceed to the next step in the Section 106 process, see Section 6.0.

1.1 Project Overview and Description

After a lengthy and competitive search, the Barack Obama Foundation selected Chicago, and specifically Jackson Park, as the future home of the OPC. The City of Chicago and the Chicago Park District also conducted a lengthy and thorough public process to review the project design and related improvements in Jackson Park, and ultimately approved the Foundation's proposal to build the OPC on a 19-acre site on the western edge of Jackson Park, along with road closures to accommodate the OPC (and reconnect fragmented parkland) and the relocation of an existing track and field from the OPC site to adjacent parkland. The City's approval of the Foundation's proposal to locate the OPC in Jackson Park is a local land use decision and is not subject to the Federal approval process, including mitigation. The same is true of the roadway closures and the relocation of the track and field.

Other aspects of the OPC project, however, require Federal involvement and trigger compliance with Section 106. Jackson Park received two Federal matching grants under the Urban Park and Recreation Recovery (UPARR) program: one from 1980 in the amount of \$125,300 for a tree planting program and community recreation program (an Innovation Grant), and the other from 1981 in the amount of \$135,870 to replace approximately 700 trees and restore approximately 7,000 square yards of landscaped areas (a Rehabilitation Grant). The OPC site is located within the Section 1010 boundary established by the grants. Under Section 1010 of the UPARR Act (54 U.S.C. §200507) and as codified in 36 C.F.R. §72.72, no property improved or developed with UPARR assistance can be converted to other than public recreation uses without NPS approval. The City is seeking approval from NPS to convert the following portions of Jackson Park: (1) a 4.6-acre rectangular space within the OPC site on which the building campus will be situated, and (2) strips of parkland along existing roadways (approximately 5.25 acres) to accommodate proposed transportation improvements. NPS will not approve a conversion proposal until the City provides replacement property and recreational opportunities of reasonably equivalent location and usefulness. To meet this requirement the City has proposed to replace the converted parkland with 5.2 acres of open space on the east end of the Midway Plaisance (east of the railroad embankment), and approximately another 7.75 acres of new parkland created from road reconfigurations and road closures within Jackson Park. If NPS approves the City's conversion proposal, NPS will amend the original UPARR grant agreements to remove the grant conditions from the converted parkland and apply the grant conditions to the replacement property.

The City has proposed a variety of roadway improvements within and adjacent to Jackson Park to mitigate traffic impacts from the road closures and to improve bicycle and pedestrian access and circulation within Jackson Park. The City is seeking Federal funding for the transportation improvements from the Federal-Aid Highway Program, which requires approval from the FHWA.

In connection with the proposed roadway improvements, the City needs permits or permission from the USACE under sections 404 and 408 of the Clean Water Act to, respectively, discharge fill material into waters of the United States, and alter an ecosystem restoration project funded under the Great Lakes Fishery & Ecosystem Restoration (GLFER) program.

For the purpose of assessing effects to historic properties under Section 106, the above-described Federal actions (conversion approval, Federal funding for transportation improvements, and USACE permits) and the local actions (approval of the construction of OPC, road closures and track and field relocation) are collectively referred to in this AOE as the undertaking. For a map depicting the location of the Federal actions and the City actions, see Exhibit 1 in Appendix A. The component actions that comprise the undertaking are described in more detail below with relevant context.

1.1.1 Non-Federal/City of Chicago Actions

1.1.1.1 Obama Presidential Center

The City has approved the construction of the OPC in Jackson Park. The OPC site is located on the east side of Stony Island Avenue between 59th and 62nd Streets, and is approximately 19.3 acres in size, see Exhibit 1a & 1b in Appendix A, and Figures 1-4 in Appendix B. The OPC includes four buildings that will occupy approximately 2.5 acres of the site, including the Museum Building, the Forum Building, the Library Building, and the Program, Athletic and Activity Center (PAAC), in addition to an underground parking facility. The remainder of the OPC site will include new pedestrian and bicycle pathways, a nature walk along the lagoon, a sloped great lawn that can accommodate a sledding hill, a fruit and vegetable garden, a play area and picnic areas. The underground parking facility is located on the OPC site between the PAAC and the Library Building. A conceptual site plan of the OPC is provided as Figure 1a in Appendix B. Visualizations of the OPC project are available at <https://www.obama.org/opc-2019/>.

1.1.1.2 Roadway Changes

The City proposes the following permanent roadway closures and removals within Jackson Park: Cornell Drive between 63rd Street (Hayes Drive) and 59th Street, the northbound section of Cornell Drive between 68th Street and 65th Street, Marquette Drive between Stony Island Avenue and Richards Drive, and the eastbound portion of Midway Plaisance between Stony Island Avenue and Cornell Drive, see Figure 2 in Appendix B. Closures of the eastbound Midway Plaisance and Cornell Drive between 63rd Street and 59th Street are necessary to accommodate the development of the OPC, reduce vehicle conflict with visitors to the park, and improve connectivity to the lagoons and lakefront. The additional roadway closures will reduce the number of multilane roadways within the park.

The City also proposes improvements to the roadway, pedestrian, and bicycle network to address the changes in travel patterns that arise from the proposed roadway closures and to improve public safety, access and circulation throughout the park. The roadway changes including widening Lake Shore Drive (Hayes Drive to 57th Drive) one travel lane to the west; removing parking and replacing it with a gravel lane in each direction on Hayes Drive (Cornell Drive to Lake Shore Drive); widening Stone Island Avenue (67th Street to 65th Place) one travel lane to the east; widening Stony Island Avenue (65th Place to 59th Street) one travel lane in each direction; and the associated intersection improvements on each roadway. Proposed bicycle and pedestrian improvements include five new underpasses, additional trails, and enhanced access accommodations; these are further described in Section 1.3.

1.1.1.3 Recreation Changes

The proposed changes in Jackson Park will impact existing recreation opportunities. The impacted area is depicted by a shaded box on the OPC conceptual site plan in Figure 1a of Appendix B. Figure 1b illustrates the area proposed for removal from the Section 1010 map along with traffic improvement measures (also areas that will be removed from the Section 1010 boundary). NPS will consider recreation opportunities lost and gained as part of its decision-making analysis. Recreation losses must be replaced with reasonably equivalent recreation opportunities under the ownership and jurisdiction of the City of Chicago that meet existing public recreation needs. Replacement recreation may be located on new or existing parkland but cannot be located within the existing Section 1010 boundary.

The OPC will affect all or a small portion of five recreational elements currently on the OPC site: (1) a portion of the footprint occupied by the existing track and field facility; (2) open recreation space, including existing trails used for biking or walking; (3) the existing picnic grove; (4) the Perennial Garden/Women's Garden; and (5) the 62nd Street playground. To address these recreation losses, the City will reconfigure or offset through replacement property, uses, and opportunities both on the OPC site as well as elsewhere within Jackson Park:

The existing track and field will be replaced with a new track and field to be constructed in the area immediately south of the OPC site within Jackson Park.

The Picnic Grove is used for picnicking, sitting, walking, gathering, pick-up games (such as soccer), play, and special events. The OPC will displace the Picnic Grove, but provide picnicking and other open space areas on the OPC campus for similar uses. The Picnic Grove's uses will be recouped through multiple picnicking opportunities available across the several areas on the larger OPC site amenable for picnicking. These include the Community Grove, Lagoon View Lawn, the Great Lawn and the Lagoon Grove, among other spaces. There will be a minimum of one acre of informal picnicking space collectively within these spaces. Other green areas of the OPC Site include the playground, the roof of the Forum building, the Women's Garden, etc.

The Perennial Garden/Women's Garden is used for gardening, aesthetic enjoyment, commemorations, sitting, walking, nature observation, meditation, gathering, and play. Existing features of the historic garden will be removed and replaced with a new design of equivalent size and improved accessibility upon completion of the OPC.

Opportunities for informal recreation will also be impacted by the OPC construction. Such areas have no formal uses, but are used informally for sitting, walking, gathering, pick-up games (soccer, other), play, and for landscaping or as buffer between recreation areas and sidewalks, paths, and roadways. These opportunities will continue to exist on the OPC site as well as in new landscaped areas made available by the closure of portions of the Midway Plaisance and Cornell Drive on the site, as discussed below.

Opportunities for play on a structured facility will also be reconfigured. The 62nd Street playground will be relocated and expanded by the Foundation as part of the OPC construction to the immediate northwest of the current location, with an enlarged footprint and all new equipment, including custom-made experiential play features.

In addition to replacing existing recreational opportunities, the OPC includes the development of new recreational opportunities. The Program, Athletic and Activity Center will provide a new opportunity for indoor public recreational programs. Other new recreation amenities on the OPC site include a sledding hill, great lawn, nature trail, and woodland walk.

The proposed alterations of roadways that will remain in the park (e.g. changes that will improve traffic flow and safety) may affect various open park spaces used for informal recreation as well as some sidewalks and pathways used for walking, jogging, and biking. The park spaces that would be lost to roadway alterations are linear, narrow and mainly serve as landscape buffer between roadways and more functional recreation areas nearby. Although some pathways and sidewalks will be removed when the roadways described above are closed and converted to greenspace, new pathways and sidewalks are proposed to replace the affected pathways and sidewalks while also providing improved connectivity and circulation within the park. Proposed underpasses will also facilitate better connectivity and safety. As part of the OPC site development, the City intends to close certain roadways within Jackson Park and convert those roadways into parkland to also satisfy UPARR. The City will restore these new areas, comprising approximately 7.75 acres of open space, to provide replacement recreation opportunities.

Finally, the City proposes to replace recreational opportunities within the UPARR conversion area on the east end of the Midway Plaisance, located east of the ICRR embankment. It is bounded by the North and South Midway Plaisance, Stony Island Avenue, and the ICRR viaduct and embankment. This area is approximately 5.2 acres. It has two mixed-use trails and a sidewalk. The majority of the east end of Midway Plaisance is an open lawn lined with trees. The open space contains the historic Cheney Goode Memorial and non-historic features, including park benches, an informational kiosk, and a wetland. The Cheney Goode Memorial consists of a bench and sundial placed on the western side of the east end of the Midway Plaisance in 1932. The Cheney Goode Memorial location is noted on Figure 3 of Appendix B. Though tree patterns have changed in most of the area, the westernmost portion of the lawn area has an elevated landscape containing dense plantings and trees that have historically provided screening of the ICRR (now Metra Electric) rail line.

The east end of the Midway Plaisance was among seven potential sites the City evaluated for UPARR replacement recreation. These included Harold Washington Park and five vacant sites between 57th Street and 71st Street. The City evaluated the sites that could offer the same quality of recreational opportunities within a mature landscape, walkability to Chicago's lakefront, and walkability to neighborhoods surrounding the OPC site. The City also considered anticipated cost, feasibility, and complexity of using the sites for UPARR replacement recreation. The vacant sites and Harold Washington Park were ruled out for UPARR-designated recreation because they lack all or most of the key characteristics and because they present feasibility concerns. In contrast, the east end of the Midway Plaisance exhibits each of the key characteristics. The Midway Plaisance is already integrated into the same park system as Jackson Park and like Jackson Park, provides a historic setting for recreation. The City believes the historic setting is valuable and enhances the experience of the space. The City also owns the Midway Plaisance, substantially limiting the risk of unforeseen complexities like

environmental contamination. For these reasons, the City proposes the east end of Midway Plaisance for UPARR replacement recreation, see 36 CFR 72.72(b)(3).

To replace lost recreational opportunities, and respond to community requests for additional recreation opportunity, the City proposes to reconfigure the east end of Midway Plaisance to include a combination of open space and a formal play area. A concept plan of the proposed recreational changes within the east end of the Midway is presented in Figure 3 of Appendix B. The western side of the lawn would be altered with the addition of a play area. The installation of a missing historic walk and tree patterns rehabilitate historic spatial organization, to a historically open character with corner plantings. The sunken grade of the lawn area would be modified to facilitate infiltration and drainage and to enhance use of the open field. This work may require a Section 404 permit from USACE. There will be no alterations to the configuration of existing roadways or walking paths. The concept plan establishes a design envelope for the purpose of analyzing potential impacts to historic properties. Within these parameters, the City will make final design selections (such as specific playground equipment) with input from the public and in light of the historic nature of the Midway Plaisance, seeking to minimize any potential effects to historic resources, pathways, and plantings, to the extent possible. The schedule for public input for the final design will be announced by the City following completion of the Federal review process.

Finally, the City proposes to replace parkland converted to roadways (approximately 5.25 acres) with roadways converted to parkland (approximately 7.75 acres), resulting in a net gain of approximately 2.5 acres of open space in Jackson Park for additional public recreation use. The former roadways will be integrated into Jackson Park and support recreational opportunities similar to those lost as a result of road widening and other road improvements within the park in order to improve traffic. The nearly optimal equivalence of location and utility of this area made it the City's preferred location compared with locating additional recreation opportunities outside the park. Alternative locations outside Jackson Park would lack the exceptional integration afforded by the City's preferred alternative in historic Jackson Park and would require the City to purchase and/or remediate property and accept the risk of unknown site conditions.

1.2 National Park Service Action

The UPARR program, administered by the NPS, provided grant funds to Jackson Park in the early 1980s. These grants require the City to maintain public recreation uses within the UPARR boundary in Jackson Park. NPS will review and approve any changes within Jackson Park that convert a recreation use to a non-recreation use. NPS approval is conditioned upon the change being in accord with the current local park plan, adequate replacement recreation property, and opportunities of reasonably equivalent location and usefulness, see 54 U.S.C. §200507. While NPS reviews the adequacy of the replacement recreation, NPS does not have authority over local City land management, including the location and design of the OPC, proposed road closures, and the final design of the proposed recreation amenities.

The need for the NPS action arises from the City's decision to authorize the location of the OPC within Jackson Park and modify the roadway network in and around Jackson Park. Elements of these projects change areas that were previously in recreation use to non-recreation uses, thus triggering a partial conversion under UPARR. The purpose of the NPS action is to review and approve a partial conversion of UPARR parkland. If the conditions outlined in the law and regulations are met, the NPS will amend the original UPARR grant agreements to remove the area no longer in recreation and incorporate the City's proposed replacement recreation property.

Evaluation of the City's proposed replacement land includes the review of current recreation uses within the identified conversion areas. The UPARR conversion areas include a portion of the OPC site as well as areas where proposed roadway widening or realignment occurs. These conversion areas are shown and noted on Exhibits 2-5 in Appendix A.

The NPS will review the proposed recreation uses associated with the replacement areas along with the City's justification to determine if they are reasonably equivalent to lost opportunities based on regulatory criteria, described at 36 CFR 72.72. The UPARR regulations do not mandate acre-for-acre replacement of recreation land. The proposed replacement areas are shown on Exhibits 2-5 in Appendix A.

1.3 Federal Highway Administration Action

The purpose of the FHWA action is to (1) address changes in travel patterns resulting from closing roadways in Jackson Park, and (2) improve bicycle and pedestrian access and circulation.

The FHWA administers the Federal-Aid Highway Program, which makes available Federal funding to state departments of transportation and local agencies for roadway projects. The Chicago Department of Transportation (CDOT) proposes to use Federal-aid highway funding for roadway construction activities to mitigate traffic impacts from the proposed closure of roadways within Jackson Park. The FHWA does not have any authority under UPARR, including proposed boundary changes or replacement recreational land under UPARR. Nor does it have authority over the design and location of the OPC or proposed roadway closures by the City. Prior to the authorization of Federal-aid highway funds, the FHWA must ensure the transportation project meets all Federal requirements, including but not limited

to compliance with the National Environmental Policy Act (NEPA), Section 4(f) of the United States Department of Transportation (USDOT) Act of 1966, and Section 106 of the NHPA.

An alternatives analysis (available on the project website, www.tinyURL.com/JPIImprovements) considered a wide range of proposed roadway, bicycle, and pedestrian alterations to meet the FHWA's purpose and need, while avoiding or minimizing impacts to historic properties and other resources. These considerations are further discussed in Section 5.0. Generally, the roadway alterations considered under the proposed FHWA action occur along Lake Shore Drive, Hayes Drive, and Stony Island Avenue and their intersecting roadways. Proposed bicycle and pedestrian improvements include five underpasses, additional trails, and enhanced access accommodations. This preliminary Preferred Alternative was found to best meet the transportation project's purpose and need while also minimizing impacts to historic properties and other resources.

The proposed roadway, bicycle, and pedestrian alterations considered under the FHWA action are shown on Exhibits 2-5 in Appendix A.

1.4 U.S. Army Corps of Engineers Action

The City will be requesting the USACE to take the following actions:

- 1) authorize proposed discharges of fill material into waters of the United States, and
- 2) to alter a Federally-funded ecosystem restoration project under the Great Lakes Fishery & Ecosystem Restoration (GLFER) program.

The City of Chicago's underlying purpose for requesting these authorizations is stated previously in Section 1.1 and 1.4.

The proposed roadway work will require three permits under Section 404 of the Clean Water Act (33 USC 1251 *et seq.*) authorizing the discharge of fill material to Federal waters. First is the City's proposal to widen Lake Shore Drive involves expanding the 59th Street bridge abutment. This work will result in a discharge of fill material and require a Section 404 permit. Second, the City's proposal to dewater the portion of the lagoon under Hayes Drive to complete bridge improvements will result in a discharge of fill material and will require a Section 404 permit. Third, the City's proposal to improve the east end of the Midway Plaisance for replacement recreation may require the City to fill a wetland, requiring a Section 404 permit. The construction of the OPC will also result in temporary and permanent impacts to the GLFER project in Jackson Park. This proposed alteration requires USACE permission pursuant to Section 14 of the Rivers and Harbors Act (RHA) of 1899 (33 USC 408), commonly referred to as "Section 408."

It is expected that the USACE will evaluate the Section 404 actions under the USACE Chicago District's Regional Permit Program (RPP), whereby USACE staff will determine whether the City's actions comply with the terms and conditions that were established as part of the public interest review undertaken in the establishment of the RPP. The USACE will "verify" that the activities are authorized by the RPP. If

the actions are not reviewed under the RPP, the USACE will process the requests under the Individual Permit process described at 33 CFR 325.

Evaluation of the USACE Section 408 action will be completed as described in Engineer Circular 1165-2-220. This includes a determination whether the proposed alteration will impair the usefulness of the GLFER project, and whether the proposed alteration is in the public interest.

The proposed locations requiring authorization of a Section 404 permit and areas associated with impacts to and replacement of the GLFER project under the USACE action are shown on Exhibits 2-5 in Appendix A.

2.0 Identification of Historic Properties within the Area of Potential Effects

2.1 Area of Potential Effects

An APE is “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties¹, if any such properties exist. The APE is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking” (36 CFR § 800.16[d]). An APE must account for both direct and indirect effects, including permanent and temporary effects. IDOT CRU, under delegation from FHWA and in consultation with the SHPO, determined an APE for the Project in 2017. Two APEs were established, one for architecture/history properties and one for archaeological resources.

Archaeological APE

The Archaeological APE includes all areas of potential ground disturbance associated with the undertaking. A map of the Archaeological APE is available on the project website (www.tinyURL.com/JPIimprovements). The Illinois Department of Transportation (IDOT) conducted an archaeological survey in 2017 following Illinois and Federal guidelines. No archaeological sites were identified that warranted eligibility for the NRHP under Criterion D (sites that “have yielded or have the potential to yield, information important in prehistory or history”). The final Archaeology Report is available on the project website (www.tinyURL.com/JPIimprovements). The SHPO provided concurrence with the archaeological findings on March 28, 2018 (see Agency Correspondence in Appendix E). At the request of the Advisory Council on Historic Preservation (ACHP), IDOT conducted further review of the eligibility of archaeological sites under NRHP Criteria A, B and C, and concluded that no archaeological sites were eligible for the NRHP under these criteria. The SHPO provided concurrence with these findings on September 12, 2018 (see Appendix E). As there are no archaeological sites either listed or eligible for listing on the NRHP within the Archaeological APE, there are no effects to historic archaeological sites as a result of the undertaking.

Historic Architecture APE

The Historic Architecture APE was initially drawn to encompass all of Jackson Park, South Shore Cultural Center Park, a portion of the Midway Plaisance, a portion of Burnham Park, and generally one side of each street bordering Jackson Park. Based on public input and SHPO consultation, the Historic Architecture APE was expanded to include a one-half mile radius around the OPC Museum Building to capture potential viewshed impacts and to include the entirety of the Midway Plaisance. The Historic Architecture APE is divided into two sub-areas: APE I east of the Illinois Central Railroad (ICRR) viaduct,

¹ A **historic property** (or **historic resource**) is defined in the NHPA [54 U.S.C. § 300308] as “any prehistoric or historic district, site, building, structure, or object included on, or eligible for inclusion on, the National Register [of Historic Places], including artifacts, records, and material remains relating to the district, site, building, structure, or object.”

and APE II west of the viaduct. APE II is further subdivided into “A” and “B” based on geographic areas. A map of the Historic Architecture APE is available on the project website. Further description of the Historic Architecture APE is provided in the Historic Properties Identification (HPI) Report, available on the project website (www.tinyURL.com/JPIImprovements). The remainder of this AOE addresses the activities associated with above-ground historic properties, including a summary of the identification process (Section 2.0) and assessment of effects to identified historic properties (Section 3.0).

2.2 Historic Properties in the Area of Potential Effects

Section 106 requires Federal agencies to consider the effects of their undertakings on historic properties that are listed in or are eligible for inclusion in the NRHP, which is the nation’s official list of historic places worthy of preservation.

