

**From:** Jackson Park Watch  
**To:** [Gorski, Eleanor](#); [Sadler, John](#)  
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**Subject:** Section 106 Review of OPC Mobility Improvements  
**Date:** Thursday, January 04, 2018 3:50:24 PM  
**Attachments:** [Jackson South Shore Framework Plan 1999.pdf](#)  
[Jackson Park Framework - 5-31-16.pdf](#)

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## *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)
- 67<sup>th</sup> 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-foot wide (p. 8, 1<sup>st</sup> 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 65<sup>th</sup> and 67<sup>th</sup>.
- The Framework Plan in only 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 1<sup>st</sup> 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)



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January 4, 2018

Abby Monroe  
Coordinating Planner  
City of Chicago  
Department of Planning and Development

Dear Ms. Monroe:

In compliance with our responsibilities as a designated consulting party to the National Historic Preservation Act, Section 106, and the National Environmental Policy Act reviews underway for Jackson Park, the National Association for Olmsted Parks (NAOP) offers the following commentary for the public record.

**I Comprehensive planning rather than fragmentary**

- We are concerned that the current process concerning the historic landscapes adversely affected by the several projects under review is considering these sites in a fragmentary rather than a holistic manner.

From the outset, Jackson Park, the Midway and Washington Park were conceived by Olmsted and Vaux as the South Park, an integrated whole unit of inextricably linked park experiences. Designed to reflect, yet enhance, the intrinsic character of the land with the "sublimity" of its lakeside setting, this innovative park design was intended to provide the city with notable scenery and several differing recreational opportunities, yet all artistically balanced, interrelated to each other

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South Park as originally conceived by Olmsted & Vaux, and as augmented by the subsequent work on these parks done by Olmsted, Olmsted & Eliot and subsequent Olmsted firms.

Olmsted & Vaux wrote, "The two outer divisions of the South Park being connected more directly, however, and by a division [The Midway] considerably wider than any connecting any other two park divisions of the whole series, it is possible to associate them much more intimately in design than any other two, so that each may in many particulars complement the other and the whole be classed together as one park."<sup>1</sup>

- In addition to noting the three park units be "classed together as one park," Olmsted and Vaux paid particular attention to the intersection of The Midway with Jackson Park. "An open area, designated Midway Place...terminates the Midway Plaisance on the east."<sup>2</sup> It was from this junction that a "view over the head of the Lagoon" to Lake Michigan was afforded.

### **III Protection of Character-Defining Features: Circulation system**

- Particularly notable among these Olmsted principles is the importance of the balanced interrelated elements of the circulation system. These not only provide real access to and through the linked sites but visually and spatially reinforce the varied characters intended to define the diverse areas of the parks. Both the curvilinear form and the reinforcing vegetation associated with these drives and paths are essential contributing factors. These character-defining features are currently at risk in the proposals under consideration.
- Therefore, NAOP recommends that Cornell Drive and Hayes Drive be identified as historic resources within Jackson Park. Cornell Drive and Hayes Drive need to be evaluated as original contributing park features and not as part of the region's transportation infrastructure. In

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<sup>1</sup> Report. To the Chicago South Park Commission, March, 1871, Olmsted Vaux & Co. -Papers of FLO, Supplementary Series, Vol 1, p. 209.)

<sup>2</sup> Report. To the Chicago South Park Commission, March, 1871, Olmsted Vaux & Co. -Papers of FLO, Supplementary Series, Vol 1, p. 225.)

addition, Lake Shore Drive needs to be evaluated as an independent historic resource.

- The walks, drives and bridle paths that were designed for Jackson Park, The Midway and Washington Park were an essential and integral part of the South Park experience. The kinesthetic relationships each circulation system had with the landscape created by the “passages of scenery” and landscape were a hallmark of Olmsted and Vaux park planning. They represent a significant investment in park design and engineering as roads “more agreeable than the best stone or concrete roads.”<sup>3</sup> The drives and avenues designed for “pleasure carriages” continue to inform the circulation pattern of the parks. While many have been repurposed for different uses, including non-pleasure through traffic, they are no less significant to the historic design feature of the parks than the land, plant, water and architectural features traditionally considered as a part of the Section 106 process. The argument that closing the drives will add parkland negates the historic role of the drives as a desirable park feature.

#### **IV Protection of Character-Defining Features: Vistas and Sight-lines**

- Given that the current plan under review does not contain either final scale or exact location of the structures under consideration, it is problematic to offer definitive commentary. However, given the generally flat topography of the site and the very deliberate choreography of articulated sight-lines and interrelationships intended by the Olmsted firm planning, it is clear that any structural additions to this heritage park should give critical attention to protecting the original design intent. In particular, this includes not obstructing planned views within and without the park, nor creating destructive shadow patterns which will affect both vegetative health and the intended artistry of diverse vistas.

#### **V Consideration of Relevant Extant Studies in the Review Process**

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<sup>3</sup> Report. To the Chicago South Park Commission, March, 1871, Olmsted Vaux & Co. –Papers of FLO, Supplementary Series, Vol 1, p. 221.)

and character-defining of the Chicago landforms.

Even after the lakefront site had been modified to accommodate the Chicago World's Fair, this comprehensive landscape vision was continued with the 1895 Olmsted, Olmsted & Eliot General Plan for Jackson Park and its implementation, which now added the golf course. Among the features of this plan was the network of drives and paths, etc., which linked areas of the parks in ever changing "passages of scenery," so characteristic of the Olmsted aesthetic. (see below)

Subsequent projects over the decades have, for the most part, respected the historic integrity of these significant historic linked parkscapes, as noted in their listing on the National Register of Historic Places in 1972 and the updated nomination documentation from the 1995 study produced Chicago Park District. The importance of this latter document (not currently included in the current record) should not be overlooked as it reflects:

- 1) research into materials not available in the 1972 process; and
- 2) the Secretary of Interior's Standards of Treatment for Historic Properties, with Guidelines for the Treatment of Cultural Landscapes, the standard protocols used to assess and protect historic landscapes against destructive alterations.

However, the current projects—the Obama Presidential Library; its ancillary structures; and the golf course amalgamation --are being considered in a piecemeal approach, not reflective of the above-mentioned protocols, resulting in the potential of irrevocable damage to the unity of these major components of our national cultural patrimony.

## **II Expansion of Area of Potential Effects (APE)**

- Therefore, NAOP recommends that the APE be expanded to include all of the Midway Plaisance and Washington Park to reflect the principles encompassing the entire

- Significant documents, several publicly funded, relating to earlier planning and evaluation studies of Jackson Park, its component elements, its environmental concerns and its community contexts have recently been revealed, thanks to the diligent research of The Cultural Landscape Foundation. Many of these documents, not previously supplied to the designated consulting parties, are of critical relevance in our consideration of the issues in this review. We salute our colleagues and request that this review be augmented by these considerations for a fully transparent process.

Thank you for the opportunity to provide these comments on behalf of the National Association for Olmsted Parks.

Sincerely,

A handwritten signature in black ink that reads "Arleyn A. Levee". The signature is written in a cursive, flowing style.

Arleyn A. Levee,  
Co-chair, National Association for Olmsted Parks

cc: Eleanor Gorski, Chicago Department of Planning and Development; Rachel Leibowitz, Illinois State Historic Preservation Office; Matt Fuller, Federal Highway Administration; Juanita Irizzary, Friends of the Parks; Charles Birnbaum, The Cultural Landscape Foundation; Margaret Schmid, Jackson Park Watch; Ted Haffner, Openlands; Michael McNamee, Save the Midway!; Lisa Dichiera, Landmarks Illinois; Ward Miller, Preservation Chicago; Betsy Merritt, National Trust for Historic Preservation



January 3, 2018

Ms. Abby Monroe  
Coordinating Planner  
City of Chicago,  
Department of Planning and Development

Dear Ms. Monroe,

As a designated consulting party to the National Historic Preservation Act, Section 106 compliance review and the National Environmental Policy Act (NEPA) review underway for Jackson Park, The Cultural Landscape Foundation (TCLF) is pleased to add the following remarks, supporting images, and attachments to the public record. As the Section 106 review is now in the initial phase of identifying historic features that could be adversely affected by the Obama Presidential Center (OPC) and related road closures, we first ask that the Area of Potential Effects (APE) be expanded to include the following:

- The South Park System (to include the entirety of the Midway Plaisance and Washington Park)

It is also evident that other issues should be raised at this early stage because they are not only fundamental to the identification of historic features but to the *review process itself*. While TCLF will comment in greater detail throughout the Section 106 review, we regard the following as essential topics to be brought to your attention immediately:

- The manifest inadequacy of the 1972 National Register of Historic Places nomination for Jackson Park and the Midway Plaisance; and the implications of the *de facto* [nomination update](#) produced in 1995 by the Chicago Park District (CPD);
- The historical precedence and design intent of the 1895 plan for Jackson Park by Olmsted, Olmsted & Eliot;
- The need to apply the *Secretary of the Interior's Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes* in the current review process;
- The overt incompatibility of the OPC and related road closures with overarching CPD plans and initiatives, as contrary to the framing language of the current review process.

### **Expanding the APE to Include the Entire South Park System**

As currently conceived in the Section 106 review, the APE includes the following areas: a portion of the Midway Plaisance near its eastern terminus; an area between the western perimeter of Jackson Park and the Metra Viaduct; several blocks in the Hyde Park and Woodlawn neighborhoods west of the viaduct; and the whole of Jackson Park. What the current APE thus fails to recognize is the essential unity of the three tracts of land today known as Washington Park, the Midway Plaisance, and Jackson Park. The three tracts were conceived and designed as a single park: the report to the South Park Commission by Olmsted, Vaux & Co., submitted in March 1871, refers, in fact, to the whole of the bounded area as “The Chicago South Park,” which it then describes as comprising an “Upper Division,” a “Midway Division,” and a “Lower or Lagoon Division.”<sup>1</sup> As such, Chicago’s South Park System is today the only intact park system designed by Olmsted and Vaux outside the State of New York. The two men regarded as a major advantage of their plan that it “locks the three divisions of the Park into one

obvious system, so that their really disjointed character will be much less impressed on the minds of observers passing through them..." To do so, the plan relied heavily on water to lace the three tracts together.<sup>2</sup> The need to fully recognize the unity of the South Parks is now brought into greater relief by the current proposal to impose a parking garage at the eastern terminus and hinge point of the Midway Plaisance, effectively placing a further barrier to the connection that Olmsted and Vaux first envisioned while simultaneously reducing the likelihood that any future initiative could restore that connection. Moreover, the OPC tower, as currently conceived, would adversely affect viewsheds from the full expanse of the Midway Plaisance, not just from the portion of it now included in the APE.

