

**Environmental Assessment
Recreation Technical Memorandum
Appendix G**

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

August 2020

National Park Service
Federal Highway Administration

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1.0 Introduction

The City of Chicago (City) has approved plans for the construction of the Obama Presidential Center (OPC) in Jackson Park on the South Side of Chicago. Jackson Park is a public park that provides a variety of recreational opportunities and amenities. In the 1970s and 1980s, the City applied for and accepted two grants from the federal government via the Urban Park and Recreation Recovery (UPARR) program for specific projects to enhance and rehabilitate Jackson Park. The UPARR program was developed to encourage local governments to revitalize their parks and make long-term commitments to maintain them. By accepting the federal funds, the City committed to maintain public recreation within the UPARR-protected areas within Jackson Park or request approval from the Secretary of the Department of the Interior to provide substitute recreation elsewhere that meets UPARR requirements.

The UPARR program administered by the National Park Service (NPS) has determined that, as proposed, construction of the OPC and related roadway improvements would convert property from recreation use within Jackson Park requiring review under the UPARR Act and related regulations. Specifically, the proposed partial conversion is for: (1) new uses within 4.6 acres of the 19.3-acre OPC site and (2) proposed roadway improvements on an additional approximately 5.2 acres that would not qualify as open and available for public recreation under UPARR.

To compensate for the lost recreation, the City has proposed two replacement recreation areas which would become subject to UPARR requirements: (1) the east end of the Midway Plaisance adjacent to Jackson Park (5.2 acres); and (2) new and additional bicycle/pedestrian paths, walking trails, and other open areas within Jackson Park that would result from the planned reconfiguration and removal of certain existing roads and new parkland or recreational space in a majority of the roadway footprint (11 acres). The 11 acres includes acreage from road closures and is the total acreage that would become subject to UPARR. Of these 11 acres, 3.3 acres are located within the OPC boundary and 7.7 acres are outside the boundary.

The remaining acreage associated with the OPC site (14.7 acres) would still be open and available to the public for recreation as required under UPARR. In fact, the development of the OPC would create new recreational amenities such as a sledding hill, great lawn, nature trail, and the addition of a Program, Athletic, and Activity Center.

For purposes of assessing impacts to recreation that would result from these proposed actions, this analysis explains existing recreation opportunities that would be lost as a result of the approval of the proposed partial conversion and how the City proposes to replace that lost recreation. Specifically, this report evaluates: (1) existing recreational opportunities and uses in Jackson Park overall; (2) existing recreational opportunities and uses that would be lost as a result of the roadway improvements and the OPC development; and (3) the proposed replacement property and associated recreational opportunities and uses that would be developed, in addition to the recreation value of the remainder of Jackson Park. This report also considers the proposed replacement areas in the context of the requirement for NPS to evaluate whether they provide “reasonably equivalent usefulness and location” pursuant to the regulations implementing UPARR. NPS would review this rationale and using due diligence determine if this partial conversion request meets the provisions of the UPARR act and regulations.

2.0 Applicable Regulatory Framework & Jackson Park

2.1 Statutory and Regulatory Background

The UPARR program provides federal funds for the rehabilitation and development of recreation areas, facilities, and services. Eligibility for UPARR funding depends on a jurisdiction having an NPS-approved recreation plan that meets UPARR Recovery Action Program (RAP) requirements. Recipients of UPARR grants must maintain the property for public recreation use unless a conversion approval is granted by the Secretary of the Interior, and that authority has been delegated to the NPS who administers the UPARR program. The conditions for approval outlined in the statute include a conclusion that the conversion is in accord with the then-current local park and recreation RAP; and adequate recreation properties and opportunities of reasonably equivalent location and usefulness have been identified (54 U.S.C. §200507).

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. (A sixth factor, relating to state intergovernmental clearinghouses, is not relevant where, as in Illinois, a clearinghouse has not been established.)

2.2 UPARR Grants and Program Requirements at Jackson Park

Federal funds in the amount of \$125,300 were granted for Jackson Park in 1980 under UPARR Grant No. 17-CTY-1670-80-02 to purchase and plant trees and shrubs; train neighborhood youth in tree planting and nurturing; and develop a program of community organized recreation to include support for community-based recreation awareness, anti-vandalism training, and park rehabilitation. The funds were intended to serve the community by organizing events and activities, including “sports, arts, cultural activities, a park awareness program, a park management program, and an anti-vandalism education program.” Arts and cultural programs were to be conducted “in cooperation with nearby available institutions.” The UPARR documentation associated with this grant characterized the community as having “a predominance of minority, low-to-moderate income families with a high concentration of youth and senior citizens.” The documentation also recognized that “[t]he area lack[ed]... recreational programs available in other areas of the city which hinder[ed] the redevelopment of the community.”

In addition, Jackson Park received UPARR funding under Grant No. 17-CTY-1670-80-04 in 1981. A grant of \$135,870 was used to replace approximately 700 trees and shrubs and to restore approximately 7,000 square yards of landscaped area. This grant was intended to improve the aesthetics of Jackson Park and to enhance informal recreational activities through improved landscaping.

As a condition of the UPARR grants, the City agreed to maintain Jackson Park for public recreation. 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 Museum of Science and Industry, the La

Rabida [Children’s Hospital], and the roadways therein.” This area is referred to as the “Section 1010 boundary” (referring to the conversion provision in the law). Any partial conversion, from recreation to non-recreation, must be reviewed and approved by NPS and is contingent on identifying replacement recreational property and equivalent recreation opportunities. The City must submit a request to convert UPARR property along with an amendment to the original UPARR grant agreement outlining replacement recreation opportunities and a revised boundary map. A revised Section 1010 boundary map would identify changes to the original area caused by the proposed partial conversion and establish new areas dedicated as replacement recreation property (36 C.F.R. § 72.72(c)). Areas to be converted from recreational use would be removed from the existing Section 1010 boundary map and areas proposed as replacement recreation property would be added to a proposed revised Section 1010 boundary map. The existing Section 1010 boundaries are shown in Figure 1.



Figure 1: Existing Section 1010 Boundary

Prior to an amendment of the original UPARR grant agreements, the NPS must also ensure recreation opportunities that are lost are replaced with adequate recreation properties and equivalent recreation opportunities. This requires a comparison analysis of the existing recreation opportunities against the proposed replacement recreation opportunities.

