

March 30, 2020

Sarah Stokely
Program Analyst
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001
Via Email: sstokely@achp.gov

Subject: Review of AOE report on proposed undertaking in Jackson Park, Chicago

Dear Ms. Stokely:

In our February 18, 2020 letter to Mr. Matt Fuller, Environmental Programs Engineer at the Federal Highway Administration based in Springfield IL, we raised numerous objections to the assertion in the January 2020 AOE report that there will be no adverse effects on the Jackson Park Terrace Historic District or on other historic properties or historic districts near or adjacent to Jackson Park and the Midway Plaisance due to the proposed changes to accommodate the Obama Presidential Center in Jackson Park. Ms. Arlene Kocher's March 17, 2020, letter to the ACHP and its accompanying documents improperly ignored our input on this vital issue. We write now to elaborate on our concerns in hopes that this will assist ACHP in its work on this matter.

I. Adverse Effects on Jackson Park Terrace Historic District

Jackson Park Terrace Historic District (hereinafter the "Historic District") is a cluster of 24 low-rise apartment buildings and a 19-story high rise, built by The Woodlawn Organization to provide affordable housing in Woodlawn. The complex – located between 60th and 61st streets and Stony Island Avenue and the Metra tracks directly across the street from the part of Jackson Park that is slated to become the site of the OPC – was designed by renowned African-American architects and planners Whitely-Whitley in 1974. To be clear, the OPC complex sits less than hundred feet away from the Historic District. Its location across from the Park and proximate to the renowned Women's Garden (also known as the Perennial Garden) has been important to its reputation and to the enjoyment of its residents, as can be seen in this quote from the *Hyde Park Herald*, the local newspaper, at the time the Jackson Park Terrace housing complex opened: "Jackson Park Terrace is across the street from the famous Perennial Garden and only minutes away from the world renowned Museum of Science and Industry. It offers residents the many recreational resources of the Park and nearby Lake Michigan" (May 29, 1974, p. 15).

In 2018 it was determined that the Historic District, though not yet at the required 50-year mark, was eligible for listing in the National Register of Historic Places. According to the January 2020 AOE report (hereinafter "AOE report"), "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*” (AOE report, p. 64) (emphasis added).

Yet, in the same January 2020 AOE report, the FHWA has failed to adequately address – or even investigate the possibility of – any adverse impacts of the Obama Presidential Center and related road changes upon this Historic District in at least the following four areas: the visual impact of the massive OPC tower building itself and the overall site design; the potential impact of the construction project on the structural integrity of the Historic District and its infrastructure; the impact of increased vehicular and pedestrian traffic generated by the OPC immediately across the street; and finally, the impact on parking.

Visual Impact of the OPC Tower and Site Design

While not every new building that may be constructed adjacent to a historic district or landmark may create adverse effects simply because of its height, it is necessary and appropriate to consider such issues on a case-by-case basis. Our February 18, 2020 letter raised specific concerns about the FHWA’s finding of no adverse effect in regards to the Historic District including but not limited to the impacts caused by the massive height of the OPC tower and its proximity to the Historic District. These concerns and comments were ignored. However, given the size of the tower and its proximity to the Historic District and its key features and characteristics, they continue to require a thorough and meaningful review precisely because of the likely significant adverse impacts on the Historic District.

The 235-foot Obama Presidential Center tower will loom large over the Historic District, with its boundary less than 100 feet away. The tower will block sunlight and will cast a substantial shadow. It will create an enormous visual obstacle to the free and clear view that Historic District residents now enjoy across the street into the tree-filled segment of Jackson Park, completely transforming the relationship of the Historic District to the Park. Clearly, it will impact the integrity of the feeling, location and setting of the Historic District, and the intent of its architects “to take full advantage of its close proximity to Jackson Park and the Midway Plaisance” (AOE report, p. 64). Those trees themselves will be entirely destroyed. While they will eventually be replaced with younger trees, it will take many years before those immature trees can replace the benefits that the current mature and healthy trees provide to the immediate area including the Historic District. The complete destruction of the current Women’s Garden will also negatively impact the Historic District and its residents. Its replacement, rather than being a tranquil space readily accessible for Historic District residents, will be, at best, a busy tourist area, further undermining the integrity of the feeling and location of the Historic District.

Adverse Physical Impact of the Construction Process Itself

Virtually no information or analysis has been disclosed concerning the likely physical impacts on the Jackson Park Terrace Historic District of the planned construction of the massive tower and the not insignificant number of other OPC buildings. Such issues must be analyzed and considered before advancing any determination that there will not be an adverse effect on the Historic District. This has not occurred, and if anything, the objections in this regard that have been raised have been overlooked and/or otherwise largely ignored.