## **The Inadequacy of the 1972 National Register Nomination; and the *De Facto* 1995 Update**

### The Inadequacy of the 1972 National Register Nomination

The City of Chicago website that hosts information on the Section 106 review refers and links to the listing of the Jackson Park Historic Landscape District and Midway Plaisance in the National Register of Historic Places, added on December 15, 1972. Notably, that nearly 40-year-old nomination attempts to document the history and significance of both Jackson Park and the Midway Plaisance in one typewritten page—an extremely meager record by even the laxest of standards. The 1972 nomination is clearly an artifact of a bygone era that had yet to develop a full appreciation for the preservation of historic designed landscapes (the NPS did not offer relevant guidance in the form of a National Register Bulletin until 1989). As much is evident in the nomination's "Statement of Significance," which mentions four architectural firms before coming to Frederick Law Olmsted, Sr., the celebrated presence behind the design of the historic landscape district itself. We can be sure that the CPD agrees that the 1972 nomination is today woefully inadequate for use in a documentary capacity, because when the CPD commissioned the U.S. Army Corps of Engineers (USACE) to conduct a Section 506 Great Lakes Fishery & Ecosystem Restoration Study for Jackson Park in 2013 (resulting in the GLFER Project; see below), it provided a 21-page historical assessment of the park, complete with bibliographic citations, as an addendum to the study.<sup>3</sup> Prepared by the CPD's own Department of Research and Planning in September 1995 (hereafter the '1995 assessment'; attached), that historical assessment constitutes a *de facto* update to the 1972 nomination, and it should therefore be recognized in the current review as an important statement of significance for the park and its history.

### The Implications of the 1995 Update: A Threefold Landscape Legacy

As the [1995 assessment](#) outlines in detail, Jackson Park is today the product of not one, but three historic Olmsted designs—a fact that makes the already significant work by the "Father of American Landscape Architecture" a unique national asset. Frederick Law Olmsted, Sr., and Calvert Vaux submitted the first design to the South Park Commission in 1871. The devastation of the Great Chicago Fire delayed any improvement to the parkland until the late 1870s, when the northernmost section of what was then called Lake Park was improved by grading, seeded lawns, new trees, and the creation of two artificial lakes (one of which survives in the form of what would become the Columbia Basin). When Jackson Park was selected as the setting for the World's Columbian Exposition of 1893, it was once more Olmsted, working with his associate Henry Codman and architects Daniel Burnham and John Welborn Root, who designed the setting of the vaunted White City, a showcase of Beaux-Arts classicism whose formality was artfully juxtaposed with the rugged shorelines of naturalistic lagoons and islands. After the closing of the international exposition, a series of fires ravaged the site, beginning in January 1894, leaving a landscape strewn with charred remains (fig. 1). The Chicago Wrecking and Salvage Company was hired to demolish what was left of the crippled structures, with only five exhibition buildings left

standing in the end. In 1895, Olmsted, Olmsted & Eliot presented a sweeping redesign of Jackson Park that retained “many of the features characteristic of the landscape design of the World’s Fair” while providing “all of the recreative facilities which the modern park should include for refined and enlightened recreation and exercise” (fig. 2).<sup>4</sup>



Fig. 1: Photograph of Jackson Park taken after a series of fires at the site in 1894

### The Historical Precedence and Design Intent of the 1895 Plan

The 1895 redesign of Jackson Park by Olmsted, Olmsted & Eliot occupies a special place in the history of landscape architecture **as perhaps the nation’s earliest large-scale brownfield-remediation project**. This innovative aspect of the 1895 plan has been recognized in very recent scholarship. As part of the GLFER Project (see below), the CPD, along with a public-private partnership known as Project 120 Chicago and the Illinois Historic Preservation Agency, tasked the firm Heritage Landscapes, LLC, to develop a plan for Jackson Park that would integrate efforts to restore the park’s ecology and preserve its Olmsted-era design. In the fall of 2015, Patricia O’Donnell and Gregory De Vries, both of Heritage Landscapes, LLC, published a scholarly article in the peer-reviewed journal *Change Over Time* outlining the framework and implementation of that plan.<sup>5</sup> As the article makes clear, the 1895 redesign of Jackson Park was an ingenious response—much ahead of its time—to what was in essence an immense brownfield site:

*Faced with a massive demolition site, the Olmsted firm innovated to address the brownfield conditions. For example, the firm created soils plans specifying considerable depth of good topsoil in specific areas of trees and shrub planting. As modern-day professionals on the forefront of best practices, we found it astounding to discover that one-hundred-twenty-year-old soils plans, which note two-foot-deep planting areas, guided rebuilding in this brownfield demolition site.<sup>6</sup>*

Although features in Jackson Park have since been modified, the most important aspects of the 1895 plan have endured. Its primary compositional elements—the lake, the fields, and the lagoons—knitted together by a circulation system that affords extended views over relatively level terrain, continue to communicate Olmsted’s vision for how the park is experienced visually and spatially. That assessment was shared by the 2013 GLFER study, which recognized that “for the most part, Jackson Park today looks similar to Olmsted’s 1895 plan in terms of the placement of lagoons, open fields, and areas heavily

planted with trees and shrubs.” And while Olmsted’s plan was updated in 1905, two years after his death, the new iteration “was based on Olmsted’s previous plans and vision for the park.”<sup>7</sup>

In addition to the aspects of Olmsted’s design that the park itself evinces, we are fortunate to have the landscape architect’s own thoughts about the 1895 plan. In a letter to South Park Board president Joseph Donnersberger dated May 7, 1894, Olmsted outlined his approach to the redesign:

*In this design **every part of all the park must be planned subordinately to and dependently upon every other part...**In this **interdependence of parts** lies the difference between landscape gardening and gardening. It is as designers, not of scenes but of scenery, that you employ us, and we are not to be expected to serve you otherwise than as designers of scenery (emphasis added).*<sup>8</sup>

Another salient aspect of the 1895 plan that can readily be seen today is the prevailing geometry of the landscape surrounding the campus of the Museum of Science and Industry (then called the Field Columbian Museum) in the park’s northern sector. Notably, the landscape treatment in that part of the park alone was designed to highlight built architecture. Here, Olmsted was unmistakably explicit, stating that the Field Columbian Museum was meant to be the only “dominating object of interest” in the park:

*All other buildings and structures to be within the park boundaries are to be placed and planned exclusively with a view to advancing the ruling purpose of the park. They are to be **auxiliary to and subordinate to the scenery of the park** (emphasis added).*

—Olmsted to Donnersberger, May 7, 1894



Fig. 2: The Revised General Plan for Jackson Park, 1895

In addition to the masterful use of the lakeshore, open fields, and interior waterways, Olmsted designed two large, open-air gymnasia along the park’s western perimeter just south of its junction with the Midway Plaisance. The two oval gymnasia, one for men and the other for women, were separated by a children’s playground (fig. 2), and both were encircled by running tracks that were also used by bicyclists. With the initial groundwork completed at the beginning of 1896,<sup>9</sup> the outdoor gymnasia in Jackson Park were a reform-era response to the condition of the city’s working-class neighborhoods and were relatively new in the United States.<sup>10</sup> Olmsted specifically touted these elements of the overall design, reporting that “similar gymnasia proved very successful in Europe and in Boston.”<sup>11</sup> The outline of the north gymnasium is still expressed in the footprint of the oval football field along the park’s western perimeter (fig. 3), which serves in a recreational capacity while echoing the form of the Olmsted-designed gymnasium.



Fig. 3: North gymnasium, 1895 Revised General Plan for Jackson Park (l.); present football field in Jackson park (r.)

**Applying the Secretary of the Interior’s Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes**

The National Park Service’s *Secretary of the Interior’s Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes* has a direct bearing on the Section 106 review currently underway. These [Guidelines](#) outline the proper treatment of cultural resources that are listed in or are eligible for listing in the National Register of Historic Places. Landscapes, unlike buildings, are dynamic systems. Assessing the potential impacts of alterations to landscapes thus requires a holistic approach, as is reflected in the *Guidelines*, which are organized in two primary areas: [1] Organizational Elements of the Landscape and [2] Character-Defining Features of the Landscape. As the author of the *Guidelines*, I can confirm that the road closures and the construction of the OPC would have obvious adverse effects in both primary areas. While TCLF will comment more fully on adverse effects during the appropriate stage of the Section 106 review (when, perhaps, the exact proposed locations and footprints of the OPC and its dependent structures will be known to the public), several preliminary points can be made at this time.

Jackson Park’s natural features include the flat topography of its fields and open spaces, its interior waterways, and the backdrop of Lake Michigan—all elements that contribute to the harmony of the overarching design. The flatness of the ground plane is indeed a character-defining feature of the park, as it was the chief characteristic that Olmsted’s design was meant to overcome by linking a system of lagoons to Lake Michigan.<sup>12</sup> The imposition of a massive high-rise tower, hundreds of feet tall, would

introduce a dominant vertical axis that would reorient the visual and spatial experience of the landscape to focus on a single architectural element, one whose stark facades, reminiscent of a Brutalist idiom, would strongly contrast with its natural setting. This is directly contrary to the overall concept of the park, which was designed, as Olmsted stated, such that its scenery constituted the dominant interest. The tower would also cast a reflection in the water of the nearby lagoons, which were meant to evoke a natural setting by reflecting only the vegetation that surrounds them. As scholar Daniel Bluestone has noted about Jackson Park, “lagoons and lakes that would reflect the foliage provided intricacy and picturesque variety—elements often tamed in other Olmsted designs.”<sup>13</sup> Moreover, the waterways were meant to “provide a sense of indirection, subtlety, and leisure; they fostered a sense of time and motion that contrasted dramatically with the experience of the city’s street grid.”<sup>14</sup> The monolithic OPC tower would also, of course, loom large over the Wooded Island, destroying its quality as a place of refuge and its “secluded, natural sylvan” character, as Olmsted described it.<sup>15</sup>

Yet another adverse effect of such a tower and its related dependencies stems from their inevitable propensity to cast shadows onto the public parkland that surrounds them. The detrimental effects of shadow on public parkland are increasingly [well documented](#)<sup>16</sup> and are the frequent subject of litigation. Notably, the “[Development Manual for Chicago Plan Commission Projects](#) (2012)” outlines the responsibility of any applicant proposing a planned development to conduct a “Sunlight Access and Shadow Impact Study.” The manual further mandates (p. 13):

*Applicants should ensure that the proposed Planned Development does not impose significant shadows **on publicly accessible parks, plazas, playgrounds, benches, or inland waterways**. Accordingly, the Applicant may be requested to provide a shadow impact study which would contain the following elements: Existing shadows and new shadows created by the development; Shadow impacts for build and non-build conditions for the hours: 9 a.m., 12 p.m. and 3 p.m., conducted for four periods of the year at the vernal equinox, autumnal equinox, winter solstice and summer solstice; and a description of how the building design **ensures solar access on public spaces** (emphasis added).*

How, exactly, the OPC, with its monolithic, stone-clad tower, will avoid imposing significant shadows on publicly accessible parkland is difficult to imagine. And given that the OPC project falls within the Lake Michigan and Chicago Lakefront District and is therefore governed by the [Lakefront Protection District Ordinance](#) (Sec.16-4-030),<sup>17</sup> whose purpose is to “insure that the lakefront parks and the lake itself are devoted **only to public purposes** and to insure the integrity of and expand the **quantity and quality of the lakefront parks**” (emphasis added), one would expect that the OPC will be subject to particularly stringent scrutiny.

Furthermore, Jackson Park’s western perimeter was designed to be visually permeable, lined with trees that define the landscape’s edge while allowing lightly veiled views into it. The OPC tower and associated buildings would obstruct views into the park and beyond to Lake Michigan from both the Hyde Park and Woodlawn neighborhoods, altering the skyline in the process. As currently conceived, the OPC complex would also entirely supplant the football field whose footprint echoes the original outdoor gymnasium, an historic feature of the 1895-designed landscape.