NPS would thoroughly review the partial conversion request and would, prior to approving the amendment, ensure compliance with all applicable federal requirements and environmental laws, including the National Environmental Policy Act (NEPA) of 1969 and Section 106 of the National Historic Preservation Act (NHPA).

To distinguish between the diverse recreational opportunities provided in Jackson Park, we use the phrase “formal recreation” to refer to a structured individual or team activity that requires the use of special facilities, courses, fields, or equipment. “Informal recreation” refers to recreational activities that do not require prepared facilities like sports fields or pavilions.

2.3 Jackson Park Planning Framework

Planning for Jackson Park is governed by the Chicago Park District’s (CPD) strategic plan for parks throughout the City, the 1972 Lake Front Plan of Chicago, and the 2018 South Lakefront Framework Plan (SLFP) that specifically addresses Jackson Park (CPD 2018).

The City received a planning grant in the late 1970s to develop their first RAP, a prerequisite to UPARR funding. The City’s 1980 RAP discusses the history of museums in Chicago’s parks and the importance of expanding cultural opportunities and diverse types of indoor and outdoor recreation. One of the five goals in the City’s 1980 RAP is to expand “cultural opportunities throughout Chicago” by increasing “private support for the arts and for institutions of culture and learning.” The City’s 1991 RAP also stressed “promoting interagency and public/private collaborations” to “improve the availability and quality of programs.” It also called for improvements to existing landscapes, creation of new landscaped areas, and rehabilitation of existing amenities.

The CPD’s strategic plan was released in 2012 (CPD 2012). The plan articulated four core values for all Chicago that focus on (1) bringing children and families into Chicago parks; (2) prioritizing quality in park programs and providing excellent and affordable recreation; (3) renewing infrastructure and leveraging partnerships that produce new parks and facilities; and (4) supporting innovation and welcoming new ideas. The strategic plan was updated in 2016 to pivot from prescriptive goals to instead provide high level ideas and direction. Among other things, the 2016 strategic plan update includes the goal of “increas[ing] access and exposure to culture and the arts.” The placement of the OPC in Jackson Park furthers this goal and is also in accord with the City’s history of museums in parks. The relationship between museums, park land, and the nearby neighborhoods has been mutually beneficial, encouraging and supporting diverse recreational opportunities in the context of an urban park.

Placement of the OPC in Jackson Park is also subject to the updated SLFP, which was a planning process led by the CPD to develop a vision for the future of Jackson Park. The public process started in June 2017 and included a 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.”

The CPD held 13 community meetings over a 10-month period beginning in June 2017 and ending in April 2018 for the purpose of updating the SLFP. In addition, the OPC site development, track and field relocation and proposed roadway closures, which are discussed further below, were each the subject of separate Lakefront Protection Ordinance applications submitted to the Chicago Plan Commission in January 2018. The Chicago Plan Commission held an open meeting to allow for public comment and approved the applications on May 17, 2018. On May 23, 2018, the City Council approved the OPC site planned development zoning. On October 31, 2018, the City Council approved: (1) an intergovernmental agreement with the CPD for the City's acquisition of the OPC site to allow for City administration of the property; (2) the form of a Use Agreement with the Foundation which sets the terms of the Foundation's use of the site; and (3) Jackson Park roadway adjustments, including the closure of Cornell Drive north of Hayes Drive, as discussed in Section 2.4 below. The City Council's approval of those actions triggered the need for this NEPA review for the associated Federal Actions described below in Section 3.0.

3.0 Existing Conditions

The City has proposed converting UPARR lands to non-recreation uses within the meaning of UPARR in certain limited sections of Jackson Park to accommodate the OPC development. These areas would be: (1) a section of the OPC site that would be occupied by buildings that contain non-recreational uses; and (2) narrow strips elsewhere in the park to accommodate related roadway improvements. As part of its proposal, the City proposes providing additional recreation opportunities in the east end of Midway Plaisance and within closed roadway alignments. In order to put those proposals in context, this section considers: (1) existing uses within all of Jackson Park; (2) existing uses at the sites of the OPC and roadway improvements; and (3) existing uses in the Midway Plaisance.

3.1 Jackson Park Overview

Jackson Park is both an important public park and recreation area as well as part of a historic property listed on the National Register of Historic Places. It is a 551.52-acre park that is generally bounded by 67th Street to the south, Stony Island Avenue to the west, 56th Street to the north and Lake Michigan to the east. Roadways within the park are owned by the Chicago Department of Transportation (CDOT) and were excluded from the UPARR boundary. The limits of CDOT ownership lie within the roadway footprint from curb to curb. The remainder of Jackson Park (547.19 acres) is owned by the CPD and classified as publicly owned park. The Section 1010 boundaries are the same as the boundaries of Jackson Park, excluding the existing roadways and the areas occupied by the Museum of Science and Industry and the La Rabida Children's Hospital pursuant to UPARR grant agreements with the City.

Primary vehicular access routes to Jackson Park include Lake Shore Drive (US Route 41) and Stony Island Avenue, which connect Jackson Park to the City's Central Business District to the north and the Chicago Skyway (Interstate 90), a major expressway to the south. 57th Drive acts as a primary route carrying traffic from Lake Shore Drive to Cornell Drive, a six-lane principal arterial, through Jackson Park. Collector roadways within the park include Hayes Drive and Marquette Drive. Visitors to Jackson Park can access both free and paid surface parking lots. Museum of Science and Industry (MSI) visitors have access to an underground parking structure as well as nearby metered parking lots. Free street parking is primarily

provided along Stony Island Avenue, Hayes Drive, and Marquette Drive. Existing bridges carry Lake Shore Drive over the 59th Street Harbor Inlet and Jackson Park Harbor as well as Hayes Drive over the northern portion of the Jackson Park Inner Harbor. A map of the existing roadway configuration, parking facilities, and roadway bridges appears below in Figure 2.

