



January 3, 2018

Ms. Abby Monroe
Coordinating Planner
City of Chicago,
Department of Planning and Development

Dear Ms. Monroe,

As a designated consulting party to the National Historic Preservation Act, Section 106 compliance review and the National Environmental Policy Act (NEPA) review underway for Jackson Park, The Cultural Landscape Foundation (TCLF) is pleased to add the following remarks, supporting images, and attachments to the public record. As the Section 106 review is now in the initial phase of identifying historic features that could be adversely affected by the Obama Presidential Center (OPC) and related road closures, we first ask that the Area of Potential Effects (APE) be expanded to include the following:

- The South Park System (to include the entirety of the Midway Plaisance and Washington Park)

It is also evident that other issues should be raised at this early stage because they are not only fundamental to the identification of historic features but to the *review process itself*. While TCLF will comment in greater detail throughout the Section 106 review, we regard the following as essential topics to be brought to your attention immediately:

- The manifest inadequacy of the 1972 National Register of Historic Places nomination for Jackson Park and the Midway Plaisance; and the implications of the *de facto* [nomination update](#) produced in 1995 by the Chicago Park District (CPD);
- The historical precedence and design intent of the 1895 plan for Jackson Park by Olmsted, Olmsted & Eliot;
- The need to apply the *Secretary of the Interior's Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes* in the current review process;
- The overt incompatibility of the OPC and related road closures with overarching CPD plans and initiatives, as contrary to the framing language of the current review process.

Expanding the APE to Include the Entire South Park System

As currently conceived in the Section 106 review, the APE includes the following areas: a portion of the Midway Plaisance near its eastern terminus; an area between the western perimeter of Jackson Park and the Metra Viaduct; several blocks in the Hyde Park and Woodlawn neighborhoods west of the viaduct; and the whole of Jackson Park. What the current APE thus fails to recognize is the essential unity of the three tracts of land today known as Washington Park, the Midway Plaisance, and Jackson Park. The three tracts were conceived and designed as a single park: the report to the South Park Commission by Olmsted, Vaux & Co., submitted in March 1871, refers, in fact, to the whole of the bounded area as “The Chicago South Park,” which it then describes as comprising an “Upper Division,” a “Midway Division,” and a “Lower or Lagoon Division.”¹ As such, Chicago’s South Park System is today the only intact park system designed by Olmsted and Vaux outside the State of New York. The two men regarded as a major advantage of their plan that it “locks the three divisions of the Park into one

obvious system, so that their really disjointed character will be much less impressed on the minds of observers passing through them...” To do so, the plan relied heavily on water to lace the three tracts together.² The need to fully recognize the unity of the South Parks is now brought into greater relief by the current proposal to impose a parking garage at the eastern terminus and hinge point of the Midway Plaisance, effectively placing a further barrier to the connection that Olmsted and Vaux first envisioned while simultaneously reducing the likelihood that any future initiative could restore that connection. Moreover, the OPC tower, as currently conceived, would adversely affect viewsheds from the full expanse of the Midway Plaisance, not just from the portion of it now included in the APE.

The Inadequacy of the 1972 National Register Nomination; and the *De Facto* 1995 Update

The Inadequacy of the 1972 National Register Nomination

The City of Chicago website that hosts information on the Section 106 review refers and links to the listing of the Jackson Park Historic Landscape District and Midway Plaisance in the National Register of Historic Places, added on December 15, 1972. Notably, that nearly 40-year-old nomination attempts to document the history and significance of both Jackson Park and the Midway Plaisance in one typewritten page—an extremely meager record by even the laxest of standards. The 1972 nomination is clearly an artifact of a bygone era that had yet to develop a full appreciation for the preservation of historic designed landscapes (the NPS did not offer relevant guidance in the form of a National Register Bulletin until 1989). As much is evident in the nomination’s “Statement of Significance,” which mentions four architectural firms before coming to Frederick Law Olmsted, Sr., the celebrated presence behind the design of the historic landscape district itself. We can be sure that the CPD agrees that the 1972 nomination is today woefully inadequate for use in a documentary capacity, because when the CPD commissioned the U.S. Army Corps of Engineers (USACE) to conduct a Section 506 Great Lakes Fishery & Ecosystem Restoration Study for Jackson Park in 2013 (resulting in the GLFER Project; see below), it provided a 21-page historical assessment of the park, complete with bibliographic citations, as an addendum to the study.³ Prepared by the CPD’s own Department of Research and Planning in September 1995 (hereafter the ‘1995 assessment’; attached), that historical assessment constitutes a *de facto* update to the 1972 nomination, and it should therefore be recognized in the current review as an important statement of significance for the park and its history.

