

# Environmental Assessment

Federal Actions In and Adjacent to Jackson Park:  
Urban Park and Recreation Recovery Amendment and Transportation  
Improvements  
Jackson Park, City of Chicago, Illinois

National Park Service  
Federal Highway Administration  
Illinois Department of Transportation

Estimated Lead Agency and  
Consulting Total Costs  
Associated with Developing  
and Producing This EA:  
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August 2020

**Federal Actions In and Adjacent to Jackson Park:  
UPARR Amendment and Transportation Improvements**

**Section No. 17-B7203-00-ES**

**Cook County, Illinois**

**ENVIRONMENTAL ASSESSMENT**

Submitted Pursuant to 42 U.S.C. 4332 (2)(c)  
by the  
U.S. Department of the Interior – National Park Service,  
U.S. Department of Transportation – Federal Highway Administration,  
and the  
Illinois Department of Transportation

Cooperating Agency  
U.S. Army Corps of Engineers

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For NPS

9/21/2020

Date of Approval



For IDOT

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For FHWA

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## Environmental Assessment



## Acronyms and Abbreviations

<b>AADT</b>	Annual Average Daily Traffic
<b>ACS</b>	American Community Survey
<b>ADA</b>	Americans with Disabilities Act
<b>ADT</b>	Average Daily Traffic
<b>ADTT</b>	Average Daily Truck Traffic
<b>BDE</b>	Bureau of Design & Environment
<b>CAA</b>	Clean Air Act
<b>CBA</b>	Community Benefits Agreement
<b>CDOT</b>	Chicago Department of Transportation
<b>City</b>	City of Chicago
<b>CMAP</b>	Chicago Metropolitan Agency for Planning
<b>CPBSHD</b>	Chicago Park Boulevard System Historic District
<b>CPD</b>	Chicago Park District
<b>CRU</b>	[Illinois Department of Transportation] Cultural Resources Unit
<b>CTA</b>	Chicago Transit Authority
<b>CWA</b>	Clean Water Act
<b>DBH</b>	Diameter at Breast Height
<b>DWM</b>	Chicago Department of Water Management
<b>EA</b>	Environmental Assessment
<b>EAB</b>	Emerald Ash Borer
<b>EcoCAT</b>	Ecological Compliance Assessment Tool
<b>EO</b>	Executive Order
<b>ESA</b>	Federal Endangered Species Act
<b>ESC</b>	Erosion and Sedimentation Control
<b>Federal Actions</b>	Federal Actions in and adjacent to Jackson Park
<b>FEMA</b>	Federal Emergency Management Agency
<b>FHWA</b>	Federal Highway Administration
<b>FIRM</b>	Flood Insurance Rate Map
<b>FQI</b>	Floristic Quality Index

<b>FTA</b>	Federal Transit Administration
<b>GLFER</b>	Great Lakes Fishery and Ecosystem Restoration
<b>HCM</b>	Highway Capacity Manual
<b>HQAR</b>	High Quality Aquatic Resource
<b>IBA</b>	Important Bird Area
<b>IDNR</b>	Illinois Department of Natural Resources
<b>IDNR-OWR</b>	Illinois Department of Natural Resources – Office of Water Resources
<b>IDOT</b>	Illinois Department of Transportation
<b>IEPA</b>	Illinois Environmental Protection Agency
<b>INAI</b>	Illinois Natural Areas Inventory
<b>INPC</b>	Illinois Nature Preserves Commission
<b>IPaC</b>	Information for Planning and Conservation
<b>IWPA</b>	Illinois Interagency Wetland Policy Act
<b>KOCO</b>	Kenwood Oakland Community Organization
<b>LA</b>	Lakeside Alliance
<b>LISC</b>	Local Initiatives Support Corporation
<b>LOS</b>	Level of Service
<b>MOA</b>	Memorandum of Agreement
<b>MBE</b>	Minority business enterprises
<b>MBTA</b>	Migratory Bird Treaty Act
<b>MPO</b>	Metropolitan Planning Organization
<b>MSI</b>	Museum of Science and Industry
<b>Museum Act</b>	Illinois Park District Aquarium and Museum Act
<b>NAAQS</b>	National Ambient Air Quality Standards
<b>NARA</b>	National Archives and Records Administration
<b>NEPA</b>	National Environmental Policy Act
<b>NHPA</b>	National History Preservation Act
<b>NHS</b>	National Highway System
<b>NLEB</b>	Northern Long-Eared Bat
<b>NPS</b>	National Park Service

<b>NRHP</b>	National Register of Historic Places
<b>OHWM</b>	Ordinary High Water Mark
<b>OPC</b>	Obama Presidential Center
<b>POAH</b>	Preservation of Affordable Housing
<b>RAP</b>	Recovery Action Program
<b>RHA</b>	Rivers and Harbors Act
<b>RSP</b>	Regionally Significant Projects
<b>SAM</b>	Social Accounting Matrix
<b>SHPO</b>	State Historic Preservation Officer
<b>SIP</b>	State Implementation Plan
<b>SLFP</b>	South Lakefront Framework Plan
<b>SOI</b>	Secretary of the Interior
<b>SSE</b>	Sam Schwartz Engineering
<b>STOP</b>	Southside Together Organizing for Power
<b>TIP</b>	Transportation Improvement Program
<b>TIS</b>	Traffic Impact Study
<b>UPARR</b>	Urban Park and Recreation Recovery
<b>USACE</b>	U.S. Army Corps of Engineers
<b>USEPA</b>	U.S. Environmental Protection Agency
<b>USDOT</b>	U.S. Department of Transportation
<b>USFWS</b>	U.S. Fish & Wildlife Service
<b>v/c</b>	Volume to capacity
<b>vph</b>	Vehicles per hour
<b>WBE</b>	Women Business Enterprises
<b>WOTUS</b>	Waters of the United States

## 1.0 Introduction

The City of Chicago (City) intends to make changes in and adjacent to Jackson Park that are a result of its approval of the construction of the privately funded Obama Presidential Center (OPC) and the adoption by the Chicago Park District (CPD) of the 2018 South Lakefront Framework Plan (SLFP). The City plans to allow for the closure of roadways and the construction of the privately funded OPC in Jackson Park and to make improvements to the roadway network in and around Jackson Park. These changes trigger the need for federal action and this Environmental Assessment pursuant to the National Environmental Policy Act (NEPA) prepared for the National Park Service (NPS) and the Federal Highway Administration (FHWA).

The proposed OPC project would impact lands currently managed consistent with the Urban Park and Recreation Recovery (UPARR) (Title 54 U.S.C. Chapter 2005) program, under which federal funds were provided by grants for improvements to Jackson Park. Any property improved or developed with UPARR grant funds may not be converted to non-recreation uses without the approval of the NPS. NPS will review and consider whether to approve a partial conversion of use at Jackson Park pursuant to UPARR program requirements. Under the UPARR Act, NPS shall approve a partial conversion when it is in accord with the current Jackson Park recovery action plan or similar plan and only if recreation properties and opportunities of reasonably equivalent location and usefulness are provided (54 U.S.C. §200507).

Before approving the partial conversion by amending the UPARR grant agreements and adjusting the UPARR boundary, the NPS must evaluate the City's proposed UPARR partial conversion including the proposed replacement property and planned development of recreation opportunities to compensate for property lost because of the conversion in Jackson Park. NPS has no legal authority over the presence or physical aspects of the OPC in Jackson Park, such as the design, configuration, materials, or workmanship of those projects. NPS has a statutory obligation to review the recreational impacts of local decisions affecting UPARR-assisted parks, and to approve conversion proposals if the local government meets the conditions outlined in the Act.

Under Title 23 U.S.C., the FHWA administers the Federal-Aid Highway Program, which makes available federal funding to state departments of transportation and local agencies for roadway projects. As a result of planned road closures related in part to the development of the OPC, the City proposes to make certain roadway improvements in Jackson Park using Federal-Aid Highway Program funds and to make bicycle and pedestrian improvements for better access to Jackson Park.

Authorizations required by the United States Army Corps of Engineers (USACE) arise principally from the proposed transportation improvements by the City. The USACE is a cooperating agency in this Environmental Assessment; the USACE federal authority and role in this project is discussed further in Section 3.3.

A minimum of a 30-day comment period will be open upon notice of the release of the Environmental Assessment. Public comments will be accepted via the NPS Planning, Environment, and Public Comment (PEPC) website at <https://parkplanning.nps.gov/ChicagoJacksonPark>. Two public hearing webinars will be held to present an overview of the Environmental Assessment and allow for public comment. A separate opportunity for the public to provide in person comments will also be provided. A hard copy of the report

will be available. Notices of the public hearings will be published in advance. All substantive public comments and responses will be made available to the public.

In addition, the City website has dedicated a page to the federal review of Jackson Park Improvements. The webpage provides important project milestone, documents, and updates that support both the OPC, the SLFP and the federal review process necessary to complete these improvements. Additional information is provided discussing the purpose of the federal review, proposed actions for FHWA and NPS, and the aspects of public participation in the Section 106 process and NEPA. The website can be accessed through the following URL: <http://www.tinyURL.com/JPIImprovements>.

## 2.0 Background

Jackson Park is located on the south side of the City of Chicago, Cook County, Illinois. See Figure 1. The proposed changes occur within and adjacent to Jackson Park and a portion of the adjacent Midway Plaisance. See Figure 2. This section provides background on activities that have occurred prior to the need for federal decisions, including the City's approval of a proposal to locate the OPC in Jackson Park and the City's planning efforts to accommodate the OPC in Jackson Park.

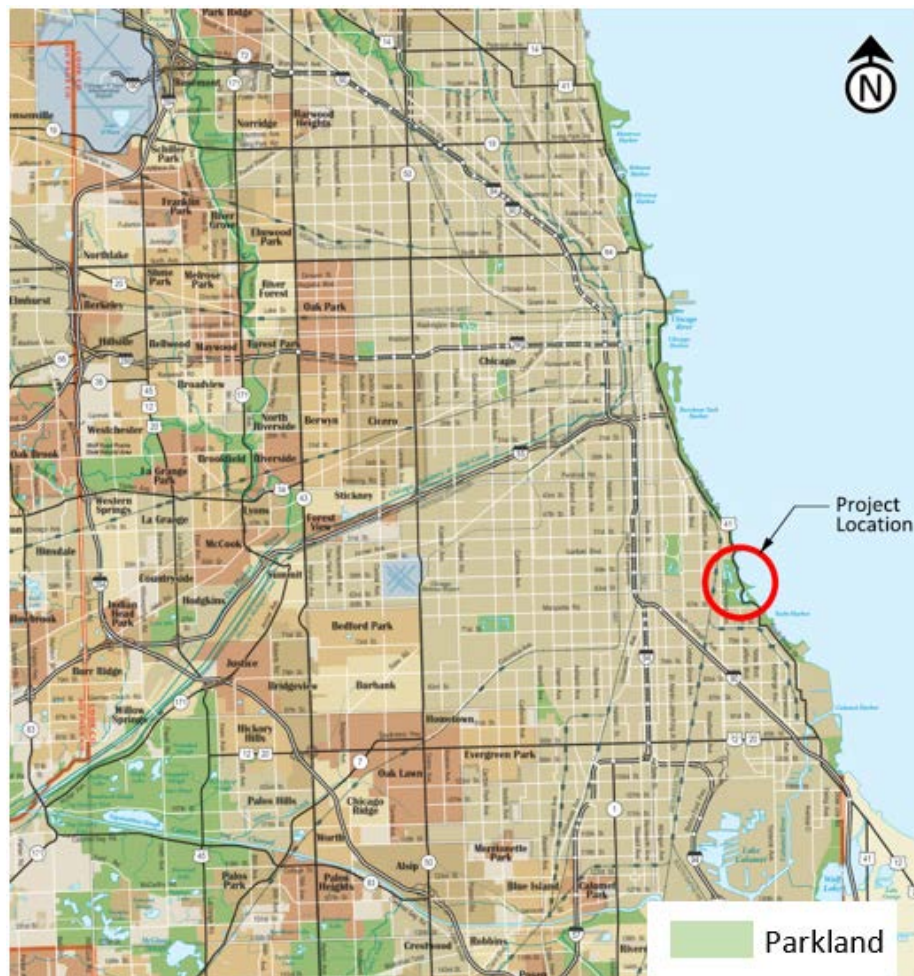


Figure 1: Project Location





Jackson Park's period of significance<sup>1</sup> for purposes of its listing on the NRHP is not etched in the distant past (NPS 1997). Here, the period of significance ranges from 1875 to 1968 including design and initial construction in the 1870s by Olmsted and the 1893 World's Colombian Exposition. It also includes subsequent redevelopment as a park between 1895-1897 based on plans by firms associated with Frederick Law Olmsted, Sr., and additions associated with the Works Progress Administration (WPA) and the CPD which occurred through 1968. As in the past, Jackson Park includes open spaces, natural settings, indoor and outdoor sports facilities, civic buildings, major temporary installations like the World's Fair, and large-scale events (festivals, marathons, etc.).

Presently, Jackson Park is an urban park surrounded by dense residential, commercial, and civic/educational development, including large buildings and building complexes within Jackson Park (e.g., MSI, track & field facility, yacht club/marina, and the golf course clubhouse) and immediately outside Jackson Park (Quadrangle Towers, Oglesby Towers, Island Terrace, Hyde Park High School, Vista Homes, etc.). The range of uses reflects varied and changing public needs for Jackson Park. Jackson Park serves several surrounding neighborhoods, including South Shore, Woodlawn, and Hyde Park. Contributing landscape features reflect the intent of the original designer that a public park be created for use by the community. As community needs have changed, alterations to Jackson Park have been necessary to sustain its purpose as a park serving the community. Jackson Park, and all of its facilities, are fully described in Appendix G.

Jackson Park is served by heavily traveled arterial roadways, including Lake Shore Drive (U.S. Route 41) to the east and Stony Island Avenue to the west. Within Jackson Park, 57th Drive carries east-west traffic from Lake Shore Drive toward the MSI. South of the MSI, 57th Drive becomes Cornell Drive and carries north-south traffic from the MSI toward Jackson Park recreational facilities and beyond to residential neighborhoods. These roadway facilities provide an important connection route for northbound/eastbound morning commuters and southbound/westbound evening commuters between major commuter expressways and the City's Central Business District. Collector roadways within Jackson Park, which gather traffic from local roads and direct it toward the arterial network, include Hayes Drive and Marquette Drive. Lake Shore Drive north of 57th Drive, 57th Drive between Lake Shore Drive and Cornell Drive, Cornell Drive between 57th Drive and Stony Island Avenue, and Stony Island Avenue south of 67th Street are on the National Highway System (NHS). The NHS consists of roadways that are important to the nation's economy, defense, and mobility. The Lakefront Trail, owned by the CPD, is a trail that runs parallel to the east side of Lake Shore Drive and serves recreational users, commuters, and tourists. See Figure 3 for the existing roadways and trails in the project study area.

Planning for Jackson Park is governed by the CPD's strategic plan for parks throughout the City. Jackson Park is addressed in the 1972 Lake Front Plan of Chicago, the 1999 Framework Plan, and most recently the SLFP, which respects the 1999 Framework Plan which included Jackson Park (CPD 2018).

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<sup>1</sup> A period of significance is the length of time when a property was associated with important events, activities, or persons, or attained the characteristics which qualify it for National Register listing.



Figure 3: Project Study Area Roadways and Trails (2017 Aerial and Trails)

As stated in the SLFP, “a key impetus” for updating the plan was to integrate major projects such as the OPC into a “holistic vision for the South Lakefront.” The public process started in June 2017 and included several rounds of public meetings to develop and refine concepts. A final preferred concept (based on public input) was presented to the CPD Board of Commissioners in April 2018. The SLFP provides eleven guiding principles for the South Lakefront area (including Jackson Park). For example, the plan calls for “serv[ing] the local community through a balance of diverse programmatic spaces—active to contemplative, athletics to arts.” Another SLFP goal is to “reinvigorate [Jackson Park] as a global attraction with cultural destinations and historically significant landscapes.” Under the SLFP it is important to “strengthen connections within the park and with the community through improved programming, access, and engagement” and “celebrate and reconnect with the water.” Jackson Park plans should “integrate buildings and landscapes to shape beautiful parks that provide an enhanced quality of life for their users.” A key tenet of the SLFP is to “continue to promote spaces that connect with nature.” More information about the City’s process relative to the SLFP can be found in Appendix G.

## 2.2 Midway Plaisance

The Midway Plaisance is an 83-acre green space that is generally bound by 60th Street to the south, Stony Island Avenue to the east, 59th Street to the north, and Cottage Grove Avenue to the west. See Figure 4. It is an open green space adjacent to Jackson Park and jointly listed with Jackson Park as a historic landscape district on the NRHP. In addition to open spaces, the Midway Plaisance also contains formal features for athletic activities and trails. The Midway Plaisance did not receive funding from the UPARR program; therefore, it is not currently a UPARR site.





Figure 4: Midway Plaisance Property Boundary

The Midway Plaisance connects Washington Park to the west and Jackson Park to the east. Primary vehicular access routes to and through the Midway Plaisance include a network of connected principal arterials. The North Midway Plaisance and South Midway Plaisance are two-lane one-way roadways that connect to Payne Drive/Morgan Drive through Washington Park and Cornell Drive through Jackson Park.

The easternmost portion of the Midway Plaisance bound by E. 60th Street, the Metra Electric Railway, E. 59th Street, and Stony Island Avenue occupies 5.2 acres and lies just west of Jackson Park.

In 1999, coordination between the CPD, the University of Chicago, and local community members, including the Midway Plaisance Advisory Council (MPAC), produced a conceptual plan for future improvements to the Midway Plaisance. It was later published in 2000 as the Midway Plaisance Master Plan (CPD 2000).

Currently, the majority of the east end of Midway Plaisance is an open lawn lined with trees. No organized CPD programs take place in the east end of Midway Plaisance and the CPD does not issue permits to reserve this portion of the Midway Plaisance. This part of the Midway Plaisance has two mixed-use trails and a sidewalk. Within the open space are park benches, trees, an informational kiosk, the Cheney Goode Memorial, and a 0.436-acre wetland. The westernmost portion of the lawn area has an elevated landscape containing dense plantings and trees that provide screening of the Metra Electric Railway. The open space allows for informal recreation such as pick-up games, walking, gathering, or open play. The proposed changes include altering the western side of the lawn with the addition of a play area.

## 2.3 Obama Presidential Center

The OPC is a privately funded project of the Obama Foundation that would chronicle the life and presidency of former President Barack Obama and Michelle Obama. It is meant to serve as a destination for gathering, education, and recreation. The decision to site the OPC in Jackson Park, the design of the OPC campus, and the related closure of roadways in Jackson Park do not require federal approval or funding. The City's decision to authorize the construction of the OPC within Jackson Park followed a national competition to find the host city for the OPC, extensive municipal proceedings once Chicago was chosen, and the approvals of the Chicago City Council, the Chicago Plan Commission, and the CPD Board of Commissioners.

The proposed OPC site is located along the western edge of Jackson Park where it connects to the Midway Plaisance. It comprises 19.3 acres within Jackson Park encompassing the area roughly bound by North

Midway Plaisance (Westbound), S. Cornell Drive, crossing Jackson Park on the southern end along the same latitude as E. 62nd Street, and S. Stony Island Avenue. Four buildings would occupy the proposed OPC site: a museum, a branch of the Chicago Public Library, a forum, and a combined Program, Athletic, and Activity Center (PAAC). In total, the buildings would occupy approximately 2.3 acres. Approximately 1.3 acres of the total building footprint would be comprised of publicly accessible outdoor spaces on the top of the forum and library since they would be built into the landscape. The museum would house exhibitions and public spaces such as a top floor that would offer views of Lake Michigan and the South Side of Chicago. The museum, forum and library are connected below ground. The OPC would also accommodate private offices of the former President and Foundation staff. The forum is intended to contain meeting spaces for performances, programming, and public functions. It would also have a restaurant. The library building would contain a branch of the Chicago Public Library. The library building would also have a public President's Reading Room that would feature a specially curated collection of books that have been of importance to the former President and Mrs. Obama and important manuscripts and other materials related to their lives. The roof of the forum would have publicly accessible outdoor space for informal gatherings. The library roof would include a fruit and vegetable garden which would provide a curated program aimed at local grade schools and community members. The library roof would also have a hardscape gathering area for small scale cultural offerings or large-group activities including informal gathering and space for picnicking. The forum, library, and museum would front an open plaza which would provide opportunities for free public events, including informal and planned gatherings. The PAAC is located at the southern edge of the OPC site along S. Stony Island Avenue. The PAAC would provide space for public activities and opportunities for programming partnerships with local organizations. It is intended to be a gymnasium-type building that would be used for various types of active recreation from basketball to yoga. It may also be used for hosting large-scale indoor events.

The landscaped site would include an area called the "Great Lawn" above an underground parking garage of 440 spaces for the OPC campus. It is intended to be a large, gently sloped, and wide-open grassy area for all types of recreation. It would have a plateau area, called the "Lagoon View Lawn," that would provide picnic opportunities, as would a Community Grove (at the high point of the Lagoon View Lawn) and a Lagoon Grove at the terminus of the slope of the Great Lawn. The sloped area is designed to be a sledding hill in winter. The site would also include a nature trail and other multi-use paths leading to and around the Great Lawn. The paths would go through the wooded area. A promenade would follow the lagoon. Lastly, the site contains a playground that would be equipped with a wide variety of experiential and exploratory play opportunities including custom-made experiential play features. The proximity of the PAAC to the landscape features would also allow for more coordinated indoor/outdoor recreation programs. Overall, the design for the OPC site is intended to reflect principles of landscape ecology relevant to storm water, tree and soil biology, biodiversity, bird habitat, and pollinators (The Obama Foundation 2020). Figure 5 includes the OPC Design Development Site Plan.

The 4.6-acre portion of the OPC site that is proposed for removal from the UPARR program would contain the following proposed OPC site elements: a museum, a branch of the Chicago Public Library, a forum building, an open plaza providing opportunities for free public events, and open space. The lost land uses from that area include formal as well as informal recreation opportunities as described further in the recreation section (5.2.3.1).



Figure 5: OPC Design Development Site Plan (April 2020)

## 2.4 Roadway Closures and Improvements

To accommodate the OPC construction and aspects of the SLFP, the Chicago City Council approved the following permanent roadway closures within Jackson Park:

- Cornell Drive between 63rd Street (Hayes Drive) and 59th Street,
- the northbound section of Cornell Drive between 68th Street and 65th Street,
- Marquette Drive between Stony Island Avenue and Richards Drive, and
- the eastbound portion of Midway Plaisance between Stony Island Avenue and Cornell Drive.

Closures of the eastbound Midway Plaisance and Cornell Drive between 63rd Street and 59th Street are necessary to accommodate the development of the OPC. The additional roadway closures would reduce the number of multilane roadways that currently divide Jackson Park to allow for a more continuous park. The planned closure of certain existing roads and rehabilitation of the roadway footprint would result in 11 acres of UPARR protected parkland to provide new bicycle/pedestrian paths, walking trails, and other open areas within Jackson Park. See Figure 6 for all roadway closures.