National Register Criteria

In order to qualify for inclusion in the NRHP a property must possess significance under at least one of four criteria:

- A. Association with events that have made significant contributions to broad patterns of history.
- B. Association with the lives of persons significant in our past.
- C. Embodiment of distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- D. Has yielded, or may be likely to yield, information important in prehistory or history (36 CFR 60.4; NPS 1997).

In general, a historic property must be at least 50 years of age or older to be considered for the NRHP, however, properties less than 50 years of age may be considered for listing if they possess exceptional significance. In addition to possessing significance, to be eligible for the NRHP a property must also retain sufficient historic integrity: “Integrity is the ability of a property to convey its significance” (NPS 1997:44). There are seven aspects or qualities that must be considered to determine whether a property retains integrity:

- 1. Location: the place where the historic property was constructed or the place where the historic event occurred;
- 2. Design: the combination of elements that create the form, plan, space, structure, and style of a property;
- 3. Setting: the physical environment of a historic property;
- 4. Materials: the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property;
- 5. Workmanship: the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
- 6. Feeling: a property's expression of the aesthetic or historic sense of a particular period of time; and

7. Association: the direct link between an important historic event or person and a historic property.

A Historic Properties Identification (HPI) Report (July 10, 2018, available on the project website, www.tinyURL.com/JPIImprovements) was prepared to document above-ground historic resources identified within the Historic Architecture APE.

In December 2018, a new district was listed on the NRHP – the Chicago Park Boulevard System Historic District. This district’s nomination recognizes the historic significance and importance of Chicago’s park boulevard system as the first major comprehensive system in the country. The park boulevards created one of the city’s most recognizable and lasting urban features. Because of their location along the park boulevard system, the buildings along the boulevards and parks further distinguish the park boulevard system and therefore contribute to the historic district. The Chicago Park Boulevard System Historic District was listed on the NRHP on December 18, 2018, five months after the final HPI was approved and concurrence was received on the determination of eligibility for historic resources in the APE for this project. The southeast end of this historic district falls within the APE and includes Jackson Park and Midway Plaisance and select properties along 57th Street, Stony Island Avenue, 59th Street, 60th Street and 67th Street. An Addendum to the HPI was prepared to document the inclusion of the Chicago Park Boulevard System Historic District in the APE and is being made available concurrently with the Final AOE. The effect of the undertaking on this historic district has been assessed in Chapter 3 of this report.

Within the Historic Architecture APE, the HPI identified eight districts and 29 individual properties listed or eligible for listing on the NRHP. Of the eight historic districts, five are listed on the NRHP (Jackson Park/Midway Plaisance, South Shore Country Club Historic District, Promontory Point, Chicago Park Boulevard System Historic District and Hyde Park-Kenwood). Three are eligible for listing (Hyde Park East, Jackson Park Terrace, and South Shore E. 67th Street Apartment District). The boundaries of these districts often overlap and may contain individually listed buildings, as seen on Exhibit 2 in Appendix A. Assessments of Effects on the individual resources that contribute solely to the Chicago Park Boulevard Historic District are detailed in Section 3.6.1.2. Where applicable, the multiple historic designations are noted in Table 1. Of the 29 individual properties, six are listed on the NRHP and 23 are eligible for listing.

Historic properties and districts that are eligible and listed on the NRHP within the Historic Architecture APE can be seen on Exhibit 2 in Appendix A and are listed in Table 1 below. The draft and final HPI reports were made available for consulting parties and the public to provide input, and are available on the project website (www.tinyURL.com/JPIImprovements). The SHPO provided concurrence with the determinations of eligibility in the final HPI on July 10, 2018, which can be viewed under Agency Correspondence in Appendix E.

**Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park**

Table 1: Historic Properties or Districts Listed or Eligible for NRHP within the APE

Exhibit 2 Resource Number	Historic Property	Address	APE Subarea	NRHP Status [Year]	NRHP Criteria	Views of Jackson Park contribute to the historic integrity
01	Jackson Park Historic Landscape District and Midway Plaisance	Roughly bounded by 67th Street, Stony Island Avenue, 56th Street, and Lake Michigan; 60th Street, Cottage Grove Avenue, 59th Street, Stony Island Avenue	I	Listed (Historic District) [1972]	C: Landscape architecture, architecture	Yes
02	Stony Island State Trust and Savings Bank/Stony Island Arts Bank	6760 S. Stony Island Avenue	I	Listed (Individually) [2013]	A: Commercial/ Financial History C: Architecture	No
03	William Dexter Three-Flat	1549 E. 69th Place	I	Eligible (Individually) [2018]	A: Woodlawn Community History C: Architecture	No
04	Island Terrace Apartment Building	6430 S. Stony Island Avenue	I	Eligible (Individually) [2018]	A: Woodlawn Community and Affordable Housing History C: Architecture	No
05	Hyde Park Academy High School	6220 S. Stony Island Avenue	I	Eligible (Individually) [2018] Also Contributing to the CPBS District [2018]	A: Hyde Park and Woodlawn Community History B: Prominent Alumni such as Gwendolyn Brooks, Jane Fautz, and Paul Samuelson C: Architecture	No
06	Jackson Park Terrace Historic District	Roughly bounded by 61st Street, Metra	I	Eligible (Historic District)	A: Woodlawn Community and Housing History	No

**Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park**

Exhibit 2 Resource Number	Historic Property	Address	APE Subarea	NRHP Status [Year]	NRHP Criteria	Views of Jackson Park contribute to the historic integrity
		Electric Railroad, E. Public Way, and Stony Island Avenue		[2018]	B: Affiliation with Leon D. Finney, Jr., and E. Duke McNeil C: Architecture	
07	Hyde Park-Kenwood Historic District	Roughly bounded by 59 th Street, Cottage Grove Avenue, 40 th Street, Metra Electric Railroad/Stony Island Avenue	I/II-A	Listed (Historic District) [1979]	A: Educational/ Religious/ Scientific/ Literary/ Commercial/ Social and Humanitarian History C: Architecture	No
08	South Shore Country Club Historic District (Currently known as the South Shore Cultural Center Park)	Roughly bounded by 71st Street, S. South Shore Drive, Lake Michigan	I	Listed (Historic District) [1975]	A: Social and Cultural History C: Architecture	No
09	South Shore E. 67 th Street Apartment Historic District	Roughly bounded by S. South Shore Drive, 67th Street, one parcel south of 67th Street, one parcel west of Merrill Avenue	I	Eligible (Historic District) [2018]	A: History of Residential Development in South Shore C: Architecture	No
10	Residences at 6700 S. Crandon Avenue	2231 E. 67 th Street	I	Eligible (Individually) [2018]	A: South Shore Cooperative Apartment/ Housing History C: Architecture/Architect	No

**Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park**

Exhibit 2 Resource Number	Historic Property	Address	APE Subarea	NRHP Status [Year]	NRHP Criteria	Views of Jackson Park contribute to the historic integrity
				Also Contributing to the CPBS District [2018] and South Shore Apt. District [eligible]		
11	Shoreline Apartments	2231 E. 67th Street	I	Listed (Individually) [2017] Also Contributing to the CPBS District [2018]	C: Architecture	No
12	Residences at 2201- 2211 E. 67 th Street	2201-2211 E. 67th Street	I	Eligible (Individually) [2018] Also Contributing to the CPBS District [2018]	A: South Shore Apartment/ Housing History C: Architecture	No
13	Leonard Graff House	6700 S. Euclid Avenue	I	Eligible (Individually) [2018]	A: History of Residential Development in South Shore C: Architecture	No
14	Dr. Paul Schutz House	6701 S. Bennett Avenue	I	Eligible (Individually) [2018]	A: History of residential development in South Shore C: Architecture	No

**Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park**

Exhibit 2 Resource Number	Historic Property	Address	APE Subarea	NRHP Status [Year]	NRHP Criteria	Views of Jackson Park contribute to the historic integrity
15	Morris N. Fox Three-Flat	6700 S. Bennett Avenue	I	Eligible (Individually) [2018]	A: History of Residential development and local Jewish history of South Shore B: Association with Morris Fox C: Architecture	No
16	Residences at 6701 S. Constance Avenue	6701 S. Constance Avenue	I	Eligible (Individually) [2018]	A: History of residential development in South Shore C: Architecture	No
17	Tower Court Apartments	6700-6708 S. Constance Avenue/ 1801-1811 E. 67th Street/ 6701-6711 S. Creiger Avenue	I	Eligible (Individually) [2018] Also Contributing to the CPBS District [2018]	A: Residential development history of South Shore C: Architecture	No
18	Hyde Park East Historic District	Roughly bounded by 56th Street, Metra Electric Railroad/one parcel west of S. Shore Drive, 54th Street/one parcel north of 56th Street, and S. Shore Drive	I	Eligible (Historic District) [2018]	A: Hyde Park Community History B: Association with various noteworthy Hyde Parkers such as African American civic leader Robert Landrum C: Architecture	No
19	Bret Harte Elementary School	1556 E. 56th Street	I	Eligible (Individually) [2018]	A: School/ Education History C: Architecture	No

**Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park**

Exhibit 2 Resource Number	Historic Property	Address	APE Subarea	NRHP Status [Year]	NRHP Criteria	Views of Jackson Park contribute to the historic integrity
20	Windermere East Hotel/Apartments	1642-1660 E. 56th Street	I	Listed (Individually) [1982] Also Contributing to the CPBS District [2018]	A. Apartment hotel history C: Rapp & Rapp Architects	No
21	Jackson Towers	5555 S. Everett Avenue	I	Eligible (Individually) [2018] Also Contributing to the CPBS District [2018]	A: Luxury Apartment History and Development of East Hyde Park B: Affiliation with Charles Comiskey C: Architecture	No
22	Promontory Apartments	5530-5532 S. Shore Drive	I	Listed (Individually) [1996]	C: Architecture	No
23	The Flamingo on the Lake	5500 S. Shore Drive	I	Listed (Multiple Properties Listing) [1986]	C: Architecture	No
24	Jackson Shore Apartments	5490 S. Shore Drive	I	Listed (Individually) [2010]	C: Architecture	No
25	Shoreland Hotel	5454 S. Shore Drive	I	Listed (Multiple Properties Listing) [1986] Also contributing to the CPBS [2018]	C: Architecture	No

**Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park**

Exhibit 2 Resource Number	Historic Property	Address	APE Subarea	NRHP Status [Year]	NRHP Criteria	Views of Jackson Park contribute to the historic integrity
				and to South Shore Apt. Hotel District [eligible]		
26	Promontory Point Historic District	Roughly bounded by 56 th Street (extended), S. Shore Drive, 54 th Street (extended), and Lake Michigan	I	Listed (Historic District) [2018]	A: Entertainment/ Social History C: Architecture/ Landscape Architecture	No
27	Helstein House	5804-5806 S. Blackstone Avenue	II-A	Eligible (Individually) [2018]	C: Architecture	No
28	Residence at 5812 S. Blackstone Avenue	5812 S. Blackstone Avenue	II-A	Eligible (Individually) [2018]	C: Architecture	No
29	Stein Building	5825 S. Dorchester Avenue	II-A	Eligible (Individually) [2018]	C: Architecture	No
30	Johnson House	5617 S. Kenwood Avenue	II-A	Eligible (Individually) [2018]	C: Architecture	No
31	Center for Continuing Education (Graduate Student Housing/Keller Center)	1301-1311 E. 60th Street	II-B	Eligible (Individually) [2018]	C: Architecture	No

**Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park**

Exhibit 2 Resource Number	Historic Property	Address	APE Subarea	NRHP Status [Year]	NRHP Criteria	Views of Jackson Park contribute to the historic integrity
32	Public Administration Building (Chapin Hall)	1313 E. 60th Street	II-B	Eligible (Individually) [2018]	C: Architecture	No
33	St. Paul's Universalist Church/Shankman Orthogenics School	1375 E. 60th Street	II-B	Eligible (Individually) [2018] Also Contributing to the CPBS District [2018]	C: Architecture	No
34	University of Chicago Power Station	6053 S. Blackstone Street	II-B	Eligible (Individually) [2018]	C: Architecture	No
35	E. 62 nd Place Firehouse	1405-1407 E. 62nd Place	II-B	Eligible (Individually) [2018]	C: Architecture	No
36	Pridmore & Stanhope-designed Greystone	6243 S. Woodlawn Avenue	II-B	Eligible (Individually) [2018]	C: Architecture	No
37 ²	Chicago Park Boulevard System Historic District	Twenty-six mile-long linear historic district following and encompassing Chicago's	I/II	Listed (Historic District) [2018]	A: Community Planning and Development C: Architecture/ Landscape Architecture	No

² Contributing resources to the CPBS Historic District that are not individually eligible for NRHP listing are noted on the maps in Appendix A, including 6450-60 S. Stony Island Avenue (Resource No. 38), 6516-20 S. Stony Island Avenue (Resource No. 39), and 2015 17 E. 67th Street/6700 12 S. Chappel Avenue (Resource No. 40).

**Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park**

Exhibit 2 Resource Number	Historic Property	Address	APE Subarea	NRHP Status [Year]	NRHP Criteria	Views of Jackson Park contribute to the historic integrity
		parks, squares, park boulevards and select properties adjacent to the system, from Logan Boulevard at the north, to and including Jackson Park and Midway Plaisance at the southeast.				
41	Frank Lillie House	5801 S. Kenwood	II-A	Listed /NHL 1976); also Contributing Resource to Hyde Park-Kenwood District	B: Significant Person (Frank Lillie) C: Architecture	No

NRHP criteria for listing:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of significant persons in or past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded or may be likely to yield, information important in history or prehistory.

3.0 Assessment of Effects

The assessment of effects evaluates the effects from the undertaking based on the nature of the Federal actions and the scope of the Federal agency's authority, as required by the Section 106 regulations. In this case, the ACHP advised FHWA and NPS to take an expansive approach in describing the effects of the non-Federal actions. This section assesses the effects of the undertaking on historic properties. For detailed background and historic context information regarding each of the evaluated elements, see the Historic Properties Inventory (HPI) Report, which can be viewed on the project website (www.tinyURL.com/JPIImprovements). In addition, a discussion regarding minimization measures can be found in Section 5.2.

Exhibit 2 in Appendix A depicts the listed and eligible historic properties and districts in the APE that are assessed for possible adverse effects in this report. The activities involved with the undertaking are also depicted in Appendix A, Exhibits 2-5. Photographs of the historic properties to and from the OPC site are provided in Appendix C.

3.1 Methodology

3.1.1 Definitions and Guidelines

The assessment of effects proceeds by applying the "criteria of adverse effect" to historic properties within the APE. The criteria of adverse effect are described in 36 CFR 800.5(a)(1):

An **adverse effect** is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

Examples of adverse effects (36 CFR 800.5(a)(2)) on historic properties include, but are not limited to:

- a. physical destruction of or damage to all or part of the property;
- b. alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR Part 68) and applicable guidelines;
- c. removal of the property from its historic location;

- d. change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- e. introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- f. neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- g. transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

To evaluate the effects of alterations to a historic property, the Secretary of the Interior has published *Standards for the Treatment of Historic Properties* (codified at 36 CFR Part 68) as well as *Guidelines for the Treatment of Cultural Landscapes*. The *Standards* were compiled to address any proposed changes to historic properties and provide recommendations. No direct changes to historic buildings outside of Jackson Park nor their immediate sites are proposed with this undertaking, but rather changes to the neighborhood setting. This analysis discusses the distance of the historic buildings from the undertaking as well as any visual changes if the historic properties are not adjacent.

Setting is defined by the *Standards* as "Setting (District/Neighborhood). The setting is the larger area or environment in which a historic building is located. It may be an urban, suburban, or rural neighborhood or a natural landscape in which buildings have been constructed. The relationship of buildings to each other, setbacks, fence patterns, views, driveways and walkways, and street trees and other landscaping together establish the character of a district or neighborhood." This undertaking relates to a landscape and roadway system within an urban context that has developed over many years and spans multiple planning eras. The Historic Property Inventory (HPI) for this undertaking has documented the immediate context and the importance of setting for each of the historic properties within the Area of Potential Effect (APE).

The *Guidelines* illustrate how to apply the *Standards* to cultural landscapes. A cultural landscape is a geographic area associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values; small-scale features within the landscape may define the spatial character of the landscape as a whole. The Jackson Park Historic Landscape District and Midway Plaisance is an example of a cultural landscape. The *Standards* and *Guidelines* have been utilized in the assessment of effects to the Jackson Park Historic Landscape District and Midway Plaisance.

The assessment of each historic property will result in one of three determinations: adverse effect, no adverse effect, or no effect. A determination of adverse effect means the undertaking's potential direct, indirect or cumulative effects meet the definition set forth above. A determination of no adverse effect means the undertaking's effects do not meet the definition above, or conditions are imposed to avoid adverse effects. A determination of no effect means the undertaking has no impact on a particular historic property. The criteria of adverse effect are applied to determine if a potential effect is either

adverse or not adverse; if there is no potential for an effect, justification is provided and the criteria of adverse effect is not applied.

3.1.2 Noise, Traffic, and Visual Analysis Methodology

A Highway Traffic Noise Analysis (available on the project website, www.tinyURL.com/JPIImprovements) was conducted to determine if any noise impacts at particular locations within and adjacent to Jackson Park and the Midway Plaisance would occur as a result of the FHWA action. Conclusions related to audible changes near historic properties are drawn from this study. According to guidance from the FHWA, highway traffic noise typically does not cause impacts at distances greater than 500 feet; therefore, the Highway Traffic Noise Analysis considers the effects of highway traffic noise within a 500-foot boundary of the proposed roadway improvements on Lake Shore Drive, Stony Island Avenue, and Hayes Drive.

Sound pressure level, also referred to as “noise level,” is measured in units called decibels (dBA). For the average human with normal hearing, a 3-dBA change in noise level is barely perceptible, especially if the change occurs gradually over time. A 5-dBA change in noise level is perceptible if the change occurs within a short span of time, but is less perceptible if the change occurs gradually over time. A 10-dBA increase or decrease is perceptible and subjectively described by most humans as “twice as loud” or “twice as soft” as the original level. The distance from a sound source is also a factor in its magnitude. With respect to traffic on a typical highway, a doubling of the distance between the highway and the receptor will reduce the noise level by approximately 3 dBA to 4.5 dBA. For example, if the noise level at 50 feet from a highway is 70 dBA, the noise level at 100 feet would be approximately 65.5 dBA to 67 dBA. These concepts are further described within the Highway Traffic Noise Analysis Report.

For each of the historic properties evaluated, the change in noise level (post-construction) as a result of the FHWA action is discussed and the effect of highway traffic noise on the property, if any, is described. The Noise Analysis indicates that there would be no perceptible change in the noise level to any historic property in the APE.

A Traffic Impact Study (TIS)³ was conducted to determine the effects of traffic diversions as a result of the City’s proposal to close roadways within Jackson Park. Conclusions related to the effects of traffic volume changes are drawn from this study. Primarily as a result of closing Cornell Drive, the TIS describes how traffic is anticipated to be diverted primarily to Lake Shore Drive to the east, Stony Island Avenue to the west, and other north-south roadways outside of the immediate area (including the Dan Ryan Expressway). The TIS also evaluated parking impacts within Jackson Park as a result of closing roadways in Jackson Park and anticipated visitors to the OPC.

Most elements of the undertaking will occur at existing surface elevations, with the exception of the proposed construction of the OPC Museum Building in Jackson Park. The OPC Museum Building is

³ Sam Schwartz Engineering, LLC. *Jackson Park Revitalization Traffic Impact Study Final Report*. (February 2018). Retrieved from https://www.chicago.gov/content/dam/city/depts/dcd/supp_info/jackson/CDOT-Traffic-Impact-Study.pdf

expected to be 235 feet tall. A visual impact analysis of the OPC Museum Building from each historic property and district listed in Table 1 was conducted using Google Earth and computer modeling. A true-to-scale model of the OPC Museum Building was built using computer modeling and imported into Google Earth where street-level viewpoints were captured from each historic property or feature toward the OPC Museum Building. A total of thirty (30) perspectives were generated for the street-level viewpoint analysis. Additional visual perspectives were generated in response to comments received on the Draft AOE. These additional visual perspectives were generated for historic properties with elevated levels above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall). The supplemental visual perspectives were generated using a combination of drone photography and computer modeling to depict views from historic properties toward the OPC Museum from elevated views. The perspectives included what the view looks like in current conditions and what the view would look like after the OPC Museum Building is constructed. There are 52 additional visual perspectives included for elevated views at 10 different locations. See Appendix D for the streetview and elevated view images used to analyze potential effects to historic properties, as noted in Table 2 and Table 3.

