

## *Jackson Park Watch*

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May 25, 2020

Matt Fuller  
Environmental Programs Engineer  
Federal Highway Administration  
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Springfield, IL 62703  
Via E-mail: [Matt.Fuller@dot.gov](mailto:Matt.Fuller@dot.gov) and [Todd.Wyatt@cityofchicago.org](mailto:Todd.Wyatt@cityofchicago.org)

RE: Section 106 Review for Jackson Park

Dear Mr. Fuller:

We submit the following statement in accordance with your invitation at the conclusion of the May 22 webinar consulting parties meeting to submit additional comments on the Section 106 review and proposals for mitigation to address the many identified adverse effects on Jackson Park.

You assert that the review process has been legitimate and thorough. However, the failure to include in the public record all of the suggestions for avoidance/minimization/mitigation that have been put forward and considered throughout this Section 106 review, at various times and in various forums, and the absence of details about the process by which such suggestions have been reviewed and dismissed (or not) undermines your assertion concerning the integrity of the review process. When the draft Memorandum of Agreement is provided in June, there should also be a complete record of suggestions put forth and evaluated by the FHWA, with an explanation of the decision-making process for each proposal (who made it, when, after discussion with whom).

We note that in the May 20 webinar you outlined the Mitigation Process (on page 7 of the Power Point presentation), and stated that “Mitigation measures should be relating to and commensurate with the impact to the historic resources.” The idea that plaques or prospective research studies are directly related to or by any measurement commensurate with the impact to the historic resources of Jackson Park is absurd. Similarly, the suggestions for restoration of long-neglected elements of the park that suffer from Park District negligence. while well intended, do not address the base cause of the adverse effects documented in the Assessment of Effects, that is, the current plan for the construction of the Obama Presidential Center (OPC) and its accompanying roadway changes. It is ridiculous to assert that the very action that causes the extensive adverse effects to the historic and cultural landscape of Jackson Park could be excluded from the required resolution of that adverse impact. We ask that this issue of commensurate mitigation be addressed directly in the next Section 106 session.

We believe that the suggestions we made in the statement that we sent to you on May 5, 2020, are directly related to and commensurate with the impact to the historic resources. We recap those recommendations here and ask that they be directly included in the public record:

- Situate the OPC on the original site that was defined for public discussion in 2015 and affirmed by the City Ordinance of March 21, 2015, thereby allowing for the retention of the iconic Olmsted design for circulation in the park as established after the 1893 world's fair.
  - Keep Cornell Drive open, appropriately narrowed and calmed and with enhanced safety measures for pedestrians and bicyclists;
  - Keep EB Midway Plaisance open and connecting with Cornell Drive;
  - Maintain the Women's Garden in its original form, with added ADA accommodation.
- Provide 19-20 acres of new parkland, to be added to and managed by the Chicago Park District, in the neighborhoods adjacent to Jackson Park (Woodlawn and South Shore).

We would also like to emphasize the continuing problems with webinar format used for the Section 106 review. As is evident from the video and raw transcript of the May 20 session, the event was marred by conflicting instructions about how to sign on to speak, confusion about the order for speaking, inconsistencies in calling on groups or individual speakers, lack of opportunity for comments on proposals made because of restrictions on how many times and how many minutes any consulting party could speak. Discussion was also hampered by the lack of advance distribution of an agenda with a complete list of suggestions made before and via the on-line survey and with the complete text of the proposals made and of the comments they received. The repeated header on the session's Power Point slides 11-14 that "Feedback from survey was *generally positive*" [*emphasis added*] begs for full disclosure of all of the comments made by participants in the survey. The survey format itself inhibited genuine public input: all comments on the selected prior suggestions for mitigation had to be plugged into one spot without any advance instructions or explanation of how much space was available for comment. The survey and the sessions seem to reflect an attempt to channel and limit public input rather than an openness to consider fully and thoughtfully all concerns and suggestions. We hope these problems will be addressed in the June 17 session.

Sincerely,

Brenda Nelms and Margaret Schmid  
Jackson Park Watch

cc: Jaime Loichinger and Sarah Stokely, Advisory Council on Historic Preservation; Arlene K. Kocher and David Clarke, Federal Highway Administration; Lee Terzis, Joel Lynch and Morgan Elmer, National Park Service; Colin Smalley, US Army Corps of Engineers; Eleanor Gorski, Chicago Department of Planning and Development; Nate Roseberry, Chicago Department of Transportation; Heather Gleason, Chicago Park District; Brad Koldehoff, Illinois Department of Transportation; Anthony Rubano and CJ Wallace, Illinois State Historic Preservation Office; Maurice Cox Chicago Department of Planning and Development; Gia Biagi, Chicago Department of Transportation; Samir Mayekar, Deputy Mayor, City of Chicago

