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ASSOCIATION *for*
OLMSTED
PARKS

"...advances Olmsted's principles and legacy of irreplaceable parks and landscapes that revitalize communities and enrich people's lives."

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January 4, 2018

Abby Monroe
Coordinating Planner
City of Chicago
Department of Planning and Development

Dear Ms. Monroe:

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 (NAOP) offers the following commentary for the public record.

I Comprehensive planning rather than fragmentary

- We are 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

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South Park as originally conceived by Olmsted & Vaux, and as augmented by the subsequent work on these parks done by Olmsted, Olmsted & Eliot and subsequent Olmsted firms.

Olmsted & Vaux wrote, "The two outer divisions of the South Park being connected more directly, however, and by a division [The Midway] considerably wider than any connecting any other two park divisions of the whole series, it is possible to associate them much more intimately in design than any other two, so that each may in many particulars complement the other and the whole be classed together as one park."¹

- In addition to noting the three park units be "classed together as one park," Olmsted and Vaux paid particular attention to the intersection of The Midway with Jackson Park. "An open area, designated Midway Place...terminates the Midway Plaisance on the east."² It was from this junction that a "view over the head of the Lagoon" to Lake Michigan was afforded.

III 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

¹ Report. To the Chicago South Park Commission, March, 1871, Olmsted Vaux & Co. -Papers of FLO, Supplementary Series, Vol 1, p. 209.)

² Report. To the Chicago South Park Commission, March, 1871, Olmsted Vaux & Co. -Papers of FLO, Supplementary Series, Vol 1, p. 225.)

addition, Lake Shore Drive needs to be evaluated as an independent historic resource.

- 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.”³ 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 role of the drives as a desirable park feature.

IV 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.

V Consideration of Relevant Extant Studies in the Review Process

³ Report. To the Chicago South Park Commission, March, 1871, Olmsted Vaux & Co. –Papers of FLO, Supplementary Series, Vol 1, p. 221.)

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 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 Expansion of Area of Potential Effects (APE)

- Therefore, NAOP recommends that the APE be expanded to include all of the Midway Plaisance and Washington Park to reflect the principles encompassing the entire

- Significant documents, several publicly funded, relating to earlier planning and evaluation studies of Jackson Park, its component elements, its environmental concerns and its community contexts have recently been revealed, thanks to the diligent research of The Cultural Landscape Foundation. Many of these documents, not previously supplied to the designated consulting parties, are of critical relevance in our consideration of the issues in this review. We salute our colleagues and request that this review be augmented by these considerations for a fully transparent process.

Thank you for the opportunity to provide these comments on behalf of the National Association for Olmsted Parks.

Sincerely,

A handwritten signature in black ink that reads "Arleyn A. Levee". The signature is written in a cursive, flowing style.

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

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