The Implications of the 1995 Update: A Threefold Landscape Legacy

As the [1995 assessment](#) outlines in detail, Jackson Park is today the product of not one, but three historic Olmsted designs—a fact that makes the already significant work by the “Father of American Landscape Architecture” a unique national asset. Frederick Law Olmsted, Sr., and Calvert Vaux submitted the first design to the South Park Commission in 1871. The devastation of the Great Chicago Fire delayed any improvement to the parkland until the late 1870s, when the northernmost section of what was then called Lake Park was improved by grading, seeded lawns, new trees, and the creation of two artificial lakes (one of which survives in the form of what would become the Columbia Basin). When Jackson Park was selected as the setting for the World’s Columbian Exposition of 1893, it was once more Olmsted, working with his associate Henry Codman and architects Daniel Burnham and John Welborn Root, who designed the setting of the vaunted White City, a showcase of Beaux-Arts classicism whose formality was artfully juxtaposed with the rugged shorelines of naturalistic lagoons and islands. After the closing of the international exposition, a series of fires ravaged the site, beginning in January 1894, leaving a landscape strewn with charred remains (fig. 1). The Chicago Wrecking and Salvage Company was hired to demolish what was left of the crippled structures, with only five exhibition buildings left

standing in the end. In 1895, Olmsted, Olmsted & Eliot presented a sweeping redesign of Jackson Park that retained “many of the features characteristic of the landscape design of the World’s Fair” while providing “all of the recreative facilities which the modern park should include for refined and enlightened recreation and exercise” (fig. 2).⁴



Fig. 1: Photograph of Jackson Park taken after a series of fires at the site in 1894

The Historical Precedence and Design Intent of the 1895 Plan

The 1895 redesign of Jackson Park by Olmsted, Olmsted & Eliot occupies a special place in the history of landscape architecture **as perhaps the nation’s earliest large-scale brownfield-remediation project**. This innovative aspect of the 1895 plan has been recognized in very recent scholarship. As part of the GLFER Project (see below), the CPD, along with a public-private partnership known as Project 120 Chicago and the Illinois Historic Preservation Agency, tasked the firm Heritage Landscapes, LLC, to develop a plan for Jackson Park that would integrate efforts to restore the park’s ecology and preserve its Olmsted-era design. In the fall of 2015, Patricia O’Donnell and Gregory De Vries, both of Heritage Landscapes, LLC, published a scholarly article in the peer-reviewed journal *Change Over Time* outlining the framework and implementation of that plan.⁵ As the article makes clear, the 1895 redesign of Jackson Park was an ingenious response—much ahead of its time—to what was in essence an immense brownfield site:

*Faced with a massive demolition site, the Olmsted firm innovated to address the brownfield conditions. For example, the firm created soils plans specifying considerable depth of good topsoil in specific areas of trees and shrub planting. As modern-day professionals on the forefront of best practices, we found it astounding to discover that one-hundred-twenty-year-old soils plans, which note two-foot-deep planting areas, guided rebuilding in this brownfield demolition site.*⁶

Although features in Jackson Park have since been modified, the most important aspects of the 1895 plan have endured. Its primary compositional elements—the lake, the fields, and the lagoons—knitted together by a circulation system that affords extended views over relatively level terrain, continue to communicate Olmsted’s vision for how the park is experienced visually and spatially. That assessment was shared by the 2013 GLFER study, which recognized that “for the most part, Jackson Park today looks similar to Olmsted’s 1895 plan in terms of the placement of lagoons, open fields, and areas heavily

planted with trees and shrubs.” And while Olmsted’s plan was updated in 1905, two years after his death, the new iteration “was based on Olmsted’s previous plans and vision for the park.”⁷

In addition to the aspects of Olmsted’s design that the park itself evinces, we are fortunate to have the landscape architect’s own thoughts about the 1895 plan. In a letter to South Park Board president Joseph Donnersberger dated May 7, 1894, Olmsted outlined his approach to the redesign:

*In this design **every part of all the park must be planned subordinately to and dependently upon every other part...**In this **interdependence of parts** lies the difference between landscape gardening and gardening. It is as designers, not of scenes but of scenery, that you employ us, and we are not to be expected to serve you otherwise than as designers of scenery (emphasis added).*⁸

Another salient aspect of the 1895 plan that can readily be seen today is the prevailing geometry of the landscape surrounding the campus of the Museum of Science and Industry (then called the Field Columbian Museum) in the park’s northern sector. Notably, the landscape treatment in that part of the park alone was designed to highlight built architecture. Here, Olmsted was unmistakably explicit, stating that the Field Columbian Museum was meant to be the only “dominating object of interest” in the park:

*All other buildings and structures to be within the park boundaries are to be placed and planned exclusively with a view to advancing the ruling purpose of the park. They are to be **auxiliary to and subordinate to the scenery of the park** (emphasis added).*

—Olmsted to Donnersberger, May 7, 1894

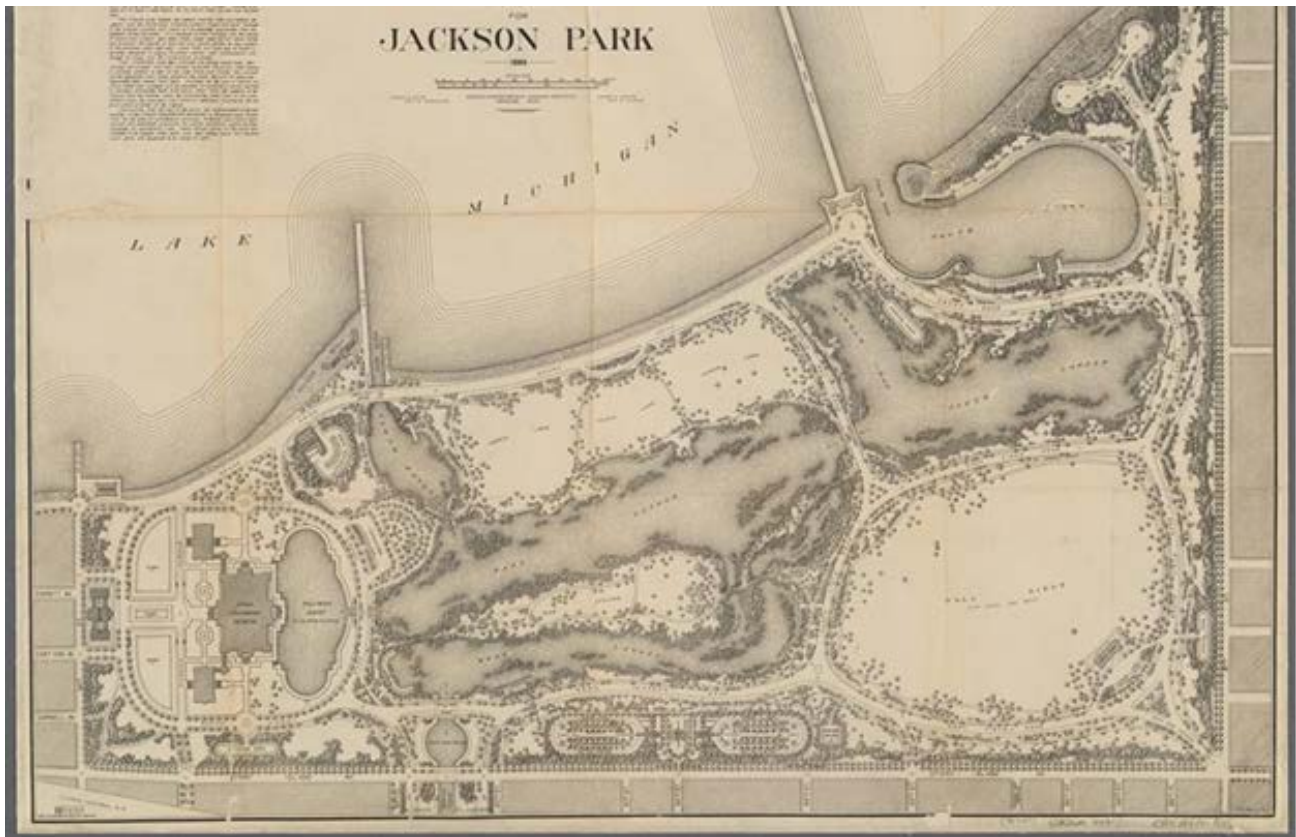


Fig. 2: The Revised General Plan for Jackson Park, 1895

In addition to the masterful use of the lakeshore, open fields, and interior waterways, Olmsted designed two large, open-air gymnasia along the park’s western perimeter just south of its junction with the Midway Plaisance. The two oval gymnasia, one for men and the other for women, were separated by a children’s playground (fig. 2), and both were encircled by running tracks that were also used by bicyclists. With the initial groundwork completed at the beginning of 1896,⁹ the outdoor gymnasia in Jackson Park were a reform-era response to the condition of the city’s working-class neighborhoods and were relatively new in the United States.¹⁰ Olmsted specifically touted these elements of the overall design, reporting that “similar gymnasia proved very successful in Europe and in Boston.”¹¹ The outline of the north gymnasium is still expressed in the footprint of the oval football field along the park’s western perimeter (fig. 3), which serves in a recreational capacity while echoing the form of the Olmsted-designed gymnasium.



Fig. 3: North gymnasium, 1895 Revised General Plan for Jackson Park (l.); present football field in Jackson park (r.)

Applying the Secretary of the Interior’s Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes

The National Park Service’s *Secretary of the Interior’s Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes* has a direct bearing on the Section 106 review currently underway. These [Guidelines](#) outline the proper treatment of cultural resources that are listed in or are eligible for listing in the National Register of Historic Places. Landscapes, unlike buildings, are dynamic systems. Assessing the potential impacts of alterations to landscapes thus requires a holistic approach, as is reflected in the *Guidelines*, which are organized in two primary areas: [1] Organizational Elements of the Landscape and [2] Character-Defining Features of the Landscape. As the author of the *Guidelines*, I can confirm that the road closures and the construction of the OPC would have obvious adverse effects in both primary areas. While TCLF will comment more fully on adverse effects during the appropriate stage of the Section 106 review (when, perhaps, the exact proposed locations and footprints of the OPC and its dependent structures will be known to the public), several preliminary points can be made at this time.

Jackson Park’s natural features include the flat topography of its fields and open spaces, its interior waterways, and the backdrop of Lake Michigan—all elements that contribute to the harmony of the overarching design. The flatness of the ground plane is indeed a character-defining feature of the park, as it was the chief characteristic that Olmsted’s design was meant to overcome by linking a system of lagoons to Lake Michigan.¹² The imposition of a massive high-rise tower, hundreds of feet tall, would

introduce a dominant vertical axis that would reorient the visual and spatial experience of the landscape to focus on a single architectural element, one whose stark facades, reminiscent of a Brutalist idiom, would strongly contrast with its natural setting. This is directly contrary to the overall concept of the park, which was designed, as Olmsted stated, such that its scenery constituted the dominant interest. The tower would also cast a reflection in the water of the nearby lagoons, which were meant to evoke a natural setting by reflecting only the vegetation that surrounds them. As scholar Daniel Bluestone has noted about Jackson Park, “lagoons and lakes that would reflect the foliage provided intricacy and picturesque variety—elements often tamed in other Olmsted designs.”¹³ Moreover, the waterways were meant to “provide a sense of indirection, subtlety, and leisure; they fostered a sense of time and motion that contrasted dramatically with the experience of the city’s street grid.”¹⁴ The monolithic OPC tower would also, of course, loom large over the Wooded Island, destroying its quality as a place of refuge and its “secluded, natural sylvan” character, as Olmsted described it.¹⁵

Yet another adverse effect of such a tower and its related dependencies stems from their inevitable propensity to cast shadows onto the public parkland that surrounds them. The detrimental effects of shadow on public parkland are increasingly [well documented](#)¹⁶ and are the frequent subject of litigation. Notably, the “[Development Manual for Chicago Plan Commission Projects](#) (2012)” outlines the responsibility of any applicant proposing a planned development to conduct a “Sunlight Access and Shadow Impact Study.” The manual further mandates (p. 13):