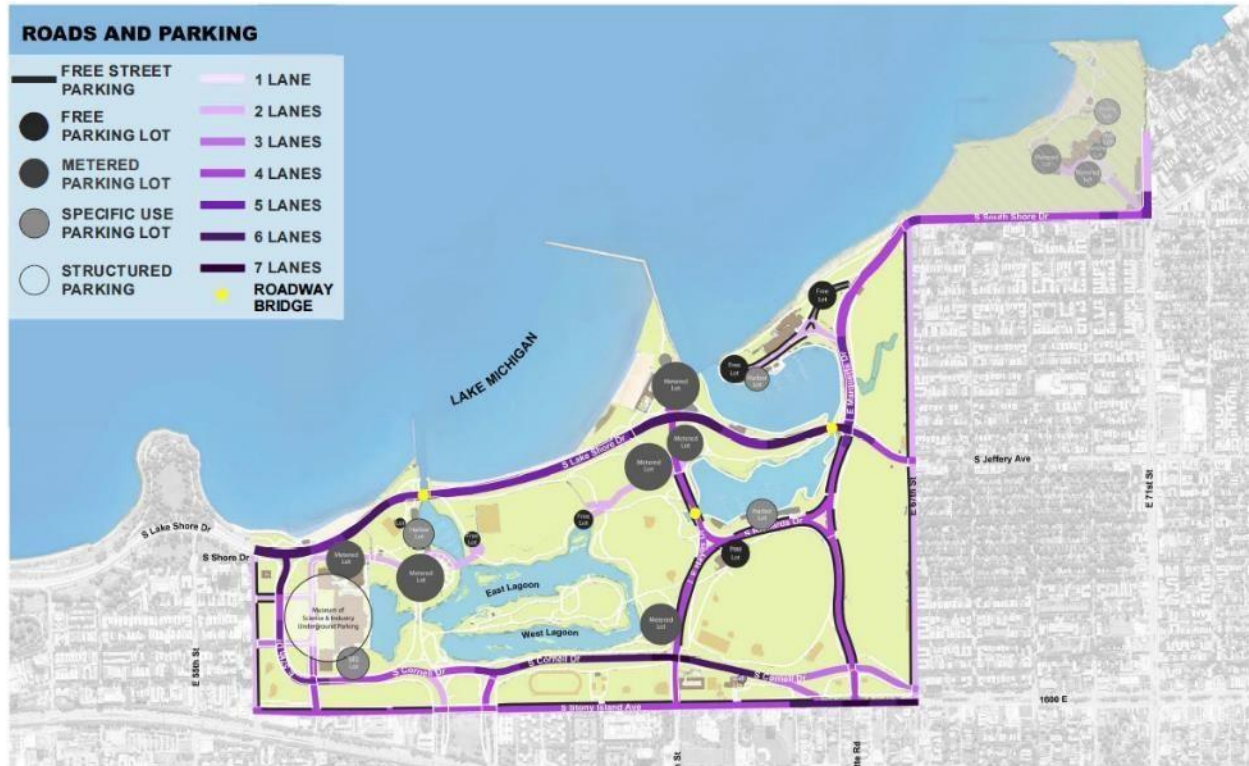


Figure 2: Jackson Park Roadways, Parking, and Bridges

The Chicago Transit Authority (CTA) provides transit access to Jackson Park via local and express bus routes as well as the Metra Electric Railway line. The Metra Electric line station is located west of Jackson Park along the North Midway Plaisance at 59th Street. The “Jeffery Jump” express bus line (J14) provides non-stop service from a stop at Jeffery Drive/67th Street to Columbus Drive/11th Street, just south of downtown. Nine other CTA routes provide access to, within, and surrounding the park.

Bicyclist and pedestrian access and circulation facilities are shown below in Figure 3. The Lakefront Trail, a regional trail within the City, is located east of Lake Shore Drive. Pedestrian underpasses at 57th Drive, 59th Street, 63rd Street, and Marquette Drive provide access for users between the park and lakeside. Other grade separated pedestrian facilities include the Music Court Bridge, the Clarence Darrow Bridge, and bridges to the north and south of the Wooded Island. The Clarence Darrow Bridge is currently closed to all traffic. Several other trails and bicycle routes are present to provide circulation within the park. The park and surrounding roadway network include several at-grade crossings, both marked and unmarked.



Figure 3: Jackson Park Pedestrian and Bicycle Facilities (2017 Aerial and Trails)

3.1.1 Existing Recreation Facilities

Jackson Park includes a variety of recreation areas that are open, public spaces. General areas of formal recreation within Jackson Park are highlighted below in Figure 4. Facilities for formal recreation include an 8-lane outdoor track, five soccer/football fields, two standard baseball diamonds, six softball/junior baseball diamonds, four basketball courts, twenty-four tennis courts (including four used as dog-friendly areas), two bowling greens, and the Jackson Park Fieldhouse fitness center and gymnasium. The park also contains golf facilities, including a driving range, club house, and an 18-hole golf course.

With a shoreline along Lake Michigan, several water-based recreation opportunities are provided within Jackson Park, including beaches, marinas, and harbors. Along the Lake Michigan shoreline are two public beaches at 59th Street and 63rd Street. The 59th Street Harbor, Jackson Park Inner Harbor, and Jackson Park Outer Harbor provide over 365 boat slips. Access points to the Lake Michigan Water Trail for non-motorized boating are provided at the 63rd Street Beach and the Inner Harbor. Other recreational use of the West Lagoon, East Lagoon, and Columbia Basin is currently restricted.



Figure 4: Formal Recreation Areas

Additional recreation amenities of Jackson Park include seven playgrounds, twelve picnic groves, two formal gardens, one community production garden, and three natural areas. The Iowa Building, located northeast of the Museum of Science and Industry, is a combination comfort/shelter station with a small open courtyard in the center. Picnic grove locations account for more than half of private event permitted spaces within the park.

Two private institutions currently occupy park space: The Museum of Science and Industry (21.21 acres) and La Rabida Children's Hospital (2.83 acres). The limits of these properties were excluded from the Section 1010 boundary. The Museum of Science and Industry provides opportunities for visitors to explore and enjoy various art and science exhibitions. Elsewhere within Jackson Park, various agreements with the CPD are in place for specific facilities, such as the Jackson Park Yacht Club and Southern Shores Yacht Club.

In addition, the park offers opportunities for informal recreation in the various open spaces. Such recreation includes running, sitting, walking, picnicking, informal games that do not require special fields or facilities such as Frisbee, nature observation, and general play.

The public actively uses three natural areas located within Jackson Park: the Paul H. Douglas Nature Sanctuary, the Bobolink Meadow, and the 63rd Street Beach Dune for nature-based recreation activities such as nature observation and walking. These areas and their different habitat types are key elements of public recreation at Jackson Park. Understanding what they offer affords a broader based understanding of the recreational opportunities within Jackson Park. The natural areas are shown below in Figure 5 (CPD Mittal Woods Natural Areas).