The City is also planning improvements to the roadway, pedestrian, and bicyclist network to address the changes in travel patterns that arise from the proposed roadway closures and to improve public safety,



access, and circulation throughout Jackson Park. These improvements are further described in Section 4.3. The Chicago Department of Transportation (CDOT) is seeking the use of Federal-Aid Highway Program funds for construction of these proposed roadway changes, pathways, and sidewalks. Prior to requesting Federal-Aid highway funds from FHWA, all federal requirements must be met, including satisfying NEPA and other environmental requirements.



Figure 6: Roadway Closures

### 3.0 Purpose and Need

The proposed Federal Actions to be taken in response to decisions made by the City are approval of the proposed partial conversion(s) through amendments to the UPARR grant agreements governing Jackson Park by the NPS, and the authorization of Federal-Aid Highway Program Funds by the FHWA.

The following sections describe the proposed Federal Actions in more detail and explain the “purpose and need” for each proposed action. Under NEPA, the “purpose and need” for a proposed Federal Action states what the agency plans to accomplish and explains the reason for taking action. The USACE is a cooperating agency in this Environmental Assessment with authorizations arising principally from the proposed transportation improvements, as detailed in Section 3.3.

## 3.1 National Park Service

### 3.1.1 NPS Authority and UPARR Background

The UPARR program provided grants to economically hard-pressed communities specifically for the rehabilitation of critically needed recreation areas, facilities, and development of improved recreation programs. The funding encouraged local governments to revitalize their park and recreation systems and to continue maintenance of these recreation areas. The federal government, via the UPARR program (Title 54 U.S.C. Chapter 2005) provided two grants to Jackson Park in 1980 (\$125,300) and 1981 (\$135,870).

As a condition of the UPARR grants, the City agreed to maintain Jackson Park for public recreation. As shown in Figure 7, the boundary for Jackson Park defined in the grant agreement encompasses “the area between the south line of 56th Street and the north line of 67th Street lying between the east line of Stony Island Avenue and the water edge of Lake Michigan, excluding the area occupied by the MSI, the La Rabida [Children’s Hospital], and the roadways therein.” This area is referred to as the “Section 1010 boundary” (referring to the applicable provision in the law).



Figure 7: Existing Section 1010 Boundary

Under the UPARR program, conversions or changes in use, whole or partial, must be reviewed and approved by the NPS. Under the UPARR Act, NPS would not approve a conversion unless it “finds it to be in accord with the then-current local park and recreation recovery action program and only on such conditions as the Secretary considers necessary to ensure the provision of adequate recreation properties and opportunities of reasonably equivalent location and usefulness.” 54 U.S.C. §200507. The prerequisites

for conversion approval are further defined by regulation 36 C.F.R. 72.72[b]). Conversions must be reflected on the applicable Section 1010 boundary map and would depict the removed lands as well as those dedicated as replacement recreation property (36 C.F.R. §72.72[c]). The existing Section 1010 boundary in Jackson Park is shown in Figure 7.

### **3.1.2 NPS Purpose and Need**

The purpose of the NPS action is to evaluate whether the City's proposed partial conversion meets the requirements of the UPARR Act and Regulations and, if so, to amend the UPARR grant agreement accordingly.

The need for the NPS action arises from the City's decision to close roadways, authorize the location of the OPC within Jackson Park, and improve the roadway network in and around Jackson Park. The NPS has determined that these projects would convert certain parts of the OPC site and areas of roadway improvements to non-recreational uses, thus triggering a partial conversion. The NPS must review current recreation uses within the identified conversion areas and then review the property identified as replacement including the planned new recreation opportunities to ensure adequate recreation properties and opportunities of reasonably equivalent usefulness and location would be provided. NPS does not have authority over the decision to site the OPC in Jackson Park or over the design of the campus; NPS's authority is limited to evaluating whether the proposed conversion meets the regulatory requirements under UPARR.

The NPS has determined that a 4.6-acre parcel containing the forum, library, and museum buildings and 5.2 acres of strips alongside existing roadways would include uses that do not qualify as recreational under UPARR. Specifically, the NPS would review the lost recreation facilities and opportunities: (1) within 4.6 acres of the 19.3-acre OPC site and (2) on an additional approximately 5.2 acres that would no longer qualify as open and available for public recreation under UPARR due to proposed roadway improvements. In accordance with the Act (54 U.S.C. 200507), the City has identified potential replacement property to accommodate these losses to recreation and articulate the equivalency of proposed replacement recreation opportunities that will be developed upon them. The prerequisites for conversion approval are set out in 36 C.F.R. § 72.72(b). They include: (1) whether practical alternatives to the conversion have been evaluated; (2) whether the proposed conversion and replacement are in accord with the current recreation plans; (3) whether the proposal assures reasonably equivalent replacement recreation opportunities; (4) whether the remainder of the Jackson Park remains recreationally viable; and (5) whether environmental requirements are satisfied. NPS would consider these factors in reaching a decision on the conversion proposal.

## **3.2 Federal Highway Administration**

### **3.2.1 FHWA Funding Authority & Background**

Under Title 23 U.S.C., the FHWA administers the Federal-Aid Highway Program, which makes available federal funding to state departments of transportation and local agencies for roadway projects. In Illinois, all Federal-Aid Highway Program funds are administered through the Illinois Department of

Transportation (IDOT) through a stewardship and oversight agreement with FHWA. Through this agreement, IDOT maintains responsibility for oversight of local agencies, including CDOT, when federal funding is sought for a project. CDOT proposes to use Federal-Aid Highway funding for roadway construction and bicycle and pedestrian improvements within Jackson Park. Prior to the authorization of Federal-Aid Highway funds, the FHWA must ensure the proposed construction activities meet all federal requirements and all applicable environmental laws.

### **3.2.2 FHWA Purpose and Need**

The purpose of the FHWA funding is to (1) address changes in travel patterns resulting from closing roadways in Jackson Park and (2) improve bicycle and pedestrian access and circulation.

The need for the FHWA action arises as a result of changes in travel patterns caused by the closed roadways. Planners of transportation improvements typically analyze future traffic conditions to evaluate the operational performance of a potential improvement at least 20 years after construction. For Northeastern Illinois, these traffic projections are provided by the Chicago Metropolitan Agency for Planning (CMAP) using regional travel-demand analyses and comprehensive plans. Traffic projections are typically estimated 20 years beyond a project construction to account for traffic growth throughout the expected lifespan of a project. Initial traffic studies projected traffic to the year 2040 based on the CMAP GO TO 2040 Comprehensive Plan<sup>2</sup> (CMAP 2014).

Mobility at intersections is measured by calculating the average delay per vehicle and relating it to Level of Service (LOS) benchmarks. LOS is a quantitative concept that characterizes degrees of congestion as perceived by motorists. LOS letter designations A through F are correlated to quantitative measures based on the average seconds of delay per vehicle experienced at an intersection. A figure depicting the different LOSs can be found in Appendix A. LOS A represents the best conditions and LOS F the worst. These measurements are reported for the heaviest periods of travel, described as peak hours. The heaviest traveled hour in the morning (A.M. peak) and in the evening (P.M. peak) are commonly reported. The Highway Capacity Manual (HCM) also defines intersection congestion in terms of traffic volumes and available capacity; if a particular movement at an intersection is predicted to carry greater traffic than it has the desirable capacity to carry, it is said to operate over capacity. This condition is reported as a LOS F, regardless of the overall delay per vehicle experienced. At signalized intersections, LOS D is considered the lowest desirable level of traffic operations by most transportation agencies in the Chicago region. Table 1 shows Intersection LOSs for 2040 projected traffic conditions assuming the City's proposed roadway closures are in place without any new roadway improvements.

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<sup>2</sup> In October 2018, the Chicago Metropolitan Agency for Planning (CMAP) formally adopted their *ON TO 2050* regional plan. In accordance with the adoption of the new regional plan, year 2050 traffic projections were obtained from CMAP and the traffic analyses were re-examined to ensure that traffic impacts would not substantially increase under year 2050 traffic volumes. This sensitivity analysis is discussed in Section 4 of Appendix H. The results of the sensitivity analysis found that while traffic volumes do increase over 2040 levels, the conclusions reached from the 2040 traffic analyses do not change for any of the alternatives under 2050 traffic volumes. It was therefore concluded that the original 2040 analyses are still valid for environmental review purposes.

Table 1: 2040 Intersection Levels of Service for FHWA No Build

Intersection	Intersection Level of Service and Delay (sec./veh.) A.M. Peak Hour	Intersection Level of Service and Delay (sec./veh.) P.M. Peak Hour
Lake Shore Dr at Marquette Dr	C (21)	C (25)
Lake Shore Dr at Hayes Dr	F (**)	F (**)
Lake Shore Dr at Science Dr	B (17)	F (**)
Lake Shore Dr at 57th Street	B (14)	F (**)
Stony Island Ave at 67th St	F (**)	F (**)
Stony Island Ave at Marquette Dr	D (50)	B (16)
Stony Island Ave at 65th Pl	F (**)	C (29)
Stony Island Ave at 64th St *	F (**)	F (**)
Stony Island Ave at 63rd St/Hayes Dr	F (**)	C (21)
Stony Island Ave at 60th St	B (14)	B (11)
Stony Island Ave at Midway Plaisance (EB)	B (11)	F (**)
Stony Island Ave at Midway Plaisance (WB)	F (**)	F (**)
Stony Island Ave at 59th St	D (44)	B (17)
Stony Island Ave at 57th St	C (27)	C (23)
Stony Island Ave at 56th St *	D (34)	D (29)
Cornell Dr/57th Dr at 67th St	Closed	Closed
Cornell Dr/57th Dr at Marquette Drive	Closed	Closed
Cornell Dr/57th Dr at Hayes Dr	F (**)	F (**)
Cornell Dr/57th Dr at Midway Plaisance (EB)	Closed	Closed
Cornell Dr/57th Dr at 57th St/MSI Drop off	A (7)	C (24)
Cornell Dr/57th Dr at Hyde Park Blvd	C (20)	B (15)
67th St at East End Ave *	B (12)	C (15)
67th St at Cregier Ave *	B (13)	B (14)
67th St at Jeffery Ave	B (19)	B (19)
67th St at South Shore Dr	B (17)	B (19)
Marquette Dr at Richards Dr (West)	Closed	Closed
Marquette Dr at Richards Dr (East)	Closed	Closed
Marquette Dr at La Rabida Entrance	B (14)	A (7)
Richards Dr at Marquette Dr (North)	Closed	Closed
Richards Dr at Hayes Dr *	A (9)	B (14)
56th St at Hyde Park Blvd *	B (12)	B (12)
56th St at Everett Ave *	A (8)	A (7)

\*Indicates All-way Stop-Controlled Intersection

\*\* Indicates one or more movements operate over capacity. These intersections are listed with a LOS F per the Highway Capacity Manual definition.

Under the conditions of the proposed road closures, by the year 2040 nine signalized intersections and one stop sign controlled intersection would experience a LOS F or operate over capacity during either the morning or the evening peak hour, with expected average vehicle delays of 1.5 minutes to as much as 4 minutes per vehicle. These LOS F intersections are a result of traffic diversions and traffic redistribution caused by the roadway closures. Details regarding intersection operation can be found in Appendix H.

Without improvements to address the road closures, many intersections would experience considerable increases in delay and operate over capacity. Thus, there is a need to improve roadway and intersection facilities to accommodate the future changes in travel patterns and provide desirable levels of intersection



safety and operation. In addition to the future congested traffic conditions, the need to improve the existing deficiencies in bicycle and pedestrian access and circulation in Jackson Park is being evaluated.

Jackson Park attracts many local residents, tourists, and recreational users each day as the home of the MSI, an outdoor track and field facility, baseball and softball diamonds, a golf course and driving range, soccer fields, beaches, harbors, gardens, and natural spaces, among many other park amenities. Improvements in 2003 along Lake Shore Drive provided improved underpasses for east-west bicycle and pedestrian access to the lakefront and the Lakefront Trail at several locations: Marquette Drive, Hayes Drive (63rd Street), 59th Street, 57th Street, and 55th Street (Promontory Point). Other than the underpasses beneath Lake Shore Drive, no other grade separated bicyclist or pedestrian locations exist within the Jackson Park. To circulate within Jackson Park, users must cross heavily traveled four to six-lane roadways, either at signalized intersections or uncontrolled crosswalks, some of which are unmarked.

Crossing locations within Jackson Park are typically spaced approximately 700 to 800 feet apart. One of the longest stretches within the Jackson Park without a crossing location occurs along the six-lane roadway of Cornell Drive between Hayes Drive and the Midway Plaisance, a length of more than one-third of a mile (1,760 feet). The Clarence Darrow Bridge, currently closed to all pedestrian and bicyclist traffic due to its poor condition, is meant to provide an east-west connection over the Columbia Basin south of the MSI. Improvements to this structure are being developed and are funded as part of a separate project. Due to the current closure of the Clarence Darrow Bridge, pedestrians and bicyclists can only cross roadways at intersections or crosswalks in order to circulate within Jackson Park.

The *Chicago Streets for Cycling Plan 2020* aims to provide safe bicycle accommodations within 0.5 miles of every resident for access to and from homes, businesses, and recreational facilities (CDOT 2020). Neighborhood routes are generally located along residential streets and provide connections between local destinations. Crosstown routes are identified along collector and arterial streets to connect major destinations through a variety of land uses. These routes may include treatments such as barrier or buffer protected on-street bike lanes, striped bike lanes, marked shared bike lanes, or signed routes. Both neighborhood and crosstown routes in the project study area have been identified along roadways bordering and terminating into Jackson Park as shown on page 35 of the *Streets for Cycling Plan*.

Divvy is Chicago's bike share system, which allows users to rent bicycles for trips such as commuting to and from work, visiting Chicago's landmarks or enjoying a ride along the lakefront. Bicycles can be picked up or dropped off at any station, typically located at major end points of user routes.

With future plans to provide bicycle routes for local residents to Jackson Park, as well as several Divvy stations currently provided in the area (See Exhibit A-2 in Appendix A) there is a need to provide safe and frequent access points and to improve facility conditions that allow for better circulation within Jackson Park.

### **3.3 United States Army Corps of Engineers (USACE)**

The USACE is a cooperating agency in this Environmental Assessment. The City has requested the USACE take the following actions:

- 1) authorize proposed discharges of fill material into waters of the United States under Section 404 of the Clean Water Act (CWA) and
- 2) authorize impacts to an ecosystem restoration project constructed with federal funds under the Great Lakes Fishery & Ecosystem Restoration (GLFER) program.

The proposed roadway work would require authorization under Section 404 of the CWA (33 U.S.C. 1251 *et seq.*). The City's proposal to widen Lake Shore Drive involves expanding the 59th Street bridge abutment. This work would result in a discharge of fill material and require a Section 404 permit. Second, the City's proposal to dewater the portion of the lagoon under Hayes Drive to complete bridge improvements would result in a discharge of fill material and would require a Section 404 permit. Further, the City's proposal to improve the east end of the Midway Plaisance for replacement recreation anticipates alterations to the existing wetland on the site, although that work may only be subject to state requirements. The construction of the OPC would also result in temporary and permanent impacts to the GLFER project in Jackson Park. This proposed alteration requires USACE permission pursuant to Section 14 of the Rivers and Harbors Act (RHA) of 1899 (33 U.S.C. 408), commonly referred to as "Section 408."

It is expected that the USACE will evaluate the Section 404 actions under the USACE Chicago District's Regional Permit Program (RPP), whereby USACE staff will determine whether the City's actions comply with the terms and conditions that were established as part of the public interest review undertaken in the establishment of the RPP pursuant to Section 404(e). The USACE will "verify" that the activities are authorized by the RPP. If the actions do not meet the conditions of the RPP, the USACE will process the requests under the Individual Permit process described at 33 C.F.R. 325, including Appendix B.

Evaluation of the USACE Section 408 action will be completed as described in Engineer Circular 1165-2-220. This includes a determination whether the proposed alteration would impair the usefulness of the GLFER project, and whether the use of a categorical exclusion is appropriate.

Impacts of the actions that are regulated by USACE are considered below as direct or indirect impacts of the proposed roadway improvements or UPARR conversion approval. In addition, USACE is undertaking its own analysis of its regulatory actions pursuant to its own regulatory framework.

## 4.0 Alternatives

This Environmental Assessment evaluates three alternatives:

- Alternative A: No Action reflects no conversion of UPARR land in Jackson Park, and no roadway or bicycle and pedestrian improvements in or adjacent to Jackson Park. The City would not close any roads in Jackson Park, nor would it allow construction of the OPC in Jackson Park. The City and the CPD would continue to manage Jackson Park and the roadway network under existing management direction.
- Alternative B: NPS Action (FHWA No Build) reflects FHWA's "no build" scenario from which to compare the effects of proposed traffic improvement actions analyzed in Alternative C. This alternative reflects a future where NPS approves the City's proposed partial conversion of UPARR

lands in Jackson Park related to the OPC and proposed replacement of lost recreation opportunities on the east end of the Midway Plaisance. Under this Alternative, the proposed roadway closures occur and the OPC is constructed, but no additional transportation improvements are made.

- Alternative C: NPS + FHWA Action (Preferred Alternative) reflects a future where, similar to Alternative B, NPS approves the City's proposed partial conversion of UPARR lands related to the OPC and proposed replacement of lost recreation opportunities on the east end of the Midway Plaisance. The proposed roadway closures occur, and the OPC is constructed. In addition, this alternative also reflects a future where FHWA authorizes funding eligibility for the transportation improvements and those improvements are built. In this alternative, there is an additional conversion proposed which includes approval of lost recreation areas from the roadway improvement, being replaced with new recreation land gained by converting closed road corridors to recreation areas. Roadways in and adjacent to Jackson Park are improved to accommodate the change in traffic patterns resulting from the roadway closures and bicycle and pedestrian improvements are made in and adjacent to Jackson Park to improve connectivity.

#### **4.1 Alternative A: No Action**

Alternative A reflects the existing recreational opportunities and infrastructure within Jackson Park, subject to ongoing operation and maintenance. Alternative A would not trigger the need to amend the UPARR agreement or use federal funding for road improvements associated with the OPC and is evaluated as a baseline for comparison of action alternatives.

Jackson Park would remain unchanged with open space and roadways remaining as they currently function. See Appendix G. The City and/or CPD have several projects for ongoing operation and maintenance of Jackson Park, including the Lakefront Trail separation (completed), the relocation and reconfiguration of baseball facilities within Jackson Park, improvements to the Osaka Garden on the Wooded Island, other improvements on the Wooded Island, and the rehabilitation of a breakwater in the Jackson Park Harbor. The City would continue to pursue other projects that are not related to the proposed actions under consideration in this Environmental Assessment and would be evaluated in the future as appropriate.

The existing Section 1010 boundary would remain in its existing configuration under Alternative A. The City would not request the use of Federal-Aid Highway funds for transportation improvements and therefore there would be no need for FHWA involvement. Alternative A is shown in Figure 8.



Figure 8: Alternative A: No Action

## 4.2 Alternative B: NPS Action (FHWA No Build)

Alternative B reflects FHWA's "no build" scenario from which to compare the effects of proposed traffic improvement actions analyzed in Alternative C. Under Alternative B, the NPS would approve the City's proposed partial conversion of UPARR lands in Jackson Park and amend the UPARR grant agreement to remove a portion of the OPC site from the UPARR boundary and to include the proposed replacement property at the Midway Plaisance within the UPARR boundary. The City's proposed roadway closures, as described in Section 2.4, would be implemented in order to construct the OPC site and provide continuous parkland. The NPS has determined that the 4.6-acre parcel containing the OPC site's forum, library, and museum buildings will support uses that do not qualify as recreational uses under UPARR. Therefore, NPS is reviewing the UPARR recreation losses within the 4.6-acre footprint and the City's proposed replacement recreation opportunities on the east end of the Midway Plaisance. This alternative is depicted on Figure 9.

As described in Section 2.4, the Eastbound Midway Plaisance (Stony Island Avenue to Cornell Drive) and Cornell Drive (62nd Street to 59th Street) roadways would be closed for construction of the OPC. As part of the OPC improvements, these roadways would be physically removed and replaced with recreation by the private institution developing the site; however, under this alternative, these areas would not be added to the UPARR amendment boundary. The northbound section of Cornell Drive between 68th Street and 65th Street and Marquette Drive between Stony Island Avenue and Richards



Drive would be closed to traffic; however, in this alternative, no funding or improvements would be proposed for their physical removal.



Figure 9: Alternative B: NPS Action (FHWA No Build)

Alternative B serves as FHWA's No Build condition for evaluating alternatives and their ability to address the transportation needs and environmental impacts. Alternative B reflects the conditions that create the purpose and need for FHWA's proposed action and that would persist if FHWA took no action.

Under Alternative B, the NPS would compare the recreation losses that would result from construction of the OPC with the proposed replacement recreation opportunities on the east end of the Midway Plaisance bounded by the North and South Midway Plaisance, Stony Island Avenue, and the Metra Electric District. If the replacement property and planned recreation opportunities are determined acceptable by the NPS, the property would become subject to federal UPARR restrictions, requiring that the area remain dedicated to public recreational use. See Figure 10 for existing and proposed conditions for the east end of the Midway Plaisance.

Proposed recreation improvements on the Midway Plaisance property will provide a mix of formal and informal recreation space. Although final decisions on playground structures in this area will be decided through a public process, it is anticipated that formal playground recreation facilities will include inclusive play facilities as well as nature play facilities. Nature play facilities would include opportunities for natural plantings and structures such as tree sundials, mud kitchens, and log steppers; inclusive play facilities in the playground area would include play facilities for people with a wide range of disabilities, such as activity tables, swings, slide mounds, and quiet spaces. See Figure 11 for proposed conceptual play options.