Absence of information in this instance, however, does not demonstrate that all is well. Common sense suggests that the structural integrity of both the Historic District residential buildings and of the water, sewer, and other infrastructure serving those buildings is at risk and could be adversely affected. Construction of a 235-foot tower on land that has historically been marshy, immediately adjacent to a lagoon that connects hydrologically to Lake Michigan, especially at a time when Lake Michigan and the lagoon itself are experiencing historically high and rising levels, raises important questions as to what kind of structural supports the tower will need and the impact their construction and installation will have on the immediate neighborhood. There are significant concerns related to the impact on the Historic District of the noise, dust, and vibration that will occur as it is built. Construction of a large underground parking garage on the site, reported to accommodate some 450 cars, will also involve major construction and excavation equipment, shifting of many cubic yards of soil, and additional noise, dust, and vibration, again raising concerns about adverse impacts on the structural integrity of buildings in the Historic District and of the infrastructure serving them.

OPC plans also call for two partially submerged buildings and a large pedestrian plaza directly across the street from the heart of the Historic District. Similar concerns about the impacts of the construction process on the Historic District apply here, concerns that have not been addressed and, based on available information, have not even been entertained.

No studies on this topic have been performed to support the conclusion of no adverse effect relative to the Historic District. Such issues must be further examined and addressed by the FHWA at this time.

Impacts of Vehicular and Pedestrian Traffic

At present, the Historic District is served by several internal roadways that connect to Stony Island Avenue. Traffic into the interior of the Historic District can turn west from Stony Island into the Historic District roadways whether approaching from the south or north. The proposed roadway changes would include both widening of Stony Island and construction of a planted median strip on Stony Island between 60th Street and 63rd Streets, making it difficult for vehicles to enter or exit the Historic District except by using the southbound lane of Stony Island. While the installation of traffic signals may be evaluated to serve cuts in the median strip, it seems most likely that any signal would be positioned to serve the OPC garage entrance at 62nd Street. As a result, the Jackson Park Terrace Historic District will be more isolated and cut off from the Park, even though the roadway changes are touted as improving Park access. Not only will it be far harder to cross the street directly because of increased vehicular traffic and decreased ease of pedestrian crossing, but once having arrived on the east side of Stony Island, Historic District residents will face not a tree-filled park, but a massive tower and a variety of other tourist-oriented buildings.

Beyond this, the AOE fails to include an adequate assessment of what the increased volumes of traffic will be or where such increases will occur. For example, it does not include a thorough analysis of where traffic now using Cornell Drive will be diverted, or the ability of other area roads to handle that newly diverted traffic. Instead, the AOE and FHWA have continued to rely on the Sam Schwartz traffic analysis which was custom-made to support the CDOT road

closures and reconfiguration plan, a plan that itself was expressly designed to accommodate the Obama Foundation desire to close Cornell Drive between 59th and 63rd streets.

We commissioned a traffic study (attached) by raSmith, a national multi-disciplinary consulting firm comprising civil engineers, structural engineers, land surveyors, development managers, landscape architects and ecologists (see attached). The analysis was led by Patrick E. Hawley, P.E., PTOE, Assistant Director of Transportation and Senior Project Manager (resume attached). While we have submitted this professional traffic analysis multiple times to the Chicago Plan Commission, CDOT, and FHWA, we have never received any acknowledgement of its existence from any of those entities. It goes without saying that the critical questions it raises about missing data (see especially pp. 1-2) have never been addressed. In particular, we point out that the study clearly demonstrates that considerable additional data gathering and analysis is essential to ensure that the CDOT plan, which the FHWA has wholeheartedly embraced, would in fact function without causing massive traffic problems throughout the entire broad area.

The Historic District is an immediate example of an area that could experience major traffic problems as a result of the OPC-driven road closures and reconfigurations. In addition to the problem of access and egress to the Historic District, during special events at the OPC, or even on nice summer weekends, Historic District residents might experience long delays before being able to drive into or out of their own immediate neighborhood. Lengthy waits at traffic lights, now atypical, might become common. If, as is not unlikely, a significant amount of the current commuter traffic on Cornell Drive were to be diverted to Stony Island, major traffic tie-ups during morning and afternoon rush hours might become the norm.

Our point here is simple: the traffic analysis is incomplete, unreliable and woefully insufficient and does not support the no adverse effect statements summarily advanced by the FHWA. Despite such concerns being raised repeatedly by us and others, these issues have been and remain largely unaddressed.