Figure 5: Jackson Park Natural Areas

The Paul H. Douglas Nature Sanctuary generally encompasses the Columbia Basin (south of the Museum of Science and Industry), the Wooded Island, habitat islands and the East and West Lagoons within Jackson Park. It is 57.62 acres in size and contains forest/woodland, riparian/water edge, and aquatic habitats. Within and surrounding the Wooded Island is an existing trail system for walkers and bicyclists connected by two bridges on the north and south ends of the island. Several overlooks surrounding the lagoons are present for visitors to enjoy views of the water, plants, and wildlife. The Japanese Garden, also known as the Osaka Garden or the Garden of the Phoenix, is present on the northeastern side of the Wooded Island. The Japanese Garden is home to a double pond surrounded by a trail system that traverses the pond by a Moon bridge, as well as a shelter and the Torii Gate at its entrance.

The Bobolink Meadow is located along the eastern edge of the East Lagoon, across from the Paul H. Douglas Nature Sanctuary. It is 5.39 acres in size and contains prairie/grassland space for wildlife and plants. To the north of the Bobolink Meadow is Bobolink Woods, which provides separation between the meadow and park facilities (i.e. parking lot and tennis courts). The Bobolink Meadow provides habitat for wildlife and native plants. Informal recreation use of the space is intended for bird watching, walking, and

nature study. Within the Bobolink Meadow exists a trail for pedestrian travel. An overlook to the East Lagoon is situated at the southern end of the Bobolink Meadow.

The Jackson Park 63rd Street Beach Dune is located on the easternmost side of the 63rd Street Beach along Lake Michigan. It is 3.01 acres in size and includes freshwater lake shoreline and dune habitat. The area provides habitat for invertebrates, fishes, and potentially mudpuppies. Native dune grasses including marram grass, little bluestem grass, and prickly pear cactus are in the restored dune area as well as some pockets of the state endangered sea rocket. This natural area is used during the migration seasons by waterfowl, and several species of shorebirds have been observed here, including the federally endangered Piping Plover (CPD Parks & Facilities). The 63rd Street Beach area encompasses the natural area for the Beach Dune, the 63rd Street Bathing Pavilion, a playground, and public beach area. Access to the Lake Michigan Water Trail for non-motorized water recreation is located just west of the dune area.

The CPD developed a vision for the future of Jackson Park and nearby parks such as the South Shore Cultural Center Park. The proposed vision for these parks is available in the 2018 SLFP on the SLFP website at <https://assets.chicagoparkdistrict.com/s3fs-public/documents/page/South%20Lakefront%20Framework%20Plan.pdf>.

3.1.2 Existing Recreation Use and Opportunities

Jackson Park experiences visitors from all over the globe as well as regional and nearby patrons to its attractions and institutions. The park has ample opportunity for both formal and informal public recreation.

City and regional use of Jackson Park centers on facilities for golf, boating, baseball, and basketball. Users also enjoy amenities such as picnic groves, beaches, marinas, harbors, gardens, playgrounds, and athletic facilities. Open recreation spaces adjacent to formal recreation spaces allow for informal uses of the park such as sitting, walking, picnicking, birding, and playing. Jackson Park also offers recreation opportunities to those visiting La Rabida Children's Hospital.

Jackson Park is a host to special events throughout the year. For example, the Chicago Half Marathon/5K begins and ends in Jackson Park and drew an estimated 18,000 participants in 2019. The Chosen Few Picnic & House Music Festival is held annually in Jackson Park to showcase Chicago music, attracting an estimated 30,000 people in 2019. Also, in 2019, Jackson Park has been the site of the Golden Lady Triathlon, neighborhood picnics, family reunions, a hunger walk, and wedding photo shoots. The park also hosts the World Basketball Festival (estimated 5,250 in attendance in 2014) and Bike the Drive (estimated 20,000 in attendance in 2015).

Jackson Park is host to a large number of the many CPD programs offered in the area. Data from 2016-2018 shows over 2,000 enrollees in CPD-sponsored programs such as conditioning and fitness, flag football, junior football, teen leadership, baseball, basketball, early bird and extended day camps, sailing camp, track and field, arts programs, gymnastics, pickleball, table tennis, wellness, and other special interest group recreation programs such as programs for seniors.

Nearby schools and neighborhoods are frequent users of facilities in Jackson Park. While the CPD does not track these uses by activity, information from 2016-2018 shows that more than 30,000 people participated in activities by reserving space in Jackson Park; not including reservations for picnic groves.

These organizations included such groups as the University of Chicago Track Club, the Hyde Park High School, Metro Baseball, World Soccer League, Chi City Ducks Football, Church Pentecost Soccer, and a police department basketball group. Picnic grove reservations from 2013-2017 show more than 500 reservations for families, churches, reunions, and many other types of groups.

Further, in 2016, over 24,000 rounds of golf were played at the Jackson Park Golf Course, accounting for approximately 15 percent of golf rounds played in Chicago parks that year. Usage of the marinas within the park varies with marina occupancies ranging from approximately 40 percent (Jackson Park Inner Harbor) to over 80 percent (Jackson Park Outer Harbor). Membership is not required to dock in the marinas. Users that are yacht club members reside in various areas within the City limits, surrounding Illinois counties, and neighboring states.

In summary, Jackson Park is a substantial urban park with an array of amenities actively used by the public.

3.2 EA Affected Area: Obama Presidential Center Site, Jackson Park

The OPC site is located along the western edge of Jackson Park where it connects to Midway Plaisance. It comprises 19.3 acres within Jackson Park encompassing the area roughly bound by North Midway Plaisance (Westbound), S Cornell Drive, crossing the park on the southern end along the same latitude as E 62nd Street, and S Stony Island Avenue.

3.2.1 Existing Recreation Facilities

The OPC site currently includes paths and an artificial turf field bounded by a track. In addition, the site has a playground, open space, an existing picnic grove, and a memorial garden area (known as the Perennial or Women's Garden). See Figure 6 below.

3.2.2 Existing Recreation Use and Opportunities

The OPC site 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.

The CPD has one picnic grove within the footprint of the OPC site – grove 11. According to data compiled by the Jackson Park District, the grove is reserved periodically for use by family groups, school groups, neighborhood groups, and other organizations. The grove also accommodates informal non-reserved picnicking. Data for 2019 shows no reserved uses for grove 11.