Table 2. Views from Street-Level Perspectives in Appendix D-1

Resource Number	Historic Property	Photo Number
01	Jackson Park Historic Landscape District and Midway Plaisance	1-5, 12, 30
02	Stony Island State Trust and Savings Bank/Stony Island Arts Bank	6
03	William Dexter Three-Flat	7
04	Island Terrace Apartment Building	8-9
05	Hyde Park Academy High School	10
06	Jackson Park Terrace Historic District	11
07	Hyde Park-Kenwood Historic District	12, 24, 25, 26
08	South Shore Country Club Historic District (Currently known as the South Shore Cultural Center Park)	19, 21
09	South Shore E. 67 th Street Apartment Historic District	19, 20
10	Residences at 6700 S. Crandon Avenue	19, 20
11	Shoreline Apartments	19, 20
12	Residences at 2201-2211 E. 67 th Street	19, 20
13	Leonard Graff House	22
14	Dr. Paul Schutz House	22
15	Morris N. Fox Three-Flat	23
16	Residences at 6701 S. Constance Avenue	23
17	Tower Court Apartments	23
18	Hyde Park East Historic District	15, 16, 17, 18
19	Bret Harte Elementary School	15
20	Windermere East Hotel/Apartments	15
21	Jackson Towers	16
22	Promontory Apartments	17

Resource Number	Historic Property	Photo Number
23	The Flamingo on the Lake	17
24	Jackson Shore Apartments	18
25	Shoreland Hotel	18
26	Promontory Point Historic District	14
27	Helstein House	24
28	Residence at 5812 S. Blackstone Avenue	24
29	Stein Building	25
30	Johnson House	26
31	Center for Continuing Education (Graduate Student Housing/Keller Center)	13
32	Public Administration Building (Chapin Hall)	13
33	St. Paul's Universalist Church/Shankman Orthogenics School	13
34	University of Chicago Power Station	27
35	E. 62 nd Place Firehouse	28
36	Pridmore & Stanhope-designed Greystone	29
37	Chicago Park Boulevard System Historic District	1-5, 7-13, 15, 16, 19, 20, 22, 23, 30
41	Frank Lillie House	25

Table 3. Views from Elevated Perspectives in Appendix D-2

Resource Number	Historic Property	Location Number
01	Jackson Park Historic Landscape District and Midway Plaisance	1-3, 6, 7, 9, 10, 11
03	William Dexter Three-Flat	4
04	Island Terrace Apartment Building	5
09	South Shore E. 67 th Street Apartment Historic District	3
10	Residences at 6700 S. Crandon Avenue	3
11	Shoreline Apartments	3
12	Residences at 2201-2211 E. 67 th Street	3
18	Hyde Park East Historic District	9, 10, 11
20	Windermere East Hotel/Apartments	9
21	Jackson Towers	11
37	Chicago Park Boulevard System Historic District	1-7, 9, 10, 11

Please note that Table 3 only includes historic properties located in APE Sub Areas I and II whose height extends above the existing tree line surrounding the Jackson Park border (typically greater than 3 stories tall) and potentially have views of the OPC.

3.2 Determinations of No Effects

Based on the scope of undertaking, some historic properties within the APE have no potential to be affected due to their distance from the undertaking, as seen in the maps in Appendix A, Exhibit 2a and 2b. The properties within the APE that are listed in Table 4 will not experience any physical changes or alterations to any of the characteristics of the property that qualifies it for inclusion in or eligibility for the National Register.

Additionally, an evaluation of possible effects from highway traffic noise, traffic diversions, and visual effects has determined that none of the properties listed in Table 4 will experience changes or alterations that diminish the integrity of these properties, taking into consideration the features and setting, if any, that contribute to the historic significance of each property. Therefore, the undertaking will have ***no effect*** to the properties presented in Table 4.

**Assessment of Effects to Historic Properties
Proposed Undertaking In and Adjacent to Jackson Park**

Table 4: Historic Properties with No Effect from the Undertaking

Resource Number	Photo Number (Appendix D-1)	Property Name	Effect Finding	Justification⁴
09	Photo 19	South Shore E. 67 th Street Apartment Historic District	No Effect	No perceptible changes in noise levels Minimal view of OPC Museum Building will not alter integrity of historic property
10	Photo 20 (closest)	Residences at 6700 S. Crandon Avenue	No Effect	
11	Photo 20	Shoreline Apartments	No Effect	
12	Photo 20	Residences at 2201-2211 E. 67 th Street	No Effect	
18	Photo 15	Hyde Park East Historic District	No Effect	
19	Photo 15	Bret Harte Elementary School	No Effect	
20	Photo 16	Windermere East Hotel/Apartments	No Effect	
21	Photo 16	Jackson Towers	No Effect	
26	Photo 14	Promontory Point Historic District	No Effect	
31	Photo 13	Center for Continuing Education (Graduate Student Housing/Keller Center)	No Effect	
32	Photo 13	Public Administration Building (Chapin Hall)	No Effect	
33	Photo 13	St. Paul's Universalist Church/Shankman Orthogenics School	No Effect	
35	Photo 28	East 62 nd Place Firehouse	No Effect	
03	Photo 07	William Dexter Three-Flat	No Effect	No perceptible changes in noise levels No view of OPC Museum Building
08	Photo 21	South Shore Country Club Historic District (Currently known as the South Shore Cultural Center Park)	No Effect	
13	Photo 22	Leonard Graff House	No Effect	
14	Photo 22	Dr. Paul Schutz House	No Effect	
15	Photo 23	Morris N. Fox Three-Flat	No Effect	
16	Photo 23	Residences at 6701 S. Constance Avenue	No Effect	
17	Photo 23	Tower Court Apartments	No Effect	

⁴ See discussion in Section 3.2.3.

**Assessment of Effects to Historic Properties
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Resource Number	Photo Number (Appendix D-1)	Property Name	Effect Finding	Justification⁴
22	Photo 17	Promontory Apartments	No Effect	
23	Photo 17	The Flamingo on the Lake	No Effect	
24	Photo 18	Jackson Shore Apartments	No Effect	
25	Photo 18	Shoreland Hotel	No Effect	
27	Photo 24	Helstein House	No Effect	
28	Photo 24	Residence at 5812 S. Blackstone Avenue	No Effect	
29	Photo 25	Stein Building	No Effect	
30	Photo 26	Johnson House	No Effect	
34	Photo 27	University of Chicago Power Station	No Effect	
36	Photo 29	Pridmore & Stanhope-designed Greystone	No Effect	
41	Photo 25 (closest)	Frank Lillie House	No Effect	

3.2.1 Highway Traffic Noise

For the historic properties listed in Table 4, the undertaking will not introduce audible elements (noise) that would alter the characteristics that qualify them for inclusion in or eligibility for the National Register. None of the properties listed in Table 4 will experience a perceptible change in noise levels (< 3 dBA).

Highway Traffic Noise was analyzed for those properties within 500-feet of the proposed roadway work on Lake Shore Drive, Stony Island, and Hayes Drive, as described in Section 3.1.2. Any property outside of the 500-foot noise analysis boundary would not experience a perceptible change in noise levels. Highway traffic noise therefore has no potential to cause effects to historic properties in Table 4. The Noise Analysis indicates that there would be no perceptible change in the highway traffic noise level for any historic property in the APE.

3.2.2 Traffic Analyses

As noted in Section 3.1.2, a Traffic Impact Study was conducted to determine the effects of traffic diversions as a result of the City's proposal to close roadways within Jackson Park. This information was utilized to determine if changes in traffic patterns or volumes had the potential to affect any historic properties within the APE.

The closures of Cornell Drive and Marquette Drive will result in a redistribution of traffic along existing arterials and collectors. The redistribution of traffic would result in three roadways exceeding their existing capacity, leading to unacceptable levels of service. Those three roadways are: (1) Stony Island Avenue, (2) Hayes Drive, and (3) Lake Shore Drive.

To address the resulting capacity deficiencies on these three roadways, the City has proposed improvements to achieve acceptable levels of service. The potential direct and indirect impacts from improvements to these three roadways are described in Sections 3.5 through 3.7 of this AOE. Even with the proposed roadway changes, other roadways will see increased traffic due to closures.

Other roadways within the study area will see increases in traffic due to the road closures, as follows:

- Dan Ryan Expressway
- State Street
- ML King Drive
- Cottage Grove Avenue
- Woodlawn Avenue
- Midway Plaisance (WB)
- 63rd Street
- 67th Street

The traffic increases on these roads will not require additional roadway expansion or changes to the roadway configurations. Existing capacity on these roads will operate at an acceptable level of service even with the additional traffic from the closed roadways; therefore, there are no direct impacts from the redistributed traffic on these roads.

Any historic properties adjacent to these roadways would see only modest additional traffic increases. Because the increases in traffic are modest, the changes in traffic patterns would not introduce visual,

atmospheric, or audible elements that diminish the integrity of these historic properties. As noted above in Section 3.1.2, in order for a change in traffic noise to be perceptible to the human ear, traffic would need to be doubled. The largest traffic increase (on roads not requiring additional capacity) is a 31% increase on 67th Street. Without physical changes to the roadway, there are no indirect visual impacts to adjacent historic properties and the modest traffic increases do not result in perceptible noise or atmospheric changes to adjacent historic properties. Therefore, changes in highway traffic patterns has no potential to cause effects to historic properties in Table 4.

The Jackson Park Traffic Impact Study evaluated the existing parking conditions within Jackson Park as well as the anticipated demands of parking from the OPC. The OPC will include onsite parking to minimize impacts to parking on adjacent roadways. As part of the South Lakefront Framework Plan parking was reviewed in Jackson Park and there are plans to provide a total parking supply in excess of existing parking via new on and off-street parking. Therefore, effects to historic properties as a result of parking are not anticipated. The Chicago Park District developed the South Lakefront Framework Plan, which reflects a community-based vision for the future of Jackson and South Shore Cultural Center Parks. The proposed vision for these parks is available in the 2018 SLFP on the SLFP website at www.southlakefrontplan.com.

3.2.3 Visual Impact Analyses

Please reference Appendix D for documentation of the views of the undertaking from the various historic properties in the APE. The photos that are the basis for the analysis are listed and the effect analysis is based upon the importance of views to the NRHP Criteria for listing of the property and to its setting. Table 5 provides a list of historic properties in the APE with their distance from the proposed OPC, a brief description of the visibility of the OPC from the historic property, and a summary of effects resulting from the undertaking.

The visual impact analysis (Photo 13 in Appendix D-1) demonstrates that the OPC Museum Building will be partially visible at street-level from some historic properties along 60th Street, west of the ICRR viaduct (Center for Continuing Education, Chapin Hall, St. Paul's Universalist Church). Views to the Midway Plaisance from these properties have been and will continue to be an important part of the setting that contributes to the significance of these 60th Street properties. The relationship between the Midway Plaisance and Jackson Park is designed along an axis formed by linear circulation, vegetation, and visual patterns that provide a sense of continuation of the pattern beyond what is visible at a pedestrian scale.

As an indication of the designed spatial organization and axial relationships within the historic district, ground level views of the portion of the Midway Plaisance west of the ICRR contribute to the integrity of setting of the properties along 60th Street; however, there are no direct views to Jackson Park from the Midway Plaisance or 60th Street west of the ICRR due to the visual barrier of the embankment and the properties' substantial distance from Jackson Park. A similar partial view of the OPC Museum building over the railroad embankment is also seen from the E. 62nd Place Firehouse (Photo 28, Appendix D-1). Though minimally visible within the properties' distant viewsheds, the OPC Museum Building will not alter the setting of these historic properties.

As illustrated by Photo 14 in Appendix D-1, the visual analysis indicates that the OPC Museum Building will be barely perceptible from the Promontory Point Historic District. The property has primary views of Lake Michigan to the east that contribute to its integrity of setting. Views southwest toward the Museum of Science and Industry will not be impacted. Therefore, the OPC Museum Building will not cause indirect effects that would alter the integrity of setting of the Promontory Point Historic District.

As shown in Photo 15 in Appendix D-1, the street-level visual analysis demonstrates that the OPC Museum Building is minimally visible from the western corner of the Hyde Park East Historic District, and the Bret Harte Elementary School. While not visible at street-level, it is possible that the OPC Museum Building and other portions of the OPC site development would be visible from some units of the upper levels of historic properties within the Hyde Park East district (Photos 15 and 16 in Appendix D-1, particularly those along E. 56th Street (Windermere East Hotel/Apartments and Jackson Towers). Aerial views of these properties can be seen in Locations 9, 10 and 11 in Appendix D-2. The modern building is proposed along the edge of Jackson Park within close proximity to the urban context which includes other tall buildings of various ages and designs; therefore, the OPC Museum Building will not adversely affect the integrity of setting for these properties at E. 56th Street. Other properties in this vicinity, including the Promontory Apartments, the Flamingo on the Lake, Jackson Shore Apartments, and the Shoreland Hotel (Photos 17 and 18 in Appendix D-1), have primary views of Lake Michigan to the east. Jackson Park is not visible from these properties at either street-level (Photos 17–18 in Appendix D-1) or from elevated viewpoints. Some buildings and units have no views towards Jackson Park, and others are blocked by adjacent high-rise buildings. The OPC Museum Building will not affect the views of these properties.

The visual analysis indicates that the OPC Museum Building will not be visible from the street-level of the properties along E. 67th Street (Photos 19–20, 22-23 in Appendix D-1). However, the Museum Building may be visible from some units of some high-rise residential buildings within the South Shore E. 67th Street Apartments Historic District (such as units at the Shoreline Apartments at 2231 E. 67th Street and at 2201-2211 E. 67th building, see Photo 3 in Appendix D-2). An aerial view from the Shoreline Apartments and 6700 S. Crandon Avenue is found at Location 3 in Appendix D-2. While the OPC Museum Building may possibly be visible within distant views of these properties, the primary views of Jackson Park and Lake Michigan from these units will not be impacted. Therefore, there are no effects that would alter the integrity of setting of the South Shore E. 67th Street Apartments Historic District or properties therein (which includes the Residences at 6700 S. Crandon Avenue, Shoreline Apartments, and Residences at 2201-2211 E. 67th Street).

The visual analysis demonstrates that the OPC Museum Building will not be visible (see Table 4; see Appendix D-1) from the following properties and therefore there are no effects that would alter the integrity of setting:

- William Dexter Three Flat
- South Shore Country Club Historic District (currently known as the South Shore Cultural Center Park)
- Leonard Graff House

- Dr. Paul Schutz House
- Morris N. Fox Three-Flat
- Residences at 6701 S. Constance Avenue
- Tower Court Apartments
- Helstein House
- Residence at 5812 S. Blackstone Avenue
- Stein Building
- Johnson House
- University of Chicago Power Station
- Pridmore & Stanhope-designed Greystone
- Frank Lillie House

Table 5. Summary of Effects on Historic Properties in the APE

	Resource Number	Historic Property	Effect Finding	Physical Change to the property?	Traffic Changes?	Is the OPC Museum Building visible?	Describe visibility of the OPC Museum Building	Street Views Photo # (Appendix D-1)	Elevated Views Location # ¹ (Appendix D-2)
ADVERSE EFFECT	01	Jackson Park Historic Landscape District and Midway Plaisance	Adverse Effect	Y	Y	Y	Visible at street level from the Columbia Basin, Music Court Bridge, North Lagoon Bridge, Wooded Island, and the Midway Plaisance. Not visible at street level from the Statue of the Republic. Visible at elevated views from the Jackson Park Golf Course, the Midway Plaisance and from 56 th Street looking south.	1-5, 12, 30	1-3, 6, 7, 9, 10, 11
	37	Chicago Park Boulevard System Historic District	Adverse Effect	Y	Y	Y	Visible at various places throughout the HD, but very localized, due to the Historic District's size. Most places in the HD will not be able to see it.	1-5, 7-13, 15, 16, 19, 20, 22, 23, 30	1-7, 9, 10, 11
NO ADVERSE EFFECT	02	Stony Island State Trust and Savings Bank/Stony Island Arts Bank	No Adverse Effect	N	Y	Y	Distance from OPC Museum Building is 4,000 feet. Visible from street level.	6	-
	04	Island Terrace Apartments	No Adverse Effect	N	Y	Y	Distance from OPC Museum Building is 1,800 feet. Visible from street level. Visible from elevated view but is consistent with other buildings in the skyline.	8, 9	5
	05	Hyde Park Academy High School	No Adverse Effect	N	Y	Y	Distance from OPC Museum Building is 750 feet. Visible on horizon from street view to the NE of the face of the building.	10	-
	06	Jackson Park Terrace Historic District	No Adverse Effect	N	Y	Y	Distance from OPC Museum Building is 100 feet. Visible in middle distance.	11	-
	07	Hyde Park-Kenwood Historic District	No Adverse Effect	N	Y	Y	Distance from OPC Museum Building is 500 feet from nearest point of the Historic District. Most of the Historic District is a considerable distance from OPC Museum Building.	12, 24, 25, 26	-
NO EFFECT	08	South Shore Country Club Historic District (Currently known as the South Shore Cultural Center Park)	No Effect	N	N	N	Distance from OPC Museum Building is 6,900 feet from nearest point of the park. Not visible from street level.	19, 21	-
	03	William Dexter Three-Flat	No Effect	N	N	N	Distance from OPC Museum Building is 4,800 feet. Not visible from street level.	7	4
	09	South Shore E. 67 th Street Apartment Historic District	No Effect	N	N	Y	Distance from OPC Museum Building is 5,450 feet from nearest point of the Historic District. The OPC Museum Building is visible and blends in with similarly sized buildings in the skyline. Primary views of Jackson Park and Lake Michigan are not affected.	19,20	3
	10	Residences at 6700 S. Crandon Avenue	No Effect	N	N	Y	Distance from OPC Museum Building is 6,000 feet from nearest point. The OPC Museum Building is visible and blends in with similarly sized buildings in the skyline. Primary views of Jackson Park and Lake Michigan are not affected.	19, 20	3

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Resource Number	Historic Property	Effect Finding	Physical Change to the property?	Traffic Changes?	Is the OPC Museum Building visible?	Describe visibility of the OPC Museum Building	Street Views Photo # (Appendix D-1)	Elevated Views Location # ¹ (Appendix D-2)
11	Shoreline Apartments	No Effect	N	N	Y	Distance from OPC Museum Building is 5,900 feet from nearest point. The OPC Museum Building is visible and blends in with similarly sized buildings in the skyline. Primary views of Jackson Park and Lake Michigan are not affected.	19, 20	3
12	Residences at 2201-2211 E. 67 th Street	No Effect	N	N	Y	Distance from OPC Museum Building is 5,800 feet from nearest point. The OPC Museum Building is visible and blends in with similarly sized buildings in the skyline. Primary views of Jackson Park and Lake Michigan are not affected.	19, 20	3
13	Leonard Graff House	No Effect	N	N	N	Distance from OPC Museum Building is 4,800 feet. Not visible from street level.	22	-
14	Dr. Paul Schutz House	No Effect	N	N	N	Distance from OPC Museum Building is 4,750 feet. Not visible from street level.	22	-
15	Morris N. Fox Three-Flat	No Effect	N	N	N	Distance from OPC Museum Building is 4,700 feet. Not visible from street level.	23	-
16	Residences at 6701 S. Constance Avenue	No Effect	N	N	N	Distance from OPC Museum Building is 4,700 feet. Not visible from street level.	23	-
17	Tower Court Apartments	No Effect	N	N	N	Distance from OPC Museum Building is 4,550 feet. Not visible from street level.	23	-
18	Hyde Park East Historic District	No Effect	N	N	Y	Distance from OPC Museum Building is 2,700 feet from the closest edge. Visible at street level.	15, 16, 17, 18	9, 10, 11
19	Bret Harte Elementary School	No Effect	N	N	Y	Distance from OPC Museum Building is 2,750 feet. Visible at street level.	15	-
20	Windermere East Hotel/Apartments	No Effect	N	N	Y	Distance from OPC Museum Building is 2,750 feet. Visible from elevated views.	16	9
21	Jackson Towers	No Effect	N	N	Y	Distance from OPC Museum Building is 2,900 feet. Not visible from street level. Visible from elevated views.	16	11
22	Promontory Apartments	No Effect	N	N	N	Distance from OPC Museum Building is 3,550 feet. Not visible from street level.	17	-
23	The Flamingo on the Lake	No Effect	N	N	N	Distance from OPC Museum Building is 3,300 feet. Not visible from street level.	17	-
24	Jackson Shore Apartments	No Effect	N	N	N	Distance from OPC Museum Building is 3,550 feet. Not visible from street level.	18	-
25	Shoreland Hotel	No Effect	N	N	N	Distance from OPC Museum Building is 3,750 feet. Not visible from street level.	18	-
26	Promontory Point Historic District	No Effect	N	N	Y	Distance from OPC Museum Building is 4,100 feet from nearest point. Visible, mostly blocked by other structures.	14	-

Assessment of Effects to Historic Properties
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	Resource Number	Historic Property	Effect Finding	Physical Change to the property?	Traffic Changes?	Is the OPC Museum Building visible?	Describe visibility of the OPC Museum Building	Street Views Photo # (Appendix D-1)	Elevated Views Location # ¹ (Appendix D-2)
	27	Helstein House	No Effect	N	N	N	Distance from OPC Museum Building is 1,800 feet. Not visible from street level.	24	-
	28	Residence at 5812 S. Blackstone Avenue	No Effect	N	N	N	Distance from OPC Museum Building is 1,700 feet. Not visible from street level.	24	-
	29	Stein Building	No Effect	N	N	N	Distance from OPC Museum Building is 1,700 feet. Not visible from street level.	25	-
	30	Johnson House	No Effect	N	N	N	Distance from OPC Museum Building is 3,000 feet. Not visible from street level.	26	-
	31	Center for Continuing Education (Graduate Student Housing/Keller Center)	No Effect	N	N	Y	Distance from OPC Museum Building is 2,000 feet. Visible from street level, blocked by trees, and embankment. Primary view is Midway Plaisance, not Jackson Park.	13	-
	32	Public Administration Building (Chapin Hall)	No Effect	N	N	Y	Distance from OPC Museum Building is 1,800 feet. Visible from street level, partially blocked by trees, and embankment. Primary view is Midway Plaisance, not Jackson Park.	13	-
	33	St. Paul's Universalist Church/Shankman Orthogenics School	No Effect	N	N	Y	Distance from OPC Museum Building is 1,600 feet. Visible from street level, partially blocked by trees, and embankment. Primary view is Midway Plaisance, not Jackson Park.	13	-
	34	University of Chicago Power Station	No Effect	N	N	N	Distance from OPC Museum Building is 1,000 feet. Not visible from street level.	27	-
	35	E. 62 nd Place Firehouse	No Effect	N	N	Y	Distance from OPC Museum Building is 2,000 feet. Visible from street level, partially blocked by trees and railroad embankment.	28	-
	36	Pridmore & Stanhope-designed Greystone	No Effect	N	N	N	Distance from OPC Museum Building is 2,000 feet. Not visible from street level.	29	-
	41	Frank Lillie House	No Effect	N	N	N	Distance from OPC Museum Building is 2,300 feet. Not visible from street level.	25	-

3.3 Historic Properties with Potential for Effects

The properties that could potentially be affected by the undertaking are listed in Table 6. The undertaking occurs within or directly adjacent to these historic properties. The effect of the undertaking on each of the properties listed in Table 6 is assessed in Sections 3.5, 3.6, and 3.7.