Finally, the proposed road closures related to the construction of the OPC would alter the park’s circulation network, an important aspect of Olmsted’s design that was intended to lead visitors on a choreographed journey through “passages” of landscape scenery (fig. 4). Neither the location nor the

disposition of the roads were accidental, their curvilinear form intended to contrast with the right-angled streets of the urban grid. In a preliminary report on the nearby designed community of Riverside, Olmsted wrote, in 1868, “as the ordinary directness of line in town-streets, with its resultant regularity of plan, would suggest eagerness to press forward, without looking to the right hand or the left, we should recommend the general adoption, in the design of your roads, of gracefully-curved lines, generous spaces, and the absence of sharp corners, the idea being to suggest and imply leisure, contemplativeness and happy tranquility.”<sup>18</sup> As with Olmsted and Vaux’s Riverside, the curvilinear flow of the roads in Jackson Park was conceived as a key element in organizing access to the planned scenic narrative.



Fig.4: Horse-drawn carriages and motorcars share the curvilinear roads of Jackson Park, early 1900s

### **Incompatibility of the OPC and Road Closures with Overarching CPD Plans and Initiatives**

#### The South Lakefront Framework Plan (1999)

Given the framing language of the Section 106 review, another fundamental question is the extent to which the OPC and the related road closures align with the CPD’s long-term initiatives and plans for Jackson Park, which have been developed with considerable federal, state, and local funding and resources in consultation with the public and numerous groups. The [City of Chicago website](#) that hosts information on the Section 106 review purports to speak to that question, stating the following: “The Chicago Park District’s South Lakefront Framework Plan (1999) outlined many of the proposed improvements now under consideration.” Yet even a cursory review of the [1999 South Lakefront Framework Plan](#) reveals that the proposals now under consideration are plainly at odds with that plan on several of its most salient points. First, of the 1999 plan’s “Seven Overall Objectives,” the fourth is to “recognize and respect the historic significance of these parks” (p. 1). Likewise, the 1999 plan outlined “Seven Guiding Principles,” the fourth of which is to “maintain open space character” (p.2). The plan goes on to clarify, in bullet points, that this will include efforts to “Promote open space as the primary land use in the park by seeking opportunities to decrease inappropriate structures, uses and paved

areas” and to “Maximize the attractiveness of views and long vistas into and within the parks.” The seventh “Guiding Principle” is to “Enhance Historic Features” (p. 3), which includes efforts to “Respect and enhance each park’s historic character, and consider the park’s historic significance as a key factor when evaluating changes to the park,” and to “Consider each park’s historic precedents for landscape form, landscape design, planting, circulation, and views when evaluating or designing changes to the park.” The 1999 plan also clearly identifies historic context as a key consideration for evaluating any changes to Jackson Park:

*Historic Context is an important consideration as one looks at upgrading present conditions and weighing future improvements. **The original Olmsted design has served the park well over time and should not be compromised by future plans** (emphasis added, p. 13).*

Suffice it to add that, with its repeated emphasis on the historicity of the South Parks and the Olmsted design, the 1999 plan does not call for the closing of Cornell Drive in Jackson Park, nor does it envision a 220-foot-high tower on the park’s western flank, or a parking garage at the eastern terminus of the Midway Plaisance, all of which are related to the current Section 106 review.

#### Project 120 Chicago: the GLFER Project

On June 10, 2014, the CPD and the not-for-profit Project 120 Chicago entered into a [Memorandum of Understanding](#) (MOU)<sup>19</sup> in order to “memorialize the progress of their collaborative work to date, and provide greater structure to more efficiently and effectively partner on projects to revitalize Jackson Park.” As the MOU states, a founding precept for the partnership is that Jackson Park is “one of the most significant and complex historic landscapes in Chicago and the nation.” A primary undertaking of the partnership is known as the GLFER Project, a “historically based and integrated project of preservation and habitat restoration” in Jackson Park. The MOU goes on to say that in February 2014, “in consultation with Park District and USACE, Project 120 hired award-winning and internationally recognized preservation landscape architect and planner, Patricia M. O’Donnell, FASLA, AICP, and her firm Heritage Landscapes LLC, to work with Park District, USACE, and other members of the Project 120 Team.” As previously mentioned, in late 2015 O’Donnell and her associate published their findings in a peer-reviewed academic journal. It bears repeating that this scholarship is the **direct result of work supported by the CPD, Project 120 Chicago, and the Illinois Historic Preservation Agency**. Part of the published research addressed the GLFER Project’s role in reducing the local impact of climate change:

*Noting the important position of this park between the lake and dense urban areas to the north, east, and west, the [GLFER] project has the potential to positively impact the climate of the South Side of Chicago... As summer temperatures increase, air quality can degrade, and heat waves can challenge both human health and economic activity. As proposed by the GLFER project, improvements in air and water quality and the increased density of park vegetation will act to counterinfluence these projected effects. What is the relationship between these potential changes in Midwestern climate and the work currently underway at Jackson Park? **The rebuilding of ecosystems with native terrestrial and aquatic plantings improves water quality and reduces the urban heat island effect. The park will be a cool refuge that will aid in moderating temperatures in the dense surrounding neighborhoods** (emphasis added).<sup>20</sup>*

The MOU estimated the total cost of the GLFER Project to be \$7 million, with \$4,550,000 coming from a federal contribution and the remaining \$2,450,000 as a local match from the CPD and “private parties.”

With its dual mandate of ecological restoration and historic preservation and its potential to address issues related to climate change, the GLFER Project would seem to be at odds with more recent plans to install the OPC in Jackson Park, given that the imposition of massive buildings within the park would likely negate any gains of the ecosystem restoration in reducing the urban heat island (UHI) effect.

It is also notable that Project 120 Chicago's [Jackson Park Framework Plan](#)<sup>21</sup> did not envision the closing of Cornell Drive or Marquette Drive, but rather sought to see that "connectivity to and through Jackson Park is reestablished." The organization had also undertaken "[The Great Lawn Project](#),"<sup>22</sup> an initiative to "restore over 40 acres of historic and graceful open space on Chicago's lakefront" by relocating the current driving range in Jackson Park to an area south of Hayes Drive. The Project 120 Chicago [website](#) states the following in that regard:

*In 1978, a driving range was introduced, which is still utilized today, after considerable objection from the Hyde Park and Kenwood communities. There is a chain link fence which surrounds the perimeter of the driving range, and creates a visual, as well as physical barrier **to the vision and purpose intended by Frederick Law Olmsted** (emphasis added).*

The more recent endeavor of the CPD to consolidate the South Shore and Jackson Park golf courses includes the expansion of the driving range that Project 120 Chicago had hoped to relocate. Given that several of the objectives of its long-term initiatives conflict with current proposals related to the OPC, it is notable that in **August 2016**, just days after Jackson Park was announced as the site of the OPC, Project 120 Chicago changed its "focus," adding the following statement to its website:

*What is the focus of Project 120 Chicago? Today, the South Parks are once again a place for grand vision and innovation, and an influential component of Chicago's South Side cultural renaissance and resurgence, and with the addition of SKY LANDING by Yoko Ono and the **Obama Presidential Library**, a marker for peace among all people and all nations (emphasis added).*

It is also worth noting that the Project 120 Chicago website now appears to be defunct, with the most recent information having been posted in October 2016.

In closing, we reiterate that the current APE in the Section 106 review should be expanded to include the entirety of the South Park System, because Washington Park, the Midway Plaisance, and Jackson Park were indeed conceived, planned, and executed as a single system, one that as a practical and cultural resource continues to be greater than the sum of its parts. We also urge that the fuller assessment of Jackson Park's design integrity and significance, and the implications that follow from it, be recognized, as well as the duty to apply the highest standards in evaluating any impact on what is universally agreed to be the irreplaceable inheritance of the citizens of Chicago and the nation. We thank you for the opportunity to provide these comments and trust that they will be taken into consideration.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR  
Founder, President, and CEO, The Cultural Landscape Foundation

cc: Eleanor Gorski, Chicago Department of Planning and Development; Rachel Leibowitz, Illinois State Historic Preservation Office; Matt Fuller, Federal Highway Administration; Juanita Irizzary, Friends of the Parks; Margaret Schmid, Jackson Park Watch; Ted Haffner, Openlands; Arleyne Levee and Lucy Lawliss, National Association for Olmsted Parks; Michael McNamee, Save the Midway!; Lisa Dichiera, Landmarks Illinois; Ward Miller, Preservation Chicago; Betsy Merritt, National Trust for Historic Preservation

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<sup>1</sup> *Report to the Chicago South Park Commission Accompanying Plan for Laying Out the South Park*, by Olmsted, Vaux & Co. (March 1871), 41.

<sup>2</sup> Bluestone, D., *Constructing Chicago*. Yale U.P. (1991), 43.

<sup>3</sup> Bachrach, J.S., "Jackson Park Design Evolution," Chicago Park District, Department of Research and Planning (Sept. 1995).

<sup>4</sup> *Park and Cemetery*, Vol. 5, No. 2 (April 1895), s.v. "Jackson Park, Chicago"

<sup>5</sup> O'Donnell, P. and Gregory De Vries, "Entangled Culture and Nature: Toward a Sustainable Jackson Park in the Twenty-First Century," in *Change Over Time*, Vol. 5, No. 2 (Fall 2015), 248-265.

<sup>6</sup> O'Donnell and De Vries (2015), p. 252.

<sup>7</sup> *Jackson Park Section 506 Great Lakes Fishery & Ecosystem Restoration Study* (2014), 7.

<sup>8</sup> Schuyler, D. and Gregory Kaliss (eds.), *The Papers of Frederick Law Olmsted, Volume IX: The Last Great Projects*. John Hopkins U.P. (2015), 778 ff.

<sup>9</sup> *Report of the South Park Commissioners, Superintendent's Report*; November 30, 1896: "The work of surfacing the gymnasium area with gravel and cinder was completed early in the year, and the running track around the northerly gymnasium was covered with a thin layer of bank gravel, and has been used for a bicycle track; it is one-quarter of a mile in length."

<sup>10</sup> Bachrach (1995), 10.

<sup>11</sup> Bachrach (1995), 10.

<sup>12</sup> Bachrach (1995), 1.

<sup>13</sup> Bluestone, D. (1991), 39.

<sup>14</sup> Bluestone, D. (1991), 44.

<sup>15</sup> Bachrach (1995), 4.

<sup>16</sup> See: (<https://tclf.org/sites/default/files/microsites/landslide2017/themes.html#shadow>).

<sup>17</sup> See: ([http://library.amlegal.com/nxt/gateway.dll/illinois/chicagozoning/title16landuse/chapter16-4lakemichiganandchicagolakefro?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:chicagozoning\\_il\\$anc=JD\\_Ch.16-4](http://library.amlegal.com/nxt/gateway.dll/illinois/chicagozoning/title16landuse/chapter16-4lakemichiganandchicagolakefro?f=templates$fn=default.htm$3.0$vid=amlegal:chicagozoning_il$anc=JD_Ch.16-4)).

<sup>18</sup> *A Preliminary Report upon the Proposed Suburban Village at Riverside, Near Chicago*, by Olmsted, Vaux & Co. (1868), 17; reprinted in 1982 by the Wicklander Printing Corp., Chicago, Ill.

<sup>19</sup> "Memorandum of Understanding: Jackson Park, Chicago": see (<http://www.hydepark.org/parks/jpac/MOU%20-%20Project%20120%20Jackson%20Park%20-%20Final.pdf>).

<sup>20</sup> O'Donnell and De Vries (2015), 250.

<sup>21</sup> See ([http://www.project120chicago.org/plans\\_projects/framework-plan](http://www.project120chicago.org/plans_projects/framework-plan)).