*Applicants should ensure that the proposed Planned Development does not impose significant shadows **on publicly accessible parks, plazas, playgrounds, benches, or inland waterways**. Accordingly, the Applicant may be requested to provide a shadow impact study which would contain the following elements: Existing shadows and new shadows created by the development; Shadow impacts for build and non-build conditions for the hours: 9 a.m., 12 p.m. and 3 p.m., conducted for four periods of the year at the vernal equinox, autumnal equinox, winter solstice and summer solstice; and a description of how the building design **ensures solar access on public spaces** (emphasis added).*

How, exactly, the OPC, with its monolithic, stone-clad tower, will avoid imposing significant shadows on publicly accessible parkland is difficult to imagine. And given that the OPC project falls within the Lake Michigan and Chicago Lakefront District and is therefore governed by the [Lakefront Protection District Ordinance](#) (Sec.16-4-030),¹⁷ whose purpose is to “insure that the lakefront parks and the lake itself are devoted **only to public purposes** and to insure the integrity of and expand the **quantity and quality of the lakefront parks**” (emphasis added), one would expect that the OPC will be subject to particularly stringent scrutiny.

Furthermore, Jackson Park’s western perimeter was designed to be visually permeable, lined with trees that define the landscape’s edge while allowing lightly veiled views into it. The OPC tower and associated buildings would obstruct views into the park and beyond to Lake Michigan from both the Hyde Park and Woodlawn neighborhoods, altering the skyline in the process. As currently conceived, the OPC complex would also entirely supplant the football field whose footprint echoes the original outdoor gymnasium, an historic feature of the 1895-designed landscape.

Finally, the proposed road closures related to the construction of the OPC would alter the park’s circulation network, an important aspect of Olmsted’s design that was intended to lead visitors on a choreographed journey through “passages” of landscape scenery (fig. 4). Neither the location nor the

disposition of the roads were accidental, their curvilinear form intended to contrast with the right-angled streets of the urban grid. In a preliminary report on the nearby designed community of Riverside, Olmsted wrote, in 1868, “as the ordinary directness of line in town-streets, with its resultant regularity of plan, would suggest eagerness to press forward, without looking to the right hand or the left, we should recommend the general adoption, in the design of your roads, of gracefully-curved lines, generous spaces, and the absence of sharp corners, the idea being to suggest and imply leisure, contemplativeness and happy tranquility.”¹⁸ As with Olmsted and Vaux’s Riverside, the curvilinear flow of the roads in Jackson Park was conceived as a key element in organizing access to the planned scenic narrative.



Fig.4: Horse-drawn carriages and motorcars share the curvilinear roads of Jackson Park, early 1900s

Incompatibility of the OPC and Road Closures with Overarching CPD Plans and Initiatives

The South Lakefront Framework Plan (1999)

Given the framing language of the Section 106 review, another fundamental question is the extent to which the OPC and the related road closures align with the CPD’s long-term initiatives and plans for Jackson Park, which have been developed with considerable federal, state, and local funding and resources in consultation with the public and numerous groups. The [City of Chicago website](#) that hosts information on the Section 106 review purports to speak to that question, stating the following: “The Chicago Park District’s South Lakefront Framework Plan (1999) outlined many of the proposed improvements now under consideration.” Yet even a cursory review of the [1999 South Lakefront Framework Plan](#) reveals that the proposals now under consideration are plainly at odds with that plan on several of its most salient points. First, of the 1999 plan’s “Seven Overall Objectives,” the fourth is to “recognize and respect the historic significance of these parks” (p. 1). Likewise, the 1999 plan outlined “Seven Guiding Principles,” the fourth of which is to “maintain open space character” (p.2). The plan goes on to clarify, in bullet points, that this will include efforts to “Promote open space as the primary land use in the park by seeking opportunities to decrease inappropriate structures, uses and paved

areas” and to “Maximize the attractiveness of views and long vistas into and within the parks.” The seventh “Guiding Principle” is to “Enhance Historic Features” (p. 3), which includes efforts to “Respect and enhance each park’s historic character, and consider the park’s historic significance as a key factor when evaluating changes to the park,” and to “Consider each park’s historic precedents for landscape form, landscape design, planting, circulation, and views when evaluating or designing changes to the park.” The 1999 plan also clearly identifies historic context as a key consideration for evaluating any changes to Jackson Park:

*Historic Context is an important consideration as one looks at upgrading present conditions and weighing future improvements. **The original Olmsted design has served the park well over time and should not be compromised by future plans** (emphasis added, p. 13).*

Suffice it to add that, with its repeated emphasis on the historicity of the South Parks and the Olmsted design, the 1999 plan does not call for the closing of Cornell Drive in Jackson Park, nor does it envision a 220-foot-high tower on the park’s western flank, or a parking garage at the eastern terminus of the Midway Plaisance, all of which are related to the current Section 106 review.