Table 6: Historic Properties with Potential for Effects

Historic Property	Analysis Required
Jackson Park Historic Landscape District and Midway Plaisance	Requires Effect Evaluation
Chicago Park Boulevard System Historic District	Requires Effect Evaluation
Stony Island State Trust and Savings Bank/Stony Island Arts Bank	Requires Effect Evaluation
Island Terrace Apartment Building	Requires Effect Evaluation
Hyde Park Academy High School	Requires Effect Evaluation
Jackson Park Terrace Historic District	Requires Effect Evaluation
Hyde Park-Kenwood Historic District	Requires Effect Evaluation

3.4 Presentation of Assessment

Effects to historic properties listed in Table 6 above were assessed using the methodology described in Section 3.1. The following sections include an effect determination for each historic property based on the undertaking as a whole. In the case of the Jackson Park Historic District and Midway Plaisance, the discussion includes a detailed description of the effects from the individual components of the undertaking – i.e., the NPS action, the FHWA action, the USACE action, and the non-Federal actions that are connected to the Federal actions (roadway closures, the development of the OPC site, and the track and field relocation).

Following the assessment of effects to each historic property, a cumulative impacts analysis is included to evaluate the effect of the undertaking combined with the effect of projects that are likely to occur but are independent from the undertaking.

The project sponsor (the City of Chicago) has agreed to this request and has included an evaluation of effects from related non-Federal actions (roadway closures, the development of the OPC site, and the track and field relocation). Neither FHWA nor NPS has direct or indirect jurisdiction over these non-Federal actions. The inclusion of this evaluation does not obligate either NPS or FHWA to address mitigation related to these actions, nor does it commit either NPS or FHWA to proceeding similarly with respect to other undertakings or obligate these agencies to future mitigation actions not related to the Federal actions.

3.5 Jackson Park Historic Landscape District and Midway Plaisance

3.5.1 Description of Jackson Park Historic Landscape District and Midway Plaisance

The Jackson Park Historic Landscape District and Midway Plaisance is all part of one NRHP-listed historic property located on the South Side of Chicago, Illinois. East of Stony Island Avenue, Jackson Park is roughly bounded by 67th Street, 56th Street, and Lake Michigan. West of Stony Island Avenue, the Midway Plaisance is roughly bounded by 60th Street, Cottage Grove Avenue, and 59th Street. The historic property (district) consists of two parks, Jackson Park and the Midway Plaisance, respectively to the east and west of S. Stony Island Avenue. Established in the 1850s, the raised tracks of the ICCR railway line cross the Midway Plaisance near its eastern end, creating a portion of the park referred to in this AOE report as the east end of the Midway. The historic property is listed in the National Register of Historic Places (NRHP 1972) for national and state significance in the areas of landscape architecture, architecture, science, sculpture, and urban planning. Under Criterion C, the historic property embodies the distinctive characteristics of a type, period, or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.

The 2018 HPI report provides detailed background information on Jackson Park and the Midway Plaisance and its historical significance. In brief, these parks are set in a mixed-use urban context that includes, in the immediate vicinity and perimeter, residential, commercial, and civic development on a scale ranging from open lots to small residences to large structures of more than thirty stories in various architectural styles ranging from Beaux Arts to Gothic Revival to Modernist. The period of significance for Jackson Park and the Midway Plaisance spans nearly one-hundred years, from 1875 to 1968. The timeframe encompasses design and initial construction in the 1870s by Olmsted, Vaux & Co., the 1893 World's Columbian Exposition, subsequent redevelopment as a park based on the 1895-1897 plans by firms associated with Frederick Law Olmsted, Sr., and additions associated with the Works Progress Administration (WPA) and the Chicago Park District (CPD) through 1968. The seminal effort to create integrated parkland after the World's Columbian Exposition was the collaborative effort of the South Parks Commission with the Olmsted firm in its various manifestations: Olmsted, Olmsted & Eliot (1893-1897) and briefly F.L. and J.C. Olmsted (1897). The leading master landscape architects included Frederick Law Olmsted, Sr., his partners John Charles Olmsted, Charles Eliot and Frederick Law Olmsted, Jr., and collaborators Warren Henry Manning and Edward D. Bolton. In the twentieth century, renowned landscape architects working through the Chicago Park District, including May McAdams and Alfred Caldwell, designed harmonious landscape interventions during the period of significance. The result is a layered history reflecting both original design concepts and evolving expressions that together reflect the historical significance of Jackson Park and the Midway Plaisance.

The HPI report identifies the resources that contribute to the historic property, including 3 sites, 16 buildings, 12 structures, and 5 objects. Landscape features that contribute to the significance of the property reflect the design intent and principles that the original designer, the firm of Frederick Law Olmsted, Sr., applied in order to create a public park serving as open space for use by the community. A

full explanation of the historic design principles that informed the historic property's development is included on pages 11 and 12 of the HPI.

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. For example, the early addition of major park amenities such as a golf course, gardens, bridges, buildings, and monuments reflected the original design principles, as did subsequent changes that fulfilled the 1905 and 1930 General Plans, which updated the original, post-1893 design. The period of significance includes many changes to accommodate the automobile as an increasingly important mode of transportation along the broad park drives; however, accommodation for high-volume commuter traffic affected the historic character and materials in many locations throughout the park. In later years, infill of the North and South Bayous and part of the East Lagoon removed visual and physical connection across the once-interconnected waterways, and the intentional demolition of ornate bridges and buildings in the 1960s introduced changes that were incongruous with the historic park character. However, community advocacy related to these incongruities led to changes that helped reestablish the many areas as public open space.

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 HPI, the combination of compatible and incompatible changes made to date do not impair the integrity of the existing character-defining features reflecting the original design principles.

Photographs of Jackson Park and the Midway Plaisance are provided in Photos 1 through 9 in Appendix C.

3.5.2 Assessment of Effects on Jackson Park Historic Landscape District and Midway Plaisance

Individual resources and features of the historic property referenced in this assessment of effects are identified in Appendix A, Exhibit 3: Jackson Park and Midway Plaisance Contributing Resources, and Exhibit 4: Jackson Park and Midway Plaisance – Referenced Cultural Landscape Features.

3.5.2.1 Effect Determination

The proposed undertaking will have an **adverse effect** to Jackson Park Historic Landscape District and Midway Plaisance because it will alter, directly and indirectly, characteristics of the historic property that qualify it for inclusion in the National Register. While the determination of adverse effect is explained below, the Cultural Resources Unit of IDOT has reviewed the continued NRHP eligibility of the historic district in light of the effect determination and concluded that the proposed changes will not sufficiently diminish or remove the overall integrity of the historic district in such a way that it would no longer qualify for NRHP listing (See Appendix E: IDOT Memorandum).

The significance of Jackson Park and the Midway Plaisance is manifested in the integrity of extant landscape resources, as opposed to those no longer remaining or those planned but never built. The overall historic property conveys the character present during the period of significance from 1875-1968

and currently possesses historic integrity of location, design, setting, materials, workmanship, feeling, and association. Explanation of the integrity and features of the landscape is included in Appendix F of the HPI.

The proposed undertaking alters contributing resources of the historic property including one comprehensive site, which is defined as the cultural landscape. Affected landscape characteristics include: Spatial Organization, Land Use, and Views; Circulation; Topography; Vegetation; and Buildings, Structures, and Small Scale Elements.

The following assessment of the historic property includes two sections: *Summary of the Adverse Effect to the Cultural Landscape* and *Effects from Federal Actions*.

3.5.2.1.1 Summary of the Adverse Effect to the Cultural Landscape

This section includes a summary of the adverse effects to the cultural landscape organized by landscape characteristics identified as contributing features in the HPI as adapted from *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*.

Effects to Spatial Organization, Land Use, and Views

- The proposed undertaking alters historic, internal spatial divisions between Jackson Park and the Midway Plaisance, which were designed by the Olmsted firm to compose a single entity, the South Park System (consisting of Jackson Park, the Midway Plaisance, and Washington Park, a separate historic district outside of the APE). Changes to roadways and placement of buildings within the spatial geometries established by designed patterns of circulation, vegetation, and views between the Midway Plaisance and the parks to the east (Jackson Park) and west (Washington Park) alters the historic designed relationship that is a basic aspect of the design of the historic property.
- Overall, physical changes concentrated in the western perimeter of Jackson Park and the east end of the Midway Plaisance would impact adjacent park areas originally differentiated by the Olmsted firm, including the lagoons, fields, lake shore, and museum grounds. The changes alter the legibility of the design of the cultural landscape in ways that diminish the integrity of spatial organization demonstrated by internal divisions of the property.
 - The OPC campus development alters the historic spatial organization of distinct, historic spaces:
 - Perennial Garden/Women's Garden;
 - Western Perimeter Playground; and,
 - North field/gymnasium.
- The proposed undertaking alters portions of the historic road network, which provides a framework for the historic property's designed spatial organization (also see Circulation).
 - Roadway closures alter the shape, form, and function of the historic primary entrance to the property by changing the historic symmetrical roadway design and spatial patterns that define the designed connection between Jackson Park and the Midway Plaisance.

- Contributing recreational use of the western perimeter is altered with installation of a new museum, institutional buildings, parking, and associated landscape development.
- Development of the OPC alters the integrity of key historic viewpoints including the East Lagoon (Music Court) Bridge, the Wooded Island North Bridge, and the west side of the Wooded Island, within the lagoon area of the historic property.

Effects to Circulation

- The proposed undertaking alters portions of the historic road network, which changes the relationship between interconnected systems of pedestrian and vehicular circulation and the distribution of the road hierarchy as originally designed and developed during the period of significance.
- Reconfiguration of Hayes Drive relocates sections of the historic road and pedestrian routes at the intersection of Hayes and Richards Drives, changing the historic character associated with the relationship between vehicular and pedestrian routes.
- The proposed undertaking alters physical components of specific historic roads and paths:
 - Removal of paths:
 - U-shaped walk defining the Western Perimeter Playground;
 - Walks along the south side of the Midway Plaisance (South Roadway, eastbound) between Stony Island Avenue, Cornell Drive, and the west side of the north field/gymnasium; and,
 - Entry walks framing and leading to the Perennial Garden/Women’s Garden within the western perimeter.
 - Removal of roadways:
 - Midway Plaisance (South Roadway; eastbound) between Stony Island Avenue and Cornell Drive;
 - Cornell Drive between 59th Street and Hayes Drive;
 - Northbound portion of Cornell Drive south of Hayes Drive between 65th Street and 67th Street;
 - Marquette Drive between Stony Island Avenue and Richards Drive; and,
 - Richards Drive and Marquette Drive intersection.

Effects to Topography

- The subtle berms at the edges of the north field/gymnasium (outer edge of the park and S. Cornell Drive) within the western perimeter are altered.
- The sunken topographic bowl of the Perennial Garden/Women’s Garden is altered.

Effects to Water Features

- The proposed undertaking does not result in adverse effects to water features that are character defining features of the cultural landscape.

Effects to Vegetation

- Historic vegetation patterns are altered:
 - Canopy trees surrounding playing fields;
 - Street trees at the park perimeter; and,
 - Terraced planting beds of the Perennial Garden/Women’s Garden within the western perimeter.

Effects to Buildings, Structures, and Small Scale Elements

- The setting of some contributing buildings, structures, and small-scale elements is changed in ways that are inconsistent with the *Secretary of the Interior’s Standards for the Treatment of Historic Properties*:
 - The setting of the Statue of the Republic is changed by alterations to the Hayes Drive and Richards Drive intersection.
 - The setting of the English Comfort Station, formed by the Western Perimeter Playground, is altered with adjacent new buildings and a campus.
- The prominence of the Museum of Science and Industry building, which is part of the overall composition and design intent of balancing park scenery with specific built areas, is diminished by the addition of new prominent buildings within the historic district. New buildings and an associated campus 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*. Integrity of workmanship is obscured by changes to the park design, the addition of new features and materials, and by the removal and alteration of historic fabric.
- The stone retaining walls forming the beds of the Perennial Garden/Women’s Garden are removed.

The combined changes diminish the sense of the historic period within the historic district and impact the integrity of design, materials, workmanship, and feeling with respect to specific elements of the historic district. The changes impact how Jackson Park and the Midway Plaisance reflect conscious decisions made by the Olmsted firm in determining spatial organization, relationships between major features, views, patterns of circulation, arrangement of vegetation, and hierarchy of buildings and other constructed features.

3.5.2.2 Effects to the Cultural Landscape from Federal Actions

This section describes the effects of each Federal action on contributing resources of the historic district and explains the cause and nature of changes to extant historic character for each contributing feature of the cultural landscape.

UPARR Partial Conversion Area within Jackson Park

If approved by NPS, the partial conversion of the area around the OPC buildings in Jackson Park would result in lifting the existing UPARR restrictions from this area and transferring the restrictions to the east end of the Midway Plaisance (east of the railroad embankment and viaduct). The change in legal status of these areas does not in itself cause physical effects on historic properties.

City Proposed UPARR Replacement Area within the East End of the Midway Plaisance

The City's proposed use of the east end of the Midway Plaisance for replacement recreation would preserve the historic character of this section of the Midway. The current layout and recreation use on this area is described in Section 1.1.1.3. Designed as part of a formal boulevard and unrealized channel between Washington Park and Jackson Park, the east end of the Midway Plaisance has been maintained as sunken lawn with perimeter plantings since the early 1890s. The sunken landform defines the space and creates a simple, formal, designed connection between the rest of the Midway Plaisance west of the ICRR viaduct and the Perennial Garden/Women's Garden in Jackson Park. Aspects of remaining historic character include spatial organization, topography, and paths; however, spatial patterns of vegetation have changed and one path has been lost. Minor changes in grades over time have led to the emergence of a wetland near S. Stony Island Avenue that has become more prominent since the 1980s.

The City proposes to rehabilitate lost features of the historic landscape while also enhancing the site for recreation use. These goals are not mutually exclusive. Frequent flooding of the large sunken lawn on the site is currently an impediment to recreational use. Instead of filling the existing, non-historic wetland, the City proposes to (1) install a stormwater infiltration system to drain the site, (2) perform limited grading to return symmetrical balance in areas that have experienced minor topographic deviation over time, while retaining the sunken aspect of the lawn, (3) reestablish pre-1960s spatial planting patterns – namely triangular plantings in the four corners of the central lawn – to recreate a smaller, symmetrical, and roughly cruciform-shaped lawn, and (4) install a historic, missing north-south path in the area depicted on Figure 3 in Appendix B, creating open space for recreation. This work may require a section 404 permit from USACE. The City proposes to install a play area near the center of the new path adjacent to the Cheney Goode Memorial. The features of the play area would retain the simple formality of open space that reflects the historic design principle of informal symmetry and balance in design. The patterns of street trees and massing of plants along the ICRR embankment would be retained as vestiges of the historic planting pattern in this part of the Midway Plaisance that are different yet designed in relation to the panels west of the ICRR viaduct. The proposed changes do not alter the historic designed relationship that exists between this eastern panel, the remainder of the Midway Plaisance, and the designed extensions through roadway alignments into Jackson Park and Washington Park.

The proposed play area would minimally modify the setting and feeling of the historic Cheney Goode Memorial (Appendix A, Exhibit 3b: 34). The Memorial consists of a concrete bench and sundial placed on the western side of the eastern Midway Plaisance to honor women's rights advocates Flora Sylvester Cheney and Senator Katherine Hancock Goode in 1932. The addition of the path adjacent to the Memorial rehabilitates the alignment of a missing historic route and increases access to the Memorial. The changes would not alter the location, materials, workmanship, design, and association of the Memorial itself. The addition of a play area east of the Memorial would be designed by a design professional meeting Secretary of the Interior's Historic Preservation Professional Qualification Standards and in accordance with the Guidelines for Rehabilitating Cultural Landscapes.⁵

⁵ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/approach.htm>.

Proposed Changes along Lake Shore Drive

Proposed changes to Lake Shore Drive expand road width and affect related intersections but do not alter aspects of the road that retain integrity. As part of the historic vehicular circulation network, the road persists as a broad, multilane drive along a similar curvilinear alignment that defined the boundary between the lake shore and the interior of the park. Designed approximately 60' wide by the Olmsted firm in the 1890s, Lake Shore Drive has always been one of the widest roads in the park. The proposed widening and additional traffic anticipated along Lake Shore Drive will change traffic noise levels; however, the change between existing and future conditions is less than 3 dBA, which is not a perceptible change.

The widening of Lake Shore Drive requires the alteration of the contributing 59th Street Bridge (North Inlet Bridge). The alteration is consistent with the *Secretary of the Interior's Standards*. The project does not alter bridge features that convey integrity, including location, design, and feeling.

The widening of the 59th Street Bridge requires a Section 404 permit from the USACE. The widening of Lake Shore Drive expands the intersections at 57th Drive, Science Drive, and Hayes Drive. The existing roadway alignments at these three locations result from several modifications to alignment between the 1980s and 2000s. Contributing features are not impacted by the adjustment of these non-contributing roadway intersections.

The addition of a lane from E. 57th Street to E. Hayes Drive also results in removal of historic parkland along the west side of the contributing roadway (Appendix A, Exhibit 4a: 1-2k). The widening of approximately two feet for an additional lane generally follows the historic alignment of the road, creating only a minor change to the historic spatial organization, and does not significantly affect historic features and materials. The widening occurs within the historic view toward Lake Michigan from the adjacent Bowling Green located southwest of the Museum of Science and Industry; however, these changes do not change the character or type of features present within the viewshed and overall setting is not changed (Appendix A, Exhibit 4a: 1-4f). The widening increases the visual presence of the roadway from the Bowling Green by increasing the proximity of traffic, but the degree of change is minimal. The change in traffic noise levels between existing and future conditions is less than 3 dBA, which is not a perceptible change.

Areas affected by change from parkland to roadway along Lake Shore Drive will be revegetated and regraded to match the existing landscape following GLFER precedent and historic design principles. Vegetation and paths installed under GLFER, while not historic contributing features, align with the *Secretary of the Interior's Standards* as a rehabilitation of portions of the historic property. The narrow band of plantings associated with GLFER that are removed by lane expansion and realignment of the previously altered intersection of Lake Shore Drive and Hayes Drive will be replaced along the east bank of the Jackson Park Inner Harbor (Appendix A, Exhibit 3b). The additional lane and removal of parkland along the road conforms to the *Secretary of the Interior's Standards*. The project does not "radically

change, obscure, or destroy character-defining spatial organization and land patterns or features and materials.”⁶ These changes to the GLFER program require a Section 408 permission from the USACE.

Hayes Drive Reconfiguration

The reconfiguration of Hayes Drive between Stony Island Avenue and Lake Shore Drive includes sections of altered roadway that conform to the *Secretary of the Interior’s Standards* and other sections that deviate from those standards. Overall, the widening of the roadway creates a minor change to spatial organization and does not significantly affect adjacent historic features. Changes in traffic noise levels between existing and future conditions along Hayes Drive are equal to or less than 3 dBA, which is not a perceptible change. The majority of the roadway alignment is maintained. Hayes Drive largely reflects its origin as a wide park drive (approximately 50 feet) following the Olmsted firm plans of the 1890s. The exceptions to the maintenance of existing alignments are at the Hayes Drive intersections with Cornell Drive and Richards Drive.

Realignment of the intersection of Hayes Drive and Cornell Drive is consistent with the *Secretary of the Interior’s Standards*.⁷ The proposed realignment replaces a non-contributing portion of Cornell Drive with a missing historic roadway pattern that provided a curved form to adjacent parkland (Appendix A, Exhibit 4b: 1-2h). The reconfiguration of the intersection includes two pedestrian underpasses that entail the alteration of historic pedestrian paths and low berms directly southeast of the intersection to accommodate the changes, which are intended to improve park safety and accessibility. The realignment overlaps areas of vegetation planted under the GLFER project around the previously altered intersection. Areas converted from roadway to parkland along Hayes Drive will be revegetated and regraded to match the existing landscape following GLFER precedent. Existing plantings will be replaced with new plantings of equivalent coverage along the east bank of the Inner Harbor following GLFER precedent. These changes to the GLFER program require a Section 408 permission from the USACE. Alterations from the realignment minimally affect the historic character of the circulation network and topography in this area. Underpasses are discussed under Bicycle/Pedestrian Enhancements below.

