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April 19<sup>th</sup>, 2018

**Ms. Abby Monroe**  
**Coordinating Planner**  
**City of Chicago, Department of Planning and Development**  
**121 N. LaSalle, Room 1000**  
**Chicago, IL 60602**

Dear Ms. Monroe:

The National Association for Olmsted Parks (NAOP) is the only national organization solely dedicated to preserving the Olmsted legacy by providing the advocacy, research, and education needed to protect, restore, and maintain these exemplary parks and landscapes. NAOP continues to be concerned by the institutional expansion of the Obama Presidential Center (OPC), both physically and visually, and the perception that historic Jackson Park is a disused and dilapidated park that will benefit only from the insertion of the OPC. While NAOP is committed to working proactively toward an appropriate and thoughtful design solution, NAOP remains concerned that the legacy of the Jackson Park and the Midway is still not being fully considered during the Section 106 review process.

Since the first public meeting to discuss the Section 106 process in December 2017, NAOP has been following the process. NAOP appreciates the inclusion of the Midway as a component of the Area of Potential Effect (APE) not only as a valuable tool for evaluating the effects of the OPC, but also as a tangible recognition of the inherent connectivity of Washington and Jackson Parks, via the Midway, by the original Olmsted design. This action formally recognizes the larger infrastructural and design characteristics of the Chicago South Park System that remain today as evidenced by an interconnected system of walks, paths, drives and view relationships. This action reaffirms our commitment for a full consideration of the historic circulation and view relationships that define Jackson Park and the Chicago South Park System.

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 offers the following commentary for the public record.

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## I. Comprehensive planning rather than fragmentary

- *We remain 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 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 by the 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. 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 addition, Lake Shore Drive needs to be evaluated as an independent historic resource. NAOP recommends a new section within Section 2.1.1 of the "Historic Properties Report" to discuss the Circulation System both within Jackson Park and its connection to the Midway and Washington Park and the larger circulation system within Chicago.

- 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>1</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 roll of the drives as a desirable park feature.

### **III. 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.

- No architectural terminus (such as a library tower) should punctuate the Midway suggesting any axial relationship between Jackson Park and The Midway. The Midway was designed as a visually fluid and physically seamless intersection between the two park units.

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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. 221.)

The National Association for Olmsted Parks appreciates the opportunity to submit the above comments and concerns as a designated consulting party to the National Historic Preservation Act, Section 106, and the National Environmental Policy Act reviews underway for Jackson Park and the resources identified in the APE.

Sincerely,



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



ASLA Lucy Lawliss, FASLA

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