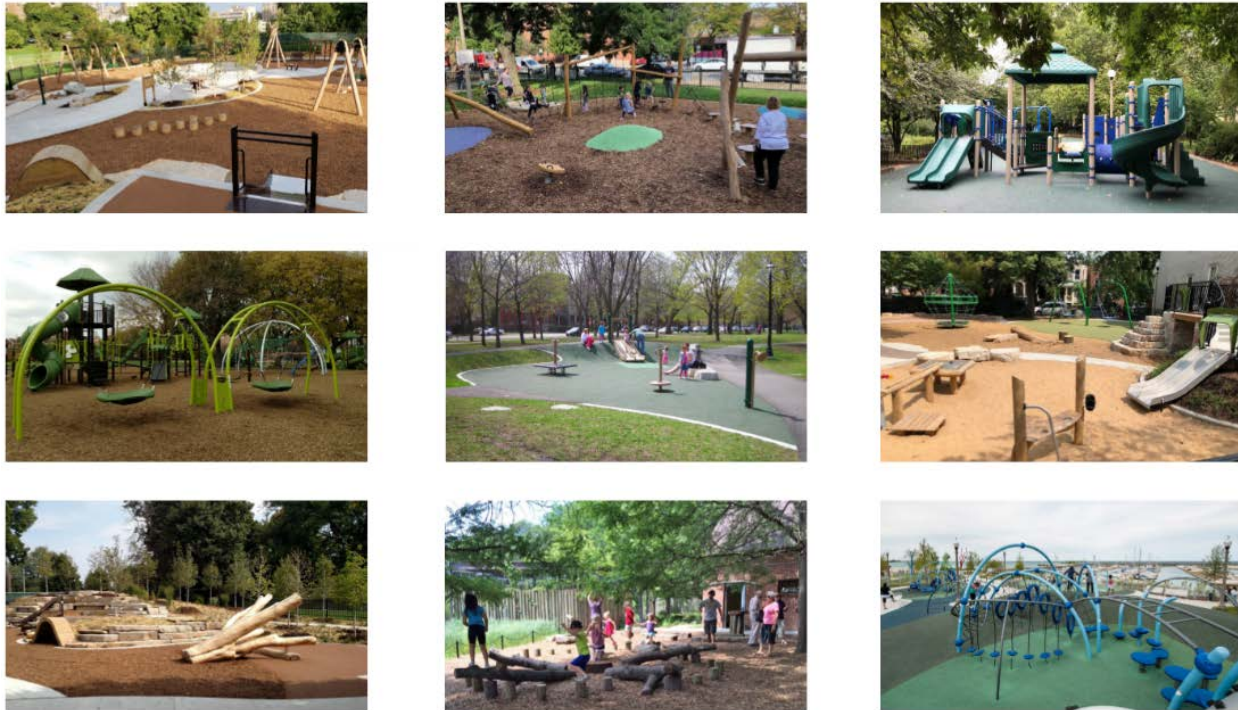
Existing Layout



Proposed Layout

Figure 10: Existing and Proposed Conceptual Recreation Replacement Opportunities on the East End of the Midway Plaisance





*Figure 11: Proposed Conceptual Recreation Replacement Opportunities on the East End of the Midway Plaisance*

The proposed flexible open space on the site would accommodate a variety of activities such as dog-walking, picnicking, and holding soccer practice. This open space area would be the size of one junior soccer field (approximately 30 by 50 yards). The sunken grade of the lawn area where a wetland is located would be modified to facilitate infiltration and drainage and to enhance use of the open field. The installation of a missing historic walk will improve access to the Cheney-Goode Memorial and the playground area, as well as rehabilitate a historic circulation pattern.

Within these parameters, the City will make final design selections (such as specific playground equipment) with input from the public and in light of the historic nature of the Midway Plaisance, seeking to minimize any potential effects to historic resources, pathways, and plantings, to the extent possible. The schedule for public input for the final design will be announced by the City following completion of the Federal review process.

#### **4.3 Alternative C: NPS + FHWA Action (Preferred Alternative)**

Alternative C incorporates the same UPARR boundary and recreation changes described under Alternative B and adds transportation improvements to mitigate traffic congestion as a result of roadway closures in Jackson Park. This alternative also increases continuity between existing park areas with proposed trails and underpasses for improved pedestrian and bicyclist access and circulation and provides replacement recreation for the road improvements to satisfy UPARR. See Figure 12.

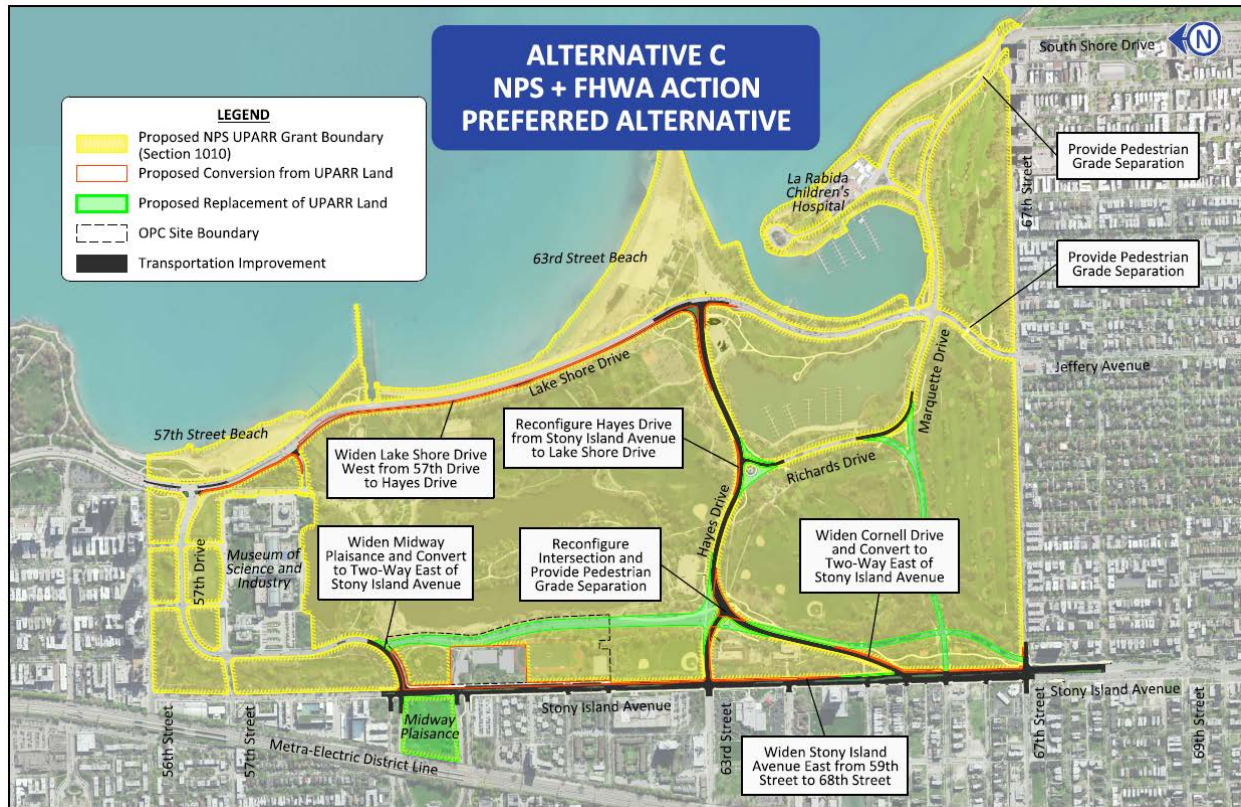


Figure 12: Alternative C: NPS + FHWA Action (Preferred Alternative)

The planned paths build upon the existing network, which has a focus on trips along and to the Lakefront Trail. Continuous east/west corridors aligned with 59th Street, 63rd Street, and Marquette Drive are planned, in accordance with the *Chicago Streets for Cycling Plan 2020*, between Stony Island Avenue and the Lakefront Trail (CDOT 2020). A new north/south path within the OPC site, generally aligned along the vacated Cornell Drive, would connect these east/west corridors and provide additional access to the Lakefront Trail.

Five new underpasses would provide safer and more comfortable access for users by physically separating pedestrian and vehicular traffic. The combination of new paths and underpasses would allow users to enter at the far southwest corner of Jackson Park and travel all the way to the northeast corner without having to cross a road at grade. Additional access improvements along Stony Island Avenue to improve access to Jackson Park include two new traffic signals with marked crosswalks and spot improvements including new pedestrian refuge islands and curb extensions to reduce crossing distances.

A conceptual representation of salient conditions in Jackson Park under Alternative C (Preferred Alternative) is shown in Figure 13 below.





Figure 13: Conceptual Representation of Conditions under Alternative C

The FHWA Action under Alternative C considers the approval of Federal-Aid Highway Funds to provide improvements to the transportation network as a result of the City’s proposed roadway closures.

FHWA’s alternatives analysis process identified the transportation improvements that are incorporated into Alternative C. The alternative analysis process is detailed in the *Alternatives to Be Carried Forward* and *Preferred Alternative* documents. These documents are incorporated by reference and can be found in full at <http://www.tinyURL.com/JPIImprovements>. The “preferred alternative” documentation concludes that Alternative 9B best meets the FHWA purpose and need while minimizing environmental impacts. Cross-sections for the proposed transportation improvements under Alternative C are included as Exhibits 3a-3j in Appendix A. The proposed transportation improvements are described below.

#### 4.3.1 Capacity Improvements

##### Lake Shore Drive – Hayes Drive to 57th Drive

- This existing section of Lake Shore Drive consists of three northbound and two southbound travel lanes. This section would be widened to add an additional southbound travel lane, resulting in a proposed section that consists of three northbound and three southbound travel lanes.

#### Hayes Drive – Lake Shore Drive to Cornell Drive

- This existing section of Hayes Drive consists of one lane in each direction with on-street parking along both sides. In this alternative, 147 on-street parking spaces would be removed to increase the number of travel lanes to two lanes in each direction with a raised barrier median.

#### Cornell Drive – Stony Island Avenue to Hayes Drive

- This existing section of Cornell Drive consists of three southbound-only travel lanes. This section would be widened to accommodate an additional lane and converted to two-way traffic, resulting in the proposed section that consists of two southbound and two northbound lanes.

#### Stony Island Avenue – 67th Street to 65th Street

- This existing section of Stony Island Avenue consists of two northbound lanes, four southbound lanes, a raised median with left turn lanes, and on-street parking on the west side. This section would be widened to the east to add one northbound through lane along Stony Island Avenue to result in a proposed section that consists of three northbound lanes, four southbound lanes, a raised median with left turn lanes, and on-street parking on the west side.

#### Stony Island Avenue – 65th Street to Midway Plaisance

- This existing section of Stony Island Avenue consists of one lane each direction with on-street parking on each side. This section would be widened to the east to add one southbound lane, one northbound lane, a center raised median with left turn lanes, and space for bus loading lanes. The proposed Stony Island Avenue section then consists of two lanes in each direction, a raised median with left turn lanes, and on-street parking/bus loading lanes on each side of the street.

The information below on bridge modifications and intersection improvements provides greater detail on capacity improvements outlined above.

### **4.3.2 Bridge Modifications**

#### Lake Shore Drive

- Widen the 59th Street underpass, the 59th Street Lagoon Inlet Bridge, and the 63rd Street underpass to accommodate the additional southbound lane proposed along Lake Shore Drive.

### **4.3.3 Intersection Modifications**

#### Lake Shore Drive

- At 57th Drive, widen the intersection to accommodate the new third southbound lane, and re-time the traffic signal to optimize signal operations.
- At Science Drive, widen the intersection to accommodate the new third southbound lane, and re-time the traffic signal to optimize signal operations.
- At Hayes Drive, widen the intersection to accommodate the new third southbound lane on Lake Shore Drive, the two new through lanes on Hayes Drive, and new turn lanes. Also, modernize the

traffic signal installation and re-time the signal to optimize operations. Provide a new pedestrian crossing on the south leg.

#### Hayes Drive

- At Richards Drive, reconfigure the existing triangular, stop-controlled intersection to a signalized T-intersection. Provide new pedestrian crossings on the east and south legs.
- At Cornell Drive, reconfigure the intersection to provide a through movement for the predominant travel through the intersection. Realign the existing section of Hayes Drive between Stony Island Avenue and Cornell Drive to create a signalized T-intersection with the realigned Hayes Drive-Cornell Drive through movement.

#### Stony Island Avenue

- At 57th Street, re-time the traffic signal to optimize signal operations.
- At 59th Street, remove the existing traffic signal and restrict westerly access to right-in/right-out only.
- At North Midway Plaisance (westbound), widen the intersection to accommodate additional through and turning lanes on Stony Island Avenue, to convert North Midway Plaisance east of Stony Island Avenue to two-way traffic, and provide two lanes in each direction on North Midway Plaisance east of Stony Island Avenue. Re-time the traffic signal to optimize signal operations.
- At South Midway Plaisance (eastbound), widen the intersection to accommodate the additional lanes on Stony Island Avenue. Remove 14 on-street parking spaces on the west leg to provide an additional eastbound left-turn lane. Re-time the traffic signal to optimize signal operations.
- At 60th Street, remove the existing traffic signal and restrict westerly access to right-in/right-out only. Widen the intersection to accommodate the additional lanes on Stony Island Avenue.
- At 63rd Street/Hayes Drive, widen the intersection to accommodate the additional lanes on Stony Island Avenue, and shift the east leg to the north to provide better alignment for the westbound through movement across the intersection. Modernize the traffic signal installation and re-time the signal to optimize operations.
- At 64th Street, widen the intersection to accommodate the additional lanes on Stony Island Avenue, and convert the stop-controlled intersection to a signalized intersection to maintain traffic progression through interconnected signals on Stony Island Avenue.
- At 65th Place/Cornell Drive, widen the intersection to accommodate the additional lanes on Stony Island Avenue and Cornell Drive, to convert Cornell Drive east of Stony Island Avenue to two-way, and to provide additional turn lanes. Modernize the traffic signal installation and re-time the signal to optimize operations.
- At Marquette Street, widen the intersection to accommodate the additional lanes on Stony Island. Modernize the traffic signal installation and re-time the signal to optimize operations.
- At 67th Street, widen the intersection to accommodate the additional lanes on Stony Island Avenue. Modernize the traffic signal installation and re-time the signal to optimize operations.

#### 57th Drive

- At Hyde Park Boulevard, re-time the traffic signal to optimize signal operations.
- At Cornell Drive/57th Street/MSI Drop-off, re-time the traffic signal to optimize signal operations.

#### Marquette Drive

- At Lake Shore Drive/Jeffery Drive, re-time the traffic signal to optimize signal operations.
- At the La Rabida Children's Hospital entrance, re-time the traffic signal to optimize signal operations.

#### 67th Drive

- At Jeffery Drive/Jeffery Avenue, re-time the traffic signal to optimize signal operations.
- At South Shore Drive, modernize the traffic signal installation and re-time the signal to optimize operations.

### **4.3.4 Pedestrian and Bicycle Enhancements**

- Americans with Disabilities Act (ADA) improvements at widened or modernized intersections including improvements to sidewalk slopes, installation of detectable warning tiles and installation of accessible pedestrian signals.
- Crosswalk improvements at widened or modernized intersections
- Additional trails (consistent with the City's *Streets for Cycling 2020* plan) along Cornell Drive and Hayes Drive
- Pedestrian underpasses at the following locations:
  - Two legs of the Cornell Drive/Hayes Drive intersection
  - Along Hayes Drive between Richards Drive and Lake Shore Drive
  - Along Jeffery Drive between Marquette Drive and 67th Street
  - South Shore Drive/67th Street intersection
- Curb extensions at the following intersections or mid-block crossings:
  - Stony Island Avenue at 60th Street
  - Stony Island Avenue at 61st Street
  - Stony Island Avenue at 62nd Street
  - Stony Island Avenue at 63rd Street
  - Stony Island Avenue at 64th Street
  - Stony Island Avenue at 65th Street
  - Stony Island Avenue at 65th Place
  - Stony Island Avenue at Marquette Street
  - Stony Island Avenue at 67th Street
  - Mid-Block Crossing of Cornell Drive between 57th Street and Stony Island Avenue
- Pedestrian refuge islands at the following intersections or mid-block crossings:
  - Hayes Drive at Richards Drive

- Stony Island Avenue at North Midway Plaisance
- Stony Island Avenue at 60th Street
- Stony Island Avenue at 62nd Street
- Stony Island Avenue at 64th Street
- Stony Island Avenue at 65th Street
- Stony Island Avenue at 65th Place
- Stony Island Avenue at Marquette Street
- Mid-Block Crossing of Cornell Drive between 57th Street and Stony Island Avenue

Under Alternative C, NPS would also evaluate and approve the conversion of UPARR recreation land caused by the roadway improvements in exchange for replacement land gained by converting closed road corridors to recreation areas. See Appendix G for more details. This would allow the closed roadways within Jackson Park to be converted into open space. The City proposes to add these new areas of open space to the new Section 1010 boundary to provide replacement recreation opportunities.

The areas within Jackson Park, where existing roadways would be converted to park space, offsets the recreation lost due to other roadway work (see Figure 12). The new recreation area within Jackson Park would predominantly include new informal recreation space, but would also include new pathways, sidewalks, and underpasses that are incorporated in the roadway improvements. The City intends for the roadway closures to improve park cohesiveness through better connected parkland; opportunities for expanded multi-use trails within Jackson Park; and improved accessibility within Jackson Park as a result of this increased trail system. This added area would provide similar, but improved recreation opportunities as the open space areas lost due to roadway improvements.

## **4.4 Alternatives Considered and Dismissed from Further Analysis**

### **4.4.1 NPS**

The NPS regulations implementing UPARR require an applicant for a conversion of recreational parkland to non-recreational uses to evaluate all practical alternatives to the proposed conversion. Alternatives that avoid conversion are evaluated as Alternative A in this Environmental Assessment. NPS did not consider alternatives that involve conversion within Jackson Park other than the proposed conversion because the ultimate decision to allow the placement of the OPC within Jackson Park is up to the City to make. Section 2.3 describes the processes used by the City to approve the placement of the OPC within Jackson Park. Further information regarding the UPARR application and site selection process is contained in the City of Chicago Analysis of its Proposal Related to Jackson Park, Cook County, Illinois under the Urban Park and Recreation Recovery Act Program (City of Chicago 2020).

### **4.4.2 FHWA**

The FHWA alternatives analysis considered a wide range of proposed improvements to meet the FHWA's purpose and need, while avoiding or minimizing impacts to Jackson Park and other environmental resources. The *Alternatives to Be Carried Forward* and *Preferred Alternative* documents describe the

development and evaluation of alternatives and are incorporated by reference in full at <http://www.tinyURL.com/JPIImprovements>. A summary of the documentation is provided below.

A “building block” approach allowed for incremental transportation improvements to be added to each of the eleven alternatives, which resulted in enhanced LOS and increased bicycle/pedestrian safety and access, consistent with the agencies’ stated purpose and need. The base, or No Build, alternative includes no project specific improvements. Each alternative considered after the No Build alternative includes proposed bicyclist and pedestrian improvements, five underpasses, additional trails, and enhanced access accommodations. Subsequent alternatives also considered operational changes, such as traffic signal re-timing, prior to physical construction of additional through and/or turn lanes. Each of these alternatives failed to meet the FHWA purpose and need criteria due to poor operational performance and were eliminated from further study. Although the No Build also operated poorly, it is carried forward as a baseline for determining any impacts or benefits of a proposed action.

The subsequent group of alternatives, called Build alternatives, evaluated the performance of additional through and turning lanes along Lake Shore Drive, Hayes Drive, and Stony Island Avenue, where the majority of re-distributed traffic from the City’s proposed roadway closures is anticipated to occur. Each of the Build alternatives include bicyclist and pedestrian improvements. Improvements along each individual roadway were evaluated, followed by combinations of improvements along two or more roadways. Only the combination of improvements along Lake Shore Drive, Hayes Drive, and Stony Island Avenue (identified as Alternative 9) meets the FHWA purpose and need and the remaining alternatives were dropped from further consideration.

The FHWA studied Alternative 9 - Mobility Improvements – Widen Lake Shore Drive/Reconfigure Hayes Drive/Widen Stony Island Avenue in detail to further minimize environmental impacts. Considering that the limits of Jackson Park begin at the backs of curb along all roadways within Jackson Park, opportunities to reduce impacts to Jackson Park while continuing to provide equivalent operational performance were limited to improvements along Stony Island Avenue. Sub-alternatives of Alternative 9 included widening Stony Island Avenue to the west (Alternative 9A) and widening Stony Island Avenue to the east (Alternative 9B). Alternative 9A resulted in greater impacts to private property, residences, businesses, and historic properties and was eliminated from further study. The transportation improvements described in Alternative 9B are therefore carried forward in this Environmental Assessment for detailed evaluation as explained above in Section 4.3 and those improvements are incorporated into Alternative C.

## **5.0 Affected Environment and Environmental Consequences**

The following sections identify which resources are present in the project study area and whether they are carried forward for a detailed analysis.

### **5.1 Impact Topics Not Carried Forward for Further Analysis**

#### **5.1.1 Agricultural Resources**

Agricultural resources are not a consideration for this project because there are no farms present, a farmland conversion does not occur, and there are no prime and important soils in the project study area. Because these resources are not present within the project study area, this impact topic is not carried forward for further analysis.

#### **5.1.2 Special Status Species**

The Endangered Species Act (ESA) of 1973 (16 U.S.C. 1531-1544) protects Federally threatened and endangered species. The United States Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) tool was used to identify the federally-listed threatened and endangered species that USFWS lists as occurring in Cook County. USFWS lists all species by county (except for the Rusty Patched Bumble Bee, the USFWS uses High Potential Zones for this species). Suitable habitat occurs within the project area for the following federally-listed species: the Northern long-eared bat (NLEB), the Piping Plover, and the Rufa Red Knot. There is no suitable habitat within the project study area for other federally-listed species identified in the IPaC report. See Appendix C. The three federally-listed species with suitable habitat within the project study area and the potential to be impacted by construction activities are discussed below.

The NLEB suitable summer habitat consists of a wide variety of forested or wooded habitats where they roost, forage, and travel. There are no records of maternity roost trees within the project study area. Section 4(d) of the ESA allows USFWS to make special rules that prohibit certain types of incidental takes to a listed species. USFWS has issued a Programmatic Biological Opinion that defines the types of activities that may affect the NLEB but are not prohibited under the Final 4(d) Rule. Impacts associated with the project alternatives were evaluated in accordance with the USFWS Programmatic Biological Opinion on Final 4(d) Rule. The evaluation determined that tree removals within the project study area may affect the NLEB, but that any resulting incidental take of the NLEB is not prohibited by the Final 4(d) Rule. The Final 4(d) Rule evaluation was sent to USFWS for their review. A response was not received within 30 days; therefore, in accordance with ESA Section 7 guidelines, agency coordination for the NLEB is complete. See Appendix C.

CDOT provided a commitment that all construction activities related to the transportation improvements would generally occur west of Lake Shore Drive. Based on this commitment, a no effect determination was made for the federally-listed Piping Plover and the federally-listed Rufa Red Knot. See Appendix C.

The Illinois Endangered Species Protection Act (520 ILCS 10) also protects Threatened and Endangered species identified by the State of Illinois. State-listed species that may occur in the project study area were



identified using Illinois Department of Natural Resources (IDNR) Ecological Compliance and Assessment Tool (EcoCAT). Suitable habitat occurs within the project area for the following state-listed species: the Yellow-crowned Night Heron, the Black-crowned Night Heron, the Seaside Spurge, the Sea Rocket, and the Pitcher's (Dune) Thistle. There is no suitable habitat within the project study area for the other state-listed species identified in the EcoCAT report. See Appendix C.