Project 120 Chicago: the GLFER Project

On June 10, 2014, the CPD and the not-for-profit Project 120 Chicago entered into a [Memorandum of Understanding](#) (MOU)¹⁹ in order to “memorialize the progress of their collaborative work to date, and provide greater structure to more efficiently and effectively partner on projects to revitalize Jackson Park.” As the MOU states, a founding precept for the partnership is that Jackson Park is “one of the most significant and complex historic landscapes in Chicago and the nation.” A primary undertaking of the partnership is known as the GLFER Project, a “historically based and integrated project of preservation and habitat restoration” in Jackson Park. The MOU goes on to say that in February 2014, “in consultation with Park District and USACE, Project 120 hired award-winning and internationally recognized preservation landscape architect and planner, Patricia M. O’Donnell, FASLA, AICP, and her firm Heritage Landscapes LLC, to work with Park District, USACE, and other members of the Project 120 Team.” As previously mentioned, in late 2015 O’Donnell and her associate published their findings in a peer-reviewed academic journal. It bears repeating that this scholarship is the **direct result of work supported by the CPD, Project 120 Chicago, and the Illinois Historic Preservation Agency**. Part of the published research addressed the GLFER Project’s role in reducing the local impact of climate change:

*Noting the important position of this park between the lake and dense urban areas to the north, east, and west, the [GLFER] project has the potential to positively impact the climate of the South Side of Chicago... As summer temperatures increase, air quality can degrade, and heat waves can challenge both human health and economic activity. As proposed by the GLFER project, improvements in air and water quality and the increased density of park vegetation will act to counterinfluence these projected effects. What is the relationship between these potential changes in Midwestern climate and the work currently underway at Jackson Park? **The rebuilding of ecosystems with native terrestrial and aquatic plantings improves water quality and reduces the urban heat island effect. The park will be a cool refuge that will aid in moderating temperatures in the dense surrounding neighborhoods** (emphasis added).²⁰*

The MOU estimated the total cost of the GLFER Project to be \$7 million, with \$4,550,000 coming from a federal contribution and the remaining \$2,450,000 as a local match from the CPD and “private parties.”

With its dual mandate of ecological restoration and historic preservation and its potential to address issues related to climate change, the GLFER Project would seem to be at odds with more recent plans to install the OPC in Jackson Park, given that the imposition of massive buildings within the park would likely negate any gains of the ecosystem restoration in reducing the urban heat island (UHI) effect.

It is also notable that Project 120 Chicago's [Jackson Park Framework Plan](#)²¹ did not envision the closing of Cornell Drive or Marquette Drive, but rather sought to see that "connectivity to and through Jackson Park is reestablished." The organization had also undertaken "[The Great Lawn Project](#),"²² an initiative to "restore over 40 acres of historic and graceful open space on Chicago's lakefront" by relocating the current driving range in Jackson Park to an area south of Hayes Drive. The Project 120 Chicago [website](#) states the following in that regard:

*In 1978, a driving range was introduced, which is still utilized today, after considerable objection from the Hyde Park and Kenwood communities. There is a chain link fence which surrounds the perimeter of the driving range, and creates a visual, as well as physical barrier **to the vision and purpose intended by Frederick Law Olmsted** (emphasis added).*

The more recent endeavor of the CPD to consolidate the South Shore and Jackson Park golf courses includes the expansion of the driving range that Project 120 Chicago had hoped to relocate. Given that several of the objectives of its long-term initiatives conflict with current proposals related to the OPC, it is notable that in **August 2016**, just days after Jackson Park was announced as the site of the OPC, Project 120 Chicago changed its "focus," adding the following statement to its website:

*What is the focus of Project 120 Chicago? Today, the South Parks are once again a place for grand vision and innovation, and an influential component of Chicago's South Side cultural renaissance and resurgence, and with the addition of SKY LANDING by Yoko Ono and the **Obama Presidential Library**, a marker for peace among all people and all nations (emphasis added).*

It is also worth noting that the Project 120 Chicago website now appears to be defunct, with the most recent information having been posted in October 2016.

