



October 30, 2018

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Via Email: [morgan\\_elmer@nps.gov](mailto:morgan_elmer@nps.gov)

Re: Comment on the City of Chicago's Process to Consider the Possible Use of the Midway Plaisance as a Replacement UPARR Site

Dear Ms. Elmer,

The Midway Plaisance Advisory Council (MPAC) "Resolution On The Possible Use Of The Midway Plaisance As a Replacement UPARR Site" adopted on August 8, 2018 which MPAC sent you on September 14, 2018

- strongly opposes the loss of any historic, public open green space, or the removal of any mature, healthy trees, on the Midway, such as could result from the use of the Midway as a replacement UPARR site, and
- strongly urges that any proposed plans for the eastern section of the Midway should take into account its historical significance as part of Olmsted's South Park System and maintain its integrity as an open meadow with flexible use, and
- strongly urges that any action taken with regard to locating a replacement UPARR site engage neighboring communities through broad community input, and take into account current community needs for access to public open space for nature and recreation.

We are writing you to express our concern regarding the flawed process that designates the eastern panel of the Midway Plaisance as the primary option for a replacement UPARR site. The process is flawed because it lacks transparency regarding both 1) the determination of the eastern panel as a replacement site without broad input from the community and 2) the publicizing of the Midway's eastern panel as the primary replacement site, thereby precluding the possibility of assigning the UPARR designation to an existing or new park location outside of the boundaries of the historic Midway Plaisance. This latter item is particularly troublesome because it limits discussion of viable replacement options that meet the recreational needs of the community, while it allows for a possible net loss of open green space. It is not unreasonable, then, to argue that a flawed UPARR process undermines the integrity of the Section 106 process itself.

At the Section 106 Consulting Parties meeting of March 29, 2018 concerning the Federal review of the City of Chicago's Proposed Jackson Park Improvements, Ms. Eleanor Gorski of the CDPD announced that "It's been determined through the (National) Park Service in consultation with the City that the east end of the Midway would be a fine replacement site" for UPARR requirements; and also the decision on the replacement would be realized "through a community process". At the October 2, 2018 meeting of the CDPD with the Midway Plaisance Advisory Council (MPAC), the City's handout noted that the UPARR designation of Jackson Park "will be expanded to include the east Midway."

The Midway Plaisance Advisory Council is very concerned about the apparent pace of the decision-making process regarding the use of the Midway as a replacement site for land lost in Jackson Park to the Obama Presidential Center. As referenced earlier, of particular concern is that the Midway Plaisance eastern panel is presented as a *fait accompli* without any consideration or sharing of the concerns and questions that were raised by the MPAC to city representatives during the October 2, 2018 meeting, thereby undermining any possibility of transparency in the notification process the city has undertaken. In addition, the speed with which decisions are being made is at odds with the consultation process that should be underway and should include the MPAC. According to 36 CFR 800.2, participants in the Section 106 process will include consulting parties, due to "their concern with the undertaking's effects on historic properties"; and will include the public, because "the views of the public are essential to informed Federal decision-making in the Section 106 process. The agency official shall seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties, (and) the likely interest of the public in the effects on historic properties...."

MPAC believes that the question of whether the eastern panel of the Midway is an appropriate site for UPARR designation should be addressed by the public, including those designated as Consulting Parties, with transparent procedures for notification of meetings, and for the recording of questions, concerns and remedies; but this process has not so far occurred. The current "listening sessions" which CDPD is holding with various community stakeholder groups do not address the question of whether the eastern panel of the Midway is an appropriate site for UPARR designation, and therefore do not meet

the level of transparency and inclusiveness we feel is necessary given the historic integrity of the Midway. The question of what properties could be appropriate UPARR replacement sites for the acreage lost in Jackson Park is of urgent importance, and should be based on community input regarding community recreational needs.

MPAC formally requests an immediate cessation of the City's Stakeholder Feedback meetings regarding the use of the Midway as a UPARR replacement site, until the question of what property near Jackson Park could be an appropriate UPARR replacement site is settled through a carefully planned, transparent community process.

We greatly appreciate your attention to this matter.

Sincerely,

Bronwyn Nichols Lodato  
President, MPAC