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March 30, 2020

(SENT VIA EMAIL)

Reid Nelson, Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

RE: *FHWA Response to Consulting Party comments on the final Assessment of Effects (AOE) to Jackson Park Historic District and Midway Plaisance*

Dear Mr. Nelson,

Landmarks Illinois, as a consulting party, is writing to express concern about the Federal Highway Administration's (FHWA) March 17, 2020 letter to you regarding its responses to consulting parties' comments on the final Assessment of Effects (AOE) to the Jackson Park Historic District and Midway Plaisance associated with proposed road and park changes to accommodate the Obama Presidential Center (OPC).

While we agree with the adverse effect findings in the final AOE, we are disappointed to see the FHWA state in its March 17, 2020 letter that for the consulting parties who objected, they "...did not provide specific reasons for their disagreement with the FHWA's findings. Therefore, the FHWA is not reconsidering its findings with respect to those objections." In response to this position, we ask what qualifies as a "specific reason," as we believe many reasons and appropriate comments were provided by the consulting parties in their letters, which have not been properly considered and addressed. This raises the question, what qualitative test within the Section 106 regulations made these objections not worth addressing? Only one objection that discussed limited issues regarding the potential adverse effect to the Jackson Park Terrace Historic District (determined eligible for listing in the National Register of Historic Places), was considered worthy by the FHWA of additional evaluation by the ACHP.

Landmarks Illinois requests that the ACHP work with the FHWA to provide more thorough responses to the objections of the consulting parties and reaching appropriate and grounded determinations regarding

adverse effects on the other historic resources identified by the consulting parties, before moving into the next phase of consultation regarding opportunities for avoidance, minimization and mitigation suggestions.

Thank you for your consideration.

Sincerely,

Bonnie McDonald

Bonnie McDonald
President & CEO

Cc: Matt Fuller, FHWA
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