



Illinois Department of Natural Resources

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JB Pritzker, Governor
Colleen Callahan, Director

May 26, 2020

Todd Wyatt, AICP
City of Chicago
Department of Planning and Development

cc: Matt Fuller, FHWA

Mr. Wyatt:

Thank you for your efforts and our opportunity to comment on the Section 106 Federal review of the Jackson Park/Obama Presidential Center undertaking. As we believe our role is to protect cultural resources as part of the public planning process, we would like to explore several preservation-based options for mitigation, focusing on the adversely affected historic resources:

1) Recordation

The historic resources within Jackson Park and the Midway Plaisance must be recorded to HALS (Historic American Landscape Survey) standards and deposited, through the Heritage Documentation Programs of the National Park Service, into the Library of Congress. 54 U.S. Code § 306103 stipulates the recordation of a historic property prior to alteration or demolition: "The Federal agency shall initiate measures to ensure that where, as a result of Federal action or assistance carried out by the agency, a historic property is to be substantially altered or demolished, in a timely manner, and that the records are deposited, in accordance with section 302107 of this title, in the Library of Congress or with such other appropriate agency as the Secretary may designate, for future use and reference..."

2) Exploration of Archaeological Opportunities

We would like to discuss the possibility of mitigative archaeological excavations in certain targeted areas of this project that will experience ground disturbance.

3) Restoration

- We would like further consultation, perhaps with the Chicago Park District, to understand the current condition of certain historic elements within the project

that will be adversely affected and whether they would benefit from restoration work beyond that called for by the current undertaking. If an element's condition is such that it would benefit from specific restoration, that work should be considered as potential mitigation to the adverse effects created by this undertaking. The elements are:

- Cheney-Goode Memorial (sculpture)
- Statue of the Republic (sculpture)
- English Comfort Station
- Restoration or reconstruction of the Women's Garden, depending on how the proposed-mitigation discussion evolves.

4) Additional Design Review

- Shift the proposed Obama Presidential Center campus south to allow the historic roadway connection between the Midway and Jackson Park to remain in place and to avoid the demolition the historic Women's Garden.
- The work (UPARR conversion) to the east end of Midway Plaisance must meet the Standards for Rehabilitation, as determined by the IL SHPO.
- The pedestrian path that will replace Cornell Drive should have its placement, cross section, surface, edges and plantings reconstructed to their Olmsted appearance.

We appreciate your input on our comments and look forward to continuing to consult on potential mitigation in advance of the MOA drafting process.

Sincerely,

CJ Wallace, Head of Regulatory & Compliance

Anthony Rubano, Project Designer & Deputy State Historic Preservation Officer

Bob Appleman, Deputy State Historic Preservation Officer & Director, Office of Realty & Capital Planning

Illinois State Historic Preservation Office