In order to avoid impacts to the Yellow-crowned Night Heron and Black-crowned Night Heron, the City commits to prohibit tree removal during the breeding season, between March 1 and August 31 for projects assessed in this Environmental Assessment. This commitment excludes tree removal that may need to occur at any time during the year due to damage, disease, pests, or other unforeseen circumstances in the interest of public safety. If removal is needed, a staff expert at the CPD would inspect potentially impacted trees for signs of nesting activity prior to removal and postpone, if necessary. This commitment will avoid adverse impacts to nesting and fledging Black-crowned and Yellow-crowned Night Heron species. Habitat for the heron will be temporarily impacted by tree clearing; however, all trees removed will be replaced at a 1:1 replacement ratio (See Appendix D). Temporary construction impacts, such as noise or vibrations, are expected to have the potential to disrupt normal behavior in the immediate vicinity of the site, but impacts will be temporary and minimal.

In order to avoid impacts to the state-listed Seaside Spurge, the Sea Rocket, and the Pitcher's (Dune) Thistle, CDOT committed that all construction activities would occur to the west of Lake Shore Drive with the exception of some curb and gutter elements proposed in existing concrete areas. See Appendix C. This commitment will avoid adverse impacts to the Seaside Spurge, Sea Rocket, and Pitcher's (Dune) Thistle.

Based on the effect determinations made in coordination with the appropriate resource agencies, the impact topic of federal and state-listed special status species is not carried forward for further analysis. See Appendix C for additional detail.

### **5.1.3 Other Wildlife and Wildlife Habitat**

Three natural areas are recognized by CPD and are listed in the Chicago Habitat Directory within Jackson Park: the Paul H. Douglas Nature Sanctuary (which includes the Wooded Island), the Bobolink Meadow, and the 63rd Street Beach Dune (see Appendix C). From mid-April through May, and then again from late August through mid-October, the Wooded Island generally has the most migratory birds within Jackson Park. The CPD designated the Wooded Island a Bird and Butterfly Sanctuary. From November through March, the greatest waterfowl diversity in Jackson Park is found off the 63rd Street Beach breakwater and in Jackson Park Inner and Outer Harbors, which straddle Coast Guard Drive from 63rd to 66th Streets.

The Lake Michigan shoreline serves as a resting place for migratory birds migrating along Lake Michigan, which is within the Mississippi Flyway. As such, the entirety of the Lake Michigan shoreline, including the limits of Jackson Park, has been designated an Audubon Important Bird Area within the state of Illinois because it is a location where shorebirds, waterfowl, and wading birds may gather.

Tree surveys were conducted within the OPC site, track and field replacement site, and adjacent to proposed transportation improvements. Previous tree surveys conducted for the CPD were also considered. The boundaries of these surveys extend to 57 percent of Jackson Park and identified 4,672



trees. The other 43 percent of Jackson Park, where proposed changes are not contemplated, contains an unknown number of trees. Of the 4,672 trees counted 17 percent would be affected by this project. See Appendix D for details. The preferred alternative would result in the removal of 789 trees: 326 trees anticipated to be removed within the OPC site, 39 trees were removed by the track and field relocation, 417 trees would be removed by the transportation improvements, and 7 trees would be removed by projects considered under cumulative analyses (2 trees were removed by the Lakefront Trail separation, 5 trees are anticipated for removal by the baseball field reconfiguration). The 417 trees removed by the transportation improvements would be replaced by the City at a 1:1 replacement ratio to compensate from the impacts, consistent with IDOT's tree replacement policy. The remaining 372 trees removed are proposed to be replaced at a 1:1 minimum replacement ratio by the CPD and the Foundation. All tree replacements on CPD property will be done in coordination with CPD, regarding species, placement of trees, etc. The replacement trees would be selected to be complementary to the historic landscape of Jackson Park. Replacement trees would also consider other functional elements including aesthetics, shade, sightlines, and access. The proposed actions do not impact the Wooded Island, the Bobolink Meadow, or the Lake Michigan shoreline. Additionally, migratory birds would be protected by the City commitment to restrict tree removal, between March 1 and August 31, for projects assessed in this Environmental Assessment. This commitment excludes tree removal that may need to occur at any time during the year due to damage, disease, pests, or other unforeseen circumstances in the interest of public safety. If removal is needed, a staff expert at the CPD would inspect potentially impacted trees for signs of nesting activity prior to removal and postpone, if necessary. With this commitment in place, there would be no effect on the nesting activity of migratory bird species by the project alternatives. Habitat for migratory birds would be temporarily impacted by tree clearing; however, all trees removed will be replaced at a 1:1 mitigation replacement ratio (See Appendix D).

In conclusion, the alternatives would result in no impacts on recognized natural areas, the Lake Michigan Shoreline, or on nesting for migratory birds. Additionally, any temporary impacts to wildlife habitat due to tree removal within Jackson Park would be minor, with ample habitat remaining throughout the property. Because Jackson Park is an urban park, wildlife within Jackson Park is acclimated to human activity and development. The proposed actions would not alter the overall quality of the wildlife habitat of Jackson Park. Therefore, the impact topic of other wildlife and wildlife habitat is not carried forward for further analysis.

#### **5.1.4 Air Quality**

The air quality analysis performed for the alternatives is documented in Appendix E. The air quality analysis indicated that the proposed transportation improvements would meet the air quality conformity requirements under the Clean Air Act (CAA). Furthermore, the relative differences in air quality levels for all three alternatives are not a discerning factor in their evaluation. Therefore, the impact topic of air quality is not carried forward for further analysis.

#### **5.1.5 Water Resources**

Water resources evaluated include Lake Michigan, the North and South Lagoons, one pond, and four wetlands. See Appendix F for additional details.

The 59th Street Inlet Bridge widening proposed in the alternatives would maintain the waterway opening of the existing bridge structure but would encroach into “waters of the United States” (WOTUS) subject to federal protections under the CWA, permanently impacting 0.04 acres of WOTUS. There are also anticipated 0.04 acres of temporary impacts required to construct the proposed bridge widening. Since the waterway opening is maintained, there is no obstruction of the use of Lake Michigan (navigable waterway). Additionally, there would be minor repairs to a bridge on Hayes Drive over the South Lagoon. The minor repairs would require a temporary impact of 0.20 acres due to the installation of cofferdams during construction as well as area needed for access during the course of repairs. The proposed impacts to the WOTUS are authorized under a CWA General Permit issued by USACE and coordination is ongoing with that agency.

If the City’s plan for replacement recreation on the Midway Plaisance is approved, it would result in a 0.436-acre permanent impact to the wetland on the east end of the Midway Plaisance (referred to as Wetland 1 in Appendix F). The City received a Jurisdictional Determination from USACE dated May 18, 2020 stating this wetland is not subject to federal jurisdiction. See Appendix F. The wetland impacts will be mitigated to meet the requirements of the Illinois Interagency Wetland Policy Act. The impacted wetland acreage would be replaced at the Cedar Creek A1 wetland bank site at a mitigation ratio of 1.5 to 1.0.

A floodplain fill totaling 0.03 acre-feet would occur within the 100-year floodplain under Alternative C. This minor floodplain fill would not impact the adjacent areas by increasing floodplain elevations and would therefore not increase the risk of flooding. Fill occurring in the floodplain would not require compensatory storage. The unavoidable fill in the floodplain would require an individual permit from the Illinois Department of Natural Resources–Office of Water Resources (IDNR-OWR) Lake Michigan Section to demonstrate compliance with the rules set forth for public waters. The process for obtaining a permit to demonstrate compliance is ongoing and will be completed prior to construction.

The project study area is not located within an area of karst topography or within a watershed that has been designated by the Illinois Environmental Protection Agency (IEPA) as vital for a particularly sensitive ecological system. The project study area is not located in a Wellhead Protection Area or within an area designated as a special resource groundwater. Potable water supply wells are not present. Additionally, there are no Sole Source Aquifers, as designated under Section 1424(e) of the Safe Drinking Water Act, within the project study area.

The analysis in Appendix F found that impacts to water resources would be mitigated. Additionally, the impacts were not a discerning factor in evaluating alternatives. Therefore, the impact topic of water resources is not carried forward for further analysis.

### **5.1.6 Highway Traffic Noise**

A Highway Traffic Noise Analysis conducted in accordance with FHWA Noise Regulations and IDOT’s *Highway Traffic Noise Assessment Manual* identified highway noise impacts as a result of transportation improvements included in Alternative C. The installation of noise barriers for the highway improvements were studied and potential locations for barriers were modeled. An analysis of potential barriers revealed that they did not meet IDOT’s feasibility and reasonableness criteria. Three barriers passed

evaluation for physical feasibility because a wall can be constructed that would achieve a 5-dBA reduction of highway traffic noise for at least two impacted receptors. Two of the three barriers passed acoustic feasibility, while one did not. These two noise barriers met the 8-dBA noise reduction reasonableness criterion. The two highway traffic noise barriers carried forward were evaluated for cost-reasonableness. Based on IDOT noise policy evaluations, neither noise barrier is cost-reasonable. Due to this, traffic noise abatement measures are not recommended to be implemented based on preliminary design. Therefore, the impact topic of highway traffic noise is not carried forward for further analysis. A *Highway Traffic Noise Analysis* report dated November 20, 2018 (with June 28, 2019 Addendum) is provided at <http://www.tinyURL.com/JPIImprovements>.

### **5.1.7 Archaeological Resources**

The study area for archaeological resources is the archaeological area of potential effect determined in consultation with the Illinois State Historic Preservation Officer (SHPO). This area consisted of all areas of potential ground disturbance associated with the proposed undertaking. As a result of survey efforts, no eligible archaeological resources were identified within the study area, and the Illinois SHPO concurred that no archaeological resources would be affected in letters dated March 28, 2018, and September 12, 2018. Therefore, the impact topic of Archeological Resources is not carried forward for further analysis.

### **5.1.8 Construction Noise from the OPC**

The OPC site is surrounded by Jackson Park on all sides with the exception of a parking lot and apartment complex to the west, across South Stony Island Avenue. The noise from the construction of the OPC has the potential to result in unavoidable adverse short-term impacts. However, in compliance with the City Noise Ordinance (Section 8-32-140), construction activities would be limited to 8:00 AM to 8:00 PM. Therefore, the impact topic of construction noise is not carried forward for further analysis.

## **5.2 Impact Topics Retained for Further Analysis**

The impacts on the topics of recreation, traffic congestion, cultural resources, social and economic issues, and GLFER areas are discussed below. The analysis of indirect effects includes an evaluation of effects from related non-federal actions such as the development of the OPC, roadway closures and relocation of the track and field. The analysis of cumulative impacts considers the incremental impacts of the Federal actions when added to other past, present, or reasonably foreseeable actions that could affect the same resources.

### **5.2.1 Past, Present, and Reasonably Foreseeable Future Actions**

The following projects are included in the cumulative impacts analysis for this Environmental Assessment. The actions discussed below have occurred or will occur in the project area independent of the Federal Actions. If any of these separate projects qualifies as a Federal Action, it will undergo its own NEPA process before the individual project receives federal approval. Each of the seven identified projects has either completed construction or is programmed for construction. Each of them also has begun, completed, or is not required to proceed through the City approval processes. Of the seven projects considered in this Environmental Assessment, those that require federal and/or state review have either initiated or

completed those activities. The rehabilitation of the golf courses within Jackson Park is not considered because while a golf course project was noted in the SLFP, the final plans and design for the golf course project are not yet approved. Interim information previously shared about the project's layout, design, and other critical details will be further developed as part of a longer-term plan for Jackson Park. Considering the proposed elements of each of the considered projects, topics that would potentially be impacted by the project's action are identified. Impacts topics that are not listed would not involve potential impacts.

#### 5.2.1.1 Stony Island Avenue Traffic Improvements

CDOT is upgrading the signal and communication equipment along Stony Island/Cornell Drive/57th Drive from 95th and Stony Island to 57th and Lake Shore Drive. The project will upgrade existing traffic signal equipment (poles, mast arms, lens, cabinet, conduit) and will interconnect the traffic signals to improve operations along Stony Island, connecting into Lake Shore Drive. Where restoration is required for new traffic signal poles/conduit runs, the project will also upgrade existing pedestrian ramps consistent with the ADA. This action has the potential to impact resources included under the impact topics of "Recreation Resources" and "Traffic Congestion."

#### 5.2.1.2 Lakefront Trail Separation

The Lakefront Trail connects 2,792 acres of parkland in six parks along Chicago's lakefront including Jackson Park. The trail is located east of Lake Shore Drive from 56th Street to Marquette Drive and north of Marquette Drive from Lake Shore Drive to 67th Street within Jackson Park. Considered a major recreational component in the lakefront parks and a transportation network, the Lakefront Trail Separation project sought to alleviate areas of congestion by separating bicyclists from other trail users. The newly separated trail includes an 18-mile bike trail and lakefront path. The separation project is complete. This action has the potential to impact resources included under the impact topics of "Recreation Resources" and "Cultural Resources."

#### 5.2.1.3 Baseball Facilities

The SLFP includes improvements to the area north of Hayes Drive and east of the Wooded Island in Jackson Park. Currently there are two natural grass baseball fields and an overlapping natural grass soccer/football field. Preliminary design is in the early stages for two new senior baseball fields and renovations of one senior baseball field. This action has the potential to impact resources included under the impact topics of "Recreation Resources" and "Cultural Resources."

#### 5.2.1.4 Osaka Garden and Other Improvements on the Wooded Island

As part of larger planning efforts for the Osaka Garden, the Wooded Island, and SLFP, the CPD completed a survey of the garden and improvements to the existing waterfall. The ultimate plan includes improvements to the perimeter fence, a new main gate, pathway enhancements, new plantings and tree pruning, landscape lighting, feature stone placements in the garden, and a new teahouse. The plan also includes the addition of an overlook that will allow for viewing of an existing art installation and new berms surrounding the installation to integrate the site with the adjacent natural areas. For the

Environmental Assessment cumulative analysis, the completed survey and waterfall work are the activities that will be evaluated as they are the past, present, or reasonably foreseeable activities. This action has the potential to impact resources included under the impact topics of “Recreation Resources” and “Cultural Resources.”

#### 5.2.1.5 Clarence Darrow Bridge

The Clarence Darrow Bridge is currently closed to all pedestrian and vehicular traffic. CDOT is evaluating potential alternatives to accommodate bicyclists and pedestrians. Built in 1880 and modified in 1895, CDOT is considering rehabilitation or replacement of the bridge with plans to retain or reproduce historic design elements and materials to the maximum extent possible. CDOT intends to follow the Secretary of the Interior’s (SOI) Standards for the Treatment of Historic Properties for Federal Actions in and Adjacent to Jackson Park. This funded action has the potential to impact resources included under the impact topic of “Recreation Resources.”

#### 5.2.1.6 Midway Plaisance Resurfacing

As part of the 2021 Arterial Resurfacing Program, CDOT will resurface both eastbound and westbound Midway Plaisance roadways between S. Payne Drive and S. Blackstone Avenue. The roadway work will include milling existing pavement, installing new asphalt, and installing ADA compliant curb ramps. Adjacent sidewalks in need of repair will be replaced. Complete Streets/safety improvements within the existing curb lines are proposed. This action has the potential to impact resources included under the impact topics of “Recreation Resources” and “Traffic Congestion.”

#### 5.2.1.7 Jackson Park Harbor Navigation Improvement Project

The CPD has submitted Federal permit applications for the construction of two new breakwaters at the Jackson Park Outer Harbor located at South Promontory Drive. For many years, the CPD has considered various alternatives to address damage caused by lake currents and waves at Jackson Park Outer Harbor. In recent years, harbor shoreline conditions have deteriorated, and an existing floating breakwater failed, which resulted in a partial closure of the harbor. Proposed improvement plans include two steel and stone groins totaling 280 feet in length. Both structures will be enveloped in steel sheet pile with a reinforced concrete crest. These proposed improvements will address the high lake levels of Lake Michigan by shielding boats from damaging waves, reducing sediment deposition in the harbor, and protecting the harbor shoreline. Any impacts that result from the Jackson Park Harbor Navigation Improvement Project would be evaluated and permitted separately by USACE. This action has the potential to impact resources included under the impact topics of “Recreation Resources” and “Cultural Resources.”

### 5.2.2 Recreation Resources

Jackson Park is acknowledged as a vital community asset providing both formal and informal recreation opportunities. As a recipient of UPARR grant funds, the City must retain recreation uses within the existing Section 1010 boundary. Any conversions from recreation to non-recreation uses within Jackson Park requires NPS review.



As a result of constructing the OPC under Alternative B, there would be a partial conversion of recreation use. To compensate for this conversion, the City proposes replacement UPARR land and amenities on the east end of the Midway Plaisance. Under Alternative C, the City proposes an additional partial conversion of recreation use, taking parkland for road improvements and using closed roadways within Jackson Park as replacement land that will be developed with recreation opportunities.

#### 5.2.2.1 Affected Environment – Recreation Resources

##### Jackson Park Recreation

Jackson Park attracts many recreation users, including tourists and members of the local community. Existing recreation opportunities in Jackson Park include the MSI, an outdoor track and field facility, baseball and softball diamonds, a golf course and driving range, soccer fields, beaches, harbors, gardens, and natural spaces, as described in Appendix G. Jackson Park also includes bike opportunities such as east-west bicycle and pedestrian access to the lakefront and the Lakefront Trail at several locations: Marquette Drive, Hayes Drive (63rd Street), 59th Street, 57th Street, and 55th Street (Promontory Point). Other than the underpasses beneath Lake Shore Drive, no other grade separated bicyclist or pedestrian locations exist within the Jackson Park. To circulate within Jackson Park, users must cross heavily traveled four to six-lane roadways, either at signalized intersections or uncontrolled crosswalks, some of which are unmarked. The OPC site within Jackson Park currently includes open space with paths that are used for walking or running, a track that is used for exercise, running, and walking, and an artificial turf field, bounded by the aforementioned track, which is used for playing football and soccer. The site also includes open picnic grove space that can be reserved by applying for a permit, a memorial garden (the Perennial or Women's Garden), and a portion of the 62nd Street Playground. Certain large public events use portions of the site. The Chicago Half Marathon traverses roadways surrounding the site. The remainder of open space on the site is used for informal recreation activities that are not tracked by the CPD.

The strips of land intended to be converted into roadways in Jackson Park, which are discussed in the Background Section 2.4, are currently parkland that are described as narrow, linear spaces that mainly serve as a buffer between roadways and more active recreation areas. These narrow, linear areas that are proposed for partial conversion of recreation use are not typically used for recreation purposes. There is, however, a north-south pathway in the area that is used for walking, jogging, and biking, but that recreation path is located outside the Lake Shore Drive conversion area.

##### Midway Plaisance Recreation

The east end of the Midway Plaisance is proposed as replacement property under UPARR to account for the proposed conversion in Jackson Park. As shown in Figure 9 in Appendix G, the majority of the east end of Midway Plaisance is an open lawn lined with trees. No organized CPD programs take place in the east end of Midway Plaisance and the CPD does not issue permits to reserve this portion of the Midway Plaisance. This part of the Midway Plaisance has two mixed-use trails and a sidewalk. Within the open space are park benches, trees, an informational kiosk, the Cheney Goode Memorial, and a 0.436-acre wetland. The westernmost portion of the lawn area has an elevated landscape containing dense plantings and trees that provide screening of the Metra Electric Railway. The open space allows for informal recreation such as pick-up games, walking, gathering, or open play. However, the CPD receives numerous

complaints from residents about lack of usable space on the eastern edge of the Midway Plaisance due to wet conditions. Sidewalks provide opportunities for walking and biking.

#### 5.2.2.2 Alternative A: No Action – Recreation Resources

##### Direct Impacts

Under Alternative A, recreation within Jackson Park and the Midway Plaisance would continue under the current City and CPD management; there would be no change to the UPARR boundary. Within Jackson Park, existing pedestrian paths, track, and turf field would continue to be available for public use for walking, running, and team sports. Open picnic grove space would continue to be available by permit. Large public events would continue to utilize portions of the site, such as the Chicago Half Marathon along roadways surrounding the site. At the Midway Plaisance, the existing open lawn lined with trees would continue to be available for informal recreation, and the existing trails and sidewalk would continue to be available for walking and running. There would be no change to existing recreation within Jackson Park or the Midway Plaisance; therefore, there would be no direct impacts to the current UPARR boundary under Alternative A.

##### Indirect Impacts – City Actions

As discussed in the direct impacts section above, there would be no change to existing recreation within Jackson Park or the Midway Plaisance; therefore, there would be no indirect impacts to recreation under Alternative A.

##### Cumulative Impacts

Other past, present, or reasonably foreseeable future projects unrelated to the OPC project, as noted in Section 5.2.1, would result in enhancement of existing recreational opportunities by improving access, safety, and existing features. These projects are: the Stony Island Avenue Traffic Improvements, Lakefront Trail Separation, baseball facilities, Osaka Garden and the Wooded Island Improvements, Jackson Park Harbor Navigation Improvement Project, Midway Plaisance Resurfacing Project, and Clarence Darrow Bridge reconstruction (see section 5.2.1). Because there would be no direct or indirect impacts on recreation, Alternative A would not contribute to the cumulative impact on recreation.

#### 5.2.2.3 Alternative B: NPS Action (FHWA No Build) – Recreation Resources

In order for the NPS to approve the UPARR conversion and replacement recreation on the east end of the Midway Plaisance, the City must improve the recreation opportunities on the east end of the Midway Plaisance in a manner that provides equivalent recreation opportunities to what was lost. The loss of recreational opportunities is considered an indirect effect of the Section 1010 boundary conversion and is discussed below in “Indirect Effects.” This includes the development of formal facilities and improvement of the property to provide for informal recreation in the section of the Midway Plaisance to be included within the Section 1010 boundary.

Further, the plans for the Midway Plaisance include space large enough for soccer games and other pick-up team sports. The City's recreation plans for the Midway Plaisance will be reviewed by the NPS for their reasonable equivalence to existing recreational opportunities under UPARR.

### Direct Impacts

The direct impacts resulting from alterations to the replacement recreation property are discussed in the paragraphs below. Indirect impacts, including the loss of recreational facilities within Jackson Park, are discussed separately in the "Indirect Effects" section following.

Under Alternative B, the concept plan for the Midway Plaisance would include new recreational opportunities to meet a variety of recreational needs. The City proposes modifying the site to accommodate a combination of a play area, open space, and rehabilitated walkways. The western side of the lawn would be altered with the addition of a play area. Final decisions on playground structures in this area would be decided through a public process but are anticipated to include inclusive play facilities as well as nature play facilities. Nature play facilities would include opportunities for natural plantings and structures such as tree sundials, mud kitchens, and log steppers; inclusive play facilities in the playground area would include play facilities for people with a wide range of disabilities, such as activity tables, swings, slide mounds, and quiet spaces. The proposed flexible open space on the site would accommodate a variety of activities such as dog-walking, picnicking, and holding soccer practice. The open space area would be the size of one junior soccer field (approximately 30 by 50 yards). The sunken grade of the lawn area that contains a 0.436-acre wetland would be modified to facilitate infiltration and drainage and to enhance use of the open field. The area would be improved to allow public use of the entire site for informal activities such as walking, sitting on the lawn, and strolling on sidewalks by rehabilitating infrastructure and restoring the sunken lawn that prevents use of much of the site. This would be an improvement over the current state of the area which can only be partially used because of the wetland on the site and degraded conditions. The installation of a missing historic walk would provide better access to the Cheney-Goode Memorial and the proposed playground area as well as rehabilitate a historic circulation pattern. Additional tree plantings in each corner would rehabilitate historic spatial organization, to a historically open character with corner plantings. See Figures 10 and 11. These improvements on the Midway Plaisance property would offer generally the same recreational resources and opportunities as lost in the 4.6-acre conversion area on the OPC site in that the same or similar activities can take place.