In closing, we reiterate that the current APE in the Section 106 review should be expanded to include the entirety of the South Park System, because Washington Park, the Midway Plaisance, and Jackson Park were indeed conceived, planned, and executed as a single system, one that as a practical and cultural resource continues to be greater than the sum of its parts. We also urge that the fuller assessment of Jackson Park's design integrity and significance, and the implications that follow from it, be recognized, as well as the duty to apply the highest standards in evaluating any impact on what is universally agreed to be the irreplaceable inheritance of the citizens of Chicago and the nation. We thank you for the opportunity to provide these comments and trust that they will be taken into consideration.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
Founder, President, and CEO, The Cultural Landscape Foundation

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; Margaret Schmid, Jackson Park Watch; Ted Haffner, Openlands; Arleyne Levee and Lucy Lawliss, National Association for Olmsted Parks; Michael McNamee, Save the Midway!; Lisa Dichiera, Landmarks Illinois; Ward Miller, Preservation Chicago; Betsy Merritt, National Trust for Historic Preservation

¹ *Report to the Chicago South Park Commission Accompanying Plan for Laying Out the South Park*, by Olmsted, Vaux & Co. (March 1871), 41.

² Bluestone, D., *Constructing Chicago*. Yale U.P. (1991), 43.

³ Bachrach, J.S., "Jackson Park Design Evolution," Chicago Park District, Department of Research and Planning (Sept. 1995).

⁴ *Park and Cemetery*, Vol. 5, No. 2 (April 1895), s.v. "Jackson Park, Chicago"

⁵ O'Donnell, P. and Gregory De Vries, "Entangled Culture and Nature: Toward a Sustainable Jackson Park in the Twenty-First Century," in *Change Over Time*, Vol. 5, No. 2 (Fall 2015), 248-265.

⁶ O'Donnell and De Vries (2015), p. 252.

⁷ *Jackson Park Section 506 Great Lakes Fishery & Ecosystem Restoration Study* (2014), 7.

⁸ Schuyler, D. and Gregory Kaliss (eds.), *The Papers of Frederick Law Olmsted, Volume IX: The Last Great Projects*. John Hopkins U.P. (2015), 778 ff.

⁹ *Report of the South Park Commissioners, Superintendent's Report*; November 30, 1896: "The work of surfacing the gymnasium area with gravel and cinder was completed early in the year, and the running track around the northerly gymnasium was covered with a thin layer of bank gravel, and has been used for a bicycle track; it is one-quarter of a mile in length."

¹⁰ Bachrach (1995), 10.

¹¹ Bachrach (1995), 10.

¹² Bachrach (1995), 1.

¹³ Bluestone, D. (1991), 39.

¹⁴ Bluestone, D. (1991), 44.

¹⁵ Bachrach (1995), 4.

¹⁶ See: (<https://tclf.org/sites/default/files/microsites/landslide2017/themes.html#shadow>).

¹⁷ See: ([http://library.amlegal.com/nxt/gateway.dll/illinois/chicagozoning/title16landuse/chapter16-4lakemichiganandchicagolakefro?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:chicagozoning_il\\$anc=JD_Ch.16-4](http://library.amlegal.com/nxt/gateway.dll/illinois/chicagozoning/title16landuse/chapter16-4lakemichiganandchicagolakefro?f=templates$fn=default.htm$3.0$vid=amlegal:chicagozoning_il$anc=JD_Ch.16-4)).

¹⁸ *A Preliminary Report upon the Proposed Suburban Village at Riverside, Near Chicago*, by Olmsted, Vaux & Co. (1868), 17; reprinted in 1982 by the Wicklander Printing Corp., Chicago, Ill.

¹⁹ "Memorandum of Understanding: Jackson Park, Chicago": see (<http://www.hydepark.org/parks/jpac/MOU%20-%20Project%20120%20Jackson%20Park%20-%20Final.pdf>).

²⁰ O'Donnell and De Vries (2015), 250.

²¹ See (http://www.project120chicago.org/plans_projects/framework-plan).

²² See (http://www.project120chicago.org/plans_projects/p4-great-lawn).