Jackson Park Watch

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January 4, 2018

Eleanor Gorski, Chicago Department of Planning and Development John Sadler, Chicago Department of Transportation City of Chicago

Via Email

Re: Section 106 Review of the OPC Mobility Improvements to Support the SLFP Update

Dear Ms. Gorski and Mr. Sadler:

As a consulting party to the Section 106 review of the "OPC Mobility Improvements to Support the SLFP Update," which was launched on December 1, 2017, we write to propose changes to the Area of Potential Effect designated for the review and to suggest additions to the list of historical sites relating to the review. We also want to express two concerns about underlying premises for the review.

I. Expansion of Area of Potential Effect ("APE").

1. The APE should include the entire golf course project. Slide 21 of the materials presented at the December 1, 2017 Section 106 Consulting Parties Kick-off Meeting includes plans for the closure of Marquette Drive as well as proposed underpasses under Jeffrey Boulevard and South Shore Drive, which are related only to the proposed golf course project, *not* to the proposed Obama Presidential Center. If these elements are to be included in the Area of Potential Effect (Archaeology) as depicted on Slide 21, then the entire golf course project area should likewise be included in the APE and should be examined for Archeological as well as Architecture/Landscape issues. The entire golf course area should likewise also then be included in the NEPA and UPARR reviews.

In conjunction with this change to the APE, the full plan for the golf course project should be made public, which as of today's date, has not occurred.

2. The APE should include all of the Midway Plaisance, from Stony Island Avenue to Cottage Grove Avenue. The Midway Plaisance was the site of numerous buildings during the 1893 Columbian Exposition. The tall main building of the Obama Presidential Center as designed and sited will have a visual impact along the entire length of the Midway. Further, the entire extent of the Midway will be affected by the traffic reconfigurations proposed in connection with the Obama Presidential Center. These areas should be included in the APE for Archeological as well as Architecture/Landscape review.

II. Additions to Historical Features of Jackson Park

We would also like to propose additions to the Historic Features of Jackson Park as itemized in Slide 33 of the December 1 presentation. Additional features to be recognized include:

- Olmsted's design for pedestrian and traffic circulation throughout Jackson Park and the intersection of Jackson Park with the Midway Plaisance
- Wooded Island and Paul Douglas Nature Sanctuary [current map tags only Japanese Garden on Wooded Island]
- The monument to the Haiti Pavilion and to Frederick Douglass' participation in Columbian Exposition (by Bowling Green Clubhouse).
- The site of Nike missile installation 1956-71 (driving range)
- 67th Street Beach
- Also, please note that although the Linnaeus Monument is included on this slide (star #11), its location is misstated as farther east than it actually is. Its inclusion is an indication that the entire Midway Plaisance should be included in APE

III. Concerns about Use of Framework Plans

During the December 1 meeting (as well as in other meetings associated with the OPC), there were frequent references to the 1999-2000 Jackson Park/South Shore Framework Plan, as a means of justifying changes that the City, the Park District, and the Obama Foundation wish to make to Jackson Park, especially to the Jackson Park road system. That plan is attached here for ease of reference. The Framework Plan does not, however, provide the support that appears to be relied upon, and perhaps of even greater concern is the fact we have not been provided any other analytical support for the proposals.

The Framework Plan is mostly a wish list with only a few items discussed therein ever being implemented. Some highlights from the report which we believe important include:

- The Framework Plan observes that Olmsted's original roadways were forty-feet wide (p. 8, 1st paragraph).
- The Framework Plan does not call for changing the configuration of the Olmsted design where the Midway Plaisance and Jackson Park connect, and instead says "The Olmsted design has served the park well over time and should not be compromised by future plans" (Historic Context, "Key Issue," pg. 13).
- The Framework Plan *does not* call for closing Cornell Drive. Section 4D, "Jackson Park: Framework Plan Recommendations," p.16, promotes narrowing Cornell south of 60th and perhaps eliminating northbound Cornell between 65th and 67th.
- The Framework Plan in only one instance noted *consideration* (emphasis added) of "removing Marquette Drive between Richards Drive and Stony Island Avenue and replacing [it] with a pedestrian/bicycle path" *based on further studies* and community input (pp. 16 and 19, C11).

We also attach the Jackson Park Projects and Framework Plan dated May 31, 2016. This was a recent effort by the Park District to promote the music pavilion and Yoko Ono sculpture projects

then being promoted by Project 120, Chicago in cooperation with the Park District (and before any mention of the OPC). Again, there was no mention of closing Cornell Drive or Marquette Drive. Further, the landscape architect (Heritage Landscapes) hired by Project 120 raised the idea of calming traffic on Cornell Drive by narrowing the lanes and/or adding a median; that proposal was again *not* included in the 2016 plan. Moreover, instead of expanding the existing golf driving range (as is now being proposed, without any details whatsoever [which we also note is a problem]), this plan moved it to an area south of Hayes Drive and did not require the closure of Marquette Drive. This relocation freed up that entire space on the lake-side of the park for community use, a recommendation that had also been included in the 1999-2000 Framework Plan (p. 18, D2 and D3. This 2016 "plan," never officially adopted, is now little discussed.

Instead, CDOT and other city agencies appear to have abandoned this 2016 plan and to focus on the 1999-2000 plan as the basis and justification for the changes being proposed to accommodate the Obama Presidential Center and other proposed changes to Jackson Park, even though such proposals are not included in the Framework Plan and supporting data for such proposals has not been provided for review and analysis.

IV. Absence of Actual Plan

As raised by many both before and during the December 1st kickoff meeting, there remain threshold issues regarding the actual proposal under review that must be addressed. As we understand, the current proposal for the OPC does not conform to the segment of Jackson Park that was set aside by City Ordinance O2015-192. Furthermore, the components of the proposal for the OPC do not seem to be finalized. For instance, the model displayed recently at the Obama Foundation's by-invitation presentation on its plan for a parking garage showed new or relocated elements for the OPC site differing from previous plans. It seems essential to have a clear proposal that accurately reflects the placement of the OPC and other proposed alternations to the park, in order to be able to adequately and effectively evaluate and respond to the proposal. Without such clarity the Section 106 review seems premature. We repeat our request for clarification of these concerns relating to the OPC site and plans.

We look forward to your response to these proposals and concerns.

Sincerely,

Brenda Nelms and Margaret Schmid Co-presidents

cc: Matt Fuller, Federal Highway Administration; Abby Monroe, Chicago Department of Planning and Development; Rachel Leibowitz, Illinois State Historic Preservation Office; Lisa DiChiera, Landmarks Illinois; Jerry Adelman and Ted Haffner, Openlands; Ward Miller, Preservation Chicago; Juanita Irizarry and Lauren Moltz, Friends of the Parks; Charles Birnbaum, The Cultural Landscape Foundation; Dan Marriott, NAOP; Betsy Merritt, National Trust for Historic Preservation; Michael McNamee and Karen Rechtschaffen, Save the Midway; Bronwyn Nichols, Midway Plaisance Advisory Council; Walter Kindred, SSCC Advisory

Council; Naomi Davis, BIG; Jawanza Malone, Kenwood-Oakland Community Association; Jack Spicer, Promontory Point Conservancy

Att: 1999-2000 Jackson Park/South Shore Framework Plan; Jackson Park Projects and Framework Plan (May 31, 2016)