Impact of Parking Problems

At present, the Historic District enjoys ample parking both on its interior driveways and in its lots, and on Stony Island Avenue, where parking is permitted on both sides of the street. This feature contributes to the integrity of location and of feeling that have been documented for this Historic District. Once the OPC is built, however, there will be a loss of public street parking along Stony Island (due to the garage entrance and the bus drop off area by the OPC plaza) and also along the Midway Plaisance. It is virtually certain that the remaining public street parking close to the Historic District will be claimed by visitors to the OPC who do not want to pay to park in the OPC garage. The increased traffic congestion and the increased competition for street-level parking adjacent to the Historic District and indeed throughout the neighborhood and the park will necessarily have a negative impact on the daily lives of residents and a negative impact on the character of a complex that was designed for a more open, park-like setting. The FHWA's assertion in the January 2020 AOE report (p. 31) that "... there are plans to provide a total parking supply in excess of existing parking via new on and off-street parking" is at best completely inadequate and at worst just plain wrong. No such plans have been made public, no

details are known, and no timeline or committed funding exist. The suggestion of no adverse effect is plainly unsupported.

II. Adverse Effects on Other Historic Properties

Concerns about the impact of the OPC and related road changes on traffic and parking in historic districts and other historic properties nearby or immediately adjacent to Jackson Park and the Midway Plaisance also led us to disagree with and object to the failure to acknowledge the potential for adverse effects on the following historic resources in our by Stony Island, 59th Street, Metra Electric Railroad, and 56th Street); the Windemere East Hotel/Apartments at 1642-1660 E. 56th Street; Jackson Towers at 5555 S. Everett Avenue; and the Hyde Park East Historic District (roughly bounded by 56th Street, Metra Electric Railroad, 54th Street, and S. Shore Drive). Those objections were improperly overlooked, and require additional consideration, study and comment by the FHWA at this juncture.

We have noted above that the FHWA has failed to provide any analysis of the impact of the proposed changes in traffic on access into and out of the Jackson Park Terrace Historic District resulting from the proposed road closures and realignments. In the January 2020 AOE, the FHWA has likewise failed to provide any analysis of the impact of traffic and parking changes that can be anticipated to result from the closure of segments of Cornell Drive and the Midway Plaisance in Jackson Park on the adjacent historic districts and independent historic properties that we list above. Instead, the FHWA continues to assert without any basis for support that the Sam Schwartz/CDOT plan, despite its demonstrated shortcomings noted in the raSmith analysis, will function smoothly and that all will be well.

To the contrary, however, all of these areas are already impacted by traffic congestion and diversions. One particularly congested time occurs at the school drop-off and pick-up times; schools in the immediate area include the Chicago Public Bret Harte Elementary School at 1556 E. 56th Street; the Earl Shapiro Campus of the University of Chicago Laboratory Schools at 5800 Stony Island Avenue; the Hyde Park Academy High School at 6220 Stony Island Avenue; and the upper school campus of the University of Chicago Laboratory Schools at 1362 E. 59th Street. Another particularly congested time occurs during afternoon rush hour periods when many vehicles exit Lake Shore Drive at 53rd Street or even 51st Street and zig zag through the local streets to avoid backups on 57th and Cornell Drives. It is highly likely that the road changes for the OPC will cause significant increases in traffic volumes in the immediate vicinity of our local schools as well as on local roads in these historic neighborhoods. Those increased volumes and congestion could create safety issues for students, parents, and other school-related adults. Importantly, they could well introduce visual, atmospheric, and audible elements that would diminish the integrity of the historic districts and historic properties identified above, and could bring about major alterations in their settings in each of these areas. Absent any analysis whatsoever of traffic changes on these neighborhood roads, such potential adverse effects cannot (and should not) be credibly dismissed. There must be additional evaluation of these issues as they relate to the historic districts that have been identified.

III. Conclusion

We strongly believe that legitimate analyses of the impacts of the OPC tower and site design, of the OPC construction process, and of the closure of the roadways in Jackson Park on traffic, parking, and noise levels on Jackson Park Terrace Historic District and on the other historic districts and historic properties outside of the Park must take place before the FHWA's current conclusions in the January AOE report can be accepted as definitive.

Sincerely,

Brenda Nelms and Margaret Schmid
Co-presidents
Jackson Park Watch

Cc: Reid Nelson, Director, Advisory Council on Historic Preservation, rnelson@achp.gov;
Jaime Loichinger, Assistant Director, Advisory Council on Historic Preservation,
jloichinger@achp.gov

Attachments