<sup>22</sup> See ([http://www.project120chicago.org/plans\\_projects/p4-great-lawn](http://www.project120chicago.org/plans_projects/p4-great-lawn)).

# 1WOODLAWN, A COMMUNITY OF NEIGHBORS

## 1Woodlawn Section 106 Consulting Party Response

*Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. The undertaking of Roadway improvements (potential federal funding) and the Obama Presidential Center (OPC) and related South Lakefront Framework Plan (potential conversion of parkland to non-recreation use within the meaning of Urban Park and Recreation Recovery [UPARR] under Public Law 95-625).*

*1Woodlawn has been accepted and listed as an official consulting party to the Section 106 process.*

1Woodlawn is a grass-roots representative organization of the Woodlawn community. We, at 1Woodlawn, wish to express our gratitude for this opportunity to express our concerns regarding plans to reconfigure Jackson Park and adjacent roadways to accommodate the construction of the Obama Presidential Center and the potential conversion of parkland as proposed by the South Lakefront Framework Plan. The Woodlawn community will experience significant impact. Such impact will prove positive when the Chicago Department of Planning and Development gives attention to our position regarding these proposed plans.

### **JACKSON PARK AND LAKEFRONT RECONFIGURATION**

- **Recreational green space**

Information we have received from local newspapers covering proposed plans, as well as your presentation describe: (Selected from Curbed Chicago, 12/27/2017)

“A two-story garage covered with landscaping” is proposed to be constructed at the east end of the Midway Plaisance. The bus staging site was eliminated from your draft of the plan along with a children’s play area, a basketball court, grilling stations, and picnic tables. The meeting’s focus was the parking garage and the architects did not say where the bus site would be relocated. An underground parking structure was discussed, but that idea was cut from presentation at the meeting. Questions, (1) is the underground garage no longer being considered? (2) Where will the bus site be moved?

The play area, grilling areas and the basketball court which was proposed to be built on the Midway Plaisance, according to the original plan, is no longer seen. Additionally, no space has been identified for the relocation of baseball diamond and football field. Not addressing these items is a non-starter for our community.

### **The South Lakefront Framework Plan (SLFP)**

On December 7th and 11th, public meetings, you presented three scenarios for review. Attendees were asked to select the scenario that reflects certain principles. The three scenarios are Coastline, Meadows and Lagoons. The principles (designated by color with their respective colored dots to be placed on comment sheets) were as follows:

# 1WOODLAWN, A COMMUNITY OF NEIGHBORS

- Serve the Community, Inspire the World
- Steward Environmental Integrity & Beauty
- Renew & Maintain Integrity & Beauty

Comment: Serving the community is the element that should carry the most weight. How will the park continue to accommodate family reunions and sports activities with the expected influx of tourists, many of whom will seek to enjoy the parks' pastoral beauty. Can the need to serve the community and renew and maintain integrity and beauty in the park coexist?

The scenarios do not show the type of recreation sports areas traditionally used by and associated with our community groups and families that utilize Jackson Park for recreation.

There may be opportunity to achieve both by looking at vacant city owned land scattered throughout Woodlawn. Attention must be given to creating additional recreational green spaces to avoid the overcrowding of Jackson Park. Hyde Park H.S. sports teams deserve to have sports fields in Jackson Park, within proximity of the school. Residents of southwest and northwest Woodlawn deserve access to quality parks and green spaces as well. This broader perspective will then provide pastoral greenspace and play areas a short walk away from our neighbors. This must be a part of the plan.

(Selected from the Chicago Tribune, July 14, 2017)

The Obama Presidential Center is slated to open in Jackson Park in 2021. As Obama Foundation Chairman Martin Nesbitt said when Chicago was picked as the site,

"This whole initiative is a community benefit"

We've seen the foundation's projections for the center's economic impact on the South Side: Once the center opens, "an estimated 2,175 new jobs. (That includes jobs at the center as well as ripple-effect employment.) Between 625,000 and 760,000 visitors every year, bringing a massive infusion of dining, lodging and retail dollars to South Side businesses. The projected economic impact for the South Side over the first 10 years could reach \$2.1 billion."

Conversely, the Obama group must remember that it's the surrounding community that will have to co-exist with the center's impact on traffic and daily life. And it's the surrounding community that knows best what the community needs.

- **Parking accommodations**

Without adequate parking the local traffic volume will rise to virtual catastrophic proportions. A good example of not considering how to accommodate new businesses and store customers is 51st, 53rd, and 57th streets, from Lake Park Avenue traveling west through the commercial zones, in the Hyde Park community. Traffic and parking are terrible at best. We do not want this problem repeated in Woodlawn. Residential side streets are often filled with cars from shoppers, leaving nowhere for residents, or their visiting guests, to park. DPD and CDOT traffic reconfiguration plans have not included adequate parking allocations. It's better to be proactive than reactive when it's already too late.

# 1WOODLAWN, A COMMUNITY OF NEIGHBORS

## Area of Potential Impact – Architectural

We believe the limited area shown on your map does not capture the significant structures in Woodlawn that will be impacted by our new curious visitors and tourists. Your boundary currently ends at Woodlawn Ave. West of Woodlawn Ave. are several historic places that will see an increase in visitors and curiosity seekers due to their proximity. Below are some examples:

- 1) Dr. Mary Fitzbutler Waring, 6425 S. Eberhart. A Notable Black Woman in Illinois who lived in the neighborhood of Woodlawn. She was 10th president of the National Association of Colored Women Clubs (NACWC), and a president of the National Association's Illinois State's Chicago and Northern District Association (CNDA)
- 2) Lorraine Hansberry- 6140 S. Rhodes Ms. Hansberry is the highly acclaimed author of “a Raisin in the Sun”.

The “lakefront” cannot be the only area of focus, nor can the APE Boundaries be so limited that they do not consider the impact on the entire, historical Woodlawn Community. The APE Boundaries must be expanded to include the entire effected area. We believe the boundary should be moved west to Eberhart.

Woodlawn is a historic community with numerous brown and gray stone homes. There are tourist groups that drive or stroll through the area presently to observe the classic construction of our buildings. We are actively pursuing means to preserve our architecture and display appreciation of our vintage homes of Bedford limestone, imported from central Indiana. We request that the Chicago Graystone and Vintage Home Program will help us Build upon the legacy and experience of the Historic Chicago Greystone Initiative, in all of Woodlawn.

We look forward to your response to the positions stated in this letter from the Woodlawn community. If you have any questions or would like to discuss further, please contact the 1Woodlawn Leadership Team listed below.

Sincerely,

1Woodlawn Leadership Team

Cassandra Guice, [REDACTED]

Malcolm Williams, [REDACTED]

Jean Clark, [REDACTED]

Debra Adams, [REDACTED]

Duwain Bailey. [REDACTED]

**From:** [DPD](#)  
**To:** [Monroe, Abby](#)  
**Subject:** Fw: Areas of Potential Effects  
**Date:** Tuesday, December 05, 2017 2:59:56 PM

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**From:** Tiffany Blackmon [REDACTED] >  
**Sent:** Tuesday, December 5, 2017 11:19 AM  
**To:** DPD  
**Subject:** Areas of Potential Effects

I attended the meeting at the South Side YMCA on Friday, December 1, 2017 and left with only 1 comment. I believe the current area of potential effect should be broadened to include the following boundaries.

47th from Lake Shore Drive to the Dan Ryan on the North  
79th and South Chicago to 87th on the South  
I-94 Dan Ryan on the West  
I-41 Lake Shore Drive and Beaches on the East

This change will include the following historical resources and would provide an accurate depiction of this community:

1. Dusable Museum of African American History
2. Lorraine Hansberry House
3. Richard Wright House
4. Isadore H. Heller House-Frank Lloyd Wright
5. Oriental Institute Museum
6. Smart Museum of Art, The University of Chicago
7. Hyde Park Historical Society
8. Gwendolyn Brooks House
9. Rockefeller Memorial Chapel
10. Regal Theatre
11. Mosque Maryam Nation of Islam
12. Bill Gates South Shore International Prep High School
13. Our Lady of Peace Catholic School
14. Winnie Mandela High School
15. Jackson Park Hospital
16. Rainbow Beach
17. South Shore Cultural Center
18. Washington Park

The traffic boundaries will have to also be included otherwise the proposed changes suggested by the Department of Transportation will not be enough to handle the increased traffic. The DOT is not taking into consideration the current bottle neck on Stony Island, Jeffery and Lake Shore Drive which is the Metra train tracks. The train tracks on 71st Street for the Metra train

will have to be elevated or an overpass created otherwise access to the Obama Presidential Center will be limited and rush hour traffic will be unbearable. I live on Stony Island currently and everyday from 4:00-6:00pm there is standing traffic on Stony with no Presidential Center. Stony must be widened from 57th to 79th (the skyway) not just 67th street. People take Stony Island to get to the Indiana Skyway which begins on 78th and Stony Island. There must be an alternate way to get people to the skyway which Jeffery may also need to be widened between 67th and 87th which is the first Skyway entrance for this thoroughfare. I am available to discuss this information with anyone willing but if you don't take my advice now you will once the Obama Center is built and traffic becomes impossible.

Thanks

Tiffany Blackmon-Burnett  
Jackson Park Resident & Business Leader

[REDACTED]  
Chicago, IL 60637  
[REDACTED]

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January 5, 2017

Ms. Abby Monroe  
Coordinating Planner  
City of Chicago  
Department of Planning and Development

Dear Ms. Monroe,

As a designated consulting party to the National Historic Preservation Act, Section 106 review and the National Environmental Policy Act (NEPA) review for Jackson Park, Friends of the Parks is pleased to submit the following remarks for the public record in reference to the initial phase of identifying historic features that could be adversely affected by the Obama Presidential Center (OPC) and related road closures.

Since it was first proposed that an Obama presidential library be sited in a public park in Chicago, Friends of the Parks has welcomed the idea of an Obama Presidential Center in Chicago but has vociferously maintained that it should not be in a park. We have suggested that it be located instead on vacant land across the street from Washington Park. The location of the Obama Presidential Center in any part of Jackson Park represents an adverse affect on this historic, Frederick Law Olmsted and Calvert Vaux-designed park—one which is on the National Register of Historic Places and is but one element of the larger South Parks system, which includes the Midway Plaisance and Washington Park. As The Cultural Landscape Foundation has clearly detailed in their submission to you as part of this review process, the designers of this park intended for the building that is now the Museum of Science and Industry to be the only and main focal point structure in Jackson Park. Any additional buildings would detract from that original vision. Additionally, the proposed location of the Obama Presidential Center specifically detracts from the designers' intended vistas from the Midway to Lake Michigan and detracts from recent federal efforts to ensure climate-protecting green space and blue space enhancement strategies in Jackson Park.

Similarly, as The Cultural Landscape Foundation points out, the existing layout of the roads in Jackson Park was very intentional. The designers sought to provide the ability for movement throughout the park for users to survey the various landscapes throughout the park. While Olmsted and Vaux certainly could not have imagined the amount of vehicle traffic that now traverses the park, and while Friends of the Parks can appreciate the concept of minimizing concrete and traffic throughout the park, it cannot be automatically assumed that removing roads through Jackson Park honors the spirit of Olmsted and Vaux's vision. In this context, any options that are considered must be reviewed through

a lens of having an adverse affect on the intentions laid out by the designers of this architecturally significant park.