Construction activities at Midway Plaisance would result in additional noise, additional construction vehicles, temporary closures, and ground disturbing activities in the project area. While these impacts should not extend more than 12 months, visitors may avoid the area and be displaced to other areas of the Plaisance and other City recreation sites during construction. These are short term adverse impacts that would be resolved once the construction ends.

As part of Alternative B, as described in Section 2.4, the Eastbound Midway Plaisance (Stony Island Avenue to Cornell Drive) and Cornell Drive (62nd Street to 59th Street) roadways would be closed for construction of the OPC and then physically removed after construction is complete. Cornell Drive between 68th and 62nd, the northbound section of Cornell Drive between 68th Street and 65th Street,

and Marquette Drive between Stony Island Avenue and Richards Drive would remain in place but would be closed to traffic. Although other existing roads would remain open and used to divert traffic from closed roads, users may have to travel farther distances to access existing recreational opportunities. Additionally, recreational users may experience increased traffic due to this diverted traffic, particularly during peak morning and evening times, resulting in increased travel times to access existing recreational opportunities. See Appendix H for a detailed discussion on the traffic-related impacts of road closures. The farther distances and/or longer travel times may be detrimental to the enjoyment of recreational facilities within Jackson Park.

#### Indirect Impacts – City Actions

Construction of the OPC campus would impact several recreation opportunities. These include an existing picnic grove, open space, the track and field, the 62nd Street Playground and the Women's Garden; the recreation losses are described below. Access to the Women's Garden will be temporarily closed by construction. Upon completion of the OPC site's development, existing features of the Women's Garden will be replaced with a new design of equivalent size and improved accessibility, and current level of public use is expected to resume and potentially increase. Although these features do not count towards replacement recreation opportunities under UPARR, this description provides context for the action and describes what OPC-generated changes would occur in the areas of the site that remain subject to UPARR and open for public recreation.

The function of the 62nd Street Playground would, in essence, be relocated and expanded by the Foundation as part of the OPC construction to the immediate northwest of the current location, with an enlarged footprint and all new equipment, including custom-made experiential play features. The construction of the OPC would also impinge upon the existing track and field facility. The track, however, is nearing the end of its useful life, according to the CPD. The construction of a new track and field facility just south of the OPC site and still within Jackson Park will change and improve current recreational opportunities and uses. The City has indicated that the relocation of the new track and field facility results in the displacement of one junior baseball playing field and one senior baseball playing field. One of these fields will be moved within Jackson Park.

The four buildings on the OPC site, including the museum, a library building, a forum, and a PAAC, would all provide spaces open to the public for exhibitions, various informal and formal events, and spaces to enjoy Jackson Park such as a top floor in the museum building that will offer views of Lake Michigan and the South Side of Chicago. The roof of the library would include a fruit and vegetable garden which will feature a curated program aimed at local grade schools and community members and would also have a hardscape gathering area for small scale cultural offerings or group activities such as informal gathering or picnicking. The buildings would front an open plaza which would provide opportunities for free public events, including informal and planned gatherings.

Recreational elements generated within the OPC site would occur in the areas of the site that remain subject to UPARR and open for public recreation including several informal picnicking areas, the Great Lawn, a nature trail, a woodland walk, and the PAAC within the OPC site boundary. Therefore, while Alternative B would result in indirect impacts to recreation, these impacts would improve recreation in

the project area. See Appendix G for additional details regarding the impacts of the OPC to recreation. A detailed description of the OPC site is provided in Section 2.3 of this Environmental Assessment.

#### Cumulative Impacts

Other past, present, or reasonably foreseeable future projects unrelated to the OPC project, as noted in Section 5.2.1, would result in enhancement of existing recreational opportunities by improving access, safety, and existing features, as described in Alternative A. Alternative B would contribute additional benefits to recreation through facilitation of informal recreation experiences and interconnectedness by easing pedestrian and recreational transit within Jackson Park and improving certain recreation opportunities at the east end of the Midway Plaisance. When considered with the other projects described above, there would be a beneficial cumulative impact to recreation under Alternative B.

#### 5.2.2.4 Alternative C: NPS + FHWA Action (Preferred Alternative) – Recreation Resources

This alternative incorporates impacts associated with Alternative B, as described above, in addition to impacts associated with improving roadways and bicyclist/pedestrian facilities. The analysis of impacts in this section will only discuss the additional impacts to recreation associated with the FHWA action under Alternative C.

#### Direct Impacts

The FHWA planned paths build upon the existing network, which has a focus on trips along and to the Lakefront Trail. Continuous east/west corridors aligned with 59th Street, 63rd Street, and Marquette Drive are planned, in accordance with the Chicago Streets for Cycling Plan 2020, between Stony Island Avenue and the Lakefront Trail. A new north/south path, generally aligned along the vacated Cornell Drive, will connect these east/west corridors and provide additional access to the Lakefront Trail.

FHWA funding will also pay for five new underpasses that will provide safer and more comfortable access for users by physically separating pedestrian and vehicular traffic. The combination of new paths and underpasses will allow users to enter at the far southwest corner of Jackson Park and travel all the way to the northeast corner without having to cross a road at grade. Additional access improvements along Stony Island Avenue to improve access to Jackson Park include two new traffic signals with marked crosswalks and spot improvements including new pedestrian refuge islands and curb extensions to reduce crossing distances. Collectively these actions would have beneficial impacts on recreation.

The planned roadway changes will have negligible effects on various open park spaces in Jackson Park used for informal recreation. The Jackson Park spaces that would be lost to roadway improvements are linear, narrow, and mainly serve as landscaped buffer space between roadways and more functional recreation areas nearby. The conversion of these areas to transportation use will not prevent park users from continuing to use the adjacent open areas of Jackson Park for informal recreation. Overall, the CPD does not expect any impact on the use of existing open spaces because the change in recreation use is undetectable; CPD has worked closely with CDOT to reconfigure pathways and open space following construction.



In Alternative C, the City proposes to add new areas of open space to provide replacement recreation opportunities under UPARR. Table 2 below shows the recreation opportunities created by the proposed trails and open areas within Jackson Park. In total, approximately 11 acres of new open areas and parkland would be designated by the conversion of closed roadways to parkland. These changes are depicted in Figure 16 in Appendix G.

*Table 2: Roadway Closures and Conversions to UPARR Designated Land*

Location	Acreage	Recreation
Cornell Drive (62nd Street to 59th Street)	3.3 Acres	Informal Recreation / New Trail
Cornell Drive (67th Street to 62nd Street)	4.1 Acres	Informal Recreation
Cornell Drive (N Midway Plaisance to OPC Site boundary)	0.1 Acre	Informal Recreation
Hayes Drive (Stony Island Avenue to Lake Shore Drive)	0.5 Acre	Informal Recreation / Extension of Existing Trail
Richards Drive (Hayes Drive to Marquette Drive)	1.0 Acre	Informal Recreation
Marquette Drive (Stony Island Avenue to Richards Drive)	2.0 Acres	Informal Recreation / New Trail

\*Acreage associated with the closure of Cornell Drive between 62nd Street and 59th Street falls within the OPC site boundary; this area has been transferred to the City.

The additional recreation land resulting from the roadway changes would include safety elements to provide greater access and connectivity for recreation users in Jackson Park. The new replacement parkland would offer more user-friendly space than the areas that would be lost to road improvements and would provide enhanced recreation opportunities as compared to the linear spaces that would be impacted by roadway improvements. Specifically, the closures of Cornell Drive, Hayes Drive, Richards Drive, and Marquette Drive would provide expansive new areas of parkland insulated from traffic and new trails. The distance from the roadways of these trails would enhance user enjoyment and encourage additional use of Jackson Park. Further, new sidewalks in the areas of the roadway improvements would offer improved opportunities for pedestrians and runners.

#### Indirect Impacts – City Actions

The indirect impacts of the OPC project discussed under Alternative B in section 5.2.2.3 would apply under Alternative C. No additional indirect impacts to recreation are anticipated under Alternative C.

#### Cumulative Impacts

Other past, present, or reasonably foreseeable future projects unrelated to the OPC project, as noted in Section 5.2.1, would result in enhancement of existing recreational opportunities by improving access, safety, and existing features, as described for Alternative B. Alternative C would contribute additional benefits compared to Alternative B through improvements to pedestrian access, safety, and interconnectedness via new paths and underpasses. When considered with the other projects described above, there would be a beneficial cumulative impact to recreation under Alternative C.

### 5.2.3 Traffic Congestion

#### 5.2.3.1 Affected Environment – Traffic Congestion

##### Roadway-Specific Characteristics

Detailed descriptions of each of the roadways within Jackson Park are contained within Sections 2.1 and 2.2 of Appendix H. Summary descriptions of each roadway are provided below. Also refer to Figure 6.

Cornell Drive/57th Drive is classified as an “other principal arterial” between Lake Shore Drive and westbound Midway Plaisance, and also south of Hayes Drive to Stony Island Avenue. It is classified as a minor arterial between westbound Midway Plaisance and Hayes Drive. The sections classified as an “other principal arterial” are also part of the NHS. Cornell Drive has three lanes in each direction and narrows to two lanes in each direction between North Midway Plaisance and Lake Shore Drive.

U.S. Route 41 (Lake Shore Drive) is an “other principal arterial” roadway that has three lanes in each direction north of 57th Drive and two southbound and three northbound lanes between 57th Drive and Hayes Drive. This section of Lake Shore Drive is part of the NHS. Between Hayes Drive and Marquette Drive, Lake Shore Drive has two lanes in each direction and is classified as a minor arterial.

Stony Island Avenue is an “other principal arterial” roadway south of 67th Street and is a minor arterial north of 67th Street. The section south of 67th Street is on the NHS. Stony Island Avenue has one lane in each direction with on-street parallel parking from 56th Street to 59th Street and from 60th Street to 65th Street. Between 59th Street and 60th Street, parking is prohibited and two travel lanes in each direction are provided. Between 65th Street and 68th Street, four southbound lanes and two northbound lanes are provided due to the merging of southbound Stony Island Avenue and southbound Cornell Drive just south of 65th Street. On-street parking is permitted in the southbound direction in this section. South of 68th Street, four travel lanes in each direction are provided with on-street parking in both directions.

North and South Midway Plaisance are a one-way “other principal arterial” couplet (North Midway Plaisance is one-way westbound and South Midway Plaisance is one-way eastbound) running along the perimeter of the Midway Plaisance. South Midway Plaisance is on the NHS. Both North and South Midway Plaisance have two travel lanes in their designated direction of travel, with on-street parking permitted along both sides.

63rd Street is an east-west, two-lane, minor arterial roadway. East of Cornell Drive, 63rd Street becomes Hayes Drive and is classified as an “other principal arterial”. Hayes Drive is on the NHS. Between Richards Drive and Lake Shore Drive, the roadway widens to two travel lanes in each direction. On-street parking is permitted west of Stony Island Avenue and between Cornell Drive and Richards Drive.

Richards Drive is a north-south major collector roadway located entirely within Jackson Park that serves as a connector between Hayes Drive and Marquette Drive. Richards Drive has two travel lanes striped in each direction. On-street parking is permitted in both directions along Richards Drive, which restricts the roadway from operating as a conventional four-lane roadway.

Marquette Road/Marquette Drive is an east-west oriented roadway that is located midway between 65th Street and 67th Street. West of Richards Drive, Marquette Road/Marquette Drive is classified as a local road. East of Richards Drive, Marquette Drive is classified as a major collector. West of Stony Island Avenue, Marquette Road has one travel lane in each direction with buffered bicycle lanes and no on-street parking or truck traffic. Between Stony Island Avenue and northbound Cornell Drive, Marquette Drive has one 16-foot-wide travel lane in each direction. Between Cornell Drive and Lake Shore Drive, Marquette Drive is striped to provide two travel lanes in each direction. On-street parking is permitted on Marquette Drive in this section. East of Lake Shore Drive, Marquette Drive is signed as U.S. Route 41 and has two 11-foot travel lanes in each direction. On-street parking is prohibited east of Lake Shore Drive.

67th Street is an east-west oriented, two-lane major collector roadway that acts as the southern boundary of Jackson Park. Parking is permitted along both sides of the street within the project study area.

#### Existing Travel Patterns

Currently, the majority of traffic through Jackson Park is concentrated on Cornell Drive/57th Drive and Lake Shore Drive. Lake Shore Drive provides access to the lakefront and downtown Chicago (Central Business District) for neighborhoods located along the south and southeast sections of the City. Cornell Drive/57th Drive serves as a connector between Stony Island Avenue and Lake Shore Drive, providing access between the lakefront and downtown Chicago to the Chicago Skyway and Interstate 94 to the south. Peak travel patterns generally follow commuter traffic flows, with the morning peak period having higher traffic volumes northbound towards downtown Chicago, and the evening peak period having higher southbound traffic volumes.

In addition to intersection traffic operations, the impact analysis evaluated travel times on routes that are expected to experience travel pattern or travel time changes. These routes are:

- 67th Street/Stony Island Avenue to Lake Shore Drive/57th Drive
- 67th Street/Stony Island Avenue to 56th Street/Stony Island Avenue
- Midway Plaisance/Stony Island Avenue to 57th Drive/Lake Shore Drive (Northbound)
- Midway Plaisance/Stony Island Avenue to 67th Street/Stony Island Avenue (Southbound)

The existing travel times along these routes are shown in Table 4 in Appendix H. Between 24 percent and 28 percent of the traffic from Cornell Drive may be diverted outside the project study area. Approximately half of this traffic is projected to divert to the Dan Ryan Expressway, while the remainder would likely be distributed over other north-south collectors and arterials to the west of Stony Island Avenue. Nevertheless, these diversions are not anticipated to result in roadways over capacity outside of the project study area (SSE 2018).

#### Existing Traffic Volumes

Existing Average Daily Traffic (ADT) and peak hour traffic volumes were collected in October 2016 in support of the *Jackson Park Revitalization Traffic Impact Study* (TIS), completed in 2018. The summarized ADT volume data is included as Attachment H-1a in Appendix H for reference.

### Existing Traffic Operations

As part of the *Jackson Park Revitalization TIS*, existing traffic operations were evaluated using the HCM methodology for signalized and unsignalized intersections within the project study area as implemented in the Synchro capacity analysis software. The results of the operational analysis for existing conditions are shown on Attachment H-1b in Appendix H. As indicated in the exhibit, most intersections operate at LOS C or better during both the morning and evening peak hours. Some intersections (Stony Island Avenue at 64th Street, 57th Street at Cornell Drive, and 57th Drive at Hyde Park Boulevard) have one or more movements with traffic volumes that exceed capacity under existing conditions, resulting in congestion and queuing within the roadway network near those intersections. Under existing conditions, traffic volumes at intersections along Lake Shore Drive do not exceed capacity (SSE 2018, Table 3-3).

### Existing Parking Supply

On-street parking is currently permitted along the following roadways within Jackson Park:

- 56th Street between Shore Drive and Stony Island Avenue
- Everett Avenue between 56th Street and Cornell Drive
- Stony Island Avenue between 56th Street and 59th Street, and between 60th Street and 67th Street
- Hayes Drive between Cornell Drive and Lake Shore Drive
- Richards Drive between Hayes Drive and Marquette Drive
- Marquette Drive between Lake Shore Drive and Richards Drive
- South Midway Plaisance between the railroad viaduct and Stony Island Avenue

The *Jackson Park Revitalization TIS* included an inventory of the available existing on-street parking. (See *Section 5.0 of TIS report*). The existing on-street parking supply is summarized in Table 5-1 of the TIS. Based on the parking inventory, there is currently curb length sufficient to provide 841 on-street parking spaces of 20 feet in length within and adjacent to Jackson Park. Individually marked parking spaces are generally not striped within the project study area.

#### 5.2.3.2 Alternative A: No Action – Traffic Congestion

Alternative A (TIS 2040 No Action) represents future conditions assuming none of the proposed actions discussed in this Environmental Assessment is taken.

### Direct Impacts

#### *Anticipated Travel Patterns*

Under Alternative A, travel patterns within Jackson Park would remain largely the same as described above or stable, with no shifts in traffic due to planned roadway capacity improvements or major proposed developments.

Appendix H depicts a comparative table of travel time changes between Alternative A and the existing conditions. Travel times along the analyzed routes are not expected to increase more than 36 seconds (0.6 minutes) through 2040.

#### *Anticipated Traffic Volumes<sup>3</sup>*

The traffic volume projections for the Alternative A (TIS 2040 No Action) scenario have no roadway network changes from current condition. About a 2.4 percent background traffic growth increase is projected by CMAP within Jackson Park as a result of implementation of the *GO TO 2040* regional plan between 2016 and 2040. The majority of this additional traffic growth is projected to occur on the arterials within the project study area, with the largest increase occurring on 57th Drive, where it is anticipated that the two-way hourly traffic volumes would increase by approximately 200 vehicles during peak hours compared to existing conditions. Additional increases in traffic within the project study area of about 150 vehicles in the morning and evening peak hours are anticipated in conjunction with the following University of Chicago campus improvements (SSE 2018):

- Parking garage and fitness facility located at Kimbark Avenue and 61st Street
- The Study hotel and restaurant located on west side of Kimbark Avenue at 60th Street
- Renovations to the David M. Rubenstein Forum located at Woodlawn Avenue and 60th Street
- Renovations to the Keller Center located on 60th Street between Kimbark Avenue and Kenwood Avenue
- Woodlawn Residential and Dining Commons located at Woodlawn Avenue and 61st Street

The Study hotel and restaurant, David M. Rubenstein Forum and Woodlawn Residential Dining Commons are currently under construction. The new parking garage and fitness center building has been proposed but construction has not begun. Renovations to the Keller Center were completed in 2019.

The ADT volumes for this alternative are shown on Attachment H-2a in Appendix H.

#### *Operational Performance*

Most intersections would continue to operate at similar LOS as under Existing Conditions if Alternative A is implemented, and no roadway or intersection improvements are constructed prior to 2040. However, some intersections would experience a degradation of traffic operations due to the increase in background traffic and the additional traffic generated by University of Chicago near-term campus development projects. Two intersections would degrade to a LOS F during at least one peak hour due to traffic growth, as described below:

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<sup>3</sup> In October 2018, the Chicago Metropolitan Agency for Planning (CMAP) formally adopted their *ON TO 2050* regional plan. In accordance with the adoption of the new regional plan, year 2050 traffic projections were obtained from CMAP and the traffic analyses were re-examined to ensure that traffic impacts would not substantially increase under year 2050 traffic volumes. This sensitivity analysis is discussed in Section 4 of Appendix H. The results of the sensitivity analysis found that while traffic volumes do increase over 2040 levels, the conclusions reached from the 2040 traffic analyses do not change for any of the alternatives under 2050 traffic volumes. It was therefore concluded that the original 2040 analyses are still valid for environmental review purposes.



- Stony Island Avenue at 67th Street would degrade from a LOS D to a LOS F, as the southbound through movement exceeds capacity during the P.M. peak hour.
- Stony Island Avenue at S. Midway Plaisance would degrade from a LOS C to a LOS F due to the eastbound approach exceeding capacity during the P.M. peak hour.

The full results of the operational analysis from the *Jackson Park Revitalization TIS* for Alternative A are shown on Attachment H-2b in Appendix H. The operational analysis results for 2016 Existing Conditions are also shown in the table for comparison purposes.

#### Indirect Impacts – City Actions

There would be no indirect traffic impacts under Alternative A, because the proposed actions would not occur.

#### Cumulative Impacts

Past, present, and future actions described above would be expected to have short term adverse impacts to congestion, but long-term beneficial impacts once implemented. These include the Stony Island Avenue Traffic Improvements and the Midway Plaisance Resurfacing. Alternative A would not contribute to any cumulative impacts, as no additional federal action occurs under this alternative.

#### 5.2.3.3 Alternative B: NPS Action (FHWA No Build) – Traffic Congestion

Alternative B includes NPS approval of the partial conversion of recreation within a portion of the OPC site, as well as the associated replacement of recreation opportunities on the east end of the Midway Plaisance. This alternative assumes that no roadway or intersection improvements would be constructed prior to 2040 to accommodate background traffic growth.

#### Direct Impacts

There are no direct traffic or parking impacts associated with Alternative B.

#### Indirect Impacts – City Actions

Alternative B represents future conditions in which the roadway closures are in place and that the OPC is constructed within Jackson Park. Under this alternative no other roadway or intersection improvements would be constructed prior to 2040 to accommodate reassignment of traffic from the roadway closures, OPC traffic generation, or background traffic growth. Indirect impacts of Alternative B would result in long-term negative impacts to traffic congestion within the project study area as a result of traffic diversions and traffic redistribution caused by the roadway closures.

#### *Anticipated Travel Patterns*

The closures would result in a change in travel patterns in the project study area and would redistribute traffic to the surrounding roadway network. As part of the *Jackson Park Revitalization TIS*, CMAP estimated approximately 24-28 percent of all vehicle trips would reroute to alternate roadways outside of the project study area.

The results of the travel demand modeling for the TIS indicated that traffic diversion to roadways outside Jackson Park would not be substantial. Analysis by CDOT determined that sufficient reserve capacity existed on parallel arterials and collector streets to absorb any diversions that would occur without adverse neighborhood impacts. These findings are summarized in the TIS (Table 3-3). As a result of these findings, the project study area in the TIS only included those roadways within Jackson Park.

As a result of closing Cornell Drive, some of the remaining vehicles within the network would divert to Stony Island Avenue to the west; however, the majority of the remaining vehicles would divert to Lake Shore Drive to the east. With the closure of Marquette Drive, many vehicles would reroute onto Hayes Drive to ultimately travel to and from Lake Shore Drive.

Travel times between 67th Street/Stony Island Avenue and 57th Street/Lake Shore Drive increased by more than 28 minutes per vehicle headed northbound in the morning peak hour and by 7.5 minutes per vehicle southbound in the evening peak hour due to the closure of Cornell Drive. Along Stony Island Avenue in the morning peak hour, travel between 67th Street and 56th Street increases by over 28 minutes per vehicle.

#### *Anticipated Traffic Volumes*

The 2040 traffic volumes developed for this alternative incorporated the CMAP reductions in traffic volumes for trip diversions to roadways outside of the project study area. Traffic volumes also included, additional visitor and employee traffic for the OPC, and reassignment of traffic to reflect diversions to other roadways as a result of the proposed closures. Because no roadway improvements would be constructed for this alternative, the remaining section of Cornell Drive between Hayes Drive and Stony Island Avenue would remain one-way southbound although the northbound split alignment section is closed. Additionally, North Midway Plaisance would remain one-way westbound east of Stony Island Avenue, resulting in Cornell Drive being one-way southbound south of 57th Street.

