



NATIONAL
ASSOCIATION *for*
OLMSTED
PARKS

August 22, 2022

Comments of the National Association for Olmsted Parks

<https://www.chicagoparkdistrict.com/Midway-East-End-Improvements-45Day-Comment-Form>

Re: Proposed Midway Plaisance East End Improvements

Summary

The National Association for Olmsted Parks objects to the July 2022 Draft Plan for “Midway Plaisance East-End Improvements.”

The so-called “Improvements” to the Midway Plaisance, which is listed on the National Historic Register, decimate the design of Frederick Law Olmsted, do immense ecological harm by eliminating a wetland, and ignore, at considerable cost, the needs of underserved neighborhoods in Chicago. We align ourselves with the comments of the Midway Plaisance Park Advisory Council, submitted on August 17, 2022, and request that the Memorandum of Agreement outlining these plans (December 2020) be amended to protect the public interest. ⁱ

Discussion

I. The So-called Improvements Should be Rejected

In 1870, city officials called on Frederick Law Olmsted and Calvert Vaux— the most famous landscape architects of the day -- to help develop a great metropolitan park that would rival Central Park in its importance to the city. The answer: South Park.

The inland park, later called Washington Park, would include a refectory, courts, garden and galleries with a carriage concourse and deer paddock. The Lake Park, now known as Jackson Park, would have a mile of lakefront; Olmsted and Vaux proposed transforming the swampy land into a system of lagoons and waterways with boat landings and shelters. The two parks were

to be connected by a narrow strip of land, now known as the Midway Plaisance, which would serve as both a boulevard and canal.

Sited on the edge of Lake Michigan, the Park – realized in different phases over a period of 20 years -- transformed a fetid wetland into a magical space that invited wildlife, birds and people into its picturesque, pastoral and restorative setting, with wide open vistas to the Lake.

Jackson Park and the Midway Plaisance also focused on ecological concerns raised by the marshy wetlands. Olmsted had a persistent concern about frequent flooding and varying fluctuations in the level of the Lake. According to the Papers, Olmsted “was so concerned about how changing water levels ... would affect plantings in the redesign of South Park that he had assistants compile a list of annual water levels on Lake Michigan from 1859 through 1892,” finding that the water levels varied as much as three feet. FLO Papers, Vol 9, p. 781, footnotes 4 and 5.

Olmsted’s design of the Park, therefore, used thick plantings – with native dune grasses, sages and sedges -- to protect park edges when flooded during storms. By helping soak up water from the sky and the lake, the park operated like a green sponge helping to address the inevitable challenges of storms and water runoff, now only worsened by climate change. See *New York Times*, “A Battle Between a Great City and a Great Lake,” p. 1 et alia (July 7, 2021).

Now 100 years later, the importance of this historic landscape and natural wetland has not diminished. This is especially true in light of the rapidly disappearing wetlands in the Chicago area, as outlined by recent [research](#). Wetlands are not luxuries. They remove pollutants, help manage groundwater, cycle nutrients and support biodiversity.

Notwithstanding, the Chicago Park District is proposing to replace the wetland at the east end of the Midway Plaisance with a “destination” playground which will include a vast amount of heavy play equipment and new paving –out of keeping with the original, green and restorative park design.

We agree with the concerns raised by the Midway Plaisance Advisory Council (MPAC), an elected body dedicated to supporting the Midway Plaisance. As outlined in the MPAC comments submitted on August 17, 2022:

The construction of a playground area on the eastern end of the Midway, at the expense of destroying a wetland, is an unnecessary, inappropriate, unduly expensive, and environmentally destructive choice.

First, and most importantly, the Park District should be acting as a steward of natural resources. As a steward, the Park District should be developing a plan for the eastern end of the Midway that embraces nature, rather than destroys it. ... Protecting the wetland allows city water management to work with natural water management, mitigating flooding and its after-effects, eliminating the need for a \$2.7 million drainage plan.

If allowed to function as a wetlands, this area of the Midway could absorb seasonal excess water and provide habitat for birds and native pollinators. This was surely Frederick Law Olmsted's vision over 100 years ago and should remain the vision today.

As the MPAC outlines, "Midway wetland restoration – achievable at a relatively modest price – would ... create an opportunity for timely environmental education, while offering a carbon sequestration function that the current mowed lawn aesthetic at public parks does not provide." MPAC comments, page 3.

II. Plans for the Playground Ignore Equity Concerns

Olmsted explored the themes of urbanization, civic infrastructure, and social justice as a foundation for the enrichment and empowerment of American society. He believed, fundamentally, in the capacity of nature to improve health and bring people together. And, in developing parks in Chicago and other communities, he was dedicated to the notion of equitable access – parks for all people.

The Urban Park and Recreation Recovery Act (UPARR) was created in this spirit. By regulation, UPARR funding is to be used for areas "lacking in recreational programs available in other areas of the city." The selection of the eastern end of the Midway Plaisance for a playground fails to address these express social justice concerns. The designation of existing parkland in Jackson Park to "make up" for parkland lost to the Obama Presidential Center will result in no net park gains. Meanwhile, there are a number of sites, scattered throughout the South Side, where new parks and playgrounds could be built.

We, therefore, agree with the comments of MPAC, page 4:

An alternative vision for UPARR would be to keep the \$260,000 of funding in underserved communities, which could use the investment in parks and playgrounds There is no reason why Hyde Park should be muscling out communities with fewer resources. The general public should have an opportunity to be heard concerning this alternative vision – and the City of Chicago and the Chicago Park District have refused to allow it.

Far from advancing equity and social justice, the proposed “improvements” amount to little more than grand expensive plans with no attention to actual costs, not to mention REAL environmental and community needs. For these reasons, we request that the Federal Highway Administration consult with all signatories to reconsider and amend the terms of the MOA to preserve Olmsted’s design, preserve the existing Midway wetland and apply UPARR funds, as expressly intended, for new parks in truly underserved communities.

ⁱ The National Association for Olmsted Parks (NAOP) is the only national organization solely dedicated to protecting and preserving the work and living legacy of Frederick Law Olmsted. NAOP is also the managing partner of the Olmsted Bicentennial, Olmsted 200, www.olmsted200.org. NAOP refused to sign on to the Section 106 Memorandum of Agreement allowing construction of the Obama Presidential Center in Jackson Park. (*Memorandum of Agreement Among Federal Highway Administration, Illinois State Historic Preservation Officer, and Advisory Council on Historic Preservation Regarding Projects in Jackson Park in Chicago, Cook County, Illinois, Dec. 2020*). Then and now, we believe that parties have failed adequately to consider avoidance and minimization to address the irreparable adverse impacts to the historic Jackson Park and Midway Plaisance.

Submitted by the National Association for Olmsted Parks
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