The Perennial or Women's Garden is used for gardening, aesthetic enjoyment, commemorations, and for sitting, walking, nature observation, meditation, gathering, and play. 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.

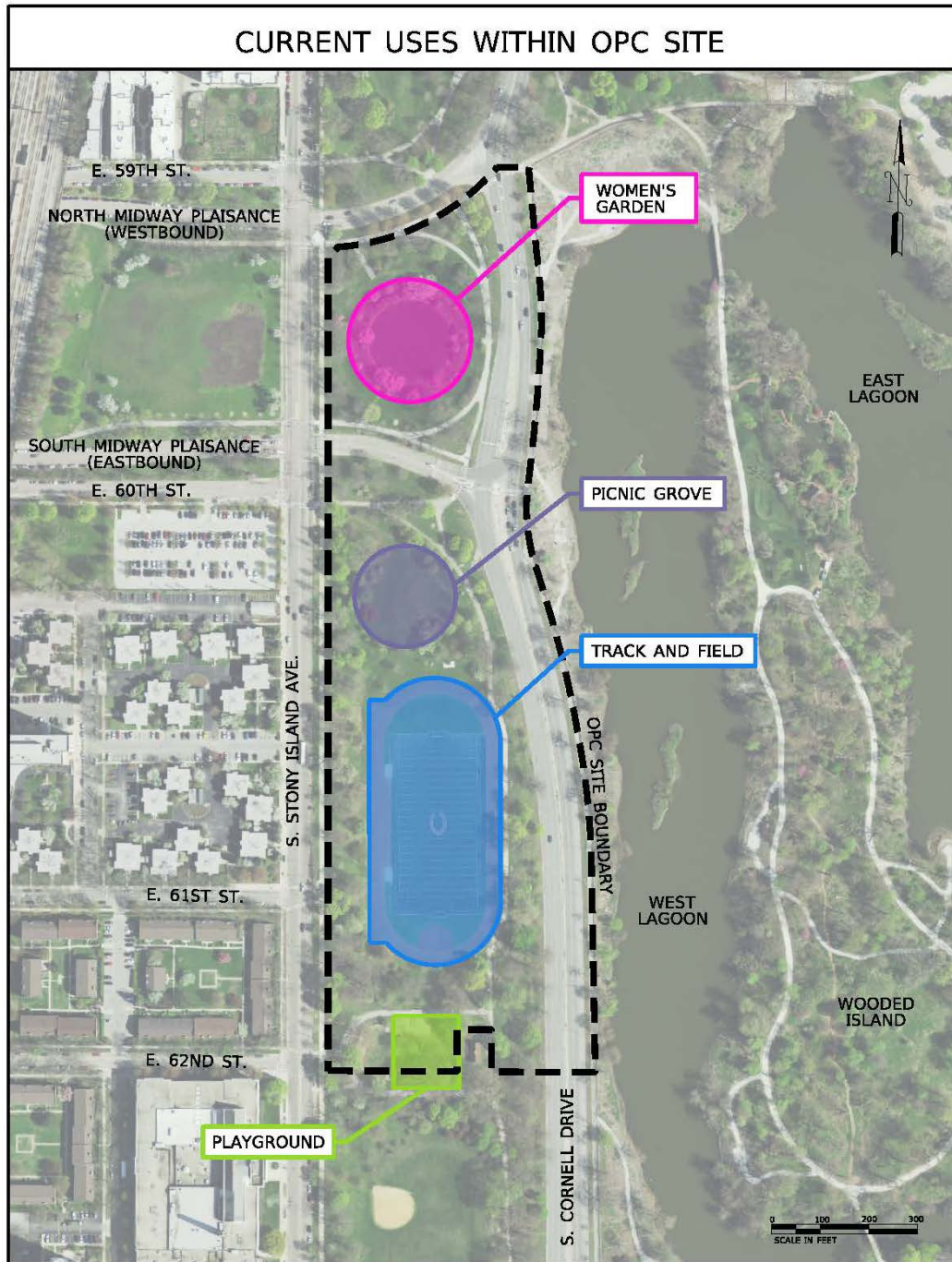


Figure 6: Current Uses within OPC Site Boundary

The 62nd Street Playground is still in use, but the equipment is old and in need of replacement. In addition to providing an area for informal play, after school programs and day camps use the playground.

The track and field facility is used by various groups. The CPD does not keep information regarding the precise number of users or nature of the groups that use the facilities. However, the facility accommodates track practice and competition, football, soccer, pick-up games, running, walking, and other exercise.

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.

Table 1 below summarizes existing uses on the OPC site as a whole.

Table 1: Current Opportunities and Uses on OPC Site

Recreation Facility/Area	Formal Uses	Informal Uses
Women's Garden (1.149 acres)	Gardening, visual aesthetic, commemoration	Sitting, walking, nature observation, meditation, gathering, play
Track & Field	Track practice and competition, football practice and competition	Exercise, running, walking, pick-up games (football, soccer)
Picnic Grove (0.55 acres)	Picnicking - family reunions, birthday celebrations, etc.	Walking, sitting, gathering, pick-up games (soccer, other), play, special events, picnicking
62nd Street Playground (0.46 acres total, 0.35 acres within the OPC boundary)	After school programs, day camps	Play
Informal Recreation (remainder of site acreage)	None	Walking, sitting, nature observation, pick-up games (soccer, other), buffer/plantings

3.3 Jackson Park: Parkland Intended for Roadway Improvements

The areas of Jackson Park that are currently parkland within the Section 1010 boundary but that would become roadways lie generally along the eastern edge of Stony Island Avenue, the western edge of Lake Shore Drive, and surrounding the proposed underpasses within Jackson Park. The intended additional roadway areas are generally 11' wide on the west side of Lake Shore Drive (63rd Street to 57th Drive) and 20' wide on the east side of Stony Island Avenue (67th Street to 59th Street). There are also planned roadway improvement areas along Hayes Drive, Cornell Drive, and North Midway Plaisance to accommodate realigned roadways and intersection improvements. The total conversion area along roadways and intersections is 5.2 acres. See Figure 7 below.