The closure of northbound Cornell Drive increases the northbound through volume by 925 vehicles, resulting in the northbound through volume doubling during the A.M. peak hour along Stony Island Avenue. Northbound vehicles that are destined for Lake Shore Drive would either turn right onto Hayes Drive, or remain on Stony Island Avenue and turn right onto 57th Street. During the P.M. peak hour, 875 additional southbound vehicles along Lake Shore Drive would turn right onto Hayes Drive. With the closure of Cornell Drive, the north leg of the Hayes Drive at Cornell Drive intersection would be removed, resulting in a T-intersection configuration and causing an additional 725 westbound left turns from diverted traffic. The ADT volumes for this alternative are shown on Attachment H-3a in Appendix H.

#### *Operational Performance*

Roadways experiencing the greatest traffic impacts include Stony Island Avenue during the A.M. peak hour and Lake Shore Drive during the P.M. peak hour. Stony Island Avenue currently has only one travel lane in each direction north of 65th Street and does not have available capacity for the amount of anticipated Cornell Drive traffic diversions during the A.M. peak hour. Similarly, Lake Shore Drive under existing conditions only has two southbound travel lanes south of 57th Drive, and the diverted Cornell Drive traffic during the P.M. peak hour exceeds the available capacity of the roadway.

Based on the traffic operation analysis findings shown in Table 9 in Appendix H, the number of signalized intersections with movements operating over capacity during at least one peak hour would increase from nine to thirteen under Alternative B. Two additional intersections would have increases in overall delay of at least 15 seconds per vehicle in Alternative B compared to Alternative A. These results are indicative of an increase in overall traffic congestion within the project study area as a result of the roadway closures in Alternative B.

The results of the operational analysis for Alternative B are shown on Attachment H-3b and in Table 9 in Appendix H. The operational analysis results for Alternative A are also shown in Table 9 for comparison purposes. Under Alternative B, nine additional signalized intersections within the roadway network experience a LOS F and/or operate over capacity during either the morning or the evening peak hour compared to Alternative A. These additional LOS F intersections are a result of traffic diversions and traffic redistribution caused by the roadway closures.

#### *Parking Supply*

The roadway closures in Alternative B would result in a loss of 128 public on-street parking spaces. Of the 128 spaces lost, 125 are within the section of Marquette Drive between Richards Drive and Stony Island Avenue. However, as discussed in Section 3.2.2.4 of Appendix H, although this section of Marquette Drive is currently signed to permit parking, it does not function as having on-street parking. Marquette Drive in this section is striped for two travel lanes in each direction, with no existing parking demand noted. Therefore, removal of this section of Marquette Drive in Alternative B would not impact existing parking demand. Table 10 in Appendix H summarizes the change in available on-street parking supply within and adjacent to Jackson Park as a result of the roadway closures in Alternative B.

Additional off-street parking is proposed under Alternative B as part of the OPC development to accommodate anticipated parking demand resulting from visitors to the center. The amount of off-street parking was evaluated as part of the Jackson Park Revitalization TIS. The number of off-street spaces proposed meets City zoning regulations and is sufficient to accommodate visitors to the OPC and its employees. The proposed off-street parking design has been approved by the City.

#### Cumulative Impacts

Several other ongoing or reasonably foreseeable projects have been identified in the project study area, as described in Alternative A. Alternative B would result in long-term negative impacts to traffic congestion within the project study area as a result of the roadway closures, traffic diversions and traffic redistribution caused by the roadway closures. As evaluated in Alternative A, the reasonably foreseeable projects with the potential to impact traffic contribute long-term, beneficial impacts. The actions in Alternative B would be the only long-term negative contribution to an overall negative cumulative impact.

#### 5.2.3.4 Alternative C: NPS + FHWA Action (Preferred Alternative) – Traffic Congestion

This alternative incorporates impacts associated with Alternative B, in addition to those arising from improved roadways and bicyclist/pedestrian facilities and additional changes to the UPARR boundary. The analysis of impacts in this section will only discuss the additional impacts associated with Alternative C.

## Direct Impacts

### *Anticipated Travel Patterns*

Diverted traffic from the Alternative B roadway closures that remains within Jackson Park predominantly travels along Lake Shore Drive, Hayes Drive and Stony Island Avenue in Alternative C. However, due to the proposed roadway improvements in Alternative C, the diverted traffic would be dispersed among the improved roadways more evenly without overburdening any one roadway. Additionally, about half of the traffic that had diverted outside of the project study area in Alternative B due to the roadway closures would instead remain within the project study area under Alternative C as a result of the roadway network improvements.

Table 11 in Appendix H depicts travel time changes between Alternative C versus Alternative B and Alternative A. Alternative C would improve traffic congestion and travel times along all of the routes depicted in Table 11 compared to Alternative B. For drivers using Cornell Drive and Hayes Drive, travel times between 67th Street/Stony Island Avenue and 57th Drive/Lake Shore Drive, would improve by a range of 1.5 to over 8 minutes in the peak hour travel periods for Alternative C compared to Alternative B. Along Stony Island Avenue, northbound travel to 56th Street in the morning peak hour would improve by over 31 minutes in Alternative C compared to Alternative B. In comparison to Alternative A, Alternative C produced generally the same travel times for the routes shown in Table 11, with the maximum travel time increase being just over 45 seconds in the northbound direction for the route along Cornell Drive and Hayes Drive between 67th Street/Stony Island Avenue and 57th Drive/Lake Shore Drive.

### *Anticipated Traffic Volumes*

The results of the CMAP travel demand modeling for this alternative indicated a shift in traffic destined to Lake Shore Drive from Stony Island Avenue onto the new two-way sections of Cornell Drive as the conversion of one-way sections to two-way sections provide additional capacity for those trips. The travel demand model determined that 1,280 vehicles would use the new northbound section of Cornell Drive between Stony Island Avenue and Hayes Drive during the A.M. peak hour, and that 200 vehicles would use the new northbound lanes on N. Midway Plaisance/Cornell Drive between Stony Island Avenue and 57th Drive during the A.M. peak hour. The ADT volumes for this alternative are shown on Attachment H-4a in Appendix H.

### *Operational Performance*

The results of the operational analysis for Alternative C are summarized in Table 12 and shown on Attachment H-4b in Appendix H. The operational analysis results for Alternative B are also shown in Table 12 for comparison purposes. Alternative C would result in all major intersections operating at LOS D or better, meeting or exceeding the lowest level of traffic operations considered desirable by regional transportation agencies.

### *Parking Supply*

The roadway improvements proposed in Alternative C would result in changes in the amount of on-street parking available within and adjacent to Jackson Park. Table 13 in Appendix H summarizes the available

on-street parking supply upon completion of the roadway improvements proposed in Alternative C. The parking supply available under Alternative B is also shown for comparison purposes.

As shown in the Table 13 of Appendix H, the proposed roadway improvements in Alternative C would result in a loss of 105 public on-street parking spaces in addition to lost parking spaces in Alternative B.

As part of the proposed roadway improvements, there are 84 new on-street parking spaces proposed in and around Jackson Park to minimize the loss of parking associated with the proposed vehicle capacity improvements. Based on the parking study completed as part of the *Jackson Park Revitalization TIS* (SSE 2018), even with the net loss of parking spaces, there is still an excess parking supply based on parking demands. As the implementation of the SLFP continues, the City will continue to work with CPD to implement additional parking supply in Jackson Park (CPD 2018) to ensure the parking needs of CPD are addressed.

#### Indirect impacts – City Actions

The indirect impacts of Alternative C are the same as those described in Alternative B. Alternative C addresses the long-term negative impacts of Alternative B by providing capacity improvements to address the redistributed traffic volumes and congestion caused by the roadway closures. Therefore, no additional indirect impacts result from implementing Alternative C.

#### Cumulative Impacts

Several other ongoing or reasonably foreseeable projects have been identified in the project study area, as described in Alternative A. As evaluated in Alternative A, the reasonably foreseeable projects with the potential to impact traffic contribute long-term, beneficial impacts. The actions proposed in Alternative C would have beneficial impacts and mitigate the majority of adverse impacts that result from Alternative B, resulting in negligible cumulative impacts to traffic congestion by implementing Alternative C.

### **5.2.4 Cultural Resources (Historic Properties)**

#### **5.2.4.1 Affected Environment – Cultural Resources (Historic Properties)**

The study area for above ground cultural resources is the historic architecture area of potential effect that was determined in consultation with the Illinois SHPO during the Section 106 process. This area was defined in order to address all areas that may be affected, both directly and indirectly, by the proposed project. Within the study area, eight historic districts and 30 individual properties (for a total of 38 historic properties) have been listed or are eligible for listing in the NRHP; these properties were identified in the Historic Properties Inventory (HPI) and associated addendum, which are available at the project website (<http://www.tinyURL.com/JPIImprovements>).

More information on the identified resources is contained within those reports. A summary table of the identified properties can be found in Table B-1 of Appendix B. The Illinois SHPO concurred with the findings of the HPI on July 10, 2018 and the HPI Addendum on February 18, 2020.

Of the numerous historic properties within the study area, most have no potential to be affected by the proposed action. An Assessment of Effect completed in consultation with the Illinois SHPO (available at



<http://www.tinyURL.com/JPIImprovements>) narrowed the full list to eight resources with the potential to be affected by the proposed action, and of those, only two were found to be adversely affected: the Jackson Park Historic Landscape District & Midway Plaisance and the Chicago Park Boulevard System Historic District (CPBSHD). The Illinois SHPO concurred with these findings on February 18, 2020.

The Jackson Park Historic Landscape District and Midway Plaisance includes both Jackson Park and the Midway Plaisance. The CPBSHD is a 1,700-acre district consisting of boulevards, parks, squares, and buildings. The Jackson Park Historic Landscape District and Midway Plaisance is a major contributing feature of the CPBSHD. The discussion of impacts in the following sections focuses on these two resources.

#### 5.2.4.2 Alternative A: No Action – Cultural Resources (Historic Properties)

Under Alternative A, no federal actions would be approved, and the proposed project areas would continue to be managed by their existing agencies. Jackson Park would remain under the jurisdiction of the CPD, and the City and IDOT would continue to manage the existing roadway network. Other planned and proposed projects with the potential to impact historic properties would be expected to continue under this alternative, even if the proposed federal actions are not approved. More information on planned and proposed projects in the vicinity can be found in Section 5.2.1.

##### Direct Impacts

No direct impacts on cultural resources would occur as a result of federal actions under Alternative A. No UPARR conversions or roadway improvements would occur. As a result, no direct impacts to the characteristics of the historic properties that qualify them for inclusion in the NRHP would occur as part of a federal action. The identified properties would remain in their existing locations, there would be no changes to existing viewsheds, and no changes would occur to the existing settings. The designed architectural features and landscape characteristics of the resources would remain intact, and their historic materials would remain in place. The historic resources would retain the features of their historic workmanship, and the properties would maintain the feeling and aesthetic of their periods of significance. Accordingly, the properties would preserve their historic associations.

##### Indirect Impacts – City Actions

As discussed in the direct impacts section above, there would be no change to existing cultural resources under Alternative A; therefore, there would be no indirect impacts to cultural resources under Alternative A.

##### Cumulative Impacts

Other past, present, or reasonably foreseeable future projects unrelated to the OPC project, as noted in Section 5.2.1, may result as part of other initiatives, but no cumulative impacts would occur as a result of Federal action under Alternative A, as no Federal action occurs.

#### 5.2.4.3 Alternative B: NPS Action (FHWA No Build) – Cultural Resources (Historic Properties)

Under Alternative B, NPS would approve the partial conversion of recreation within a portion of the OPC site, as well as the associated replacement opportunities on the east end of the Midway Plaisance, but

FHWA would not authorize funding for any roadway improvements. Although the change in UPARR legal status would not in itself alter historic properties, the proposed use of the east end of the Midway Plaisance would occur as a result of the NPS action. Under Alternative B, the OPC site would be developed according to plans, but no roadway improvements would occur.

#### Direct Impacts

The replacement recreation proposed for the east end of the Midway Plaisance would have a direct impact on the Jackson Park Historic Landscape District and Midway Plaisance and the CPBShD; however, these impacts would not be adverse and would be minimal in scale compared to the size of the 683-acre Jackson Park Historic Landscape District & Midway Plaisance and 1,700-acre CPBShD. Contributing features of the Midway Plaisance would be impacted by the change in the recreational use; however, these impacts would not change the characteristics for which the resource is listed in the NRHP. The sunken lawn and historic Cheney-Goode Memorial would remain in their historic locations. The designed character of the sunken lawn would remain intact, and historic features would be restored, including a north-south path and historic vegetation patterns. The new playground would be designed to be compatible with the existing character of the Midway Plaisance. The overall setting of the resource would remain intact, most notably its relationship to the rest of the Midway Plaisance and Jackson Park. Material features of the Midway Plaisance would remain intact, including the sunken lawn and the Cheney-Goode Memorial. Due to the intact design and material features, the historic workmanship of the Midway Plaisance's design would remain intact. The area would retain the feeling, aesthetics, and associations that qualify it for listing on the NRHP.

#### Indirect Impacts – City Actions

The OPC development would have an adverse impact on the Jackson Park Historic Landscape District and Midway Plaisance and the CPBShD that arises indirectly from the federal action on the UPARR conversion.

The development of the 19.3-acre OPC site would alter contributing physical elements of Jackson Park, including the Women's Garden, the Gymnasia Fields, the historic circulation patterns and associated features, and the designed topography and views within Jackson Park. These changes would alter notable landscape features of Jackson Park, including the historic location of features and their historic design. The setting of Jackson Park would be altered by the removal of historic designed features and the addition of a new museum building. Material elements of Jackson Park, such as the Women's Garden and historic roadways, would be removed. Due to the changes in design and materials, the workmanship of Olmsted's original design would be less apparent, and the feeling and aesthetic of Jackson Park would be altered. Due to the large-scale changes in this area of Jackson Park, its ability to convey historic associations would be diminished.

The development of the OPC would result in adverse impacts to historic features, but the area of change would be small in scale given the overall size of the historic resources; less than 3 percent of the 683-acre Jackson Park Historic Landscape District & Midway Plaisance and less than 2 percent of the 1,700-acre CPBShD would be altered. Furthermore, the proposed changes would be compatible with the existing character of the area. Jackson Park has been continually utilized for cultural activities and institutions over its history, and the area has been altered over time to accommodate the contemporary needs of the

public. Historic alterations have included WPA era improvements, such as the English Comfort Station, and post-World War II additions, such as the baseball fieldhouse. Non-historic alterations have included the widening of roadways, the straightening of Cornell Drive, alterations to Marquette Drive, the removal of trees, and the construction of a golf driving range. These continual adaptive alterations to Jackson Park have also become part of the cultural landscape and developmental history of this facility. The proposed project would be a continuance of this developmental history. Mitigation strategies are currently being developed as part of the Section 106 consultation process, and this process is expected to culminate in the discussion and potential execution of a Memorandum of Agreement (MOA) outlining stipulations for mitigation under the National Historic Preservation Act (NHPA) as a result of this proposed project.

For the purposes of NEPA, the impacts to cultural resources would be adverse but would be small in proportion to the overall size of the historic resources and would be consistent with land use patterns and developmental history. Impacts would be further mitigated to the extent agreed upon in an MOA as part of the NHPA Section 106 process.

#### Cumulative Impacts

Other past, present, or reasonably foreseeable future projects unrelated to the OPC project, as noted in Section 5.2.1, would contribute minimal alterations to historic features, which would contribute a relatively small increment to the overall cumulative impact. Although the past, present, and reasonably foreseeable actions in the area would be expected to alter historic resources, the overall totality of these impacts would be minor; these impacts would not be expected to impact the integrity of historic resources in the area or diminish the features for which they are eligible for listing in the NRHP. Alternative B would contribute additional impacts to historic resources. Specifically, while the UPARR partial conversion itself would not contribute directly to cumulative impacts on the Jackson Park Historic District and Midway Plaisance or the CPBSHD, the UPARR partial conversion would contribute indirectly to cumulative impacts on these resources as a result of the development of the OPC. As noted above, these indirect impacts are adverse but small in proportion to the overall size of the historic resources and would be consistent with land use patterns and developmental history of the historic resources. The cumulative impacts to historic resources would not affect the eligibility of these historic resources for listing in the NRHP.

#### Mitigation

Measures to minimize impacts have been undertaken as part of the project development process. For example, the UPARR replacement location selection of the east end of the Midway Plaisance allows for restoration of the historic sunken lawn, which has degraded into a non-historic wetland over time. Additionally, the new playground in this location would be designed to be compatible with the historic character of the area. Within Jackson Park, impacts would be minimized because of the following design elements: the replacement of the Women's Garden would incorporate design and material elements of the existing garden, impacts to the English Comfort Station would be avoided, proposed topography and walkways would be designed to reflect the character of the historic landscape design, and the track and field would be relocated to an area with existing active recreational uses. Impacts on circulation patterns and features would be minimized because conversion of the closed roadways to pedestrian walks and greenspace would be designed to maintain the historic character as much as possible. Impacts on the

viewshed would be minimized because the use of earth toned building materials, the use of berms and planted buffers, and the partial submergence of several of the OPC buildings would reduce their visibility.

Mitigation strategies are currently being developed as part of the Section 106 consultation process and may culminate in the execution of an MOA outlining stipulations for mitigation under the NHPA as a result of this proposed project.

For the purposes of NEPA, the impacts to cultural resources would be adverse but would be small in proportion to the overall size of the historic resources and would be consistent with land use patterns and developmental history. Impacts would be further mitigated to the extent agreed upon with the SHPO as part of the NHPA Section 106 process.

#### 5.2.4.4 Alternative C: NPS + FHWA Action (Preferred Alternative) – Cultural Resources (Historic Properties)

Under Alternative C, NPS would approve the proposed partial conversion of UPARR lands related to the OPC and the transportation improvements (as well as associated replacement of lost recreation opportunities), and FHWA would authorize funding for the transportation improvements. Historic properties under Alternative C would experience the same impacts as under Alternative B as described above in section 5.2.4.3, plus additional impacts related to the transportation improvements. These additional impacts are discussed below.

##### Direct Impacts

Under Alternative C, additional impacts would occur to historic resources due to the proposed FHWA roadway improvements. These roadway improvements would have a direct impact on the Jackson Park Historic Landscape District & Midway Plaisance and the CPBShD, and these impacts would be adverse. Contributing features of the historic resources would be altered in a way that diminishes the characteristics for which the resources are listed in the NRHP (see Table 4 for more details). Some contributing features would no longer remain in their historic locations; specifically, the Hayes Drive/Richards Drive intersection would be moved. Important design features of the resources would be altered as a result of project implementation. The historic triangular design of the Hayes Drive/Richards Drive intersection and its design emphasis on the Statue of the Republic would be removed as a result of the proposed project. The designed character of Marquette Drive and Richards Drive would be adversely affected by their closure to roadway traffic and the reduction of their paved areas for use as pedestrian paths. The setting of the historic resources would be altered by these changes to the design and location of contributing historic features, and as a result, the integrity of setting would be diminished. Material features would be lost as a result of project implementation due to the removal of historic roadways. These alterations would diminish the evident historic workmanship of Olmsted's design implementation by altering the spatial organization of Jackson Park, and the historic properties' feeling and aesthetic would be negatively impacted by these changes. By removing elements of the historic design, the associations of the historic properties that qualify it for listing on the NRHP would be diminished.

Table 3: Direct Impacts to Historic Resources under Alternative C

Impacted Features	Summary of Impacts*
Lake Shore Drive	Widening and intersection improvements
Hayes Drive Reconfiguration	Widening of the roadway; realignment of intersections with Cornell Drive and Richards Drive; introduction of new traffic signals
Stony Island Avenue Improvements	Widening of the roadway; realignment of sidewalks; topography changes
Marquette Drive and Cornell Drive closures	Roadway closures to vehicular traffic
Jackson Park Inner Harbor	Replacement GLFER areas provide rehabilitation of a deteriorated historic path and lagoon overlook; replacement vegetation
Bicycle/Pedestrian Improvements	New underpasses, additional access points, new pedestrian refuge islands, additional pedestrian ramps, traffic timing and signal improvements, pavement markings

\*The impacts reflected in this table are in addition to the impacts discussed under Alternative B in Section 5.2.4.3.

### Indirect Impacts – City Actions

For Alternative C, the indirect impacts are expected to be the same as Alternative B plus the indirect impacts from the transportation improvements that would be implemented under Alternative C. As described in Alternative B, Section 5.2.4.3 above, the impacts from the development of the OPC are described as indirect impacts, relative to the federal action of UPARR partial conversion. The development of the OPC would have an adverse impact on the Jackson Park Historic Landscape District and Midway Plaisance and the CPBSHD that arises indirectly from the federal action on the UPARR conversion. Under Alternative C, roadway improvements would not induce changes in the pattern of land use or growth rate in the vicinity of Jackson Park that would result in alterations to historic resources. Therefore, no additional indirect impacts to cultural resources are expected as a result of the roadway improvements under Alternative C.

### Cumulative Impacts

Other past, present, or reasonably foreseeable future projects unrelated to the OPC project, as noted in Section 5.2.1, would contribute minimal alterations to historic features, which would contribute a relatively small increment to the overall cumulative impact. Although the past, present, and reasonably foreseeable actions in the area would be expected to alter historic resources, the overall totality of these impacts would be minor; these impacts would not be expected to impact the integrity of historic resources in the area or diminish the features for which they are eligible for listing in the NRHP. Alternative C would contribute additional impacts to historic resources. The UPARR partial conversion would contribute indirectly to cumulative impacts on the Jackson Park Historic District and Midway Plaisance and the CPBSHD. As noted above, these indirect impacts are adverse but small in proportion to the overall size of the historic resources and would be consistent with land use patterns and developmental history of the historic resources. The roadway improvements would contribute minor adverse additional impacts. Both historic resources would retain their overall historic character and use patterns, and they would remain eligible for listing in the NRHP.



## Mitigation

Minimization and avoidance measures have been undertaken as part of project development. For example, widening and intersection improvements along Lake Shore Drive would remain consistent with the historic road alignment and with the previous 3-lane typical section of the southbound road. Additionally, the replacement vegetation would follow GLFER precedent and historic design principles. The Hayes Drive reconfiguration would avoid physical impacts to the Statue of the Republic, and the Stony Island Avenue improvements would avoid traffic noise increases. Roadway closures of Marquette Drive and Cornell Drive would maintain the alignments as a pedestrian pathway, which would retain the spatial organization within Jackson Park. The bicycle and pedestrian improvements would be designed to minimize alterations to the historic topography and vegetation within Jackson Park.

Mitigation strategies are currently being developed as part of the Section 106 consultation process, and this process may culminate in the execution of an MOA outlining stipulations for mitigation under the NHPA as a result of this proposed project.