Realignment of the intersection of Hayes Drive with Richards Drive is not consistent with the *Secretary of the Interior’s Standards*.⁸ The realignment replaces the historic triangular intersection (Appendix A, Exhibit 4b: 1-2j) with a T-shaped intersection and changes roads and walks that define historic spatial organization and views within the setting of the *Statue of the Republic* (Appendix A, Exhibit 3b: 26). Rising above a circular traffic island, the statue marks the center of the triangular intersection of Hayes Drive and Richards Drive and commemorates the twenty-fifth anniversary of the 1893 World’s Columbian Exposition in 1918. The historic design is arranged to highlight the statue as the central focal point of surrounding roads and position the monument to be viewed from vehicles or at a distance from walks. Placed on a traffic island with crossings located some distance away, the contributing statue was

⁶<https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/circulation.htm>

<https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

⁷ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/circulation.htm>

⁸ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/circulation.htm>

sited in a setting where it was not intended to be regularly accessed by park users on foot. The relationship between viewers and the statue is balanced by distance and speed.

The new design of the roadway bypasses the *Statue of the Republic* that is the focal point of the historic intersection. The construction of a pedestrian plaza replaces one of the last remaining historic vehicular triangular intersections within the park and the circular traffic island with a new feature (pedestrian plaza) that alters the historic circulation pattern. The contributing triangular intersection channels movement, directs views, and creates a setting for the statue. The new pedestrian zone changes the relationship between the vehicular intersection, pedestrian routes, and the statue. Although the shape of the pedestrian plaza reflects the portion of the removed roadway that formed the intersection, the intentional balance of the scale of the statue with the speed and alignment of the road is changed and the historic character of the design is altered. Realignment of the triangular intersection deviates from the design principles of informal symmetry and balance in design, unified composition, and orchestration of movement. In addition, the realignment will introduce visual elements that diminish the integrity the *Statue of the Republic*. While performing a safety function, the addition of a standard traffic signal adjacent to the statue introduces an upright, colored visual element that diminishes the integrity of the setting of the statue.

Alteration of Hayes Drive between Richards Drive and Lake Shore Drive is consistent with the *Secretary of the Interior's Standards* because it minimally affects contributing features and preserves the historic character of the historic property. The roadway alignment and footprint remain the same at the contributing Hayes Drive Bridge and do not alter features that contribute to the integrity of the historic bridge. Repairs to the Hayes Drive Bridge require a Section 404 permit from the USACE. Adjustment of the Hayes Drive curb line and adjacent paths removes slivers of parkland planted under GLFER. Areas affected will be revegetated and regraded to match the existing landscape following GLFER precedent. Existing plantings will be replaced with new plantings of equivalent coverage along the east bank of the Inner Harbor. These changes to the GLFER program require a Section 408 permission from the USACE. Accommodation of a pedestrian underpass on Hayes Drive west of Lake Shore Drive creates minor changes to the predominantly level topography and presents no change to the character of views from the roadway between the *Statue of the Republic* and Lake Michigan (Appendix A, Exhibit 4b).

Stony Island Avenue Improvements

Changes to Stony Island Avenue do not change the overall character of the use or contributing physical features of the historic property. Highway noise levels along Stony Island Avenue within Jackson Park will not change more than 3 dBA, which is considered not to be a perceptible change. Widening the roadway will occupy parkland along the historic property's perimeter, realign historic sidewalks, and modify the thinly screened buffer with tree rows, groves, and subtle berms (Appendix A, Exhibit 4b: 1-1a); however, the character of the features will not be substantially altered. The project will realign sidewalks and regrade adjacent berms; however, the association of the road with the sidewalk and setting of perimeter topography and vegetation remains. While contributing features are altered by additions for new use, historic character is preserved in accordance with the *Secretary of the Interior's Standards* that require "that these features are not radically changed, obscured, damaged, or

destroyed.”⁹ In addition, alteration of Stony Island Avenue at the intersection of the Midway Plaisance (North Roadway) includes minor widening of the road (Appendix A, Exhibit 4b). The change to circulation follows the historic alignment and is consistent with the *Secretary of the Interior’s Standards*.

Other Proposed Transportation Changes

The FHWA action also proposes changes to the character of the historic property’s use and physical features along the east bank of the Jackson Park Inner Harbor, along Marquette Drive between Richards Drive and Stony Island, and along Cornell Drive north of Hayes Drive. The project will rehabilitate a deteriorated historic path and lagoon overlook along the Inner Harbor (Appendix A, Exhibit 4b: 1-2u). New plantings between the path and the shore of the Inner Harbor consist of replacement vegetation for areas associated with the GLFER project that were removed by the FHWA action. The changes to the GLFER program require a Section 408 permission from the USACE. Plantings in this area follow historic design principles, align with the precedent of the GLFER project, and are consistent with the *Secretary of the Interior’s Standards*.

In these areas, the construction of pedestrian-scale walks deviates from the 1895 design and the subsequent construction of the existing, interrelated vehicular and pedestrian circulation system, including broad, tree-lined roadways that help to establish historic spatial organization. Along Marquette Drive, the new walk follows the alignment of the removed portion of the historic roadway (Appendix A, Exhibit 4b: 1-2f). There are no perceptible (less than 3 dBA) noise level changes along these roadways as a result of the proposed improvements.

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 a part of the OPC development. The walk maintains views over the West Lagoon as a pedestrian experience but removes these views as a vehicular experience (Appendix A, Exhibit 4a: 1-4a). Designed by the Olmsted firm in the 1890s as a 50’ wide, multilane road, Cornell Drive is a principal organizing element that makes up the historic spatial organization of the park. While road size is close to the scale of the historic design, the character of current vehicular speed and volume is higher than historic vehicular usage, which has affected the character of historic feeling along the drive. The proposed changes eliminate the high traffic volume from the roadway. While the new walks help to minimize the impacts on historic designs from removal of roads they do not fully address the change in balance between pedestrian and vehicular circulation throughout the historic property that was part of the Olmsted principle of orchestration of movement. The new walks temporarily impact plantings associated with the GLFER project, requiring a Section 408 permission from the USACE.

Bicycle/Pedestrian Enhancements

The proposed enhancements for bicycle and pedestrian use through underpasses and additional access do not introduce visual elements that diminish the integrity of the historic property. The construction of five shared-use underpasses (1) at the east end of Hayes Drive, (2) at the middle of Jeffery Avenue, (3)

⁹ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

east of the intersection of Hayes Drive and Cornell Drive, (4) west of the intersection of Hayes Drive and Cornell Drive, and (5) at the southeast end of Marquette Drive, inserts a new type of circulation feature in the park for the purpose of improving park access and circulation while also enhancing public safety.¹⁰ Although the underpasses require minor alterations to historic topography and vegetation, their design does not radically obscure the character-defining spatial organization or land patterns of the site (cultural landscape) and is consistent with the *Secretary of the Interior's Standards*.¹¹ The underpasses at Hayes Drive and Cornell Drive lower grades along historic walks and raise roadway grades along approximately 300 feet to accommodate the underpasses. Grades are repaired and new vegetation is installed reflecting historic patterns. New routes connect to existing walks in each location and facilitate continuity of the contributing pedestrian network across the historic property. The Hayes Drive and Cornell Drive underpasses will have impacts on plantings associated with the GLFER project, requiring a Section 408 permission from the USACE.

The addition of pedestrian refuge islands along Stony Island Avenue, Cornell Drive near the Museum of Science and Industry, and at the intersection of Hayes Drive and Richards Drive are consistent with the *Secretary of the Interior's Standards* associated with health and safety considerations. The addition of curb extensions along Stony Island Avenue are similarly consistent.¹²

In general, the installation of sidewalk ramps, upgrading of marked and unmarked crossings, and changes to traffic signals and timing sequences throughout the historic property are consistent with the *Secretary of the Interior's Standards* associated with health and safety considerations.¹³

3.5.2.3 Effects from Non-Federal Actions

Roadway Closures

The closure and subsequent removal of roadways results in physical damage to the historic vehicular network and individual historic road segments in the south and west parts of the historic property. Historic road segments proposed for removal include: Midway Plaisance (South Roadway; eastbound) between Stony Island Avenue and Cornell Drive; Cornell Drive between 59th and 62nd Streets; the northbound portion of Cornell Drive south of Hayes Drive from 65th Street to 66th Place; and Marquette Drive between Stony Island Avenue and Richards Drive. These roads retain historic alignments and continue to define interior spaces, compose the historic sequence of people's movement through the landscape, and provide access to key historic locations as intended by the historic design of the site (cultural landscape).

Road closures remove historic roadways that are part of the historic property and replace them with parkland. This action alters the historic circulation network and affects the balance of the designed road hierarchy. Roadway closures affect the designed relationship between vehicular and pedestrian circulation in which modes of movement, views, and vegetation are interrelated elements. Removal of

¹⁰ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

¹¹ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

¹² <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/special.htm>

¹³ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/special.htm>

historic roadways alters spatial organization of the overall park, reduces differentiation of landscape character areas within the historic property, and is not consistent with the *Secretary of the Interior's Standards* that recommend the retention and preservation of historic land patterns and circulation systems.¹⁴

Closure of the Midway Plaisance (South Roadway; eastbound) between Stony Island Avenue and Cornell Drive removes a historic circulation route. This roadway segment demonstrates a particularly strong expression of historic landscape character related to the design of the property in the 1890s plans of the Olmsted firm. The south roadway of the Midway Plaisance forms part of the formal and balanced juncture between the eastern parts of the original South Park (Jackson Park, the Midway Plaisance, and Washington Park) as proposed prior to the World's Columbian Exposition in the 1871 plan. Closure of the roadway section removes an aspect of spatial organization that is basic to the historic design of Jackson Park at its connection to the Midway Plaisance. This closure removes contributing historic circulation and spatial organization at the primary public interface with both Jackson Park and the Midway Plaisance. The action would eliminate the purposeful connection between and symmetrical composition of this distinct portion of the historic property.

Closure of Marquette Drive between Stony Island Avenue and Richards Drive also converts a contributing roadway into parkland. Developed as an internal park drive (approximately 32 to 36 feet wide) following the 1905 General Plan, Marquette Drive reflects its historic alignment with the exception of the western connection to S. Cornell Drive. In addition to removal of this roadway segment, the change eliminates the original, contributing triangular intersection with Richards Drive (Appendix A, Exhibit 4b: 1-2g). This is one of the last remaining triangular intersections within the park. The intersection and Marquette Drive approximately between S. Creiger 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.

Closure of Cornell Drive between 62nd and 65th Streets and between 66th Place and 67th Street will not alter the integrity of the historic property (district) because substantial modification of these roadway segments occurred previously, and these sections of road do not contribute to the significance of the cultural landscape.

OPC Site Development

Implementation of the OPC will affect the overall site/cultural landscape of the Jackson Park Landscape District and Midway Plaisance, including the Perennial Garden/Women's Garden, the English Comfort Station, and the Western Perimeter Playground (E. 62nd Street playground) (Appendix A, Exhibit 4a and 4b).

¹⁴ <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/circulation.htm>

The OPC will transform the cultural landscape within the project footprint and affect some contributing features beyond the footprint. The project site overlays part of the western perimeter of the historic property. The proposed design replaces contributing landscape characteristics, which include spatial organization, topography, vegetation, and circulation, with new features. While location of proposed partially underground buildings, development of green roofs on three of the buildings, and planting new trees reduces the visibility of new buildings within the landscape and provides the appearance of green space, its implementation will change the character of the historic landscape. In particular, the addition of the Museum Building and other buildings will alter the historic design principles of the prominence of landscape scenery, unified composition, and orchestration of use within the historic open space of the project footprint. This is not consistent with the *Secretary of the Interior's Standards* that state: "When alterations to a cultural landscape are needed to assure its continued use, it is most important that such alterations do not radically change, obscure, or destroy character-defining spatial organization and land patterns or features and materials."¹⁵

Changes to the cultural landscape directly north of the proposed OPC buildings but within the project footprint remove physical features that contribute to the significance of the historic property. A new garden will replace the historic Perennial Garden/Women's Garden, designed in 1936 by May McAdam, Chicago Park District's first female landscape architect (Appendix A, Exhibit 4a: 1-10). The garden lies within the center of the formal terminus of the Midway Plaisance in Jackson Park and was historically developed to be symmetrically framed by the main park drives and adjacent walks of the Midway Plaisance north and south roadways, Stony Island Avenue, and Cornell Drive. The sunken basin of the garden remains from incomplete excavations for a waterway proposed by the Olmsted firm along the Midway Plaisance following the removal of the Woman's Pavilion of the 1893 World Columbian Exposition. The changes to the garden will make the space universally accessible, by removing steps currently surrounding the garden, and introducing new accessible paths around the perimeter and down to the sunken garden. The new design incorporates several characteristics of the historic garden, including the approximate interior dimensions, general shape and location, three entry paths, walled edges, surrounding plant beds, and plant types. The new garden demonstrates aspects of the original design principles of juxtaposition of design formality, informal symmetry and balance, and sustainable design and environmental conservation; however, extant historic materials are removed and the organization of the space is altered to implement the proposed design. The symmetrical layout of concentric rings of planting beds and paths will be replaced with asymmetrical winding paths, gathering spaces, and planting areas. Historic materials including stone edged terraced planting beds, steps, and vegetation, will be removed. The symmetrical triangular path intersections at the east side of the space that define the transition from the Midway Plaisance to Jackson Park will be replaced with asymmetrical paths (Appendix A, Exhibit 4b: 1-2m). Removal of the relatively uniform topographic setting surrounding the sunken garden and replacement with undulating terrain does not correspond to the formality of the historic design in relation to its setting. The comprehensive changes to garden features also impact the direct, historical association of the garden to its legacy of female designers. Implementation of the new

¹⁵ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

garden physically damages this part of the site (cultural landscape) that contributes to the historic property.

With the exception of the English Comfort Station building (Appendix A, Exhibit 3a-16), 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 western perimeter exhibits integrity to the period of significance and demonstrates continuity in the larger patterns of spatial organization, land use, views, circulation, and tree massing. As noted on the 1895 General Plan, the western perimeter and the Museum of Science and Industry grounds were designed along formal, architectural lines as a park edge that interfaces with the adjacent residential areas and contrasts with the more scenic areas of the lake shore, fields, and lagoons. The formal areas of the park were to be lighted after dark and always kept open in contrast to the more rural areas. Portions of the OPC campus internally demonstrate this design directive; however, the overall development deviates from contributing spatial organization related to the full park perimeter and adjacent areas. The area designed and designated by the Olmsted firm as an outdoor place for exercise (he used the term "gymnasia") retains the designed composition and general form of two, symmetrical open fields surrounded by canopy trees that are joined in the middle by the layout of the Western Perimeter Playground and English Comfort Station (Appendix A, Exhibit 4a: 1-7). Olmsted's use of "men's gymnasium" and "women's gymnasium" for the north and south fields refers to the original meaning of the word as a general place of exercise, rather than as a room or building for enclosed sporting activities. Part of the Library Building, lawns, picnic areas, and a playground replace the open athletic field and track of the existing north field/gymnasium. Historic walks designed parallel to existing historic roadways will be removed between the north field/gymnasium along Cornell Drive and between Cornell Drive and the Midway Plaisance (South Roadway; eastbound). The changes to this portion of the historic property are not consistent with the *Secretary of the Interior's 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." The *Secretary of the Interior's Standards* cite an example of inserting a new visitor center that blocks or alters a historic view or vista."¹⁶ The addition of buildings, service facilities, paths, and landscaping changes contributing spatial organization, topography, vegetation, and circulation in the location of the contributing playground and the historic fields of the western perimeter.

The addition of a two-level athletic center (the PAAC) and paved pedestrian paths and play area involve reconfiguration of historic paths, spaces, and play areas, and the replacement of vegetation. This alters historic design, setting, and feeling of the contributing spatial organization, walkways, and canopy trees of the Western Perimeter Playground. The contributing playground site provides a symmetrical landscape setting around the historic English Comfort Station and a designed fulcrum to the balanced layout of the historic fields to the north and south (Appendix A, Exhibit 4a: 1-2p). The current playground does not contain historic play equipment. Replacement of the character-defining, U-shaped walk with asymmetrical pathways around an athletic center (the PAAC) departs from the original application of historic design principles with respect to the setting of the historic resource and its

¹⁶ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/spatial.htm>

relationship to the cultural landscape. The new, substantially larger playground is located north of the existing playground. Historic and proposed uses remain dedicated to community recreation in this area. Although the new playground and picnic areas will be approximately nine times larger than the historic playground, the development of the PAAC and associated grounds results in removal of distinctive uses, features, and spatial relationships that characterize this portion of the historic property, and therefore is inconsistent with the *Secretary of the Interior's Standards* which emphasize the retention of historic character, distinctive features, and characteristic spatial relationships.

Historic views are part of the cultural landscape that contribute to the Jackson Park Landscape District and Midway Plaisance. Construction of the OPC includes the addition of new visual elements that diminish the integrity of views within Jackson Park and the Midway Plaisance along the western perimeter of this historic property. Tall buildings exist outside of the historic property but not within it. Within this 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.¹⁷ The OPC Museum Building affects views within this historic property by drawing specific focus to an exceptionally prominent building. This building will disrupt historic, designed views over parkland from the East Lagoon (Music Court) Bridge (Appendix A, Exhibit 4a: 1-4b), the Wooded Island North Bridge (Appendix A, Exhibit 4a: 1-4c), and the west side of the Wooded Island (Appendix A, Exhibit 4a: 1-4d). Westward and southward views from these locations reveal a designed setting with features of the waterways, a backdrop of tree canopy, and tall buildings and residential development that recede into the background outside of the boundary of the historic property. In general, constructed OPC site elements and buildings are more densely concentrated near S. Stony Island Avenue than toward the east of the project footprint which is characterized by lawn and trees. Deliberate design and siting to blend into the landscape setting partially align to historic design principles; however, the proposed project diverges from the design principles of the prominence of landscape scenery and a unified composition by proposing new building mass and landforms within the park that draw specific focus on the façade of the Museum Building.

Views east from the Midway Plaisance west of the ICRR viaduct are typified by the linear arrangement of roads, walks, and trees with tall buildings at the edges or rising above the horizon in the distance. The views from the Midway Plaisance are indicators of the symmetrical organization of spatial patterns and axial relationship between the Midway Plaisance and Jackson Park. In contrast to the aforementioned views within Jackson Park, the contributing aspects of these views are minimally altered by the proposed OPC site development.

The OPC construction alters historically important topography that defines spaces, forms a unifying element along the western perimeter, and provides a sense of physical and visual separation between uses. Within the OPC footprint, the historic berms between E. 60th Street and E. 62nd Street and west of S. Cornell Drive are removed in some locations to provide level access and accentuated in height in other areas (Appendix A, Exhibit 4a: 1-1a, 1-1b). The proposed design provides topography that

¹⁷ Correspondence from Olmsted to Donnersberger May 7, 1894. Washington DC, Library of Congress, Olmsted Papers) Series A34:79.

functions as a physical and visual buffer between the park and the neighborhood setting; however, the design adds buildings and landscape features that detract from and alter extant historic topography.

Construction of the OPC also changes existing historic vegetation in a way that is inconsistent with the *Secretary of the Interior's Standards* which emphasize the retention, preservation, protection, and maintenance of historic materials and features. The historic planting design and extant patterns of historic vegetation were designed to create interest in the landscape, provide buffers, define spaces, reinforce circulation routes and views, and create a sense of removal from the surrounding city. While new plantings associated with the OPC were designed to fulfill these functions for the new facilities of the OPC, the 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 (Appendix A, Exhibit 4a: 1-5, 1-7). Placement of a small sewer lift station near the OPC site includes the placement of utility covers and a modified embankment in an area of GLFER plantings along the west bank of the West Lagoon. This requires a Section 408 permission from the USACE. The project does not affect the waterbody and the affected area will be revegetated and regraded to match the existing landscape. Existing plantings will be replaced with new plantings of equivalent coverage along the east bank of the Inner Harbor following GLFER precedent (Appendix A, Exhibit 4b: 1-2u).

Track and Field Relocation

This action relocates the track and field to an area with ball fields that were added in the 1940s within one of the two open fields (or “gymnasia”) designed for outdoor recreation along the western perimeter (Appendix A, Exhibit 4a: 1-7). The action raises a portion of the recessed topography to accommodate the track and field and realigns a historic path along Cornell Drive; however, it relocates existing features from a similar location that continues to demonstrate historic integrity. The proposed changes to contributing topography and walks on the west edge of the proposed track and field continue to demonstrate character-defining patterns.¹⁸ The introduction of similar features will not further diminish the integrity of the historic property in the proposed location. The relocation is consistent with the *Secretary of the Interior's Standards* because it retains overall patterns and preserves the southern field as an open recreational space.¹⁹

¹⁸ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/approach.htm>

¹⁹ <https://www.nps.gov/TPS/standards/four-treatments/landscape-guidelines/rehab/spatial.htm>

3.6 The Chicago Park Boulevard System Historic District

3.6.1 Description of property

The Chicago Park Boulevard System Historic District (CPBS Historic District) consists of approximately 1,700 acres along 26 miles within the City and roughly spans from W. Logan Boulevard and the Kennedy Expressway on the north to E. 67th Street and S. South Shore Drive on the south. The district includes 19 boulevards, 6 squares, 8 parks, and 2,096 adjacent buildings from the period of significance that face the parks, boulevards and squares and contribute to the significance of the system. The CPBS Historic District covers a vast geographic area and includes a total of 2,136 contributing resources.