With various proposals for Jackson Park and South Shore Cultural Center “revitalization” coming to light in conjunction with the timing of planning for the Obama Presidential Center in Jackson Park, Friends of the Parks has strongly spoken out for the need for comprehensive park planning which takes into consideration community views and ensures an integrated approach in the spirit of Olmsted’s vision that every part be planned subordinate to and dependent on every other part. Since then, the Obama Presidential Center has surprised the community with a proposal to take over land on the Midway, as well, for a parking garage. Because the local process has not been fully comprehensive and because the public does not have clarity on how the proposed golf course improvement, expansion, and linking of the current two, separate golf courses in Jackson Park and South Shore Cultural Center will relate to OPC buildings and road closures and the timing of this Section 106/NEPA review process, Friends of the Parks asks that the Area of Potential Effects (APE) be expanded to include the entire South Park System, including the Midway Plaisance and Washington Park, as well as the South Shore Cultural Center grounds.

We thank you for the opportunity to speak into this process and look forward to continuing dialogue about the protection of Jackson Park and surrounding parks in light of the many proposals on the table to modify them.

Sincerely,

A handwritten signature in blue ink that reads "Juanita Irizarry". The signature is fluid and cursive, with the first name being more prominent.

Juanita Irizarry  
Executive Director



**LANDMARKS  
ILLINOIS**

People saving places.

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30 N. Michigan Ave.  
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Chicago, IL 60602

[www.Landmarks.org](http://www.Landmarks.org)

January 5, 2018

(SENT VIA EMAIL)

Ms. Abby Monroe  
Coordinating Planner  
City of Chicago,  
Department of Planning and Development

RE: Response to request for comments on the proposed APE boundaries and APE historic features for the Obama Presidential Center Mobility Improvements

Dear Ms. Monroe,

Thank you for requesting comments regarding the proposed boundaries for the Area of Potential Effect (APE) associated with proposed road changes to accommodate the Obama Presidential Center (OPC) and on the list of identified historic features. As a consulting party to the Section 106 process, we are making the following suggestions, listed and summarized below.

- Expand the APE's southern boundary to 71<sup>st</sup> St.
- Expand the APE's western boundary to include the entire Midway Plaisance
- Include Woodlawn neighborhood in APE through exploration of potential economic displacement impacts
- Maintain and identify GLFER Project within the APE
- Support the recommendations of CLF and Jackson Park Watch for additional historic features within the APE

Landmark Illinois (LI) requests that the APE as currently proposed (October, 2017) be expanded to the south and the west. To the south, we request that the boundary be extended to 71<sup>st</sup> Street, which is the southern boundary of the existing Jackson Park Highlands Historic District, a locally designated landmark district. We believe the proposed road changes and building of a parking garage could result in changes to traffic patterns and on-street parking demand that has the potential for visual and accessibility impacts within this historic community.

To the west, we recommend extending the APE to the full length of the Midway Plaisance, terminating at S. Cottage Grove Avenue. We do not concur with the claim that the Midway is compromised by the Metra tracks. We do believe the potential effect of building a parking garage at the eastern terminus needs to be evaluated within the Midway as a whole. The Secretary of Interior's Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes should be consulted as it

relates to the garage's proposed design and location, as well as the design and location of the Obama Presidential Center.

We also urge further evaluation of the OPC's potential accumulative impact on the Woodlawn neighborhood as it pertains to possible economic and racial gentrification and displacement due to real estate speculation. The African American community in Woodlawn should be considered integral to its history, and could be considered an historic and cultural resource that could be impacted, both positively and negatively. While we do not have specific boundaries to recommend for the expansion of the APE to address this potential adverse effect to the existing community, we believe it to be an important social justice issue that needs to be anticipated and proactively addressed relative to preventing displacement. For example, creating The 606 trail on the northwest side has added a valued amenity, but also begun to displace low-income residents through speculative developments. There is an opportunity to plan ahead to assure that the OPC does not have the same unintended impact, but instead strengthens the existing mixed-income community and creates opportunities for its existing residents to remain and to invest.

Within the APE, we would like to see acknowledgment of the 2013-initiated GLFER project, which itself went through an extensive Section 106 review. It should be maintained and identified as it respects Jackson Park's 1895 Olmsted, Olmsted & Eliot design. Funded by a federal grant through the U.S. Army Corps of Engineers Great Lakes Fishery and Ecosystem Restoration program, with support from the non-profit Project 120 Chicago, and the Chicago Park District, the project area is just east of the proposed site for the OPC. The ongoing project seeks to improve the habitat, ecological health and sustainability of the park, while also enhancing its historic integrity and park user needs. The project was planned for four-phases:

- Area 1-Wooded Island and east and west lagoons
- Area 2-Inner Harbor
- Area 3-Golf Course Area
- Area 4-LaRabida

The project will serve as a national model for balancing ecological needs with historic preservation goals. Its design meets the Secretary of Interior Guidelines for Cultural Landscapes and was designed by Heritage Landscapes, a landscape architecture firm that specializes in Olmsted parks. Detailed historic research and analysis was conducted by the Chicago Park District historian and Heritage Landscapes to determine appropriate treatments. We look forward to the same care going toward the setting and

landscape design of the OPC, the parking garage, and ultimately any reevaluation of the Jackson Park Golf Course.

Aside from further noting the GLFER project within the APE, the identified list of historic features is sufficient to the best of our knowledge. However, we are aware that other organizations such as Jackson Park Watch and the Cultural Landscape Foundation have made additional suggestions identifying specific physical features (both landscape and circulation patterns) of the 1895 Olmsted, Olmsted & Eliot design of Jackson Park, which we support.

Again, thank you for the opportunity to comment on the currently proposed APE boundaries and its historic features. We look forward to participating in the ongoing Section 106 process and making further comments and mitigation suggestions based on future presentations.

Sincerely,



Bonnie McDonald  
President

Cc: Matt Fuller, FHWA  
Rachel Leibowitz, SHPO  
Eleanor Gorski, DPD

**From:** [DPD](#)  
**To:** [Monroe, Abby](#)  
**Subject:** Fw: Section 106 Jackson Park comments  
**Date:** Monday, January 08, 2018 10:51:00 AM

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**From:** gary ossewaarde <[REDACTED]>  
**Sent:** Friday, January 5, 2018 2:33 PM  
**To:** DPD  
**Subject:** Section 106 Jackson Park comments

Dear Ms. Gorski, Ms. Monroe, and Mr. Sadler:

I would like to add a couple of thoughts about comments on a couple of possible APE impacts on historic features or principles.

The proposed tall Museum building would by itself be adverse only if one assumes that new structures of necessity detract from the historic template. I think that has to be balanced with a whole host of impacts the new structure(s) would have (both desirable and not) to site and park access and mobility, attractiveness, wildlife, appropriateness and value of the use and program, and their judged added attractiveness in the park's and surrounding areas context. There are other high structures just outside the park that also cast shadows. Shadow would seem to be narrow-- a wider building might make more intrusive shadows. The time of long shadows would be brief each day in either direction and would rotate since in our latitude the sun is southward- in mid winter at a very low angle. so the shadow in the afternoon would likely touch only the norther edge of the lagoons and Wooded Island. The Museum being south of 60th Street, studies would have to be done to see whether and how far the morning shadow would go along the Midway or traverse it all the way (depending on the actual height of th building. (I have not seen what the actual height would be- figures speculated would seem to be the maximum allowable height under certain conditions per the underlying Zoning Ordinance. Ability to view Lake Michigan and to Washington Park would seem to be desired by the designers.)

It seems to me that a major structure, if right, at this point would indeed emphasize the nexus of the three parks coming together rather than interrupt it- and serve as a beacon of hope for many.

Other factors are impact on hydrology and underground structure remains. I think the structure being windowless is irrelevant. In conclusion, many factors would have to be taken into account in determining the Museum a negative APE.

As for closure of Cornell Drive, claiming replacement with a (ample and following the Olmsted contour, as proposed) pedestrian and bike trail, would, because it is not for regular traffic make it contrary to the Olmsted design: There are many non traffic trails in Jackson Park from Olmsted's design. I note that when a previous draft Framework was presented at Washington Refectory two years ago showing a lane of traffic on Darrow Bridge, everyone (including those opposing a non-traffic Cornell Drive as non historic) opposed having traffic on Darrow even though that and the oval road of which it is a part was designed for and originally carried traffic-- not always very light! So, I think opposition to converting Cornell on this grounds is grasping at straws.

I have reservations about the parking garage where it is proposed but the revised design including elevation so people on the east side of the tracks can see down the Midway could actually help reconnect the long east-west vista. Regardless of a garage there, the design (even if flattened ) at that junction is a real enhancement that does not detract from Olmsted's sweep.(It is unlikely that anyone would open up underneath the tracks- and if done it would only give a limited view.) A garage there does cut the parks connection, but more damage seems to likely from putting and underground garage in Jackson Park.

Gary Ossewaarde

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**From:** [Gorski, Eleanor](#)  
**To:** [Vera Mccurry](#)  
**Cc:** [Monroe, Abby](#)  
**Subject:** Re: Resending of Stakeholder info.  
**Date:** Wednesday, January 03, 2018 9:42:13 PM

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Thank you! Received.

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**From:** Vera Mccurry <[REDACTED]>  
**Sent:** Wednesday, January 3, 2018 8:49:08 PM  
**To:** Gorski, Eleanor  
**Subject:** Resending of Stakeholder info.

Eleanor,

I am resending our Stakeholder comments as my original comments were returned via email.

Our JPAC Stakeholders were impressed with your presentation of the many historical sights which we include in our historical tour of Jackson Park. We would only add for emphasis :

- 1.The LaRabida Monastery Hill and Promenade,
- 2.The 1893 historic Promenade Wall,
- 3.The Historic 67th Street Beach and Promenade.

Again,

Thank you for your work in putting together the historic areas map.

Best,

Louise McCurry, JPAC Stakeholder.

Sent from my iPhone

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**NATIONAL ASSOCIATION OF COLORED WOMEN'S CLUBS, INC.**

1601 R STREET, N.W., WASHINGTON, DC 20009

TELEPHONE (202) 667-4080/ FAX (202) 667-2574

Ms. Sharon R. Bridgeforth, President, 3670 Monaco Parkway, Denver, CO 80207 Telephone (303) 294-9105

E-mail [SharonNACWC@g.com](mailto:SharonNACWC@g.com)

Executive Secretary: Mrs. Carole A. Early

Theme: Our Legacy Inspires and Compels Us to Sustain the Organization for the Future, Create a Sisterhood Bond That Is Strong,  
And Serve Our Communities in a Much Greater Way

**Residence/Office of the NACWC National Historian**  
**6834 South Champlain Avenue – Chicago, Illinois 60637**  
**5441 South Michigan Avenue – Unit 301 - Chicago, Illinois 60615**

**VIA E-MAIL - DPD@cityofchicago.org**

Ms. Abbey Monroe  
City of Chicago  
Department of Planning

**Re: Historical Properties Inventory Report –  
List of Historic Features and the Area of Potential Effect Maps**

Dear Ms. Monroe:

Enclosed for review is feedback from the National Association of Colored Women's Clubs, Inc. (NACWC also known as NACW). NACWC is a 501(c)(3) non-profit charitable organization founded in 1896 whose constitution was adopted in 1897 on the south side of Chicago and incorporated in St. Louis, MO in 1904.