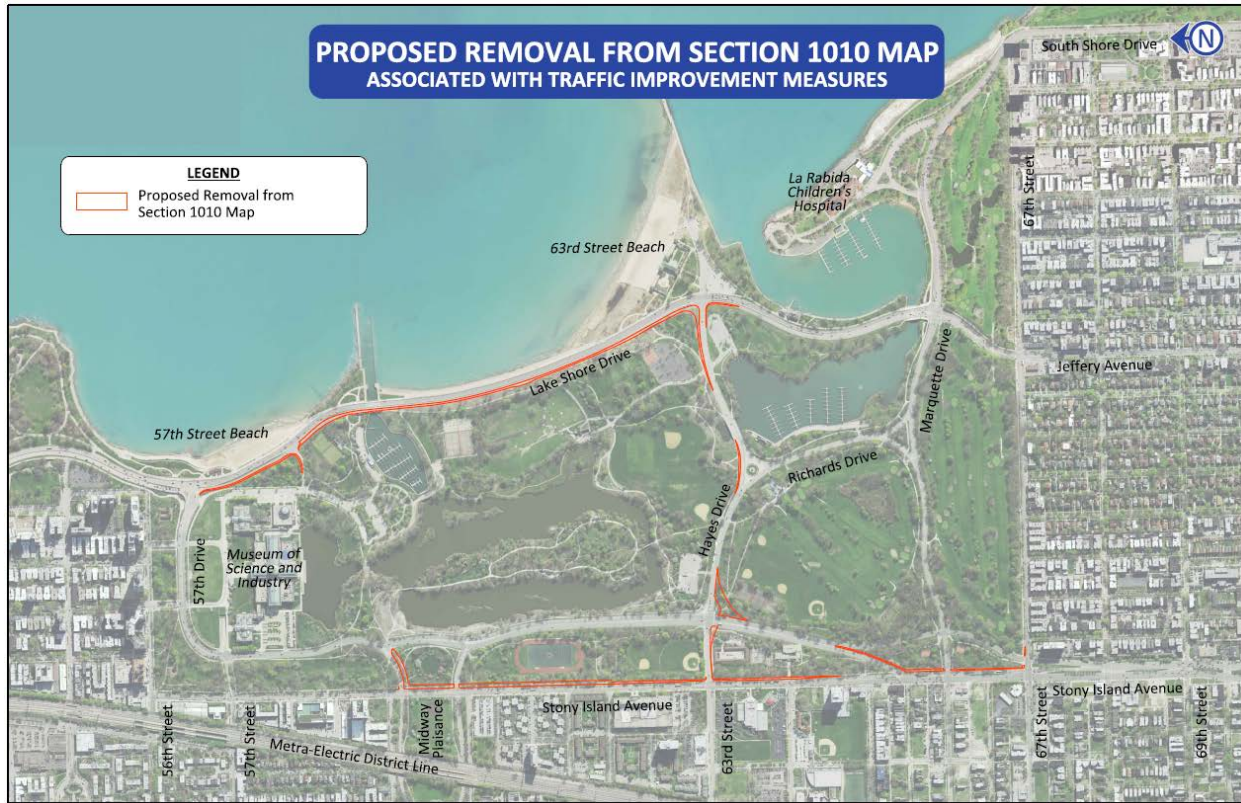


Figure 7: Conversion Areas along Roadways and Intersections

3.3.1 Existing Recreation Facilities

The roadway-related conversion areas consist of sidewalks/walkways, open space, or landscaping that serve as buffer zones for roadways and/or areas for informal recreation.

3.3.2 Existing Recreation Use and Opportunities

The conversion areas along roadways and intersections are narrow strips of land with limited recreational opportunity and uses, listed in the Table 2 below.

These areas of intended roadway changes are narrow, linear spaces that mainly serve as a buffer between roadways and more active recreation areas. These linear spaces along the west side of Lake Shore Drive are not typically utilized by park visitors. 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.

Location of Roadway Work	Acreage Impacted	Existing Recreation Opportunity/Use
Stony Island Avenue (67th Street to 59th Street)	2.4 Acres	Landscaped Buffer/ Sidewalk
Lake Shore Drive (Hayes Drive to 57th Drive)	1.3 Acres	Landscaped buffer not intended for recreation
Hayes Drive / Cornell Drive / 63rd Street intersection	0.7 Acres	Landscaped Buffer / Informal Recreation
Hayes Drive / Richards Drive Intersection	0.1 Acres	Landscaped Buffer / Informal Recreation
Hayes Drive / Lake Shore Drive Intersection	0.2 Acres	Landscaped Buffer / Informal Recreation
Cornell Drive (65th Place to Hayes Drive)	0.2 Acres	Landscaped Buffer / Informal Recreation
North Midway Plaisance (Stony Island Avenue to Cornell Drive)	0.3 Acres	Landscaped Buffer / Informal Recreation

The City proposes to provide the east end of the Midway Plaisance as substitute UPARR property and would improve public recreational opportunities there. This section describes the Midway Plaisance as a whole and, specifically, the current conditions on the eastern portion. The Midway Plaisance is under the ownership and jurisdiction of the City of Chicago, with management by the CPD.

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 8. It is an open green space adjacent to Jackson Park and jointly listed with Jackson Park as a historic landscape district on the National Register of Historic Places. 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.

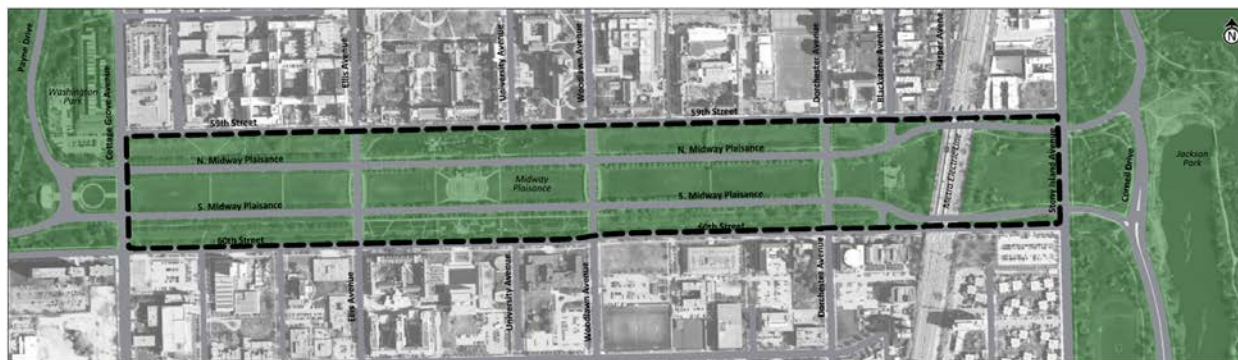


Figure 8: Midway Plaisance Property Boundary

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. Payne Drive/Morgan Drive provides east-west access to the Jane Adams (I-90/I-94) Expressway and Cornell Drive provides north-south access to Stony Island Avenue and the Chicago Skyway (I-90). Woodlawn Avenue (a collector roadway) and Cottage Grove Avenue (a minor arterial) provide north-south access for local traffic to the Midway Plaisance.