The CPBS Historic District was listed on the NRHP in December 2018 under Criterion A at the national level for Community Planning and Development as the first comprehensive system of greenways for a major city in the United States. The system was created to foster healthful, livable neighborhoods and to spur residential development in what was then the outskirts of the City. The district is also significant under Criterion C at the local level for Architecture, representing the types and styles of buildings constructed in Chicago from 1869 through 1942, and for Landscape Architecture as a designed landscape that expresses a comprehensive artistic quality unlike any other in Chicago. The architectural streetscapes along the boulevards are identified in the nomination as a “frame” to the landscaped medians and parks upon which they sit, and in turn these landscaped spaces were the focal points for their neighborhoods. The buildings framing the CPBS Historic District exhibit a wide variety of architectural styles that distinguish them from buildings outside the CPBS and that express the stylistic development of Chicago.

The period of significance for the district is 1869 to 1942 and encompasses the years legislation was passed establishing the system through the end of substantial improvements to the system. The Chicago Park Boulevard System is associated with the country’s most important early landscape architects and was one of the nation’s first major systems. As noted in its nomination, the CPBS Historic District “goes beyond the story of the parks alone and beyond the narrative of a single segment of Chicago’s continuous park and boulevard system. It attempts to view the city’s park and boulevard system more holistically.” The NRHP nomination for the district notes that the integrity of individual resources and landscape features varies, but the historic district overall retains a high level of integrity.

The portion of the CPBS Historic District that lies within the APE for this undertaking generally includes 59th and 60th Streets between Cottage Grove and Stony Island Avenues, streets that surround Jackson Park (56th, 67th and Stony Island), as well as the entirety of the Jackson Park Historic Landscape District and Midway Plaisance. This part of the CPBS district overlaps with portions of the Hyde Park East Historic District [eligible] and the Hyde Park-Kenwood Historic District, and includes individually listed properties such as the Windermere East Hotel and Shoreline Apartments. See Table I in Appendix A and the HPI addendum for a summary of contributing resources.

The majority of the properties within the APE that contribute to the CPBS Historic District were previously identified in the HPI as either listed or eligible for listing on the NRHP. Individual resources

and features of the CPBS Historic District are identified in Appendix A, Exhibit 5: Chicago Park Boulevard System Historic District - Contributing Resources.

3.6.1.1 Effect Determination

The proposed undertaking will have an adverse effect to the CPBS Historic District because it will alter, directly and indirectly, characteristics of one portion of the district that qualify it for inclusion in the National Register. However, the proposed changes associated with the undertaking will not diminish the overall integrity of the CPBS Historic District in such a way that it would no longer qualify for NRHP listing.

The Jackson Park Historic Landscape District and Midway Plaisance is a contributing resource to the CPBS Historic District. The adverse effect on the Jackson Park Historic Landscape District and Midway Plaisance constitutes an adverse effect on a contributing resource of the CPBS Historic District. Both NRHP districts (CPBS and Jackson Park/Midway) have significance under Criterion C in the areas of urban planning/community planning and development, landscape architecture, and architecture. The assessment of effects for the Jackson Park Historic Landscape District and Midway Plaisance discussed in Section 3.5 also applies to the assessment of effects on the CPBS Historic District.

The effect on the CPBS Historic District stemming from the adverse effect on the Jackson Park Historic Landscape District and Midway Plaisance is limited to one park among twelve parks contributing to the CPBS Historic District, among thousands of other specific resources contributing to the roughly 1,700-acre district that stretches along 26 miles within the City. Also, as discussed above in Section 3.5, the Jackson Park Historic Landscape District and Midway Plaisance continues to be eligible for listing on the NRHP, meaning that it retains the integrity to convey its historic significance and, thus, to contribute to the CPBS Historic District. Thus, the noted adverse effect of the undertaking on the CPBS Historic District does not render it ineligible to qualify for NRHP listing.

The proposed undertaking will not significantly alter relevant characteristics of the remaining contributing resources in the CPBS Historic District. There are only three buildings that contribute solely to the CPBS Historic District and that may be affected by the undertaking: one along E. 67th Street and two along S. Stony Island Avenue. The effect of the proposed undertaking on these buildings is evaluated below.

3.6.1.2 Assessment of Effects on property

As summarized above, the buildings within the CPBS Historic District are significant due to their placement on the boulevard facing the open space, as well as their individual architectural quality. The siting of the individual properties is of primary importance since the grouping and density of buildings create the frame of the boulevard system. Changes to the landscaped areas upon which the buildings face have occurred, but such changes do not diminish the contribution of the buildings to the system as a whole.

The majority of the contributing resources of the CPBS Historic District are located outside the APE (approximately 23 of 26 miles of parks and boulevards). The portion within the APE includes portions of

two other historic districts, and, for the most part, the overlapping districts share the same contributing resources.

The two properties on S. Stony Island Avenue (6516-6520 S. Stony Island Avenue/1556-1558 E. 65th Place, and 6450-6460 S. Stony Island Avenue/1554-1556 E. 65th Street) which are contributing resources solely to the CPBS Historic District are located approximately 500 feet south (0.10 miles) of the site of future OPC buildings within the UPARR conversion area. The buildings are also located in the vicinity of proposed roadway changes, including sidewalk improvements, widening of S. Stony Island Avenue, and the realignment of S. Hayes Drive and S. Cornell Drive south of Hayes Drive. These resources comprise a Craftsman-style multiple dwelling and a Classical Revival-style multiple-use building, both of which are three stories in height and typical of early-twentieth-century architectural forms and styles in Chicago and mixed-use buildings commonly bordering the Boulevard system.

Although the undertaking will introduce physical changes to the setting of these properties, the visual and physical relationship between the buildings and Jackson Park will be maintained and none of the changes will affect features of their setting that contribute to their historic significance. It is unlikely that there will be significant visual effects to these properties associated with the project. The OPC Museum Building will not be visible at street-level, but may be visually perceptible at units on upper floors, see Photos at Location 8 in Appendix D-2. Despite the potential visibility of the undertaking from these properties, the potential changes will not impact features of the resources that contribute to the significance of the CPBS Historic District. The undertaking will not alter the integrity of location, design, workmanship, materials, feeling, and association of these two resources; further, the undertaking will not cause any physical changes or a change in use to the two contributing resources.

The property at 2015-17 E. 67th Street/6700-12 S. Chappel Avenue contributes to the CPBS Historic District solely and no effect was determined as documented above in Section 3.2. Also, Photo 22 in Appendix D-1 illustrates that the OPC is not visible.

The contribution of Jackson Park and the Midway Plaisance to the historic significance of the Chicago Park Boulevard System is discussed in the NRHP nomination for the CPBS Historic District. The undertaking has the potential to affect the Jackson Park Historic Landscape District and the Midway Plaisance, which is a contributing resource to the CPBS Historic District. The proposed undertaking alters the cultural landscape of the parks, including spatial organization, land use, and views; circulation; topography; vegetation; and buildings, structures, and small scale elements. Details of this assessment of effects can be found in Section 3.5. Because the undertaking adversely affects the Jackson Park Historic Landscape District and Midway Plaisance, which contributes to the significance of the CPBS Historic District, the undertaking will result in an adverse effect on the CPBS Historic District.

3.7 Other Historic Properties

Photographs to and from Jackson Park for each of the remaining historic properties identified in the HPI with potential effects from the Federal actions are provided in Photos 10 through 24 in Appendix C.

3.7.1 Stony Island State Trust & Savings Bank (Stony Island Arts Bank)

3.7.1.1 *Description of property*

The Stony Island State Trust & Savings Bank, known today as the Stony Island Arts Bank, sits on the west side of S. Stony Island Avenue, between E. 67th Place and E. 68th Street at 6760 S. Stony Island Avenue, see Exhibit 2 in Appendix A. In December 2013, the Stony Island Trust & Savings Bank was individually listed in the NRHP under Criterion A for fine commercial architecture and its financial history and under Criterion C for architecture. During the property's Period of Significance of 1923 to 1931, the fine Classical Revival style bank served as a center of the South Shore community's economic life and symbol of the neighborhood prosperity of that era.

The Stony Island State Trust & Savings Bank retains a very high level of integrity of location, design, workmanship, and materials in relation to its architectural significance. After sitting vacant for over three decades, the building was restored and redeveloped by a non-profit arts organization for use as a community center and art gallery in 2013. Because the restoration project retained a substantial amount of the original fabric, and many interior spaces continue to express its original bank/office functions, the property also retains a high degree of integrity of feeling and association. However, the property retains a low degree of integrity of setting.

During its Period of Significance, the monumental Classical Revival style bank stood within a vibrant commercial district. Between the 1970s and the early 21st century, many of the surrounding small historic commercial buildings were razed. Some of the area's numerous open spaces have been redeveloped as small commercial strip malls with surface parking lots in front of the businesses. The property's integrity of setting has also been affected by several roadway projects including the widening of S. Stony Island Avenue (ca. 1940s, late 1960s, early 1980s) and construction of the S. Cornell Drive spur (ca. 1975) since the property's Period of Significance.

3.7.1.2 *Effect Determination*

The undertaking will not alter the Stony Island Trust & Savings Bank's integrity of location, design, workmanship, materials, feeling and association. The property's integrity of setting is quite low. Since 1931, the end of the Period of Significance for this property as determined by its NRHP form, the Stony Island Trust & Savings Bank's setting has undergone substantial changes, as noted above. The OPC Museum Building may be visually perceptible from some vantage points (Photo 6 in Appendix D-1); however, it will only be seen in distant views, and there are other high-rises in closer proximity to the property. Although the OPC Museum Building will be more than minimally visible from the Stony Island State Trust and Savings Bank, the modified viewshed does not alter the characteristics and aspects of integrity that qualify the building for inclusion in the NRHP. The undertaking will not further diminish

the property's already extremely low integrity of setting. Therefore, the undertaking will have ***no adverse effect*** to the Stony Island Trust & Savings Bank.

3.7.1.3 *Assessment of Effects on property*

The Stony Island Trust & Savings Bank is located a considerable distance from the site of the future OPC buildings within the UPARR conversion area – approximately 4,000 feet or 0.75 miles – but is closer in proximity to some of the associated roadway closures and improvements. The property is 600 feet from the southernmost limit of the northbound lanes of S. Cornell Drive north of E. 67th Street (within Jackson Park), which will be closed and is proposed as UPARR replacement land. It is also located along the southern end of the roadway improvement work along S. Stony Island Avenue at E. 68th Street. The roadway improvements include reconfiguration of the south approach to the S. Stony Island Avenue intersection with E. 67th Street resulting from the removal of the northbound lanes of S. Cornell Avenue from E. 68th Street to the north. Roadway widening along S. Stony Island Avenue is proposed north of the E. 67th Street intersection. Sidewalk improvements are also proposed along S. Stony Island Avenue. However, these improvements do not occur adjacent to the Stony Island Trust & Savings Bank, and there will be no physical changes to the property associated with the roadway closures and improvements. A noise analysis has determined that there will be no perceptible audible differences (less than a 3 dBA change in noise level) to the Stony Island Trust & Savings Bank associated with the roadway improvements. There may be some visual changes to the property's setting due to its location along a portion of the to-be-removed northbound lanes of S. Cornell Drive, but this roadway configuration was constructed in the late 1970s after the property's Period of Significance; therefore, these changes will have no effect on the property or the features of its setting that contribute to its significance.

The development of the OPC will not cause any physical changes to the Stony Island Trust & Savings Bank, though there may be some visual effects associated with the project. As shown in Photo 6 in Appendix D, the construction of the OPC Museum Building may be visually perceptible from the Stony Island Arts Bank. Although this addition may introduce a visual change within the park/neighborhood setting from the Stony Island Arts Bank, the construction of the high-rise Good Shepard Manor Senior Center apartments at 6720 S. Cornell Avenue in the late 1980s has previously altered this view.

The relocation of the Jackson Park track and field is located 3,400 feet (0.6 miles) from the Stony Island Trust & Savings Bank. It will not cause any physical changes to the property, nor will it be visible from the property. Similarly, due to their distance from the property, there are no effects to the Stony Island Trust & Savings Bank associated with the USACE Section 404 permit authorizations or Section 408 permission.

3.7.2 **Island Terrace Apartment Building**

3.7.2.1 *Description of property*

The Island Terrace Apartment Building is located on the west side of S. Stony Island Avenue between E. 64th and E. 65th Streets at 6430 S. Stony Island Avenue and was built in 1969, see Exhibit 2 in Appendix A. The Island Terrace Apartment Building was determined to be individually eligible for listing in the NRHP

under Criterion A for its Woodlawn community and affordable housing history and Criterion C for architecture on July 10, 2018 per the historic resource survey forms prepared for this project. Produced by the noteworthy architectural firm of Dubin, Dubin, Black, & Moutoussamy, the structure was one of the neighborhood's first Modern high-rises designed to provide affordable apartments to moderate and low-income renters.

The Island Terrace Apartment Building has had only minimal alterations since its completion in 1969 and thus retains a high level of integrity of location, design, workmanship, materials, feeling and association in relation to its architectural significance. The property also possesses integrity of feeling and association as a Modern building with high-quality, affordable apartments with close visual and physical access to Jackson Park and its expansive landscape.

The Island Terrace Apartment Building's integrity of setting, however, is low. Since the late 1960s, approximately a dozen structures north, south, northwest, and southwest of the Island Terrace Apartment Building have been demolished. By the mid-1990s, Walter Scott School, just northwest of the property, had also been razed and adjacent S. Harper Avenue was greened over. Mount Carmel High School built Haggerty Athletic Field on that site

The Island Terrace Apartment Building is bordered on the east by S. Stony Island Avenue and the green space of Jackson Park's western perimeter (labelled as LCA 1.1. in Figure 8 of the HPI), including the Jackson Park Field House to the northeast (built about a decade prior to the high-rise). To the southeast, the widening of S. Stony Island Avenue and construction of the S. Cornell Drive southbound spur to S. 65th Place were undertaken shortly after the Island Terrace Apartment Building was erected. The southern part of the western perimeter of Jackson Park has had few changes since the late 1960s when the Island Terrace Apartment Building was erected. However, due to the many other changes to the area, the property's integrity of setting has been considerably diminished.

3.7.2.2 *Effect Determination*

The undertaking will not alter the Island Terrace Apartment Building's integrity of location, design, workmanship, materials, feeling and association. Since 1978, the end of the Period of Significance for this property, the Island Terrace apartment's setting has undergone substantial changes. However, despite the property's low integrity of setting, the Island Terrace Apartment Building has continuously maintained its physical and visual relationship with Jackson Park. There may be some physical changes to the property's setting, including sidewalk improvements, widening of S. Stony Island Avenue, the realignment of S. Hayes Drive and S. Cornell Drive south of Hayes Drive, and new elements within its viewshed of Jackson Park such as visibility of the OPC Museum Building. The visual and physical relationship between the Island Terrace Apartments and Jackson Park will be maintained and none of these changes will cause effects to features that contribute to the significance of the Island Terrace Apartment Building and its eligibility to be listed on the National Register. Although the OPC Museum Building will be more than minimally visible from the Island Terrace Apartment Building, the modified viewshed does not alter the characteristics and aspects of integrity that qualify the building for inclusion in the NRHP. Therefore, the undertaking will have ***no adverse effect*** to the Island Terrace Apartment Building.

3.7.2.3 *Assessment of Effects on property*

The Island Terrace Apartment Building is located approximately 1,800 feet (0.3 miles) from the site of the future OPC buildings within the UPARR conversion area and approximately 300 feet west of the northbound S. Cornell Drive roadway closure considered as proposed UPARR replacement. The proposed UPARR replacement area along S. Cornell Drive may introduce some changes that could be visible from some units on the upper stories of the high-rise. However, the Island Terrace Apartment Building will continue to front onto S. Stony Island Avenue and will maintain its close physical and visual relationship with Jackson Park. Therefore, these visual changes would not alter the features of the property's setting that contribute to its historic significance. The proposed replacement recreation along S. Cornell Drive will consist of parkland and pathways, insulated from traffic, that offer improved opportunities for pedestrians and runners.

The Island Terrace Apartment Building is located along the west side of S. Stony Island Avenue where proposed roadway improvements from the FHWA action will occur. Roadway improvements include widening of S. Stony Island Avenue and improving intersections at E. 65th Street and E. 64th Street. Sidewalk improvements are proposed along the west side of S. Stony Island Avenue in front of the Island Terrace Apartment Building. This will include removing the existing narrow strip of parkway directly in front of the building. However, the property will continue to maintain its close physical and visual relationship with Jackson Park, and therefore, this minor alteration will not cause an effect on the features of the property's setting that contribute to its significance. In addition, there will be no perceptible audible changes (less than a 3 dBA change in noise level) associated with the proposed improvements.

The development of the OPC site and the relocation of the track and field may result in some new visual elements that may be seen from the Island Terrace Apartment building. As shown in Photos 8-9 in Appendix D-1 and Location 5 in Appendix D-2, the construction of the OPC Museum Building may be visible at street-level. The construction of the OPC Museum Building and the relocated track and field may also be visible from some units on the upper-levels of the building. The building will remain a Modern high-rise that fronts onto S. Stony Island Avenue and maintains close physical and visual relationships with Jackson Park and its expansive landscapes. Therefore, these changes will have no effect on the features of the property's setting that contributes to its significance.

Due to their distances from the property, there are no effects to the Island Terrace Apartment Building associated with the USACE Section 404 permit authorizations. Impacts to and replacement of GLFER plantings associated with the roadway improvements may be visible from the upper levels of the Island Terrace Apartment Building; however, the property will continue to maintain its close physical and visual relationship with Jackson Park, and therefore, this minor alteration will not cause an effect on the features of the property's setting that contribute to its significance.

No changes will occur to the Island Terrace Apartment building's use.

3.7.3 Hyde Park High School

3.7.3.1 Description of property

Hyde Park High School (known today as Hyde Park Academy High School) is located on the west side of S. Stony Island Avenue between E. 62nd and E. 63rd Streets at 6220 S. Stony Island Avenue, see Exhibit 2 in Appendix A. Hyde Park High School was determined to be individually eligible for listing in the NRHP under Criterion A for Hyde Park and Woodlawn community history, Criterion B for prominent alumni who attended such as Gwendolyn Brooks, and Criterion C for architecture on July 10, 2018 per the historic resource survey forms prepared for this project. Since its completion in 1913, the Beaux Arts style building housed a prominent public high school. The close physical and visual proximity to Jackson Park has always contributed to the property's significance.

Hyde Park High School retains excellent integrity of location, design, workmanship, and materials in relation to its architectural significance. Additions to the building were undertaken prior to the end of the 1978 Period of Significance, and were designed with compatible materials and design. The structure possesses integrity of feeling and association as a prominent public school that took full advantage of its proximity to and verdant views of Jackson Park. The property's integrity of setting has been somewhat diminished, however. Between the 1960s and 1980s, several properties south of Hyde Park High School were razed. These included low-rise apartment buildings; the Parkland Hotel at S. Stony Island and S. Harper Avenue; and a previous elevated railroad track and platform along E. 63^d Street. The Chicago Public Schools installed a narrow rectangular surface parking lot south of the southern additions, and this was enlarged over the years.

Although the western perimeter of Jackson Park has had some changes over time (labelled as LCA 1.1 in Figure 8 of the HPI), lawn and trees have always been the predominant feature in views east from Hyde Park High School.

3.7.3.2 *Effect Determination*

The undertaking will not alter the Hyde Park High School's integrity of location, design, workmanship, materials, feeling and association. The property's integrity of setting has been somewhat diminished. Since 1978, the end of the Period of Significance for this property, the Hyde Park High School's setting has undergone substantial changes. However, despite this, Hyde Park High School's setting has continuously maintained its physical and visual relationship with Jackson Park. There may be some physical changes to the property's setting, including sidewalk improvements, widening of S. Stony Island Avenue, a realignment of S. Hayes Drive and S. Cornell Drive south of Hayes Drive in Jackson Park, and new elements such as the OPC Museum Building that may be perceptible within views from the Hyde Park High School. However, the visual and physical relationship between Hyde Park High School and Jackson Park will be maintained and none of these changes will cause effects to features that contribute to the significance of the Hyde Park High School Building and its eligibility to be listed on the National Register. Although the OPC Museum Building will be more than minimally visible from the Hyde Park School, the modified viewshed does not alter the characteristics and aspects of integrity that qualify the building for inclusion in the NRHP. Therefore, the undertaking will have ***no adverse effect*** to the Hyde Park High School.

3.7.3.3 *Assessment of Effects on property*

Hyde Park High School is located approximately 750 feet (0.14 miles) south of the site of the future OPC buildings within the UPARR conversion area and approximately 575 feet (0.10 miles) west of S. Cornell Drive, which is proposed to be closed and used as replacement UPARR land. Despite the close proximity of the high school to the OPC site, the undertaking will not cause any physical changes to the property. The proposed UPARR replacement area along S. Cornell Drive may introduce some changes that could be visible from Hyde Park High School, but the school will continue to maintain its close physical and visual relationship with Jackson Park and, therefore, these visual changes will not affect the features of the property's setting that contribute to its historic significance.

The Hyde Park High School is located in close proximity to various proposed roadway improvements, including the widening of S. Stony Island Avenue, improvements at the E. 63rd Street and E. 62nd Street intersections, and sidewalk improvements along the west side of S. Stony Island Avenue in front of the school. None of these improvements will affect the features of the property's setting that contribute to its historic significance, as the property will continue to maintain its close physical and visual relationship with Jackson Park, and Stony Island Avenue has been historically widened over time. In addition, there will be no perceptible audible changes (less than a 3 dBA change in noise level) associated with the proposed roadway improvements.