Since 1896, it has been custom for NACWC presidents and officers to operate from their homes rather than from NACWC National Headquarters in Washington, D.C. This fact is documented can be documented through organization minutes, historical documents of NACWC leadership who lived in Chicago, and also the records of NACWC's federated standard club leadership in Chicago archived in the Chicago History Museum. This practice is also documented by through the records of the late Illinois Senator Everett Dirksen. Senator Dirksen defined his early civil rights advocacy through his work with the National Association of Colored Women's Clubs and its National President at that time, Mrs. Irene McCoy Gaines, also a Chicago south side resident.

The enclosed feedback document includes recommendations and provides both valuable historic information to be added to the list of historic features and the Area of Potential Effect Maps.

That National Association of Colored Women's Clubs greatly appreciations the opportunity to participation in the Section 106 processes and thanks the City of Chicago Department of Planning.

Sincerely,

Cassandra Cecelia Guice  
NACWC National Historian  
Member of NACWC Executive Council  
President of the Myra Hunter Reeves Culture Club, a standard club of NACWC – Chicago, IL

**NATIONAL ASSOCIATION OF COLORED WOMEN'S CLUBS, INC.**

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Theme: Our Legacy Inspires and Compels Us to Sustain the Organization for the Future, Create a Sisterhood Bond That Is Strong,  
And Serve Our Communities in a Much Greater Way

**Residence/Office of the NACWC National Historian**  
**6834 South Champlain Avenue – Chicago, Illinois 60637**  
**5441 South Michigan Avenue – Unit 301 - Chicago, Illinois 60615**

**Historical Properties Report Feedback – January 5, 2018**  
**Submitted by Cassandra Cecelia Guice, NACWC National Historian**

The African American neighborhoods of Woodlawn, Washington Park, Bronzeville and South Shore, share a rich, historic culture and relationship with the National Association of Colored Women's Clubs dating back to the 19<sup>th</sup> Century (1897). These neighborhoods, in their geographic entirety, exist in the area of potential effect created by the building of the Obama Presidential Center. We ask that the following be included and considered in the Historical Properties Report that is to be compiled on January 5, 2018.

**Area of Potential Effect Maps.**

**Recommendation:** That the Area of Potential Effect (APE) Map Boundaries be reconfigured to include the neighborhood boundaries of Woodlawn (Stony Island to King Drive, 59<sup>th</sup> to 71<sup>st</sup>, South Chicago Avenue); Washington Park/Washington Park Neighborhood; Bronzeville; and South Shore (at least south to 75th Street ).

**Rationale 1:** The Obama Presidential Center (OPC) Understanding of its Impact Area:

President Barack Obama and OPC community liaison Mr. Michael Strautmanis, since the announcement of the center's site have engaged in conversations (other than the general public meetings) with the organizations, aldermen, others leaders and residents of the neighborhoods OPC would impact. These conversations have included representative neighborhood groups such as the Network of Woodlawn/1 Woodlawn and Washington Park Advisory Council, as well as the alderman representing Woodlawn, Washington Park and Bronzeville. These meetings have been well documented by the media. By the very fact that these meetings are taking place, there is a recognition that the residents of these neighborhoods are stakeholders and could be impacted by the project.

**Rationale 2:** Historic nature of the residents and neighborhood organizations of Woodlawn, Washington Park and Bronzeville involvement in the Civil Rights Movement and milestones of African American culture.

**Rationale 3:** Encroachment of real estate speculators and developers engaged in property "quick cash" purchases; resale of property at prices that cannot be considered affordable (high as \$600,000); as well as, uncharacteristic increased rents for apartment leasing in the Woodlawn, Washington Park, Bronzeville and South Shore neighborhoods. This economic gentrification, which will result in the displacement of existing residents, began in earnest with the announcement that the OPC was coming to the South Side.

(continued)

## Historical Properties Report Feedback - January 5, 2018 (Page 2 of 2)

**Rationale 4:** The historic homes and buildings of associated civil rights organizations and leaders, as well as, with the NACWC and its leadership. As mentioned in the attached letter, since 1896 it has been custom for NACWC presidents and officers to operate from their homes rather than from NACWC National Headquarters in Washington, D.C. The APE Map boundaries need to be expanded to include these historically significant homes.

### List of Historic Features.

#### **Recommendations:**

1. That certain homes and buildings associated with the historic neighborhood organizations of Woodlawn, Washington Park, Bronzeville and South Shore be added to the list.
2. That certain homes and buildings associated with the 122-year history of the National Association of Colored Women Clubs (NACWC) and its historic members who were residents of the Woodlawn, Washington Park, Bronzeville and South Shore neighborhoods be added to the list.

**Rationale 1:** African Americans living in Chicago were restricted to living within certain geographic boundaries until landmark Supreme Court cases like *Shelley v. Kraemer* (1948) and the 1968 Fair Housing Act made moving out of the South Side possible. As mentioned in the attached letter, since 1896 it has been custom for NACWC presidents and officers to operate from their homes. The early development of NACWC's role in the political, economic, and social development in Chicago's black community and black communities across the country was in due to the participation of the NACWC leadership and their supporters living in neighborhoods of Woodlawn Bronzeville, Washington Park and South Shore.

Four examples that can be added to the list.

1. Kress (Crest) Office Building – NW Corner of King Drive and 63<sup>rd</sup> Street (not within the APE Boundaries)
2. 6736 S. Jeffery Blvd. Headquarters of the Chicago and Northern District Association (CNDA) – Northern District headquarters of NACWC's Illinois state level. (within the current APE boundaries)
3. 6425 S. Eberhardt / 6427 S. Eberhardt– Home and Medical Office building of Dr. Mary Fitzbutler Waring. (Influential medical doctor in throughout Woodlawn, the state of Illinois and 10<sup>th</sup> National President of NACWC)



Home - 6425 S. Eberhardt.



Office - 6427 S. Eberhardt

(End)



# openlands

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January 3, 2018

Ms. Abby Monroe  
Coordinating Planner  
City of Chicago,  
Department of Planning and Development

Dear Ms. Monroe,

Openlands, as a Section 106 Consulting Partner for Jackson Park, believes that the proposal by the Obama Foundation to locate the Obama Presidential Center in Jackson Park on Chicago's South Side is an opportunity for the City of Chicago, the Park District, and the adjacent neighborhoods and institutions to honor, restore, and reinvigorate both the legacy and the future vision for Chicago's historic parks and their surrounding neighborhoods. Chicago can give the Center a spectacular setting, and the Center can provide a catalyst for enduring benefits for the citizens of Chicago.

In the late 1800s, Frederick Law Olmsted and Calvert Vaux, the designers of the parks, believed that urban parks not only provided refuge from the stresses of city life, but also were democratic and cultural places for all classes of people to interact. This influence on history and culture is still true today. The cultural and historic value of these great park landscapes should not be underestimated nor should the value of the Presidential Center in providing the spark necessary for their restoration, rediscovery, and reinvigoration. Jackson Park can once again be vibrant community amenities for the neighbors as well as for people from all over the city and the world who will visit the Presidential Center.

As part of the Section 106 review, Openlands supports the following principles:

**Principle 1: Minimize building in the parks**

The Presidential Center building footprint should be minimal and be placed in the most appropriate location vis-à-vis not just cultural and historical propriety, but a range of sound site planning considerations gleaned from a rigorous analytical process of the site and its surroundings.

**Principle 2: Replace any land used for buildings with new or reclaimed park acreage**

Any taking of parkland for the entire Center needs to be replaced with additional acreage of new park space and, where appropriate, the removal of service structures and underutilized buildings that populate Jackson Park. Additional spaces need to be identified and determined both in advance and within the framework of the Section 106 process in order to understand

all relevant historical impacts of the project. We note here that greening of vacated roads does not constitute new park space.

**Principle 3: Provide convenient public access and transportation**

Seize the opportunity to create a regional transportation hub to serve multiple cultural and neighborhood amenities. All automobile parking for the Center must be outside the parks or underground. The road system should be improved for walkability and access to trail systems, but also with community needs in mind.

**Principle 4: Exploit synergies with existing community and cultural institutions**

The Section 106 process should integrate plans and enhance connections with nearby institutions of significant cultural and historic value. There is a unique opportunity to illustrate sustainability principles and practices (green infrastructure, native landscaping, energy efficiency, etc.) in partnership with the Museum of Science and Industry and others.

**Principle 5: Restore and revitalize the parks**

Chicago must renew its commitment to restoring and revitalizing Washington and Jackson Parks and the Midway Plaisance. If carefully considered and constructed, the Library could enhance prime features of these treasured public parks which in turn can provide amenities for local communities and spaces for people to connect to nature.

The park system was created in order to provide the residents of Chicago with beautiful and inviting spaces for people to recreate, for wildlife to thrive, and communities to gather. The plan to build the Presidential Center should honor the legacy which both protected open spaces and made them accessible to people. A visionary plan guided by clear principles must lay the foundation for this ambitious plan.

To this end, Openlands finds the fractious and siloed nature of the planning process in and of itself problematic. The four different planning processes represented by the Chicago Park District's Framework Plan, the CDOT Transportation Plan, the Obama Center Plan now including the parking garage located on the Midway, and the Golf Chicago Plan. These different processes all serve to deny both agency accountability and legitimate public input via separate but related interests. As part of these separate processes, realistic alternatives to basic elements such as the redesign of the roadway network, the location of the library garage, and the proposed golf course, have never been shown, but mysteriously are well coordinated between each of the processes and interests. We hope and trust that the NEPA and Section 106 process will not only lend accountability to these disparate processes, but also will lend legitimacy through the exploration of alternatives if and when historic and cultural impacts are present. With this in mind, the Area of Potential Effects (APE) scope should be expanded to at least include the Golf Course Plan.

As part of the Section 106 review, Openlands urges the Lead Agencies to request from all parties a comprehensive plan that takes into account not just the historic and cultural significance of these parks, but a unified comprehensive planning process that allows for accountability, public input, and the testing of alternative solutions. Specifically, a holistic planning process should at a minimum consider the following:

- how the proposed changes will affect both the historic and cultural elements of the park(s) and the surrounding neighborhoods. These decisions cannot be made without good information. We have heard nothing on how the proposed road closings will impact traffic patterns and the adjacent neighborhood;

- the City's plans to avoid massive gentrification and displacement of present residents, thereby impacting the historic and cultural fabric of Woodlawn, South Shore, and to an extent Washington Park and Hyde Park;
- how a championship-caliber golf course will remain an affordable community asset and they have not offered details on how they will replace existing recreation resources slated for removal;
- plans for the merger of the golf courses will expand the new course beyond the current footprint, remove hundreds, if not thousands of the park's mature trees, destroy the beloved South Shore Nature Sanctuary, and reduce existing parkland;
- at this time there is no information addressing how the city intends to mitigate the loss of natural resources in Jackson Park or how these changes fit into a comprehensive plan for reinvestment in the three South Side parks.

Based on these cultural and historic impacts, we request the Section 106 process recommend to unify the planning process to explore meaningful alternatives, and include all of the Midway and perhaps even Washington Park in the APE. Openlands well understands the effort required to inventory and understand the impacts to historic structures. Openlands also understands that a thoughtful investigation cannot take place concurrently between four planning processes.

Once again, we reiterate our request that as part of the Section 106 review, Openlands urges the Lead Agencies to request from all parties a comprehensive plan that takes into account not just the historic and cultural significance of these parks, but a unified comprehensive planning process that allows for accountability, public input and the testing of alternative solutions. To this end, there must be a proactive, comprehensive plan that lays out a vision for our parks and a framework to evaluate how future developments will impact transportation, affordable housing, nature and wildlife, economic growth, and public access to park amenities. Only in this manner can the Presidential Center, which we support, serve as a catalyst for meaningful change yet preserve the historic and cultural significance of the South Parks.