For the purposes of NEPA, the impacts to cultural resources would be adverse but would be mitigated to the extent described in this EA. Impacts would be small in proportion to the overall size of the historic resources and would be consistent with land use patterns and developmental history.

## **5.2.5 Social and Economic Issues**

### **5.2.5.1 Affected Environment – Social and Economic Issues**

The project study area neighborhoods of South Shore, Woodlawn, and Hyde Park (see Attachment I-2 of Appendix I) have a combined population totaling more than 100,500 residents.<sup>4</sup> The predominant racial groups in the project study area and surrounding neighborhoods are black/African American at 74.0 percent of the total population and white at 17.7 percent. The racial composition of the project study area differs from that of the City of Chicago in which 49.1 percent of the population is white and 30.5 percent is black/African American. The proportion of people of Hispanic origin is less than in the City of Chicago, at 3.6 percent in the project study area and 29.0 percent in the City. The demographic profile of the project study area is presented in detail in in Appendix I, specifically Table 2.

Of the three neighborhoods, South Shore has the largest population under the age of 18 at 27.9 percent, which is slightly higher than the City of Chicago's percentage of 21.5 percent. South Shore also has the largest percentage of senior citizens, with 3.6 percent of persons 65 years of age or older, which is less than the 11.7 percent of persons in that age group in the City of Chicago. Hyde Park has the largest proportion of persons between the ages of 18 and 64, with 80.3 percent of the population in this age range. The median age is 36.8 for South Shore, 34.3 for Woodlawn, and 32.9 for Hyde Park. Data on ages of population are presented in Table 3 of Appendix I.

Of the three neighborhoods, South Shore and Woodlawn have a greater number of people with only a high school degree than Hyde Park, accounting for 19.0 percent and 16.0 percent respectively. Hyde Park

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<sup>4</sup> Demographic, poverty, labor, and housing data presented in this section are from U.S. Census Bureau, 2019.

has the greatest number of people with a bachelor's degree or higher for people 25 years of age or older, accounting for 16.0 percent of the neighborhood's population. Overall, the percent of people in the project study area with educational degrees is lower than that of the City of Chicago. Data on the educational attainment of population are presented in Table 4 of Appendix I.

Within the project study area, 38.8 percent of people in South Shore and 38.0 percent of people in Woodlawn live below the poverty line, exceeding the overall percentage of people below the poverty line in the City of Chicago by 18.2 percent and 17.4 percent respectively. Hyde Park has the highest median household income and exceeds that of the City of Chicago. Both South Shore and Woodlawn are considered low-income with populations of concern for purposes of this report, because the percentage of people below the poverty line within a neighborhood is at least 10 percent more than the City of Chicago average. Tables indicating federal poverty guidelines for 2017 (Table 5), median income (Table 6), and number and percentage of people below the poverty line (Table 7) can be found in Appendix I.

In all three neighborhoods the labor force participation rates (persons in the labor force divided by population 16 years and older) fall below those of the City of Chicago and the State of Illinois (see Table 8 of Appendix I). Unemployment rates (percentage of unemployed workers in the total labor force) for South Shore and Woodlawn from 2013 to 2017 were considerably higher than the City of Chicago and Illinois, while that of Hyde Park was below.

Within the project study area and surrounding neighborhoods, the percentage of home ownership ranges from 21.0 percent to 36.6 percent, with 21.0 percent home ownership in South Shore, 23.5 percent in Woodlawn, and 36.3 percent in Hyde Park. Overall fewer people in the project study area own homes than in the City of Chicago as a whole (25.9 percent compared to 44.6 percent). Median housing values in South Shore and Woodlawn, \$184,142 and \$154,752, respectively fall below the City of Chicago median of \$234,500, while the median house value in the Hyde Park neighborhood of \$272,758 is approximately \$38,000 higher. Renter occupied housing accounts for 79.0 percent of housing in South Shore, 76.5 percent in Woodlawn, and 63.7 percent in Hyde Park. The number of renters in all three neighborhoods exceeds the citywide percentage of 55.4 percent. Median rental rates for South Shore and Woodlawn (\$877 and \$938, respectively) are lower than the City of Chicago median rate (\$1,029), while the median rental rate in Hyde Park (\$1,109) is higher.

Recent population trends in the project study area's neighborhoods have been varied. In its *Woodlawn Community Area Economic Analysis* commissioned by the Network of Woodlawn, AECOM found strong population growth (AECOM 2019). From 2010 to 2018, Woodlawn saw an increase of 2,941 residents (13.7 percent growth). This represented 28.3 percent of the growth the City of Chicago as a whole experienced. Growth was more moderate in Hyde Park, which had a 3.6 percent increase in population (931 residents). The largest neighborhood in the project study area, South Shore, experienced a 1.5 percent decline in its population over the 8-year period. The project study area as a whole saw a 3.3 percent rise in population, substantially stronger than the 0.4 percent population growth of the City of Chicago during the same time period. Table 10 of Appendix I presents the population change in the neighborhoods within the project study area.

Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority and Low-Income Populations,” requires agencies to analyze the environmental effects of a proposed action on minority and low-income communities and to avoid the disproportionate placement of high and adverse environmental, economic, social, or health impacts from federal actions and policies on minority and low-income populations (1994). The Environmental Justice (EJ) analysis was conducted in accordance with EO 12898. The analysis involved several steps: defining the study area, identifying minority and low-income populations, identifying any high and adverse human health or environmental impacts, and determining whether any high and adverse impacts would disproportionately affect minority or low-income populations.

The study area was defined as Census tracts within the South Shore, Woodlawn, and Hyde Park neighborhoods. Each of the tracts in the South Shore and Woodlawn neighborhoods was found to meet the criteria of an EJ Area. Within the Hyde Park neighborhood, all tracts but Tract 4111 meet the EJ Area criteria. South Shore has a minority population of 97 percent and a low-income population of 38 percent. Woodlawn has a minority population of 91 percent and low-income of 38 percent. Hyde Park’s minority population is 53 percent and low-income population is 23 percent. Identification of these minority and low-income populations was collected via the U.S. Census Bureau (U.S. Census Bureau 2019). See Table 13 of Appendix I.

#### 5.2.5.2 Alternative A: No Action – Social and Economic Issues

Alternative A assumes that there is no UPARR boundary conversion, the OPC is not constructed, and no roads are closed.

##### Direct Impacts

Because no federal actions would occur under Alternative A, there would be no additional direct social economic impacts.

##### Indirect Impacts – City Actions

As discussed in the direct impacts section above, there would be no change to existing social and economic issues; therefore, there would be no indirect impacts to social and economic issues under Alternative A.

##### Cumulative Impacts

Other past, present, or reasonably foreseeable future projects, unrelated to the OPC project, as noted in Section 5.2.1, would have negligible impacts on the social and economic environment as a whole. Alternative A would not contribute to any cumulative impacts, as the Federal action does not occur under this alternative.

#### 5.2.5.3 Alternative B: NPS Action (FHWA No Build) – Social and Economic Issues

Alternative B includes NPS approval of the partial conversion of the UPARR boundary within a portion of the OPC site as well as associated replacement of recreation opportunities on the east end of the Midway Plaisance.

### Direct Impacts

NPS's approval of the partial conversion of recreation in Jackson Park under UPARR does not authorize construction of the OPC or other changes in Jackson Park. However, it does affect the Midway Plaisance because conversion approval assumes the City will make improvements to the replacement site. The proposed development of recreation opportunities on the Midway Plaisance would have temporary impacts on the local community, such as a slight increase in short term employment arising from the construction activity at the proposed replacement recreation site. None of the other socioeconomic factors detailed in the above Socioeconomic Affected Environment section, such as the population level or population composition, is expected to change as a result of the action. Likewise, housing trends are not anticipated to be impacted. Public space impacts are expected to be positive and limited to the change in recreation use at the east end of the Midway Plaisance, improving the recreational amenities of the area.

Direct impacts associated with the UPARR conversion would not physically change existing conditions outside of the Midway Plaisance, nor would it directly impact community cohesion or otherwise geographically divide or isolate the residents or businesses within South Shore, Woodlawn, or Hyde Park.

### Indirect Impacts – City Actions

#### *Economic*

Indirect impacts are primarily related to the OPC planned for Jackson Park. The Chicago Community Trust commissioned Deloitte Consulting LLP to evaluate the overall economic impact, including direct, indirect, and induced effects (defined in Appendix I), of the construction and operation of the OPC and the ongoing operations of the Obama Foundation (Deloitte Consulting LLC 2016 and Obama 2016). The economic impact study methodology and results are discussed in detail in Section 4.2.2 of Appendix I (results are based on 2016 estimates, with an assumption that the construction and start-up period is anticipated to last approximately 6 years).

Total expenditures regarding OPC construction and start-up are projected to be approximately \$402.0 million. Of this total, 82 percent (\$328.5 million) is anticipated to be spent within Illinois and 64 percent (\$258.1 million) is expected to be spent within Cook County. Table 19 in Appendix I summarizes construction spending.

Labor requirements during the OPC's anticipated six-year start-up activities were evaluated. Although the timeline has been extended, the labor requirements provide a baseline level of anticipated economic activity. An estimated 1,528 12-month jobs will be created during the OPC's start-up. Ninety percent of these jobs (1,375 jobs) are expected to be in Illinois, with 1,224 jobs in Cook County. The South Side is anticipated to see 657 jobs generated during the OPC's startup. Table 20 in Appendix I summarizes estimated job creation during the OPC's six-year startup phase.

Non-labor expenses budgeted for the OPC's start-up efforts were also evaluated. These non-labor expenses are expected to be approximately \$69.2 million. Non-labor expenses include the following cost categories:

National Archives and Records Administration off-site facility expenses<sup>5</sup>, corporate and administrative, public engagement, communications, digital, development, and contingency/miscellaneous. Eighty percent (\$55.0 million) of the expenses are anticipated to be spent in the State of Illinois. Cook County is forecast to receive 70 percent (\$48.4 million) in spending, with the South Side receiving 34 percent (\$23.4 million). Table 21 in Appendix I summarizes the anticipated non-labor expenditures by geography.

Within the State of Illinois, the direct impacts of the OPC construction include 2,017 jobs, which will provide income of \$123.9 million. Output<sup>6</sup> associated with the direct expenditures of the OPC is expected to total \$305.5 million. Indirect effects, reflecting business to business spending, are projected to generate 673 jobs and \$41.1 million in income in Illinois during the OPC's construction. These effects are also anticipated to contribute \$115.9 million in output to the state's economy. Induced effects from household spending are expected to generate an additional 992 jobs, income of \$49.6 million, and output of \$148.2 million to Illinois' economy during the OPC's construction phase.

In total, 3,682 jobs, with an associated total income of \$214.6 million, are forecast to be created in Illinois through the construction of the OPC. Additionally, \$569.6 million in output is expected to be added to the state's economy. Table 22 in Appendix I summarizes the economic impacts to the State of Illinois during the OPC's construction.

In Cook County, the direct impacts of the OPC's construction include 1,569 jobs which will provide income of \$109.8 million. Output associated with the direct expenditures of the OPC are expected to total \$242.8 million. Indirect effects from business to business spending are projected to generate 439 jobs and \$29.5 million in income in Cook County during the OPC's construction. These effects are also anticipated to contribute \$72.7 million in output to the county's economy. Induced effects, which arise from household spending, are expected to generate an additional 675 jobs, income of \$35.9 million, and output of \$100.0 million to Cook County's economy during the OPC's construction phase.

In total, 2,683 jobs, with an associated total income of \$175.3 million, are forecast to be created in Cook County through the construction of the OPC. Additionally, \$415.0 million in output is expected to be added to the county's economy. Table 24 in Appendix I summarizes the economic impacts to Cook County during the OPC's construction.

Table 5 below summarizes the jobs forecasted to be created within the State of Illinois from OPC start-up activities and construction, including direct and indirect impacts.

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<sup>5</sup> National Archives and Records Administration (NARA) activities were anticipated to be located in the Chicago suburbs and then on-site at the time of the 2016 study; however, current plans do not call for material NARA activities on-site.

<sup>6</sup> Output includes employment compensation, other proprietary income, other property type income, intermediate expenditures, and taxes.

Table 4: Estimated Total Job Creation from OPC Construction and Start-Up Phases, State of Illinois

Project Phase	12-Month Jobs
<b>Start-Up</b>	
OPC start-up activities	1,375
<b>Start-Up Total</b>	<b>1,375</b>
<b>Construction (direct and indirect)</b>	
OPC construction (direct)	2,017
Business-to-business spending (indirect)	673
Household spending (indirect)	992
<b>Construction Total</b>	<b>3,682</b>

The CMAP developed population forecasts at the neighborhood level through 2050. The projections assume the development of OPC, along with other anticipated projects (CMAP 2018). Table 11 in Appendix I summarizes CMAP's projections through 2050.

The neighborhoods in the project study area are forecast to experience approximately a 14.2 percent increase in population between 2015 and 2050. Woodlawn is expected to have the fastest growing population, with a 23.9 percent growth between 2015 and 2050. Hyde Park is anticipated to grow 10.8 percent by 2050.

The OPC's construction and start-up phase and annual operations phase will have a positive impact on the tax revenues of the State of Illinois and local governments. As part of the *Economic Impact Assessment*, (Obama 2016) estimated taxes for the indirect and induced effects were approximately \$16.5M in tax payments. These payments exclude the direct taxes paid by the Obama Foundation and its employees. Table 36 in Appendix I summarizes the total state and local taxes during the construction and start-up phase.

### *Housing*

The possibility of gentrification and the impact of the OPC on housing within the project study area have been raised as concerns by a variety of stakeholders and interested parties. As noted previously, the Network of Woodlawn put forth its own plan to grow inclusively, and the Community Benefits Agreement Coalition crafted legislation to protect residents from displacement, which was introduced to City Council in July 2019 (Obama CBAC 2020). Importantly, the City of Chicago owns nearly 25 percent of Woodlawn's vacant land, and approximately 30 percent of the existing housing stock has long-term affordability guarantees. These characteristics are expected to assist Woodlawn in withstanding potential rising property values without losing substantial existing residents.

In addition, through a proposed ordinance (City of Chicago Department of Housing 2020), the City would make a commitment to Woodlawn to:

- help protect existing residents from displacement;
- create new rental and for-sale housing opportunities that are affordable to households at a range of incomes;



- ensure that existing housing stock offers good quality housing for residents;
- promote housing options to support equitable and inclusive income diversity in Woodlawn; and
- support economic development opportunities.

### *Community Cohesion*

Community cohesion is not anticipated to be negatively impacted by the OPC. The proposed construction and operations of the OPC will not geographically divide or isolate the residents or businesses within South Shore, Woodlawn, or Hyde Park. Rather, as a presidential center highlighting the first African American president, the OPC is expected to enhance the cultural richness of the neighboring African American communities. The OPC's construction and operation are not anticipated to encroach upon residential property or disrupt access to education and childcare facilities, community centers, or places of worship. As part of the improvements related to the OPC's construction, bicycle and pedestrian access will be enhanced and neighborhood access to Jackson Park improved, supporting community cohesion.

### *Traffic Congestion*

The increase in traffic congestion from the closed roads would lead to an adverse economic effect. The economic impacts of the proposed road closures may include increased fuel consumption and lost productivity due to increased congestion and vehicle delays.

### Cumulative Impacts

As discussed above, the direct impacts associated with the NPS action would not physically change existing conditions outside of the Midway Plaisance, and the indirect impacts from the development and operation of the OPC would provide increased employment and income in the project area. Moreover, certain other projects in Jackson Park, unrelated to the OPC project but potentially having impacts to the same resources, were considered in Section 5.2.1. Most of those other projects would provide slight increases in employment. The impact of the construction and operation of the OPC under Alternative B would create a substantial number of jobs in Cook County. However, the increase in traffic congestion from the closed roads would lead to an adverse economic effect. The economic impacts of the proposed road closures may include increased fuel consumption and lost productivity due to increased congestion and vehicle delays. When considered with the other projects described above, there would be a beneficial cumulative impact to social and economic conditions under Alternative B.

### Environmental Justice

Various economic, social, environmental, and health impacts associated with Alternative B were evaluated. For the impacts warranting detailed analysis (recreation, traffic access, cultural resources, and social and economic issues), Alternative B would not result in high and adverse impacts. Therefore, Alternative B would not cause disproportionately high or adverse impacts to the low-income and minority communities in the project study area. Moreover, Alternative B would not take private land, displace any residents, or divide or cause isolation to neighborhoods within the project study area. Minimal positive employment impacts may arise from construction and operational activities associated with the proposed NPS action. Input from the public is also an important consideration in the EJ process. The proposed action

has been the subject of a comprehensive public outreach and involvement program to encourage public involvement by residents in these neighborhoods. The City and the CPD held or participated in over 50 meetings to discuss the OPC campus location, the design and uses of the proposed buildings, proposed roadway changes and proposed park improvements. There were over 6,000 total attendees at these various meetings, which ranged from large gatherings in the hundreds at two different McCormick Place events to a handful of area residents in building-specific discussions. No groups or individuals have been, or will be, excluded from participation in public involvement activities, denied the benefit of the project, or subjected to discrimination in any way on the basis of ethnicity, religion, race, elderly, color, age, sex, national origin, or religion.

#### 5.2.5.4 Alternative C: NPS + FHWA Action (Preferred Alternative) – Social and Economic Issues

This alternative incorporates impacts associated with Alternative B, in addition to those arising from improved roadways and bicyclist/pedestrian facilities and additional changes to the UPARR boundary. The analysis of impacts in this section will only discuss the additional impacts associated with Alternative C.

##### Direct Impacts

The direct adverse impacts to socioeconomic resources would be similar to Alternative B, but there would be a notable additional public investment in infrastructure related to the roadway improvements. As described in Appendix H, the Federal Actions will provide improvements to traffic operations. The proposed roadway and bike/pedestrian improvements will cause temporary impacts to employment and income during the construction period. In total, the construction projects are estimated to cost \$174 million. Construction will occur in three phases lasting one to two years each. An estimated 166 full-time equivalent construction jobs are anticipated to be generated directly during the projects, with estimated labor expenditures of \$52.6 million. An additional 56 construction management jobs are expected to be created, with expenditures of \$14 million. Table 41 in Appendix I summarizes the direct expenditures and expected labor association with the proposed actions.

No additional long-term employment and income impacts are expected to arise from the Federal Actions in Alternative C compared to Alternative B. Additionally, the proposed transportation improvements are not expected to impact population level or demographics nor geographically divide or isolate the residents or businesses within the South Shore, Woodlawn, or Hyde Park neighborhoods. The proposed transportation improvements would alleviate the economic impacts of traffic congestion described in Alternative B.

##### Indirect Impacts – City Actions

The indirect adverse impacts to socioeconomic resources would be similar to Alternative B, in addition to the indirect impacts from the transportation improvements under Alternative C. As described in Alternative B, section 5.2.5.3 above, the impacts from the development of the OPC are described as indirect impacts, relative to the federal action of UPARR partial conversion. The development of the OPC would include indirect impacts on economics, housing, and community cohesion. Alternative C would also include the impacts from the transportation improvements. Indirect impacts from the proposed transportation improvements of Alternative C would include the jobs and economic impacts that arise

from the expenditures of household income generated by the direct and indirect impacts (spending by workers). Therefore, there are no additional adverse indirect impacts under Alternative C.

#### Cumulative Impacts

As discussed above, the direct impacts associated with the FHWA action would provide increased employment and income, compared to the impacts of Alternative B. Moreover, certain other projects unrelated to the OPC project, but potentially having impacts to the same resources were considered in Section 5.2.1. Most of those other projects would provide slight increases in employment and would alleviate the traffic congestion impacts of Alternative B. There may be some positive impacts from decreased fuel consumption and increased productivity associated with reducing traffic delays under Alternative C, compared to Alternative B. The impact of the actions in Alternative C would not be adverse in relation to overall social and economic impacts of the region.

#### Environmental Justice

Similar to Alternative B, the impacts warranting detailed analysis (recreation, traffic access, cultural resources, and social and economic issues), Alternative C would not result in high and adverse impacts. Therefore, Alternative C would not cause disproportionately high or adverse impacts to the low-income and minority communities in the project study area.

Impacts related to EJ that would occur due to the NPS action are discussed under Alternative B above (Section 5.2.6.3). The EJ impacts that would occur due to the FHWA action added to the impacts of Alternative B are discussed below.

Section 4.2.2 of Appendix I summarizes the economic and employment impacts of the project and the opportunities they create for the communities of South Shore, Woodlawn, and Hyde Park. Minimal positive employment impacts may arise from construction activities associated with the proposed FHWA action. From a sociological perspective, the proposed action would not divide or cause isolation to neighborhoods within the project study area. There will be no right-of-way acquisition or relocations of residential or commercial properties. The roadway improvements will include rerouting traffic in the area but will overall improve transportation reliability. There will be no adverse impacts to transit services. Existing bicycle/pedestrian facilities will be improved, and new bicycle/pedestrian facilities will be constructed improving neighborhood access to Jackson Park.

Input from the public is also an important consideration in the EJ process. The proposed action has been the subject of a comprehensive public outreach and involvement program to encourage public involvement by residents in these neighborhoods. The City and the CPD held or participated in over 50 meetings to discuss the OPC campus location, the design and uses of the proposed buildings, proposed roadway changes and proposed park improvements. There were over 6,000 total attendees at these various meetings, which ranged from large gatherings in the hundreds at two different McCormick Place events to a handful of area residents in building-specific discussions. No groups or individuals have been, or will be, excluded from participation in public involvement activities, denied the benefit of the project, or subjected to discrimination in any way on the basis of ethnicity, religion, race, elderly, color, age, sex, national origin, or religion.

Minimal positive employment impacts may arise from construction activities associated with the proposed FHWA action. From a sociological perspective, the proposed action would not divide or cause isolation to neighborhoods within the project study area. There will be no right-of-way acquisition or relocations of residential or commercial properties. The roadway improvements will include rerouting traffic in the area but will overall improve transportation reliability. There will be no adverse impacts to transit services. Existing bicycle/pedestrian facilities will be improved, and new bicycle/pedestrian facilities will be constructed.

## **5.2.6 Great Lakes Fishery and Ecosystem Restoration (GLFER)**

### **5.2.6.1 Affected Environment – GLFER**

As part of an effort to restore bird, fish, and wildlife habitat within the natural areas of Jackson Park, the CPD and the USACE entered into a Project Partnership Agreement signed in August 2014. A five-year construction contract was awarded in September 2014. The Water Resources Development Act, Section 506, GLFER, authorized the ecological restoration project. The GLFER project aims to create or enhance nearly 147 acres of native habitat within Jackson Park and along the Lake Michigan shoreline. The project includes 24 acres of new natural areas and the installation of over 600,000 native plants that will increase the biological diversity of Jackson Park and provide critical habitat and beautiful scenery for Jackson Park visitors. In addition, to improve access and circulation throughout Jackson Park, the project includes installation of overlooks along the water's edge, new pathways, and the reconstruction of existing pathways on the Wooded Island. Refer to Appendix J.