The development of the OPC site and the relocation of the track and field may result in some new visual elements that could be perceptible within some views of the park from Hyde Park High School. As shown in Photo 10 in Appendix D-1 the construction of the OPC Museum Building may be visible at street-level. In addition, the Jackson Park track and field relocation is proposed to occur across the street from the property. As explained in the HPI, historically there were two oval tracks located at Jackson Park's western perimeter, and the south track (site of proposed relocated track) remained in the park longer than the track to the north. Even with these possible changes, Hyde Park High School will remain a fine Beaux Arts style school building that fronts onto S. Stony Island Avenue and maintains close physical and visual relationships with Jackson Park and its expansive landscapes.

Due to their distance from the Hyde Park High School, there are no effects to the Hyde Park High School associated with the USACE Section 404 permit authorizations. Impacts to and replacement of GLFER plantings may be visible from the Hyde Park High School, but the property will continue to maintain its close physical and visual relationship with Jackson Park and, therefore, this minor alteration will not affect the features of the property's setting that contribute to its significance.

The undertaking will not cause any changes to the Hyde Park High School's use.

3.7.4 Jackson Park Terrace Historic District

3.7.4.1 Description of property

The Jackson Park Terrace Historic District is located on the west side of S. Stony Island Avenue at 6018-6050 S. Stony Island Avenue / 6040-6050 S. Harper Avenue. Composed of 24 low-rise apartment structures and a 19-story high-rise, the complex is generally bounded by E. 61st Street, S. Blackstone Avenue, E. Public Way (S. Park Shore East), and S. Stony Island Avenue, see Exhibit 2 in Appendix A. The Jackson Park Terrace was determined to be eligible under Criterion A for Woodlawn Community and

housing history, Criterion B for its association with prominent community developers Leon D. Finney and E. Duke McNeil and Criterion C for architecture, listing as a historic district in the NRHP on July 10, 2018 per the historic resource survey forms prepared for this project. Developed by the Woodlawn Organization (TWO) to provide affordable housing and services in Woodlawn in the early 1970s, the complex was designed by renowned African-American planners and architects, Whitely-Whitley. This is the primary significance of this historic district: as a landmark development of the local African-American community in response to the threat of neighborhood urban renewal.

The Jackson Park Terrace Historic District retains a high degree of integrity of location, design, workmanship, and materials in relation to its architectural significance. It also retains a high level of integrity of feeling, and association as an affordable housing complex designed to take full advantage of its close proximity to Jackson Park and the Midway Plaisance. The Jackson Park Terrace's integrity of setting, however, has been somewhat diminished.

When the complex was built in the early 1970s, the area between its northernmost east-west street (one of two internal roadways called E. Public Way) and E. 60th Street was composed of lawn with the eight-story historic Plaisance Hotel at the corner of S. Stony Island Avenue and E. 60th Street. The hotel was demolished in the early 1980s, and a large rectangular surface parking lot was installed between the northern roadway (E. Public Way) and E. 60th Street around 2000. In addition, the Experiment Station/61st Street Farmer's Market (at E. 61st and S. Dorchester) installed an organic garden growing facility at the east end of the northern roadway (E. Public Way) in 2013. The area south of the Jackson Park Terrace complex, between E. 61st and E. 62nd Streets, was historically filled with low-rise apartments. These were replaced by the Park Shore East Co-op in 1980. Views east towards the western perimeter of Jackson Park (labelled as LCA 1.1 in Figure 8 of the HPI) have remained generally consistent over the years. Some park features have changed or were installed in the area across from the Jackson Park Terrace since its construction in 1974, including the 8-lane rubberized-surface track installed in 2000. Despite such changes, lawn and trees have always been the predominant features of east views.

3.7.4.2 *Effect Determination*

The undertaking will not alter the Jackson Park Terrace Historic District's integrity of location, design, workmanship, materials, feeling and association. The property's integrity of setting has been previously compromised. Since 1978, the end of the Period of Significance for this property, the areas north and south of the Jackson Park Terrace's setting have undergone substantial changes. To the east, some park features have changed since that time; however, the historic district has continuously maintained its physical and visual relationship with Jackson Park and the Midway Plaisance. While the OPC Museum Building will be visible, the property's setting with the visual and physical relationship between the property and Jackson Park and the Midway Plaisance will be maintained and none of these changes will cause effects to features that contribute to the significance of the Jackson Park Terrace Building and its eligibility to be listed on the National Register. Although the OPC Museum Building will be more than minimally visible from the Jackson Park Terrace Historic District, the modified viewshed does not alter the characteristics and aspects of integrity that qualify the building for inclusion in the NRHP. Therefore, the undertaking will have ***no adverse effect*** to the Jackson Park Terrace Historic District.

3.7.4.3 *Assessment of Effects on property*

The Jackson Park Terrace Historic District is located approximately 100 feet west of the future site of the OPC buildings within the UPARR conversion area across S. Stony Island Avenue. It is also located 350 feet (approximately 0.07 miles) south of the east end of the Midway Plaisance (a proposed site of UPARR replacement land). The district is also located along S. Stony Island Avenue in the vicinity of proposed roadway widening and intersection modifications at E. 60th Street and S. Midway Plaisance. Sidewalk improvements are also proposed along the west side of Stony Island Avenue in front of the property.

These roadway improvements may be perceptible within some views from the district, but will not affect any features of its setting that contribute to the property's historic significance as the property will continue to maintain its relationship with Jackson Park and the Midway Plaisance. In addition, there will be no perceptible audible changes (less than a 3 dBA change in noise level) associated with the proposed roadway improvements.

The development of the OPC site, roadway closures, and relocated track and field may also result in some new visual elements that could be perceptible within some views of units of the Jackson Park Terrace. As shown in Photo 11 in Appendix D-1, the OPC Museum Building will be visible from some vantage points within the complex. The removal of the 8-lane rubberized-surface track will have no impact on the historic district's integrity of setting because the track is not a historic feature and was constructed after the district's Period of Significance. Despite the introduction of some new visual elements, including views of the OPC Museum Building, the Jackson Park Terrace Historic District will maintain its close physical and visual relationships with Jackson Park, the Midway Plaisance, and their expansive landscapes.

Due to their distances from the property, there are no effects to the Jackson Park Terrace Historic District associated with the USACE Section 404 permit authorizations and Section 408 permission.

There will be no physical changes to the Jackson Park Terrace Historic District associated with the undertaking, nor will the undertaking cause any changes to the district's use.

3.7.5 Hyde Park-Kenwood Historic District

3.7.5.1 *Description of property*

The Hyde Park-Kenwood Historic District is bounded roughly by E. 59th Street on the south; E. 47th Street on the north; S. Lake Park Avenue from E. 47th Street to E. 56th Street and S. Stony Island Avenue from E. 56th Street to E. 59th Street on the east; and S. Cottage Grove Avenue on the west, see Exhibit 2 in Appendix A. In February 1979, the Hyde Park-Kenwood Historic District was officially listed on the NRHP under Criteria A, B, and C. Periods of Significance were not clearly specified in nomination forms of the 1970s; however, a Period of Significance of 1860-1937 can be inferred from the nomination form. Research and analysis were conducted for the HPI to evaluate properties erected between 1937 and 1978. This historic resources survey determined that numerous properties erected between 1937 and 1978 within the historic district could be deemed as contributing resources. Both the 1979 nomination and this recent survey determined that the Hyde Park-Kenwood Historic District possesses a large

collection of historic properties that have important associations with Jackson Park, the Midway Plaisance, and the University of Chicago.

The Hyde Park-Kenwood Historic District retains a high level of integrity of location, design, workmanship, and materials in relation to the architectural significance of its vast collection of buildings. The historic district also retains a high level of integrity of association, feeling, and setting as an exceptional residential and academic enclave with close physical and visual proximity to Jackson Park and the Midway Plaisance. The historic district is bisected by the ICRR (now Metra Electric) rail line. As shown in the HPI Figure 9, most of the Hyde Park-Kenwood Historic District lies outside of the APE boundaries and its setting is of an urban residential district. The historic resources survey determined that most of the structures built after 1978 have associations with the University of Chicago. Although the structures represent a broad range of architectural styles, designs, and materials, most of them are similar in scale and height to other nearby structures within the historic district. In addition, many have setbacks, courtyards, or other landscaped spaces that provide unity between these contemporary buildings, the historic properties, Jackson Park and the Midway Plaisance. Therefore, the addition of contemporary structures has not diminished the historic district's integrity of setting.

3.7.5.2 *Effect Determination*

The undertaking will not alter the Hyde Park-Kenwood Historic District integrity of location, design, workmanship, materials, feeling and association. There may be some physical changes to the property's setting (sidewalk improvements, widening of S. Stony Island Avenue, realignment of S. Hayes Drive and S. Cornell Drive south of Hayes Drive in Jackson Park, OPC Museum Building and other related new elements) that may be perceptible within views from some vantage points within the historic district. However, views of these changes will only be perceptible from a limited area within the historic district; the visual and physical relationship between Hyde Park-Kenwood Historic District and Jackson Park and the Midway Plaisance will be maintained and these changes will not affect features that contribute to the significance of the historic district or its setting. Although the OPC Museum Building will be more than minimally visible from the Hyde Park-Kenwood Historic District, the modified viewshed does not alter the characteristics and aspects of integrity that qualify the building for inclusion in the NRHP. Therefore, the undertaking will have **no adverse effect** to the Hyde Park-Kenwood Historic District.

3.7.5.3 *Assessment of Effects on property*

Most of the properties within the Hyde Park-Kenwood Historic District are located west of the ICRR viaduct and embankment and are a considerable distance away from the future site of the OPC buildings and the east end of the Midway Plaisance (a proposed site of UPARR replacement land). However, the southeast corner of the historic district (east of the viaduct and embankment) is located approximately 500 feet north (0.10 miles) of the site of the future OPC buildings within the UPARR conversion area and approximately 150 feet north of the east end of the Midway Plaisance (UPARR replacement land). Despite this close proximity, neither the future site of the OPC buildings nor the UPARR replacement land, either the east end of the Midway Plaisance or the site of roads that will be removed and converted to parkland, will cause any physical changes to the district or affect the features of its setting that contribute to its historic significance. The UPARR replacement areas on the east end of the Midway

Plaisance and along S. Cornell Drive may introduce changes that could be visible from vantage points within the historic district. Even with these changes, the Hyde Park-Kenwood Historic District will continue to maintain its close physical and visual relationship with Jackson Park and the Midway Plaisance and, therefore, these visual changes will not affect the features of the property's setting that contribute to its historic significance.

The southeast corner of the Hyde Park-Kenwood Historic District is located at the intersection of E. 59th Street and S. Stony Island Avenue, where some proposed intersection improvements will occur. Sidewalk improvements are also proposed at all corners of the intersection. There will be no physical changes to the historic district associated with this work, nor will the roadway improvements affect the features of the district's setting that contribute to its significance. In addition, there will be no perceptible audible changes (less than a 3 dBA change in noise level) associated with the proposed improvements.

Due to its distance from the property, there are no effects to the Hyde Park-Kenwood Historic District associated with the USACE Section 408 permission. The City will seek authorization under Section 404 of the Clean Water Act to allow for regrading and the installation of a sewer inlet to allow the wetland to drain, but the basic contours will remain the same. This area will be visible from some properties within the southeast corner of the Hyde Park-Kenwood Historic District; however, the district will continue to maintain its close physical and visual relationship with Jackson Park and the Midway Plaisance and, therefore, these visual changes will not affect the features of the property's setting that contribute to its historic significance.

The development of the OPC site, roadway closures, and relocated track and field may result in some new visual elements that could be perceptible within some vantage points within the Hyde Park-Kenwood Historic District. As shown in Photo 12 in Appendix D-1, from the Hyde Park-Kenwood Historic District, the OPC Museum Building will likely be visible from some vantage points, particularly along the southeast corner of the historic district. However, views 24, 25 and 26, Exhibit D-1 from within the district demonstrate there are no visual effects from these locations. The removal of the 8-lane rubberized-surface track will have no impact on the district's integrity of setting because the track is not a historic feature and was constructed after the district's Period of Significance. Despite some new visual elements, including views of the OPC Museum Building, the Hyde Park-Kenwood Historic District will maintain its close physical and visual relationships with Jackson Park, the Midway Plaisance, and their expansive landscapes as well as the integrity of its district setting as an urban, academic residential neighborhood.

No changes will occur to the uses of properties within the Hyde Park-Kenwood Historic District.

3.8 Cumulative Effects

3.8.1 Methodology

A cumulative effect is the impact on the environment which results from the incremental impact of the Federal action when added to other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person takes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

This analysis of cumulative effect assesses the result of combining the effects of the undertaking and other past, present, or reasonably foreseeable actions potentially affecting the same historic properties at the same time. The effects of the undertaking are described in detail in earlier sections of this report. These incremental effects are further assessed in combination with the effects of unrelated activities that are current and reasonably foreseeable and may impact the same historic resources. These activities include:

- 1) traffic signal interconnect improvements along Stony Island Avenue
- 2) improvements to separate the Lakefront Trail
- 3) the relocation and reconfiguration of baseball facilities in Jackson Park
- 4) improvements to the Osaka Garden on the Wooded Island
- 5) other improvements on the Wooded Island
- 6) potential improvements of the Columbia (Clarence Darrow) Bridge
- 7) resurfacing of eastbound and westbound Midway Plaisance between S. Payne Drive and S. Blackstone Avenue
- 8) Jackson Park Harbor Navigation Improvement project

These eight projects are independent of the undertaking that triggered this Section 106 process. If any of these separate projects qualifies as a Federal undertaking, it will undergo its own Section 106 process as appropriate before the individual project receives Federal approval. Each has also initiated, completed, or is not required to proceed through the City approval processes. Those projects requiring Federal and/or State review have either initiated or completed those reviews.

The current condition of the potentially affected historic properties reflects past effects on the historic properties and in turn informs the assessment of potential cumulative effects from the undertaking. Detailed descriptions of current condition, taking into account past changes, are provided in the 2018 Historic Property Inventory (HPI) (www.tinyURL.com/JPIImprovements). For example, the HPI includes extensive analysis of how Jackson Park and the Midway Plaisance have undergone substantial change over time while maintaining historic value and function. As established by the HPI and summarized in Section 3.5 of this document, the combination of changes made to date have not impaired the integrity of the existing character-defining features reflecting the original design principles for the park.

3.8.2 Analysis

The undertaking will result in certain adverse effects on the historic landscape of the Jackson Park Historic Landscape District and Midway Plaisance, and as result, on the CPBS Historic District. The

components of the undertaking with adverse effect on the historic landscape include proposed changes to the Midway Plaisance, OPC site development, and certain roadway closures. Other components of the undertaking will deviate from the historic design and have primarily negative effects, such as the Hayes Drive reconfiguration and the changes along Marquette Drive and Cornell Drive. Other components of the undertaking will have minimal or no effects, including the Lake Shore Drive improvements and the bicycle and pedestrian improvements.

This section considers the combined effects of the undertaking and the following unrelated projects, several of which are noted in the 2018 South Lakefront Framework Plan (<https://www.southlakefrontplan.com/>):

- *Stony Island Avenue Traffic Signal Interconnect Improvements*
The Chicago Department of Transportation (CDOT) is upgrading the signal equipment and communication along Stony Island Avenue/ Cornell Drive / 57th Drive from 95th and Stony Island to 57th and Lake Shore Drive. The project will upgrade existing traffic signal equipment (poles, mast arms, lens, cabinet, conduit) and will interconnect the traffic signals to improve operations along Stony Island Avenue, connecting into Lake Shore Drive. Where restoration is required for new traffic signal poles/conduit runs, the project will also upgrade existing ramps consistent with the Americans with Disabilities Act.
- *Lakefront Trail Separation*
The Lakefront Trail connects 2,792 acres of parkland in 6 parks including Jackson Park. The trail is located east of Lake Shore Drive from 56th Street to Marquette Drive and north of Marquette Drive from Lake Shore Drive to 67th Street within Jackson Park. Considered a major recreational component in parks and a transportation network, the Lakefront Trail Separation project sought to alleviate areas of congestion by separating bicyclists from other trail users. The newly separated trail includes an 18-mile bike trail and lakefront path. The separation project is complete.
- *Baseball Facilities*
The South Lakefront Framework Plan includes improvements to the area north of Hayes Drive and east of the Wooded Island. Currently there are two natural grass baseball fields and an overlapping natural grass soccer/football field. Preliminary design is in the early stages for two new senior baseball fields and renovations of one senior baseball field.
- *Osaka Garden and Other Improvements on the Wooded Island*
Improvements to the Wooded Island and Osaka Garden are part of the Wooded Island Plan, which was incorporated into the South Lakefront Framework Plan. The plan includes improvements to the perimeter fence, a new main gate, pathway enhancements, new plantings and tree pruning, landscape lighting, feature stone placements in the garden, and a new teahouse. The plan also includes the addition of an overlook that will allow for viewing of an existing art installation and new berms surrounding the installation to integrate the site with the adjacent natural areas. These plans are still in design and are subject to funding availability and continued design refinement.
- *Clarence Darrow Bridge*

The Clarence Darrow Bridge is currently closed to all traffic, and CDOT is evaluating potential alternatives to accommodate bicyclists and pedestrians. Built in 1880 and modified in 1895, CDOT's evaluation has concluded that the bridge is so structurally deficient that it cannot be rehabilitated without affecting its historic integrity. Based on its condition, CDOT is considering rehabilitation or replacement of the bridge while retaining historic design elements and materials to the maximum extent possible. CDOT intends to follow the Department of the Interior's Standards for the Reconstruction of Historic Properties for the project.

- *Midway Plaisance Resurfacing*

As part of the 2021 Arterial Resurfacing Program, CDOT will be resurfacing both eastbound and westbound Midway Plaisance between S. Payne Drive and S. Blackstone Avenue. The work will include milling existing pavement, installing new asphalt, installing ADA compliant curb ramps, replacing sidewalk in need of repair, filling missing sidewalk gaps, and complete streets/safety improvements within the existing curb lines.

- *Jackson Park Harbor Navigation Improvement Project*

The Chicago Park District has submitted Federal permit applications for the construction of two new breakwaters at the Jackson Park Outer Harbor located at South Promontory Drive. For many years, the Chicago Park District has considered various alternatives to address damage caused by lake currents and waves at Jackson Park Outer Harbor. In recent years, harbor shoreline conditions have deteriorated, and an existing floating breakwater failed, which resulted in a partial closure of the harbor. Proposed improvement plans include two steel and stone groins totaling 280 feet in length. Both structures will be enveloped in steel sheet pile with a reinforced concrete crest. These proposed improvements will address the high lake levels of Lake Michigan by shielding boats from damaging waves, reducing sediment deposition in the harbor, and protecting the harbor shoreline.

The Stony Island Interconnect project will improve traffic operations and modernize signal equipment along Stony Island Avenue. These changes will not alter features of the Jackson Park Historic Landscape District and Midway Plaisance or the CPBS Historic District. The Lakefront Trail Separation Improvements project generally corresponds to existing and historic circulation within the property and minimally alters the Jackson Park Landscape District and Midway Plaisance. The baseball field complex improvements alter rehabilitated parkland around the Hayes Drive Bridge but minimally alter characteristics of the cultural landscape that contribute to the significance of the property. The Osaka Garden Improvements project seeks to enhance the historic garden and context, while preserving features that contribute significance to the historic property. Other Wooded Island Improvements will minimally alter characteristics of the historic property. Altogether, the foregoing projects will minimally alter characteristics of the Jackson Park Historic Landscape District and Midway Plaisance (cultural landscape) and the CPBS Historic District that contribute to the significance of these properties. They have beneficial and no adverse effects. Accordingly, the noted current and reasonably foreseeable activities do not provide context in which the undertaking would contribute cumulative effects to Jackson Park Historic Landscape District and Midway Plaisance or to the CPBS Historic District.

With respect to the Clarence Darrow Bridge, the potential effect of the project is being evaluated in a separate Section 106 process, which has not reached conclusion. The undertaking at issue in this document will be considered in the cumulative impacts assessment for the Clarence Darrow Bridge project, but at present the bridge project analysis has not resulted in a finding of adverse effect. Thus, no cumulative effect is currently identified for this undertaking in connection with the potential improvement of the bridge.

The effects of the road resurfacing project on the central and western portions of the Midway Plaisance will be evaluated in a separate Section 106 process, which has not reached conclusion. The undertaking at issue in this document will be considered in the cumulative impacts assessment for the resurfacing project, but at present the resurfacing project analysis has not resulted in a finding of effect. Thus, no cumulative effect is currently identified for this undertaking in connection with the potential roadway resurfacing improvement.

With respect to the Harbor Navigation Improvement Project, the potential adverse effect will be evaluated in a separate Section 106 process. The undertaking at issue in this document will be considered as appropriate in the cumulative impacts assessment for the harbor improvement project. The project area is a manmade shoreline consisting entirely of post-1920 landfill, armored with boulder revetments, steel walls, and beach sand. The adjacent lakebed immediately offshore contains no structures or historic properties. The project area lies at the outer southeastern perimeter of Jackson Park, well away from the area of the OPC in the northwest of Jackson Park. No cumulative effect is currently identified for this undertaking in connection with the planned improvement of the outer harbor.