Sincerely,



Gerald W. Adelman, President and CEO

### **About Openlands**

Founded in 1963, Openlands is one of the nation's oldest and most successful metropolitan conservation organizations, having helped secure, protect, and provide public access to more than 55,000 acres of land for parks, forest preserves, land and water greenway corridors, and urban gardens. For more information, visit [www.openlands.org](http://www.openlands.org).

# Preservation Chicago

Citizens advocating for the preservation of Chicago's historic architecture

Brad Suster January 04, 2018

*President*

Jacob Kaplan Ms. Eleanor Gorski, Deputy Commissioner, Department of Planning and Development, Historic Preservation Division

*Vice President*

Mr. John Sadler, Chicago Department of Transportation

Debbie Dodge Ms. Abby Monroe, Coordinating Planner, Department of Planning and Development

*Secretary*

City of Chicago

Andrew Thornton 121 N. LaSalle Street

*Treasurer*

Chicago, Illinois 60602

*Board of Directors* Re: Obama Presidential Center -Jackson Park/Midway Plaisance-Section 106 Hearings and Comments, addressing the Area of Potential Effect-APE, Roadway Improvements and SLFP-South Lakefront Plans.

Cathie Bond

Stuart Berman Dear Ms. Gorski, Mr. Sadler and Ms. Monroe,

Emily Nielsen

Joyce Jackson

Jack Spicer

Andrea Reed

Susannah Ribstein

Charles Vinz

Thank you for the opportunity to both participate and address issues and on the Area of Potential Effect-APE and road changes impacting Frederick Law Olmsted's historic Jackson Park, the Midway Plaisance and nearby Washington Park, all part of Chicago's legacy Olmsted Parks.

As Preservation Chicago is a Consulting Party to the project, and part of the Section 106 Hearings on these National Register Resources, we share many of the concerns and impacts stated in the December 1, 2017 meeting. These public comments were also reflected in prior public meetings, relating to the proposed plans and the impact of the Obama Presidential Center and the proposed merger of the two golf courses into one at Jackson Park and South Shore Cultural Center. We are also in agreement with many of the letters received on this topic from other organizations. Specifically, these include letters from Openlands, Jackson Park Watch, Landmarks Illinois and Friends of the Parks to name several, on the inclusion of additional lands added to the APE-Area of Potential Effect, additions to historic features, concerns about the framework plans and variations between 1999 documents, and the absence of actual plans.

While recent Section 106 Meetings, began in December 2017, have initially focused on the APE, roadway plans for Jackson Park and the Midway Plaisance, and the

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potential negative and adverse impact on these important parklands, we wanted to take this opportunity to express a variety of concerns relating to these proposed plans and concepts. We also would like to address the larger impact of the Obama Presidential Center on historic Jackson Park and the adjacent Midway, in addition to other roadways, which will experience an adverse impact, most notably, South Lake Shore Drive and Cornell Drive.

We are of the opinion that these plans are all interrelated and therefore wanted to express our concerns in a direct letter to help understand some of the reasons we have arrived at various conclusions. It is our hope that this will be the most helpful way of expressing concerns about perspective changes to these legacy parks as proposed, and to encourage a more sensitive approach and therefore better outcomes.

We are very concerned about the potential destruction of cultural treasures, impacting cultural, architectural, historical and natural resources, some of which are listed in the National Register of Historic Places documents. Below are listed a wide range of critical features of the park, which may be severely impacted and may or may not have been sensitively considered, prior to the planning of the Obama Presidential Center-OPC and the adjacent buildings and roadways

1.) Potential negative impact on the Frederick Law Olmsted and Olmsted, Olmsted & Eliot Design: The preliminary proposed plan as presented, appears to radically change both the historic design and impact of both Jackson Park and the Midway Plaisance, in both the renderings and maps, and appears to reflect a certain insensitivity to the work of Olmsted and his firm. If this project were to proceed forward, as reflected in the preliminary plans relating to road reconfigurations, historic roadway closures and the overall concept to remove 20-plus-acres of parkland for the Obama Presidential Center, this would perhaps represent the most disastrous destruction of one of the most seminal landscapes of Frederick Law Olmsted.

Olmsted and his firm are recognized as one of the world's most important Landscape Architects. The designs of the firm are considered "public works of art," of the highest artistic standards and quality, and employing the "restorative power of landscape for ordinary people," in the words of Olmsted. The South Parks System of Jackson Park, the Midway Plaisance and Washington Park, designed by Olmsted, is one of the firm's most important commissions, alongside with Central Park and Riverside Park in New York City. The Olmsted parks of Chicago represent the very best-of-the-best, and are truly world treasures. Any type of major impact and heavy-handed changes, would be considered adverse changes to these delicate park designs and landscapes, and would result in a major loss of these parks as an Olmsted design and together this would be considered tragic. The two combined proposals for the Jackson Park will most likely modify, impact and change almost every portion and corner of this historic park.

2.) Proposed changes to the Midway Plaisance and adjoining gateway into Jackson Park in the OPC plans may result in the potential loss and irreparable damage of the nexus and the important and delicate link, connecting Jackson Park to the Midway, and extending to Washington Park to the west. This is one of the most important features of

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these richly composed and articulated parks, along with the relationships and connections between these various components, which are very much a part of these Olmsted world treasures.

3.) The proposed removal of the May McAdams Perennial Garden, dating from the 1930s, designed by a woman and perhaps the Chicago Park District's first female Landscape architect. This is also the site of the 1893 Women's Building, by Sophia Hayden, one of the first large exposition buildings, designed exclusively to showcase Women's achievements, and the only building at the Chicago World's Fair designed by a woman. This is an amazing legacy and so many issues relevant to the Woman's Movement, and the great achievements of Women, including Suffrage efforts, were linked to this building and site. The building hosted the likes of Susan B. Anthony, Dr. Caroline Winslow and Elizabeth Cady Stanton, in addition to Jane Addams and Bertha Palmer and with works of art and murals by Mary Cassatt. This potential loss of this garden, along with the permanent foundations of the Women's building, located below the soil line, along with other features and memorials, would be a great loss to these many feats and this wonderful story. This is to all be replaced in the OPC plans with a water-retention and drainage pond, as the entire site will be clear-cut and re-graded with excavating equipment in the existing proposed schemes for this site.

4.) The removal of Cornell Drive, which is an original Frederick Law Olmsted feature of the park, noted as "West Drive" in historical plans and documents. This was drastically widened and expanded in the 1960s, with the loss of hundreds of trees and once marked by citizen protests to protect them--all to add additional lanes and to express traffic through the park, which would be considered a misstep today. However, this was a former carriage drive and still retains its historic path, which could be again narrowed to the proportions of a carriage drive and to further calm speeding traffic. It is also thought that removing this drive in the proposed OPC plans would greatly enhance the park and free portions from automobile traffic. However, the experience of driving through a beautiful tree-lined park is also very pleasant for many drivers and the Chicago Parks are really for everyone and much like Lake Shore Drive is a beautiful experience, even if you're in an automobile. Certainly improvements and restoration of the roadway can occur, which would also greatly improve the experience of the park from a vehicle. However, this roadway should remain as a historic and critical Olmsted feature of Jackson Park.

5.) The potential negative impacts on other adjacent and nearby Olmsted roadways and pastoral drives in Jackson Park. This would include a major expansion of South Lake Shore Drive to accommodate the closing of Cornell Drive (formerly West Drive in the Olmsted Plans for Jackson Park) and a reconstruction of that road to new Federal and modern highway standards and regulations, further destroying the character of that amazing roadway, which has "a pastoral boulevard character" as it meets Jackson Park and the Lake Michigan Shoreline. This expansion could negatively impact, modify and destroy a very significant feature of the park, while also potentially further decreasing pedestrian access to Lake Michigan and 57<sup>th</sup> Street Beach, with this widening and additional traffic now diverted to this roadway. This area of the park is one of Olmsted's most significant relationships, between the park and lagoons and the

# Preservation Chicago

Citizens advocating for the preservation of Chicago's historic architecture

Lakefront and should not be further modified. There is also the possibility with these changes, that the 57<sup>th</sup> Street Beach may be physically impacted and reduced in size by proposed modifications and a widening of Lake Shore Drive.

6.) Impact of a large incongruous and awkward parking garage squeezed into the middle of the Midway, at the gateway entry to Jackson Park, with the rearranging of existing streets, and access to the proposed above-ground facility. This is all paired with the visual discourse of an above-ground parking facility, which will upset the integrity of the Midway, which connects both Jackson Park and Washington Parks.

7.) The impact on Promontory Point, with possible changes and modifications to South Lake Shore Drive, and its possible widening to accommodate automobile traffic from the proposed closing of Cornell Drive and other streets and former carriage drives throughout the park.

8.) Removal of sacred greenspaces, small meadows, and gardens, which are also a vital part of the Olmsted legacy of trees, which often help to form these spaces. Olmsted cited that the trees are very important and among his favorite things, and this site has many old growth trees, some predating the park and reflecting the wetlands that existed where the Lakefront met the marshy soils of Chicago. He also advocated for *"the respect of the genius of a place...noting every site has ecologically and spiritually unique qualities"* and *"...to create an unconscious process that produced relaxation"* to the viewer and the experience of the parks. These parks and this park were for everyone, without distraction or *"distracting elements"*, which Olmsted fought continuously, until perfect. The proposed modifications and OPC tower in Jackson Park will certainly be a *"distracting element"*. The idea of an Olmsted park as a place to regenerate oneself in nature, especially in a large industrial city like Chicago, is reflected in his quotation--*"It is one great purpose of the Park to supply to the hundreds of thousands of tired workers, who have no opportunity to spend their summers in the country, a specimen of God's handiwork that shall be to them, inexpensively, what a month or two in the White Mountains or in the Adirondacks is, at great cost, to those in easier circumstances."*

9.) The impact on the historical and very important view-sheds and vistas throughout Jackson Park, and on the Midway with this proposal and larger development of the OPC. This project will impact many perspectives and view-sheds from most every direction, and becoming a predominant feature of the park. Olmsted is said to have redesigned the park to accommodate the Palace of Fine Arts, later known as the Field Museum of Natural History until 1922, and then becoming the (Rosenwald) Museum of Science and Industry to present day, as the primary feature of the park. The Museum building, with its symmetrical plan is also visually centered at the park's north end and framed by 57<sup>th</sup> Street and Cornell Drive, which is proposed to be removed, further unbalancing the original vision, centered within these perimeters by historic carriageways and drives. The proposed tower and OPC would further adversely impact that vision and of course is off-center and off-alignment with Jackson Park, the Midway and would be an asymmetrical feature within a delicately balanced park.

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10.) Possible impact of both the Obama Presidential Center Tower, plaza, outbuildings and garage, on the migratory-fly-zone of birds and other wildlife, which use the parks and specifically the long Midway Plaisance expanse, as it has direct access to Lake Michigan from Washington Park and others areas to the west. The area of the Midway proposed for the garage is also a place for waterfowl, which further encourages wildlife and nature in the parks and the Midway.