Visitors to the Midway Plaisance can access free on-street parking along both sides of the North and South Midway Plaisance roadways. Free on-street and metered parking is also provided on bordering and surrounding roadways to the park, including 59th Street, 60th Street, Ingleside Avenue, Ellis Avenue, University Avenue, Woodlawn Avenue, Dorchester Avenue, Blackstone Avenue, and Stony Island Avenue. The Metra Electric Railway, which crosses through the park, is carried via an overpass viaduct. Existing roadway bridges carry Ellis Avenue, Woodlawn Avenue, and Dorchester Avenue.

The CTA provides a part-time transit service (Route 2) through the Midway Plaisance along 60th Street. Hyde Park bus routes (Route 171, 172, and 192) circulate through the Midway Plaisance along Ellis Avenue, 60th Street, Dorchester Avenue, and 59th Street. Several bus routes operate along Stony Island Avenue to the east (Routes 6, 15, and 28) and Cottage Grove Avenue to the west (Route 4). The Metra Electric Railway provides daily access at the 59th Street station to downtown.

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. See Figure 9. It contains two one-way sections of roadway: South Midway Plaisance (eastbound) and North Midway Plaisance (westbound). Each roadway provides two travel lanes and meets Stony Island Avenue at a traffic signal before continuation into Jackson Park or the Midway Plaisance.

Recreation facilities within the Midway Plaisance include a warming hut and temporary soccer/football fields within the center of the Midway Plaisance between Cottage Grove Avenue and Dorchester Avenue. An ice/skating rink is located between Ellis Avenue and Woodlawn Avenue. The remainder of the Midway Plaisance is open space that includes the University of Chicago's Winter Garden, trails, and monuments. Adjacent to, but outside the limits of the Midway Plaisance, are several facilities for the University of Chicago to the north and south. The presence of the adjacent University facilities draws students and visitors to the Midway Plaisance.

In 1999, coordination between the CPD, the University of Chicago, and local community members produced a conceptual plan for future improvements to the Midway Plaisance. It was later published in 2000 as the Midway Plaisance Master Plan (available on the Midway Plaisance Advisory Council [MPAC] website, <http://midwaypac.org/visit-the-park/history>). MPAC is a local community group that monitors the park, represents the community, and advises the CPD.

3.4.2 Existing Recreation Use and Opportunities

Overall, the Midway Plaisance affords opportunities for walking and biking, informal recreation, as well as formal athletic activities such as soccer, football, and ice skating. Several paths and sidewalks are provided within and adjacent to the Midway Plaisance to provide access to facilities and the surrounding University of Chicago campus buildings. According to the “Chicago Streets for Cycling Plan 2020,” bicycle routes are envisioned along North and South Midway Plaisance to connect to future routes along Stony Island Avenue and Best Drive (CDOT 2020). Pedestrian and bicyclist bridges are present along Ellis Avenue, Woodlawn Avenue, and Dorchester Avenue. Regional visitors to the Midway Plaisance are drawn by the adjacent University of Chicago facilities. Use of the facilities primarily consists of City and local visitors that would participate in recreation activities on the athletic fields or visit the ice/skating rink.

As noted, 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 below, 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 Park District does not issue permits for the reservation of this portion of the park. This part of the park 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. Sidewalks provide opportunities for walking and biking.

