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April 19, 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 Historic Properties Inventory (HPI) and Archaeology Reports and preliminary eligibility determinations

Dear Ms. Monroe,

Landmarks Illinois is writing to provide its comments regarding the Historic Properties Inventory (HPI) and Archaeology Reports and preliminary eligibility determinations in the APE associated with proposed road changes to accommodate the Obama Presidential Center (OPC). As a consulting party, we have several comments and questions in regards to this phase of the Section 106 review process.

While the APE was extended to include the entire Midway, as we had recommended in our January 5, 2018 letter, we are disappointed that it is not extended to 71st St. to the south, and to include a larger area of Woodlawn. It may not be anticipated that these areas will experience direct visual or audible adverse effects, ground disturbances, change in public access, traffic patterns or land use due to the road reconfigurations or the OPC during its operation, however, we contend that there is the risk of real estate speculation that will invariably result in displacement and demolition.

We noted this concern in our January 5, 2018 letter, looking to the recent example of The 606 trail on the northwest side. While The 606 is a valued and accessible amenity, it has caused documented displacement of low-income residents through speculative developments. As we previously stated, there is an opportunity to plan ahead to assure that the OPC does not have the same unintended impact. With measures in place, the OPC can instead strengthen the existing mixed-income community and create opportunities for its existing residents to remain and to invest. Therefore, an expansion of APE boundaries into Woodlawn and south to 71st St. would allow further evaluation of potential historic districts and other mitigation measures that may curb displacement and encourage building rehabilitation over replacement. The Section 106 mitigation process is where these measures can be developed.

In regards to the evaluation of the HPI, archeology reports and preliminary eligibility determinations, our comments are summarized below.

HPI Period of Significance

Landmark Illinois (LI) requests that the period of significance in the HPI, currently recommended to be 1875-1953, be extended to 1968. In our view this is more logical for the following reasons:

- As stated by the National Park Service, generally properties eligible for listing in the National Register are at least 50 years old. Ending the period of significance at 1953 denies the opportunity for any properties built between 1953 and 1968 to be considered for National Register designation, or events of social significance to be acknowledged, despite qualifying for consideration based on the 50-year rule. (See below)
- There is precedent in past successful National Register nominations within the Chicago Park District to extend the period of significance to 50 years prior to the nomination date. This is the case with Washington Park and most of the major parks within the system.

HPI Contributing and Non-contributing Resources within Jackson Park and the Midway Plaisance

We are in agreement with the identified contributing and non-contributing resources with the exception of the following:

- In 1956, the federal government installed a NIKE missile site in Jackson Park's lawn tennis area. Because the running track and some ball fields were considered too close to the site, the north and south bayous were filled and a large ball field meadow was created. While it is noted that this action impacted the historic integrity of the park, the social history for this action – preparation for a nuclear attack – should not be ignored. This historic change in Jackson Park, dictated at the time by a policy mandate of the federal government, in fact lends itself to additionally qualify Jackson Park for listing in the National Register under Criterion A (sites associated with events that have made a significant contribution to the broad patterns of our history), not just Criterion C.
- Jackson Park Field House – built in 1957, this mid-century building was designed by Ralph Burke, who died before its completion. He was a municipal engineer who spent most of his career doing major infrastructure projects for the city of Chicago, including the master planning for O'Hare International Airport. <http://www.library.northwestern.edu/libraries-collections/transportation/collection/o-hare-at-50/research-materials/ralph-h-burke.html>

Archeological Reports

We concur with the findings in the archeological reports. However, during site preparation for construction, which will occur in the areas of the former Transportation and Women's Buildings from the World's Columbian Exposition, we would request that a designated archeologist be on call in the event there is need

for further evaluation of any potential Fair-related building materials unearthed during excavation.

Preliminary Eligibility Determinations

We are in agreement with the proposed Hyde Park East Historic District, a South Shore E. 67th Street Apartments Historic District and the individual properties identified in APE Sub-Area II-A and APE Sub-Area II-B as eligible for listing in the National Register of Historic Places. We propose the following additions:

- The proposed South Shore E. 67th Street Apartments Historic District should extend farther south to 71st St., as the same character of apartment buildings are continuous.
- Many Greystones, large apartment complexes and some single-family houses dating to the late-nineteenth and early-twentieth centuries were categorized as “not eligible” in APE Sub-area II-B. With the exception of Chapin Hall, it appears that all properties coded green or yellow in the Chicago Historic Resources Survey (CHRS) in this area were determined not eligible for listing in the National Register of Historic Places. The rationale for this determination is not clear. It generally is acknowledged that the CHRS survey, completed in the Woodlawn community in the 1980s, often missed or included only selective examples of a style and many buildings that could have been coded orange were not. Many of these properties categorized as “not eligible” in the 6100-6230 S. Dorchester, 6021-6239 S. Kimbark, 6122-6223 S. Kenwood and 6101-6233 S. Woodlawn blocks, as well as the church at 1200 E. 62nd St., should be reevaluated.

Jackson Park Landscape Integrity Analysis

Western Perimeter - Character Defining Features Analysis

While we agree there has been more compromise in the western part of Jackson Park than other areas, there are remnant berms, roadways and plantings that should be recognized and distinguished. Particularly important are the WPA-era Perennial Garden and the Midway Plaisance twin roadways that buffer the Midway’s connection into Jackson Park. While Cornell Drive was widened over the years, there always has been a circuit drive around the park and some aspect of this historic path should be recognized. Alignment of the Midway roads, Cornell Drive as a circuit road and the Perennial Garden are important historic features in the area of the proposed projects. We are aware that other organizations such as OpenLands have made additional comments regarding topography and physical land features (both landscape and circulation patterns) and we defer to their expertise from an open space perspective.

Key features identified in Jackson Park’s 1895 design through later important phases, such as the 1930s/WPA-era, should be integrated into the OPC site, landscape design and road reconfiguration planning. The Chicago Park District and its consultants with the Army Corps of Engineers insured that that 2013-initiated

4/19/2018

Great Lakes Fisheries and Ecosystem Restoration (GLFER) project met the Secretary of Interior Guidelines for Cultural Landscape Rehabilitation and balanced ecological needs with historic preservation goals. We seek the same care toward the setting and landscape design of the OPC, the road planning, the Jackson Park Golf Course and, as recently announced, the framework plan for the South Lakefront. The GLFER project is still underway and to be completed by the fall of 2019 according to the Corps of Engineers.

We look forward to participating in the ongoing Section 106 process and making further comments regarding identified adverse effects and proposing mitigation suggestions based on future presentations.

Sincerely,



Bonnie McDonald
President

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