The GLFER project includes restoration and planting for areas throughout Jackson Park. In the existing condition from the overall original plan, only the areas north of Hayes Street have been implemented and planted, with no current funding proposed to complete the areas south of Hayes Drive. See Attachment J-1 in Appendix J for GLFER areas.

### **5.2.6.2 Alternative A: No Action – GLFER**

Alternative A assumes that there is no UPARR boundary conversion, the OPC is not constructed, and no roads are closed.

#### Direct Impacts

There would be no changes in the GLFER restored areas under Alternative A, because the proposed actions would not occur.

#### Indirect Impacts – City Actions

There would be no indirect GLFER impacts under Alternative A, because the proposed actions would not occur.

#### Cumulative Impacts

None of the projects discussed in Section 5.2.1.1 result in impacts to GLFER restoration areas. Alternative A would not contribute to any cumulative impacts, as no federal action occurs under this alternative.

### 5.2.6.3 Alternative B: NPS Action (FHWA No Build) – GLFER

Alternative B includes NPS approval of the partial conversion of recreation within a portion of the OPC site, as well as associated replacement of recreation opportunities on the east end of the Midway Plaisance.

#### Direct Impacts

There are no impacts to GLFER restoration areas associated with the 4.6-acre conversion area on the OPC campus or replacement of UPARR areas within the east end of the Midway Plaisance because there are no GLFER restored areas in the conversion area or in the east end of the Midway Plaisance.

#### Indirect Impacts – City Actions

Along the east side of Cornell Drive, the CPD proposes to construct a new lift station to intercept and reroute an existing sanitary sewer main that in the existing condition is under the proposed OPC site. In addition, CPD is installing a new electrical duct bank to re-route an existing high voltage electrical duct bank. Temporary fencing along the east side of Cornell Drive would result in temporary impacts to restored GLFER areas. The proposed lift station would result in permanent impacts. See Attachment J-2 in Appendix J.

The Foundation proposes to construct accessible pathway connections from the OPC site to existing GLFER pathways and replace the existing crushed stone screening covered paths with concrete, resulting in temporary impacts to GLFER areas. See Attachment J-3 in Appendix J.

There are no impacts to GLFER areas within Jackson Park associated with the track and field relocation or the proposed roadway closures because there are no GLFER restored areas near the track and field relocation area. A summary of the temporary and permanent GLFER impacts associated with this proposed work is provided in Table 6.

*Table 5: Alternative B – GLFER Impacts*

Scope of Work	Permanent Impact	Temporary Impact	Total Area
Lift station, sanitary sewer	78 sq. ft. (0.002 acres)	2870 sq. ft. (0.06 acres)	2948 sq. ft. (0.062 acres)
Path connections, grading	0.00 acres	0.166 acres	0.166 acres
<b>Total</b>	<b>0.002 acres</b>	<b>0.226 acres</b>	<b>0.228 acres</b>

All replacements and restoration location areas were identified in coordination with the CPD and the USACE. The temporary impacts associated with Alternative B would be restored in place. The permanent impacts to GLFER areas (0.002 acres) associated with Alternative B would be replaced on the east side of the Jackson Park Inner Harbor to the south of Hayes Drive.

#### Cumulative Impacts

None of the projects discussed in Section 5.2.1.1 result in impacts to GLFER restoration areas. The actions of Alternative B would be the only impacts that contribute to the overall negligible cumulative impacts.

#### 5.2.6.4 Alternative C: NPS + FHWA Action (Preferred Alternative) – GLFER

This alternative incorporates impacts associated with Alternative B, in addition to those arising from improved roadways and bicyclist/pedestrian facilities and additional changes to the UPARR boundary. The analysis of impacts in this section will only discuss the additional impacts associated with Alternative C.

##### Direct Impacts

The widening of southbound Lake Shore Drive to the west would have permanent and temporary impacts to the restored GLFER areas from grading and utility work. Along the west side of Lake Shore Drive, there would be impacts to dunes and meadows. The proposed pedestrian underpasses near the intersections of Lake Shore Drive and Hayes Drive as well as Cornell Drive and Hayes Drive would also result in permanent and temporary impacts. The GLFER impacts along Cornell Drive and Hayes Drive include meadows, savannas, woodlands, sedge lawns, and transition prairies. Table 7 below summarizes the impacts along each section of proposed roadway. These impacts are depicted in Attachment J-4 in Appendix J. The impact areas have been broken into two different classifications. The permanent impacts represent areas such as the widening of Lake Shore Drive that would permanently impact the GLFER areas. The temporary grading impacts and temporary utility impacts are areas that would be restored in place.

*Table 6: Alternative C – Direct Transportation Improvement GLFER Impacts*

<b>Location/Roadway</b>	<b>Permanent Impact (acres)</b>	<b>Temporary Impact (acres)</b>	<b>Total Area (acres)</b>
Lake Shore Drive	0.71	1.40	2.11
Hayes Drive	0.58	0.07	0.65
Cornell Drive	0.03	0.00	0.03
<b>Total</b>	<b>1.32</b>	<b>1.47</b>	<b>2.79</b>

All impacts to GLFER areas would be restored or replaced within Jackson Park. Areas impacted temporarily by construction would be restored using the GLFER planting palate as a guide. Permanently impacted GLFER areas would be replaced on the east side of the Jackson Park Inner Harbor to the south of Hayes Drive. The original USACE GLFER restoration planting plans included this area but has not yet been implemented. Therefore, implementing the GLFER planting in this area would serve as a replacement for the permanent impacts by providing a net gain of 1.11 acres compared to the existing restoration area. This implementation is consistent with the overall restoration plan. Replacement and restoration area plans are included in Attachment J-5 in Appendix J. All replacement and restoration locations were coordinated with the CPD and the USACE. Table 8 provides a summary of the GLFER impact replacement areas.

*Table 7: Proposed GLFER Impact and Replacement Summary*

<b>Impact Type</b>	<b>Impact (acres)</b>	<b>Replacement (acres)</b>	<b>Net Difference (acres)</b>
Temporary	1.70	1.70	0.00
Permanent	1.32	2.43	+1.11



The CPD sent a Section 408 alteration request to the USACE on August 20, 2019. A letter received from the USACE on February 26, 2020 indicated that the Section 408 request is complete, and a review is expected to be completed within 90 days. This letter and previous coordination meeting minutes with the USACE are included in Attachment J-6 in Appendix J.

#### Indirect Impacts – City Actions

Alternative C would have the same indirect impacts described in Alternative B. Alternative C would not result in additional indirect impacts because the impacts of the proposed action would be limited to the roadway improvements.

#### Cumulative Impacts

None of the projects discussed in Section 5.2.1.1 result in impacts to GLFER restoration areas. The actions of Alternative C would be the only impacts that contribute to the overall beneficial cumulative impacts.

### **5.3 Impact Summary**

Table B-2 in Appendix B provides a summary of the direct, indirect, and cumulative impacts associated with each alternative for each impact topic evaluated in the Environmental Assessment. The table also includes potential mitigation measures that have been identified as appropriate strategies to minimize and offset likely impacts associated with the proposed project.

### **5.4 Preferred Alternative**

Three alternatives were evaluated against the NPS and FHWA purposes and needs for action:

- Alternative A – No Action
- Alternative B – NPS Action/FHWA No Build
- Alternative C – NPS + FHWA Action (Preferred Alternative)

Alternative A is not a viable or practical alternative as it does not meet either agency's purpose and need for action.

In Alternative B, NPS would allow for the evaluation and approval of the partial conversion from the OPC site with replacement property and equivalent recreation at the east end of Midway Plaisance. The City's closure of east bound Midway Plaisance (Stony Island Avenue to Cornell Drive) and Cornell Drive (63rd Street to 59th Street) would increase traffic congestion. By taking no action in Alternative B, FHWA would not fulfill its purpose and need to address changes in travel patterns from closing the roadways and to improve bicycle and pedestrian access and circulation.

In Alternative C, NPS would allow for evaluation and approval of the partial conversion at the OPC site and along roadways in Jackson Park, as well as associated replacement recreation in the Midway Plaisance and in vacated roadways not currently part of the UPARR boundary within Jackson Park. This alternative fully evaluates the partial conversion(s) outlined in the NPS purpose and need. In addition, in Alternative C, FHWA would approve federal funding for transportation improvements to respond to traffic congestion resulting from the roadway closures in Jackson Park and for improved pedestrian and bicyclist access and

circulation because federal analysis requirements are met. As discussed in Section 4.3, FHWA evaluated nine transportation alternatives as part of its alternative analysis process, which concluded that Alternative 9B best meets the FHWA purpose and need while minimizing environmental impacts.

Because Alternative C meets the purposes and needs of both NPS and FHWA, Alternative C is selected as the preferred alternative.

## **6.0 Consultation and Coordination**

### **6.1 Public Engagement**

The public engagement efforts undertaken by the City are summarized in Section 2.3, including the municipal processes associated with the OPC site and the CPD engagement for the 2018 SLFP. The SLFP process described in Section 2.3 and the public engagement described in this section informed to the federal review process.

#### **6.1.1 Project Website**

The City has dedicated a website to the federal review of Jackson Park Improvements. The website provides reference documents and updates that support the OPC, the SLFP, and the federal review process necessary to complete these improvements. The project website can be accessed at <http://www.tinyURL.com/JPIImprovements>. The Environmental Assessment will be available for review, and public comments on this Environmental Assessment are being collected on the NPS PEPC website at <https://parkplanning.nps.gov/ChicagoJacksonPark> for a minimum of 30-days. After the public comment period closes, substantive comments will be responded to and agency responses will be publicly available via a public comment analysis report and included in the final decision document.

#### **6.1.2 Public Information Meeting on Jackson Park Combined NPS and FHWA Process**

A Public Information Meeting held on September 17, 2018 at the South Shore Cultural Center provided the public with information regarding the federal review process. Information included a summary of the timeline for the federal process to date and the roles and responsibilities of each federal agency. Additional information included draft purpose and need statements, and a description of each proposed Federal Action, the City's actions, and the next steps in the federal review. Meeting materials, including a meeting summary, are available at <http://www.tinyURL.com/JPIImprovements>.

#### **6.1.3 Public Hearings and Public Comment Period on the Environmental Assessment**

Two public hearing webinars will be held to present an overview of the Environmental Assessment and allow for public comment. A separate opportunity for the public to provide in person comments will also be provided. A hard copy of the report will be available. A minimum of a 30-day comment period will be granted upon notice of the release of the Environmental Assessment. An electronic copy is available at the NPS PEPC link <https://parkplanning.nps.gov/ChicagoJacksonPark> where public comments may be entered electronically. Notices of the public hearings will be published in advance and it will be held in a

format consistent with NPS and IDOT public hearing requirements. Public hearing presentation materials will be made available online.

## **6.2 Compliance with Other Laws**

### **6.2.1 Section 106 of the National Historic Preservation Act**

Compliance with Section 106 of the NHPA (36 C.F.R. Part 800) is being conducted separately from but concurrently to this NEPA process. More information on the Section 106 process can be found in the AOE and on the project website (<http://www.tinyURL.com/JPIImprovements>). More information about impacts to Cultural Resources under NEPA is located in section 5.2.4 of this document.

### **6.2.2 Section 4(f) of the U.S. Department of Transportation Act**

Section 4(f) of the U.S. Department of Transportation Act of 1966, known as Section 4(f), provides for consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites (prehistoric and historic districts, sites, buildings, structures, or objects listed in, or eligible for, the NRHP) during transportation project development. The law, now codified in 49 U.S.C. §303 and 23 U.S.C. §138, applies only to agencies within the U.S. Department of Transportation (USDOT) and is implemented by the FHWA and the Federal Transit Administration (FTA) through the regulation at 23 C.F.R. Part 774.

The following actions (local and federal) described in this Environmental Assessment are not subject to Section 4(f) requirements because (1) the actions do not require an approval from the FHWA to proceed, (2) the actions are not transportation projects, and (3) the actions are being implemented to address a purpose that is unrelated to the movement of people, good, and services from one place to another:

- City's decision to close roadways in Jackson Park;
- The City's decision to allow construction of OPC in Jackson Park;
- The NPS decision with respect to the partial conversion of UPARR land in Jackson Park and the replacement recreational opportunity;
- The USACE decision with respect to Section 404 permits and Section 408 permissions.

A total of 41 properties are protected by Section 4(f) within the project area. Of these properties, 4 of the properties are not avoided by the transportation project. Each of the Section 4(f) properties may have a Section 4(f) use, including Jackson Park, Midway Plaisance, Jackson Park Historic Landscape District and Midway Plaisance, and the CPBSHD. Permanent and temporary use acreages are summarized in Table 9 below.

Table 8: Section 4(f) Land Use

Section 4(f) Property	Perm Use (acres)	Temp Use (acres)	Total Use (acres)
Jackson Park	5.2	23.4	28.6
Midway Plaisance	0.0	0.1	0.1
Jackson Park Historic Landscape District and Midway Plaisance	5.2	23.5	28.7
CPBS Historic District	5.2	23.5	28.7

Minimization and mitigation measures for the transportation improvements, proposed for FHWA funding and described as part of Alternative C, are subject to Section 4(f) requirements and are fully evaluated in a Draft Section 4(f) Evaluation, located in Appendix K.

On April 22, 2020, the Draft Section 4(f) Evaluation was released to the Officials with Jurisdiction (OWJs) and Federal agencies with encumbrances on Section 4(f) land for a comment period that concludes on June 12, 2020. The Draft Section 4(f) Evaluation was also made available on the City's website (<http://www.tinyURL.com/JPIImprovements>) for public review. After the close of the comment period, FHWA will consider the comments received and complete the Final Section 4(f) Evaluation. The Final Section 4(f) Evaluation will be completed prior to, or concurrent with, the conclusion of FHWA's NEPA process. The Draft Section 4(f) Evaluation is incorporated by reference and can be found in full at Appendix K.

### 6.3 Agency and Tribal Government Consultation

The following agencies have been consulted with in relation to their specific roles and responsibilities for Federal Actions in and Adjacent to Jackson Park:

- Advisory Council on Historic Preservation
- Federal Transit Administration
- Illinois Department of Natural Resources
- Illinois Environmental Protection Agency
- Illinois State Historic Preservation Office
- U.S. Coast Guard
- U.S. Department of the Interior Fish & Wildlife Service
- U.S. Environmental Protection Agency

Consultation with the appropriate agencies will continue to ensure environmental laws and regulations are fulfilled.

### **6.3.1 Tribal Government Consultation**

There are no known tribal lands within the project study area. However, in accordance with the Tribal Memorandum of Understanding for Illinois transportation projects, the FHWA initiated consultation with Tribal governments with an interest in Illinois lands. The Forest County Potawatomi Community expressed an interest in any project archaeological information as part of the Section 106 NHPA Consultation. On behalf of FHWA, IDOT completed archaeological investigations for Alternative B and C and found no archaeological resources listed or eligible for listing in the NRHP. The result of the archaeological investigations was shared with the Tribal governments. No further coordination is required. However, if human remains are found FHWA will contact the Tribes in accordance with Native American Graves Protection and Repatriation Act.

### **6.3.2 NEPA-404 Merger Meetings**

In Illinois, the FHWA and IDOT follow a NEPA-404 merger process when an Environmental Assessment is being prepared and an Individual Section 404 permit is anticipated to be required. The process is described in a Statewide Implementation Agreement titled “National Environmental Policy Act and Clean Water Act Section 404 Concurrent NEPA/404 Processes for Transportation Projects in Illinois.” Commonly referred to as the “NEPA-404 merger process,” the process ensures that the resource and regulatory agencies can provide input on purpose and need, alternatives to be carried forward, and the preferred alternative prior to any decisions being finalized on projects that require a Section 404 permit from the USACE and require either an Environmental Assessment or Environmental Impact Statement from the FHWA.

The FHWA began its NEPA process in November 2017 when it issued Cooperating Agency letters to relevant state and federal agencies. The focus of the FHWA NEPA process was on the roadway improvements necessary to address congestion as the result of the City’s plans to close roadways in Jackson Park and to improve bicycle and pedestrian access and facilities in Jackson Park. Because the NEPA class of action documentation was an Environmental Assessment, and a Section 404 permit was an anticipated requirement with the roadway improvements, FHWA determined that the project would complete the NEPA-404 merger process.

The Purpose and Need for the FHWA action was presented to the NEPA-404 merger agencies on March 16, 2018 and concurrence was received from the USEPA, USACE, IDNR at the meeting and subsequently by e-mail from the USFWS and the Illinois SHPO.

The Alternatives to be Carried Forward for the FHWA action was presented to the NEPA-404 merger agencies on May 4, 2018 and concurrence was received from the USFWS, USEPA, Illinois SHPO, and subsequently by e-mail from the USACE.

The preliminary preferred alternative was presented at the June 21, 2018 NEPA-404 merger meeting. It was noted at the meeting that NPS and FHWA agreed to prepare a single Environmental Assessment and coordinate the preferred alternative for highway improvements with the merger agencies. FHWA requested concurrence by e-mail on 6/28/2018 and received concurrence from USEPA (7/6/2018), USFWS (7/24/2018), and USACE (8/2/2018).

FHWA's identification of a "preferred alternative" during the NEPA-404 merger process is a preliminary determination for coordination purposes. The preferred alternative documentation serves to coordinate with the resource and regulatory agencies and does not finalize the decision-making process. Rather, the information contained in the preferred alternative documentation for the NEPA-404 merger process is brought forward into the NEPA documentation and, updated as necessary, for formal public and agency review and comment. FHWA's final decision on a preferred alternative is only concluded at the completion of the NEPA process after all federal requirements are satisfied. These documents are incorporated by reference and can be found in full at <http://www.tinyURL.com/JPIImprovements>.

### **6.3.3 Jurisdictional Transfer of Roadways, Vacations and Dedications**

CDOT has requested a jurisdictional transfer of roadways from IDOT in response to the City's proposed roadway closures and resulting improvements to the roadway network. The following roadways will be transferred from IDOT to CDOT jurisdiction: 57th Drive from 57th Street to Lake Shore Drive, Cornell Drive from 67th Street to 57th Street, Stony Island Avenue from 69th Street to 65th Place and Hyde Park Boulevard from 57th Street to 55th Street. Coordination of a jurisdictional transfer agreement is ongoing.

Coordination is ongoing between CDOT and CPD regarding the vacation and dedication of public way in Jackson Park to accommodate the City's proposed increase in park space and roadway improvements to offset the roadway closures in Jackson Park.

### **6.3.4 Environmental Commitments, Permits, and Certifications**

A list of environmental commitments, permits, or certifications is provided below:

#### **6.3.4.1 Environmental Commitments**

- Wetland mitigation will occur at the Cedar Creek A1 Bank site if required as a condition of the USACE 404 permit or to meet the requirements of the Illinois Interagency Wetland Policy Act. A mitigation ratio of 1.5 to 1.0 will be applied. Wetland credits will be purchased prior to construction.
- To avoid impacts to threatened and endangered species located within and along the shoreline of Lake Michigan including the Piping Plover, Rufa Red Knot, Pitcher's (Dune) Thistle, Seaside Spurge, or Sea Rocket, the City's construction will generally occur west of Lake Shore Drive, with the exception of some curb and gutter elements proposed in existing concrete areas.
- To avoid impacts to the Yellow-crowned Night Heron and Black-crowned Night Heron, the City commits to prohibit tree removal during the breeding season, between March 1 and August 31 for projects assessed in this Environmental Assessment. This commitment excludes tree removal that may need to occur at any time during the year due to damage, disease, pests, or other unforeseen circumstances in the interest of public safety. If removal is needed, a staff expert at the CPD would inspect potentially impacted trees for signs of nesting activity prior to removal and postpone, if necessary. Impacted trees will be replaced at a 1:1 ratio and will be in keeping with historic designs. Specific details regarding tree replacement can be found in Section 5.1.2 of the Tree Impact Evaluation Memorandum contained in Appendix D.

- Effects to GLFER areas will be restored or replaced within Jackson Park. Areas impacted temporarily for construction will be restored in place using the GLFER planting palette as a guide. Permanent effects to GLFER areas will be replaced on the east side of the Jackson Park Inner Harbor to the south of Hayes Drive.
- Erosion Control Blankets made of sod, straw mats, or synthetic materials will be placed over areas containing soils susceptible to erosion during construction as a temporary erosion control method. Landscaping, coordinated with CPD, will be completed in these areas following construction to promote vegetation growth in order to prevent future erosion.
- A Stormwater Pollution Prevention Plan will be developed during the design stage of the transportation improvements project.
- Dust and airborne dirt generated by roadway construction activities will be controlled through dust control procedures outlined in IDOT's Standard Specifications for Road and Bridge Construction.
- To minimize the effect of roadway construction noise on adjacent properties, as part of its mitigation measures, the City will ensure that IDOT's Standard Specifications for Road and Bridge Construction, particularly Article 107.35, are incorporated into the City's plan and bid documents so that any selected contractor will implement such specifications.
- Continuity of pedestrian and bicycle facilities will be maintained throughout construction. When necessary, detour routes will be constructed if necessary and signed.
- Access to CPD facilities will be maintained throughout construction.
- CDOT will transfer ownership of the right-of-way from the abandoned roadways (described in Section 2.4) to the CPD in the amount of 7.7 acres. All areas in Jackson Park that are used temporarily for construction purposes will remain in the ownership of the CPD, and those areas will be returned to a condition as good, or better, than they were in prior to construction.
- All Section 106 mitigation measures described in the fully executed MOA will be incorporated as part of the project to address adverse effects to historic properties.

#### 6.3.4.2 Permits/Certifications Required

Following the conclusion of the NEPA process, detailed construction plans are developed and all necessary permits and approvals are obtained during the design phase of the project. The following permits will be required for this project:

- A USACE Clean Water Act/Section 404 Regional Permit is required for the discharge of fill material to WOTUS related to roadway improvements. A Section 404 Regional Permit is required for the widening of the 59th Street Inlet Bridge and for temporary dewatering beneath the Hayes Drive bridge for repairs to the structure. The Section 404 Regional Permit is currently under review.
- USACE Rivers and Harbors Act/Section 408 authorization is required for alterations to GLFER areas and is currently under review.
- The IDNR Office of Water Resources – Part 3704 Regulation of Public Waters permit, which requires a public notice, will be submitted for approval concurrent with the NEPA Public Hearing for the project.



- The IEPA Section 39 Final Determination for Water Quality permit has been approved.
- NPDES - This project will result in the disturbance of one or more hectares (five or more acres) of total land area. Accordingly, it is subject to the requirement for a National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharges from the construction sites. Permit coverage for the project will be obtained under the IEPA General Permit for Stormwater Discharges from Construction Site Activities (NPDES Permit No, ILR10). Requirements applicable to such a permit will be followed, including the preparation of a Stormwater Pollution Prevention Plan. Such a plan shall identify potential sources of pollution which may reasonably be expected to affect the quality of stormwater discharges from the construction site and shall describe and ensure the implementation of practices which will be used to reduce the pollutants in discharges associated with construction site activity and to assure compliance with the terms of the permit. This plan is currently in progress.

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