Among the current and reasonably foreseeable activities noted above, only the Stony Island Traffic Signal Interconnect project has the potential to cause effects to a roadway of the CPBS Historic District outside of the Jackson Park Historic Landscape District and Midway Plaisance. The signalization project minimally alters the CPBS Historic District. Also, Stony Island Avenue has been previously widened and altered, and many of the properties along Stony Island Avenue have diminished integrity of setting. Thus, this undertaking does not contribute cumulative effects to the CPBS Historic District or the Jackson Park Historic Landscape District and Midway Plaisance in the context of the activities listed above in Section 3.5.1.

3.8.3 Cumulative Effect – Conclusion

The analysis of this undertaking in conjunction with past, present and reasonably foreseeable actions identified a cumulative adverse effect on the historic property of the Jackson Park Historic Landscape District and Midway Plaisance and the CPBS Historic District. The cumulative effect arises from combining the effects of the undertaking on the same historic resource at the same time, given the resource's current condition and taking into consideration the effects of past activities. Other current and reasonably foreseeable activities have indeterminate or beneficial effects in whose context the undertaking does not contribute cumulative effects to historic properties within or outside the Jackson Park Historic Landscape District and Midway Plaisance or the CPBS Historic District. Some of the reasonably foreseeable activities listed above in Section 3.8.1 may be further analyzed in a future

Section 106 process that would take into consideration the potential for cumulative effects with this undertaking.

4.0 Consulting Party and Public Involvement

Throughout the Section 106 process, opportunities were made available for the public and consulting parties to provide input. A current list of the identified and interested groups included as consulting parties for the project can be viewed under Public Involvement in Appendix E. Updates to this list are posted to the project website (www.tinyURL.com/JPIImprovements) as necessary.

On December 1, 2017, a Consulting Party Kick-Off Meeting was held to discuss the Section 106 process, the APEs, and a preliminary summary of historic features within the APE, as documented in the HPI. Input received was evaluated and incorporated into the final delineation of APE boundaries and historic resources identified.

The second Consulting Party meeting was held on March 29, 2018 to discuss the results of the historic properties identification and the next steps in the Section 106 process. Prior to the meeting, the Archaeological Report and the draft HPI were distributed to consulting parties and the public for review and input. Audience members who attended the meeting asked several questions during the question and answer session following the meeting presentation. Twenty-nine comment letters were received outside of the meeting during the comment period ending April 19, 2018. Input received during the question and answer session of the meeting as well as during the 30-day comment period is summarized on the project website (www.tinyURL.com/JPIImprovements).

The SHPO provided concurrence on the finding of no eligible archaeological sites for the NRHP as described in the Archaeological Report on March 28, 2018 and supplemental memorandum on September 12, 2018 (see Appendix D for correspondence). The HPI was revised based on comments received from the public, SHPO, and other reviewing agencies. A final HPI was submitted to the SHPO for approval on June 6, 2018. The SHPO provided written concurrence on the determinations of eligibility listed in the final HPI on July 10, 2018 (see Appendix D for correspondence). An Addendum to the HPI was prepared to document the inclusion of the Chicago Park Boulevard System Historic District in the APE and is being made available concurrently with the Final AOE.

The draft Assessment of Effects (AOE) was made available for the public, consulting parties, ACHP and SHPO for a 30-day review and comment period beginning July 29, 2019 and ending August 30, 2019. Consulting Party Meeting #3 was held on August 5, 2019 to discuss the results of the AOE and the next steps in the Section 106 process. The meeting was organized into two sessions: a smaller discussion with consulting parties only, followed by an evening meeting open to the public. The same presentation was given during each session, followed by a question and answer period. Forty-one comment letters were received during the 30-day comment period. Comments collected from the meeting and during the 30-day comment period are documented and summarized in Appendix F of this final AOE.

Consulting parties may either concur or object to the effect findings in this final AOE within 30-days of receipt of this document. If any objection is received on the effect findings within 30-days, FHWA may either consult with the objecting party to resolve the disagreement, or FHWA may request the ACHP provide its opinion on the objection. The FHWA will take into account the ACHP's opinion upon issuing

its final decision regarding effects. Upon concluding the effects analysis, the FHWA, the NPS and the USACE will proceed to the next step in the Section 106 process (see Section 6.0.).

5.0 Avoidance and Minimization of Effects

If the results of the assessment of effects indicate a finding of adverse effect, agencies should conduct further consultation to attempt to resolve the adverse effect pursuant to 36 CFR 800.6. This includes consultation with the ACHP, SHPO, and consulting parties to seek ways to avoid, minimize, or mitigate the adverse effects (36 CFR 800.6(b)(2)).

During the Draft AOE 30-day public comment period, several comments were received regarding avoidance and minimization measures, including requests for further details in the report and suggestions to avoid or minimize effects to historic properties. The following sections respond to comments received by summarizing efforts made to avoid or minimize impacts or effects to historic properties.

5.1 Avoidance Measures

5.1.1 City Action

The actions of the City described in this report (authorizing construction of the OPC, closing roads, and relocating an existing track and field in Jackson Park) do not require Federal funding or approval and, therefore, are not subject to the NHPA's requirement to consider avoidance, minimization, and mitigation of adverse effects to historic properties. The Federal agencies do not have sufficient control to condition project approval for the construction of the OPC, closing roads in Jackson Park, or relocating the existing track and field in Jackson Park. Nevertheless, the opportunity to avoid adverse effects presented itself indirectly to the City through its own municipal approval process. The governing bodies of the City and the Chicago Park District approved the construction of the OPC in Jackson Park or Washington Park, with the Foundation ultimately selecting the Jackson Park location. The municipal process included 11 public hearings (4 in 2015 and 7 in 2018) and over 50 community meetings on the OPC and related infrastructure and open space improvements. In considering the proposal, the City had two practical alternatives: (1) deny the Foundation's proposal and lose the opportunity to host the OPC, or (2) approve the Foundation's proposal subject to development limits and obligations to preserve park uses and public access. The primary vehicle governing the OPC's placement, design, and use within Jackson Park is the planned development for the site (Institutional Planned Development No. 1409 or PD 1409). PD 1409 includes a site plan, landscape plan, building elevations and floor plans for the OPC, and specifies the project's permitted uses. After the adoption of a planned development ordinance, the Zoning Administrator must review every application for a permit or license within the planned development boundaries and determine that the proposed use, building or structure complies with all provisions of the planned development ordinance. In addition to PD 1409, the City Council authorized the placement of the OPC in Jackson Park subject to a Use Agreement, which imposes additional legal constraints on the Foundation's use of the park site.

5.1.2 NPS Action

The adverse effect to historic properties identified in this document arises from the presence of the OPC in Jackson Park, in particular its alteration of features such as the conversion of the roadway to parkland,

that contribute to the historic significance of the Jackson Park Historic Landscape District and Midway Plaisance, and the CPBS Historic District. NPS has authority only over evaluating the adequacy of the proposed replacement recreation opportunities on the closed roadways and on the east end of the Midway Plaisance due to the City's decision to locate the OPC and to make traffic improvements in Jackson Park. NPS has no legal authority over the presence or physical aspects of the OPC or traffic improvements in Jackson Park, such as the design, configuration, materials, or workmanship of those projects.

NPS has a statutory obligation to review the recreational impacts of local decisions affecting UPARR-assisted parks, and to approve conversion proposals if the local government meets the conditions outlined in the Act.

With respect to the replacement recreation, NPS evaluates recreational equivalence according to criteria established in the Act establishing UPARR. Specifically, NPS approves a conversion only upon conditions that "ensure the provision of adequate recreation properties and opportunities of reasonably equivalent location and usefulness" (54 U.S.C. 200507). For locational equivalence, the implementing regulations for UPARR indicate replacement property is not *required* to be on the same site or directly adjacent to or close by the conversion site, but it should serve the same communities, should meet their public recreation needs, should be administered by the same political jurisdiction (in this case, the City), and must not be located within an existing UPARR-designated area, see 36 CFR 72.72(b)(3).

5.1.3 FHWA Action

The FHWA alternatives analysis (available on the project website, www.tinyURL.com/JPIImprovements) considered a wide range of proposed improvements to meet the FHWA's purpose and need, while avoiding or minimizing impacts to historic properties and other resources. To avoid any effects to historic properties by the project, the FHWA considered a No-Action Alternative and an alternative to implement Congestion Management Process Strategies. It should be noted that historic properties begin at the backs of roadway curbs for all roadways located within and adjacent to Jackson Park and the Midway Plaisance.

The No-Action Alternative assumes no roadway improvements are made in response to changed conditions by the City's proposed roadway closures. Congestion Management Process (CMP) strategies involve ways to reduce congestion in a transportation network that do not involve major construction, and do not provide additional through lane capacity for single-occupancy vehicles. Considerations under this alternative include traffic signal re-timing to optimize signal operations, as well as Americans with Disabilities Act (ADA) and crosswalk improvements. These alternatives did not satisfy the purpose and need for the project. A total of nine "build alternatives" were considered in an effort to achieve the purpose and need of the project and minimize impacts to historic properties and other environmental resources. The alternative evaluated for effects to historic properties in this AOE provides the best balance of achieving the project's purpose and need and minimize effects to historic properties, and other resources.

5.1.4 USACE Action

The improvements considered by the FHWA action result in the USACE authorization of Section 404 permits under the Clean Water Act and a Section 408 permission under the Rivers and Harbors Act, specifically: the widening of Lake Shore Drive over the 59th Street Inlet Bridge (Section 404), temporary dewatering beneath the Hayes Drive bridge to improve the structure (Section 404), and impacts and replacement of GLFER restoration areas (Section 408).

As noted above, the FHWA alternatives analysis considered a wide range of proposed improvements to meet the FHWA's purpose and need, while avoiding or minimizing impacts to historic properties and other environmental resources. The alternatives analysis demonstrated improvements along Lake Shore Drive, Hayes Drive, and Stony Island Avenue are required to meet the FHWA stated purpose and need. The improvements along these roadways result in permanent and temporary impacts to areas improved under the GLFER program; therefore, the Section 408 permission required for this action cannot be avoided in order to meet the objectives of the FHWA action. The widening of Lake Shore Drive requires an expansion of the 59th Street Inlet Bridge, therefore, the authorization of a Section 404 permit for this action cannot be avoided.

Improvements to the Hayes Drive Bridge are proposed in order to meet the objectives of the FHWA action. The Hayes Drive Bridge is in poor condition and in need of repair, which required temporary dewatering of the Jackson Park South Lagoon in order to conduct repairs and therefore, the Section 404 permit for this action cannot be avoided. Placement of a small sewer lift station near the OPC site includes the placement of utility covers and a modified embankment in an area of GLFER plantings along the west bank of the West Lagoon. This requires a Section 408 permission from the USACE. The project does not affect the waterbody and the affected area will be revegetated and regraded to match the existing landscape. Existing plantings will be replaced with new plantings of equivalent coverage along the east bank of the Inner Harbor following GLFER precedent (Appendix A, Exhibit 4b: 1-2u). A discussion of the minimization of Section 404 and GLFER area impacts is provided in Section 5.2 below.

5.2 Minimization Measures

5.2.1 City Action

While the City is not subject to the NHPA's requirement to consider minimization of adverse effects to historic properties, the City has incorporated minimization efforts into PD 1409 and the Use Agreement, which, although legally separate from one another, collectively govern the development and operation of the OPC in Jackson Park. PD 1409 and the Use Agreement considered together provide legal certainty concerning the siting, uses, design, and public accessibility of the OPC in its historic setting. PD 1409 includes a bulk table specifying, among other things, the maximum size of the built space on the OPC site. The provisions of the Use Agreement in particular detail the public's continued access at customary park and museum hours to the open and interior spaces of the OPC. These terms help to ensure that the OPC's effect on the historic landscape is controlled and the public's enjoyment of this landscape is maintained and subject to legal oversight.

In addition, through an iterative process with frequent public input, the design of the project reflects extensive minimization efforts to address the historic resources and character of the historic property,

including specifically Olmsted's designs for Jackson Park. As a result, the design of the OPC avoids or minimizes many effects on the historic cultural landscape.

The entire OPC site has been developed as a designed landscape within the perimeter of Jackson Park, an area intended by Olmsted to contrast with the rest of the more picturesque and pastoral parts of the park. The OPC's landscape design employs traditional Olmsted typologies within the park in order to provide a greater degree of compatibility with the park as a whole. For example, the more formal or urban typology is reflected in the plaza and campus area; the wooded landscape typology is reflected in landscaping and plantings around the site, including the Woodland Walk; the wet landscape typology is reflected in the Lagoon Walk; and the field landscape typology is reflected in the Great Lawn. Using typologies that are broadly congruent with the historic design practices of Olmsted helps minimize the effect of the OPC on the historic cultural landscape.

The proposed OPC site lies on the western perimeter of Jackson Park, using a footprint that concentrates primary physical change within a small area of the historic property (approximately three percent). While some nearby historic resources are affected, the perimeter location avoids impacts to many historic resources in other parts of the historic district. This location also avoids physical adjacency to the most prominent historic building in the park, the Museum of Science and Industry (MSI), while also avoiding the primary north-south visual axis to and from the MSI within the park. Doing so helps reduce visual competition with the MSI and helps moderate any effect on the historic dominance of the MSI in the cultural landscape of Jackson Park.

The configuration of OPC-related buildings breaks down the scale of the overall project by framing a campus, rather than calling for a single large structure to house all activities and functions. The campus buildings are oriented to face the urban, built environment outside the park rather than inward into the park. These design elements help maintain a strong visual connection between the park and the adjacent community, an important element of the historic cultural landscape. The placement of the outdoor recreation amenities and the Program, Athletic, and Activity Center echoes the intended location of the outdoor gymnasium and an associated facility in early plans by Olmsted.

The height of the prominent OPC Museum Building enables a smaller footprint within the historic property than if the building were shorter. The orientation, location, and materials of the Museum Building have been developed with attention to views from the historic property and the skyline surrounding.

The visibility of other new OPC buildings within the park landscape has been minimized and the prominence of landscape scenery enhanced through the location of buildings, the design of green roofs, and the partial submergence of approximately forty percent of the project's occupied space, and underground parking. Further accommodation for the expression of green space within the footprint of the project involves the placement of subtle berms and planted buffers to minimize impacts to historic views and vistas within the historic district. The use of earth-toned building materials further reduces the potential effect on the landscape, helping to visually situate the proposed buildings in the landscape.

The changes associated with the OPC prioritize pedestrians over vehicles as well as internal circulation within the historic property over commuter traffic through the property. The shift is not a replication of historic design but enhances the prominence of landscape scenery, which itself relies on native Illinois vegetation in keeping with Olmsted's design principles. (In addition, the Foundation has committed to plant more than 400 trees on the OPC site to sustain and refresh the park's canopy.) The design of circulation increases accessibility in the western perimeter of Jackson Park. The proposed garden design to replace the Perennial Garden/Women's Garden near the Midway Plaisance, for example, provides full accessibility and a safer to approach from surrounding parkland. At Cornell Drive between 59th and 62nd Streets, the conversion of a portion of the roadway to a pedestrian walkway associated with the OPC results in removal of high-speed traffic and reduction of non-historic road widths along Cornell Drive. The new walk generally follows the alignment of Cornell Drive, offers a wide pathway to interpret the historically wide drive, and provides views over the West Lagoon.

Road closures incorporate new pedestrian walks and the remainder of the former roadways are converted to greenspace in most cases. The conversion from vehicular roads to pedestrian walks typically approximates the alignment of the historic roadways including at the historic triangular intersections of Hayes Drive and Marquette Drive and at Marquette Drive and Richards Drive.

5.2.2 NPS Action

As part of evaluating replacement recreation on the east end of the Midway Plaisance and within Jackson Park, the City considered opportunities to minimize the potential effects of its action on the historic cultural landscape. With respect to current roadways being recovered as open space for future public recreation within Jackson Park, the City considered the addition of structured recreation amenities in those areas but determined that such amenities would be incongruent with the historic use of these areas for movement across and access within Jackson Park and could lead to greater or equivalent effects to the historic cultural landscape. In addition, the areas are long, slender, and sinuous in nature and therefore impractical for many forms of structured recreational amenity such as playgrounds, ballfields, etc.

In evaluating replacement recreation proposed for the east end of the Midway Plaisance, the City believes the conceptual plans forming the design envelope maintains significant open space on the east end of the Midway Plaisance; provides structured recreation amenities (play area) that are compatible with Secretary of the Interior Standards for the Treatment of Historic Properties (specifically standards 9 and 10 which allow for compatible new additions) and are desired by the community; preserves the historic Cheney-Goode Memorial; maintains the historic sunken aspect of the panel; recovers the partially obscured north-south path across the east end of the Midway Plaisance parallel to the ICRR (now Metra Electric) tracks near the Cheney-Goode Memorial; and rehabilitates historic tree plantings in the corners of the sunken lawn and at the edge of the ICRR embankment.

5.2.3 FHWA Action

As part of the alternative development process, efforts to minimize potential effects of the FHWA action included the following:

- minimization of additional turn lanes to avoid excess capacity,
- minimization of through and turn lane widths,
- roadway reconfigurations to reduce widening needs and utilize existing roadway footprint, and
- minimization of roadway median barrier widths.

The specific minimization efforts considered for the transportation improvements are outlined in the Preferred Alternative document, located in the NEPA Documents section of the project website (https://www.chicago.gov/content/dam/city/depts/dcd/supp_info/jackson/2018-06-27-Draft-PreferredAlternative_package.pdf).

The proposed transportation improvements also considered strategies to preserve or enhance the historic character of Jackson Park. These strategies generally include:

- consideration of historic roadway and pedestrian path alignments,
- minimization of potential tree impacts or removals, particularly larger trees of specific species,
- reduction of proposed grading to preserve landscape qualities and existing berms, and
- restoration of existing cladding on the 59th Street Inlet bridge

5.2.4 USACE Action

The FHWA minimization efforts discussed above also, in turn, minimize impacts to the associated Section 404 permit and Section 408 permission required of the USACE. Both temporary and permanent impacts of the 59th Street Bridge widening have been minimized to the construction footprint required to widen the bridge. Similarly, the temporary impacts of the Hayes Drive Bridge dewatering are limited to the minimum areas required to construct the proposed bridge repairs. Temporary and permanent impacts to the GLFER areas have also been minimized to the minimum amount required to construct proposed improvements. Temporary staging areas for construction have been adjusted to reduce or avoid GLFER impacts.

6.0 Conclusions

As summarized by this document, Table 7 summarizes the effect findings for each historic property associated with the undertaking. The result of the Assessment of Effects is that the undertaking will have an **Adverse Effect** to historic properties.

Table 7: Summary of Effect Findings

Resource ID	Historic Property	Effect Finding
01	Jackson Park Historic Landscape District and Midway Plaisance	Adverse Effect
37	Chicago Park Boulevard System Historic District	Adverse Effect
02	Stony Island State Trust and Savings Bank/Stony Island Arts Bank	No Adverse Effect
04	Island Terrace Apartments	No Adverse Effect
05	Hyde Park Academy High School	No Adverse Effect
06	Jackson Park Terrace Historic District	No Adverse Effect
07	Hyde Park-Kenwood Historic District	No Adverse Effect
03	William Dexter Three-Flat	No Effect
08	South Shore Country Club Historic District (Currently known as the South Shore Cultural Center Park)	No Effect
09	South Shore E. 67 th Street Apartment Historic District	No Effect
10	Residences at 6700 S. Crandon Avenue	No Effect
11	Shoreline Apartments	No Effect
12	Residences at 2201-2211 E. 67 th Street	No Effect
13	Leonard Graff House	No Effect
14	Dr. Paul Schutz House	No Effect
15	Morris N. Fox Three-Flat	No Effect
16	Residences at 6701 S. Constance Avenue	No Effect
17	Tower Court Apartments	No Effect
18	Hyde Park East Historic District	No Effect
19	Bret Harte Elementary School	No Effect
20	Windermere East Hotel/Apartments	No Effect
21	Jackson Towers	No Effect
22	Promontory Apartments	No Effect
23	The Flamingo on the Lake	No Effect
24	Jackson Shore Apartments	No Effect
25	Shoreland Hotel	No Effect
26	Promontory Point Historic District	No Effect
27	Helstein House	No Effect
28	Residence at 5812 S. Blackstone Avenue	No Effect

Resource ID	Historic Property	Effect Finding
29	Stein Building	No Effect
30	Johnson House	No Effect
31	Center for Continuing Education (Graduate Student Housing/Keller Center)	No Effect
32	Public Administration Building (Chapin Hall)	No Effect
33	St. Paul's Universalist Church/Shankman Orthogenics School	No Effect
34	University of Chicago Power Station	No Effect
35	E. 62 nd Place Firehouse	No Effect
36	Pridmore & Stanhope-designed Greystone	No Effect
41	Frank Lillie House	No Effect

As part of the NHPA Section 106 process, the project will continue to seek additional opportunities to reduce effects and impacts to historic and environmental resources. 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, resolving adverse effects.

In the final step of the Section 106 process, the FHWA, NPS, USACE and the City will explore measures to further avoid, minimize, or mitigate adverse effects to historic properties from the Federal actions and to reach agreement with the Illinois State Historic Preservation Officer and the Advisory Council on Historic Preservation on measures to resolve adverse effects. Agreement on these measures will be documented in a Memorandum of Agreement (MOA). Consulting parties who may have responsibilities for implementing mitigation measures, such as the Illinois Department of Transportation and the City of Chicago, will be invited to sign the MOA. Other consulting parties will be invited to concur on the MOA, however, the refusal of any party invited to concur on the MOA does not invalidate it.

Measures necessary to mitigate adverse impacts from the Federal actions will be incorporated into 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 considering the impacts of the action and the benefits of the proposed mitigation measures.

7.0 References

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