

Save the Midway!

February 16, 2020

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

cc: Mr. Matt Fuller, Environmental Programs Engineer, Federal Highway Administration, matt.fuller@dot.gov

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

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

Dear Ms. Kocher,

Save the Midway is providing our comments to the *Assessment of Effects to Historic Properties: Proposed Undertaking In and Adjacent to Jackson Park, Jackson Park, Chicago, Illinois*, January 2020 (AOE) prepared by the City of Chicago Dept. of Planning and Development on behalf of the Federal Highway Administration (FHWA).

URBAN PARK AND RECREATION RECOVERY (UPARR) PROGRAM, OBJECTION TO FINDINGS OF EFFECTS

Save the Midway objects to the FHWA's determination in the AOE that "The City's proposed use of the east end of the Midway Plaisance for replacement (UPARR) recreation would preserve the historic character of this section of the Midway" (Section 3.5.2.2, 44). The proposed play area would reduce the open central turf area of the panel. This would detract from the original design of the sloping sunken meadow, and disrupt the feeling of the "historic character of axial movement and views above sunken, open planes" of the Midway (HPIR¹, Appendix F, Section 1.5.6, 14).

"At the easternmost division, the field in the central panel is used seasonally for soccer" (Section 2.9.2.1, 81). The proposed play area would reduce the area of the east end of the Midway available for some recreational use. This would detract from the "informal recreational use of sunken lawn panels" which was found to be a contributing resource of the Midway by the HPIR (Section 2.9.2.1, 82).

The HPIR found that with one exception "new playgrounds have been placed within the historic setting (of Jackson Park) and diverge from the original design." (Appendix F, Section 2.4.1, 35) One of the seven playgrounds was found to be a contributing resource

but only for spatial organization and land use because it appears on early Olmsted design plans and “retains sand and turf patterns set against the arc of the surrounding walk...” (36). The play area proposed for the east center panel of the Midway would diverge from the original design and detract from spatial organization and land use.

Therefore the proposed play area on the east Midway would be an adverse effect on the design, setting and feeling of the Midway.

¹*Section 106 Historic Properties Identification Report: Federal Undertakings in and Adjacent to Jackson Park, Cook County, Illinois* (HPIR), prepared for FHWA, posted on the City’s website on July 27, 2018

UPARR NEXT STEPS

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

We propose that:

1. To avoid any adverse effect to the east section of the Midway, the City should remove the playground and the UPARR designation from the plan for the east section, and leave the east section as primarily an open flexible meadow as designed by F. L. Olmsted in his *Study of Design for the Midway Plaisance—Alternative*, 1894 (Olmstead Archives, NPS).
2. The City should work with local community organizations to create new parkland on empty lots or other City owned property within the area to provide more neighborhood parks. We note that the City’s targeted area on the Midway is near other current and planned play areas and would thus be redundant. Such redundancy would not be the case in some neighborhoods close to the Midway.
3. The City should place the UPARR designation on the new parks and playground.

OTHER ADVERSE EFFECTS TO THE MIDWAY

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

Our suggestions to avoid this adverse effect on the Midway:

- The City should not drain the ephemeral wetland but should rather replace it with a small, narrow, designed water feature. It should be respected as an ecological resource that promotes the richness of flora and fauna of the entire area. We suggest any future plans for the space respond to the natural environment and to enhance it.

GENERAL COMMENTS AND OBJECTIONS TO THE 16 JANUARY 2020 ASSESSMENT OF EFFECTS

Save the Midway would like to object to several aspects of the 16 January 2020 Assessment of Effects document. Namely,

- 1) “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.”

According to section 106 of the National Historic Preservation Act of 1966, the 106 process is to seek to “[r]esolve adverse effects by developing and evaluating alternatives that could avoid, minimize, or mitigate these impacts on historic resources.” Given the admitted and documented adverse effects to the Midway, Jackson Park, and the Women’s/Perennial Garden in the AOE, the plans of a private foundation (OF) and the City, seem to be very much subject to the Federal approval process. **If there has been a change to the National Preservation Act, could the Federal Highway Administration please provide the documentation for this change? Is the Advisory Council on Historic Preservation in agreement with the claim that what happens to National Historic Registry properties is no longer of concern to the federal agencies?**

We note that up until this January 2020, the process was proceeding as if the OPC and the City had to seek to avoid, minimize and mitigate. We note that this change in essence cuts out community and other stakeholder voices in this process. We note that is an anti-democratic move and is on top of a process that has already been fraught with the lack of engagement with the community (e.g., the lack of community input in selecting the UPARR replacement; the lack of community input in designing the proposed UPARR replacement park; the initial confiscation of the Midway for a private parking garage, etc).

Up until last month, we understood that given the historic significance of the parks and area, the OPC and the City were under an obligation to avoid, minimize, or mitigate. This change in process is a disturbing one and signals a dark time for the patrimony of the U.S.: if cities and private foundations can now make determinations on their own regarding how national treasures are treated, we are about to lose our own history.

We note that according to AOE report itself, federal standards are being violated in numerous respects in the OPC plans. We note in particular on page 51: “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.’”

One further wonders about the environmental review procedures that are also supposed to be part of this process. We call attention to the fact that the rising Lake Michigan waters

have already once this winter forced the nearby closure of South Shore Drive/US Route 41: if Cornell Avenue is closed as planned, where will local and through traffic go if US Route 41 becomes more frequently closed because of rising water levels? Indeed, will the OPC with its expansive subterranean private complex further exacerbate these rising water levels?

We note that the City of Chicago was forced in 1982 by a federal consent decree to create local park councils in order to make sure that local communities would be able to control their own parks. Given that the City has without community input decided upon UPARR replacement, we question the assumption that the planning decisions are simply ones of local land use.

- 2) We reiterate our objections to the destruction of the Women's/Perennial Garden. It is an insult to claim that using a modified circular pattern in the back entrance to the OPC in any way preserves the landscape design of May McAdams and her tribute to Sophia Hayden. We reiterate our dismay at the erasure of the accomplishments of two women, Sophia Hayden and May McAdams, by the work of Michael Van Valkenburgh.

We applaud the desire to make the garden universally acceptable, but deny that this may only be accomplished by the complete destruction of the McAdams's landscaped garden. Indeed, we note that during this year's annual commemoration of the first automobile race, participants in wheelchairs and crutches were able to access the central area without difficulty.

We further object to the size of the museum tower of the OPC: it destroys the visual coherence of the unity of the three Olmsted parks by blocking the open view shed from Jackson Park to the west and from the Midway Plaisance to the east. The tower becomes the primary focal point rather than open space and unobstructed views.

Sincerely,

Michael McNamee and Karen Rechtschaffen
Co-chairs
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