11.) A tree-cut or loss of approximately 500 trees for just the 20 plus acres of space for the Obama Presidential Center. An additional 2,500 trees, some old-growth trees are to be lost for a reconfiguration of the proposed golf courses and fairways at Jackson Park and South Shore Cultural Center. This may not even include the cutting of trees and the loss of greenspace to further widen South Lake Shore Drive, if Cornell Drive is to be closed and the potential widening of South Stony Island Avenue and both park loss and potential tree cut for this widening and expansion.

It also seems a bit peculiar for a large city like Chicago, that such a proposal would reduce two separate golf courses, with 27 holes and greens, and make one golf course of 18 holes and greens from two. Instead, we should be restoring the two golf courses – the Jackson Park course said to be the oldest course, west of the Allegany's, and instead increase the number of golf courses to three available facilities, with a professional-grade Tiger Woods course elsewhere. Perhaps this could be located on the old South Works Steel Site, along the Lakefront, which would extend the Lakefront park system along the newest section of Lake Shore Drive, South of 79<sup>th</sup> Street-Rainbow Beach. This would help to both preserve and activate recreation and additional greenspaces to the South and have a series of courses for all levels of golfing, from beginners, to intermediate and to a professional level. Such an idea may also positively impact the South Chicago community.

12.) Potential loss and damage to the Nature Sanctuary at the South Shore Cultural Center, which may greatly impact the habitat of many plant and animal species.

13.) In addition to the points above, the disturbance and possible destruction of archeological material comprised of the World's Columbian Exposition/Chicago World's Fair, including foundations of many exhibition halls, by a who's-who of architects that designed these structures. These include the permanent masonry foundations of the Women's Building and the Children's Building, a first of its kind and designed by architect, Sophia Hayden – a woman architect for a Women's Building and dating from 1892-1893. This was a most important event for both Chicago and American, celebrating the 400<sup>th</sup> anniversary of the discovery of America, by Christopher Columbus. It was an event that was on the world stage and was as important to America, as its European counterparts in London in 1851 and Paris in 1889. This cannot be understated as to its importance, relating to architecture, urban cities, planning, in addition to the technologies that appeared in the many large-scale and voluminous exhibition halls of the Fair.

14.) Addressing the existing neglect and deferred maintenance to crumbling pedestrian paths, numerous park buildings, shelters and features, including the

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Columbia/Clarence Darrow Bridge, the "Golf Shelter" and Comfort Station, near 67<sup>th</sup> and Lake Shore Drive, the Iowa Building and other features, which have long ago deserved the attention of the Chicago Park District and the City of Chicago. These should still be restored and addressed, in addition to the many buildings of the South Shore Cultural Center, some which are in better shape than others, like the stables and connecting gatehouse. This reexamination of the parks, is an opportunity to address these issues with or without the addition of the OPC and the proposed changes to the golf courses.

Therefore we at Preservation Chicago feel the impact on the world-renowned legacy parks, of Jackson Park, the Midway, Washington Park and the Chicago Lakefront, would experience a tremendous adverse impact to these very important National Register sites.

We would therefore recommend at this time that the Obama Presidential Center, which we graciously welcome as another great Chicago institution and museum, consider a relocation to another nearby site, which would have a lesser impact on these amazing legacy parks. Perhaps there are equally close sites in proximity to the existing University of Chicago Campus, with its many resources, libraries and museums. This institution would thereby build upon and contribute to those existing resources.

We have also identified several of these potential sites, owned by the University of Chicago, and extending from the Washington Park Neighborhood at the Green Line, which would be most beneficial to the community, to the University of Chicago Campus. Other sites, fronting, but not on, the Midway Plaisance, at both 60<sup>th</sup> and Cottage Grove Avenue (which is currently a paved parking lot), and to a site just west of and adjacent to The Reva and David Logan Center for the Arts (another paved parking lot), which would also place these buildings, also by the same architect, next to one another and fronting the Midway. This would allow for a cohesive architectural vision by the same architectural firm, while grouping resources close together. These alternate sites also have ample parking facilities nearby, so a new garage structure would not be required. Perhaps such a site, with the aid of the University of Chicago, could also sponsor the return of the "Obama Presidential Library and Archives concept," which would set a very high standard and level of research, which could further this as a destination for both scholars, researchers and tourists alike.

We hope that these suggestions are helpful and that they may positively impact future plans and decisions relating to the sacred qualities and features of these Olmsted Parks – a true work of art, by one of the great masters of Landscape Architecture.

Sincerely,

*Ward Miller*

Ward Miller, Executive Director

Preservation Chicago

**From:** Jack Spicer  
**To:** [Gorski, Eleanor](#)  
**Cc:** [Don Lamb](#); [Monroe, Abby](#)  
**Subject:** Promontory Point / 106 APE  
**Date:** Wednesday, December 27, 2017 12:38:47 PM

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Eleanor —

I'm writing to you on behalf of The Community Task Force for Promontory Point and of the Promontory Point Conservancy.

After reviewing the scope of the 106 Review being conducted for the Obama Presidential Center and Jackson Park, we would request that Promontory Point be removed from the Area of Potential Effects, Historic Architecture/Landscape.

Promontory Point is not even remotely effected by the OPC and is not within the bounds of Jackson Park.

As complicated as the Review has become, we would hope that the removal of Promontory Point would simplify the process for all. The Review is an important and promising process and we would be happy to help in any other way we would be able.

Best,  
— Jack Spicer

**From:** Karen Rechtschaffen  
**To:** [Monroe, Abby](#); [Rachel.Leibowitz@Illinois.gov](mailto:Rachel.Leibowitz@Illinois.gov); [matt.fuller@dot.gov](mailto:matt.fuller@dot.gov)  
**Subject:** 106 review  
**Date:** Friday, December 29, 2017 4:27:43 PM

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Dear Ms. Monroe,

Thank you very much for your recent email requesting additions to the Area of Potential Effect. we would like to confirm that you received Save the Midway's earlier request to add to additions to the list: 1) the entire Midway Plaisance park 2) the entire South Park System of which the Midway is an integral part. At the 1 Dec meeting only the entire city block where the planned multi-story garage sits was on the list. We believe that the entire Midway Plaisance will be affected by a garage at its head; so too will the entire Park System of Jackson, Washington, and Midway Parks be affected by the severing of the Midway at its head. Given that the South Park System is the only intact Olmsted Park System outside of the State of New York, this is a significant negative effect on several individual parks on the National Register of Historic Places as well as an entire historically significant park system.

Best wishes,  
Karen Rechtschaffen  
Michael McNamee  
Co-chairs, Save The Midway

Karen Rechtschaffen



[www.karenrechtschaffen.com](http://www.karenrechtschaffen.com)



(3)

These documents certainly refer to adverse effects of the <sup>current building of the</sup> OPC which has buildings and non-park district purposes for land which is and has long been public land paid for by taxpayers. The removal of public land for <sup>an</sup> unknown diffuse private purpose which the OPC <sup>is</sup> is certainly an adverse effect of building an OPC, in and of itself - <sup>and it is</sup> against Blacks and Latins! <sup>as per the Consent Case then, 1982 and now.</sup>

(4)

Taking away Cornell Drive from southbound traffic does not in reality increase any green space in the area because the land is finite and increasing land by taking away Cornell Drive necessitates taking <sup>or other</sup> green space from another <sup>adjacent</sup> area for <sup>the</sup> traffic going South, and also bringing the traffic closer to habitation for human beings. A Dr. Coccaro at the University of Chicago and others is studying the effects of lack of natural open space on the development of the human brain on the molecular level. This means lack of open space affects human beings from development as a fetus through childhood to adulthood. Certainly an adverse effect of development of the OPC in Jackson Park on land which is now open land (Charlie Rose's series on brain research on TV)

see TV -  
Charlie  
Rose series  
on Brain  
Research

Thus there is good reason to believe that bringing traffic closer to residential areas if taken away from Cornell Drive - will be - is - detrimental to development of children's brains. Traffic effluent is already known to increase the development of asthma in children on the south side of Chicago. Traffic increased in the neighborhoods is an adverse effect

The removal of Cornell Drive will only bring the traffic which is destined further south through Hyde Park, Woodlawn, South Shore and probably Chatham, Morgan Park, etc.

[It is of course an insanity to think that cutting traffic from Cornell Drive will therefore increase tourism for any OPC structure!]

The neighborhoods will be adversely effected - all of them!

(5)

It is also true and well known that the building of any structure, especially on a lakefront or coastal area causes a concrete covering of land so that water cannot go into the land and down to the water table.

The displaced water does not go away but pushes back on the shoreline or coast elsewhere eroding it. This is an adverse effect of the OPC, and any other building on a coast.

But Obama said in a video that he wants to "give back" something to the south side of Chicago and he outlined a "Reddland" - cum-personal conception of unknown, (i.e. the O.P.C.) undeveloped type in Jackson Park. We already

(6)

have a park land for children outlined by and for parental oversight with the Chicago Park District with mothers bringing their large families and neighbors to open land for picnics; mothers and parents sitting on the surrounding higher land to survey the area where their children, pre-teens and teens engage in structured games appropriate to their age level, with uniforms and coaches. His building would take all this away due to the rigidity of a "Reddland" envisioned by Obama and the Obama Foundation for our neighborhood children. A rigidity which would structurally interfere with cross country skiing, unstructured nature study in other seasons, etc.

The concepts of the so called Obama Center are not those of Park District experts in family/childhood activities and needs but are based e.g. on cloning unnatural fantasy one hill for seedling for children which would be outgrown in 3 months or less, for one example; near a highway exposing the children to fumes and dirt of a major bus and green line interchange and the crowding of bigger kids from several local high schools!

So what is the need for an OPC p. 5  
in view of his pushing for a "peddy land"  
instead of allowing us our <sup>current parent</sup> Jackson Park?

Does he envision it as financially supporting  
his personal "idea"? This is adverse to taxpayers

(7)

It is buildings with no discernable concept <sup>for them</sup>  
to the public so far, even so close on the  
current recreation and public park lands, their  
aesthetics and beauty and habitat for wild-  
life and water fowl reserves — Jackson  
Park is under an international flyway  
for migratory birds — his concrete  
structures interfere with the water table  
and displace water in the area — they  
have no <sup>integrated</sup> architectural reference to <sup>the</sup> historic  
style of the Museum of Science and Industry  
or any other neighboring structures &  
cause an adverse <sup>aesthetic</sup> reaction in the  
historic site of the Olmsted beauty  
of the park.

It is disruptive and conceptless and unnecessary:

6.  
Finally, There is no real reason for <sup>an</sup> ~~any~~ Obama Presidential Center there in Jackson Park at all or anywhere else for that matter because the National Archives and Records Administration already has established the Obama Presidential Library in Bolingbrook, IL, on a site which is in conformity with the regulations established by the U.S. Code of Federal Regulations for Presidential Libraries. This library has by law rights to documents of his career, probably academic as well as political, its artifacts and documents. There will be no lending for exhibition of any documents or artifacts from the Obama Presidential Library in Bolingbrook to any other place which does not conform to the same regulations established for a presidential library. Nor is there any reason for such lending for any exhibit because the contents of the Obama Presidential Library in Bolingbrook are being digitized and can be accessed elsewhere through any computer in any location. Therefore the Obama Library Center or Museum cannot be a center or museum on Obama because the United States has <sup>ALL</sup> the rights to his career as well as <sup>his</sup> presidential artifacts & documents and hence there is no need for an OPC in Jackson Park. <sup>There is</sup> it is certainly against the National Environmental Policy Act as it affects Parks and Transportation. <sup>He has no rights or reason to do this!</sup> Neither did the Mayor.