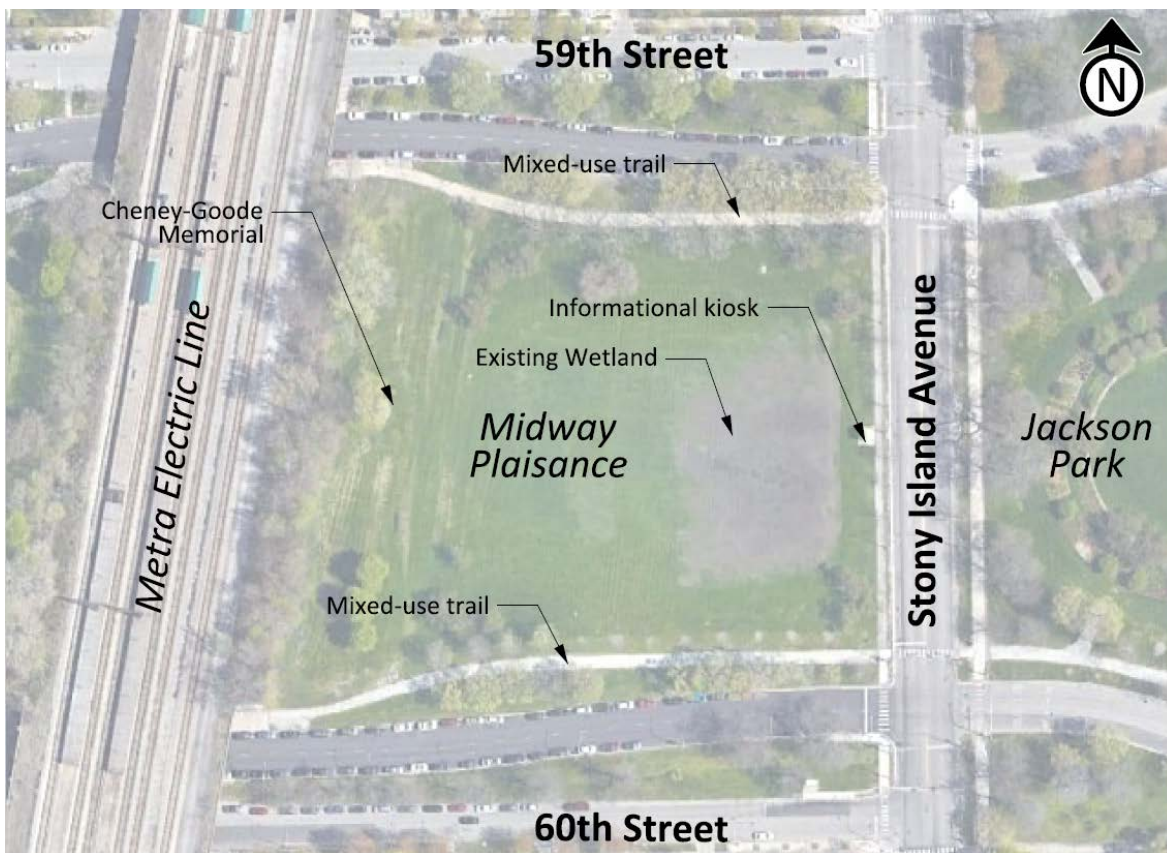


Figure 9: East End of the Midway Plaisance

Presently, the CPD receives numerous complaints from residents about lack of usable space on the eastern edge of the Midway Plaisance due to excess wet conditions. At several community meetings with the Midway Park Advisory Council, two in March and October of 2018 and the other in August of 2019, while some residents favored leaving the space as is, the majority of residents shared how they might use this space if it weren't wet most of the time including, holding soccer practice, walking their dogs, and picnicking to name a few. To the west—adjacent to the Metra embankment that is often used as a sledding hill in the winter—there was broad support for a children's play area as part of the plan for the area. A Midway Plaisance Framework Plan written in 2000 called for this area to provide children's activities such as a garden and play spaces (CPD 2000).

4.0 Impacts Analysis

The following sections present the impact analysis for potential impacts of the proposed OPC and roadway adjustment on recreation for the three alternatives considered.

Detailed descriptions of alternatives are provided in the EA and referenced in this technical memorandum. Potential impacts can be direct, indirect, or cumulative. Direct impacts occur as a result of the proposed action, at the same time and place of implementation. Indirect impacts occur as a result of the proposed action, but later in time or farther in distance from the action. Cumulative impacts result from the "incremental impact of the action when added to other past, present, or reasonably foreseeable future actions, regardless of what agency (federal or nonfederal) or person undertakes such other actions" (40 CFR 1508.7).

Potential impacts are generally described in terms of context and intensity. Context refers to the setting, situation, or circumstances surrounding a particular resource. Intensity refers to the severity of the impact.

4.1 Past, Present, and Reasonably Foreseeable Future Actions

The cumulative impacts analysis would assess the incremental impact of the Federal Actions when combined with other prior, current, or reasonably foreseeable future actions. The following projects are included in the cumulative impacts analysis:

4.1.1 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 would upgrade existing traffic signal equipment (poles, mast arms, lens, cabinet, conduit) and would 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 would also upgrade existing pedestrian ramps consistent with the Americans with Disabilities Act (ADA).

4.1.2 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.

4.1.3 Baseball Facilities

The SLFP plan 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.

4.1.4 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 would allow for viewing of an existing art installation and new berms surrounding the installation to integrate the site with the adjacent natural areas.

4.1.5 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 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 project has been funded.

4.1.6 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.

4.1.7 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 would be enveloped in steel sheet pile with a reinforced concrete crest. These proposed improvements would 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.

4.2 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.

4.2.1 Direct Impacts

Under Alternative A, recreation within Jackson Park and the Midway Plaisance would continue under the current City ownership 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.

4.2.2 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 the current UPARR boundary under Alternative A.

4.2.3 Cumulative Impacts

Other past, present, or reasonably foreseeable future projects, unrelated to the OPC project, 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, and Clarence Darrow Bridge reconstruction (see section 5.2.1 of the EA). Alternative A would not contribute to any cumulative impacts on recreation, as no Federal action occurs under this alternative.

4.3 Alternative B: NPS Action (FHWA No Build)

Alternative B includes NPS approval of the partial conversion of recreation due to the construction of OPC and replacement of recreation opportunities on the Midway Plaisance.

It is the City's intention that the OPC site or campus complements and enhances Jackson Park, providing new public facilities and integrating the site effectively with the rest of the Park. City plans associated with

the OPC campus include removing current roadways to better connect the park to the lakefront and other local South Side institutions. It would include winding landscapes, a sledding hill, and quiet spaces to read or reflect. The majority of the space would be free and open to the public as an integrated component of Jackson Park. The plan is depicted on Figure 10. The shaded box depicts that portion of the site that the NPS is evaluating as a conversion under UPARR.



Figure 10: OPC Design Development Site Plan (April 2020)

4.3.1 Direct Impacts

4.3.1.1 UPARR Conversion and Replacement

If approved by NPS, the partial conversion of the area around the proposed OPC buildings in Jackson Park would result in lifting the existing UPARR restrictions from a 4.6-acre parcel within the OPC site containing the forum, library, and museum and adjacent land (see the red box in Figure 10) and transferring the UPARR restrictions to the 5.2 acre site on the east end of the Midway Plaisance (see the green box in Figure 11). Although changing the UPARR boundary alone would not result in direct impacts on recreation, lost recreation opportunities within the conversion footprint and alterations to the replacement recreation property for improved recreation within the Midway Plaisance would result in direct changes to recreation. The direct impacts resulting from alterations to the replacement recreation property are discussed in the paragraphs below. Indirect impacts, including the planned OPC improvements and

attendant recreational facility loss within Jackson Park, are discussed separately in section 4.3.2, “Indirect Impacts of City Actions.”



Figure 11: Alternative B - NPS Action/FHWA No Build

4.3.1.2 East End of the Midway Plaisance

The City proposes to dedicate acreage as replacement recreation property on the east end of the Midway Plaisance bounded by the North and South Midway Plaisance, Stony Island Avenue, and the Metra Electric Railway. This area is approximately 5.2 acres. See Figure 12. The Section 1010 boundary would be modified to include this replacement recreation area making the property subject to the provisions of UPARR. The area would remain dedicated to public recreational use unless another conversion of use was determined.

In order for the NPS to approve the UPARR conversion and this acreage as replacement, the City must improve the recreation opportunities in a manner that provides equivalent facilities to what was lost. The loss of recreational facilities is considered an indirect effect of the Section 1010 boundary partial conversion and is discussed in section 4.3.2, “Indirect Impacts of City Actions” below. 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.

To replace lost recreational opportunities and respond to community requests, the City proposes modifying the site (as indicated in Figure 13 below) 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 design decisions on playground structures in this area would be decided through a public process but would 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 would be modified to facilitate infiltration and drainage to remove the wetland and to enhance use of the open field. The installation of a missing historic walk and tree patterns would rehabilitate historic spatial organization to a historically open character with corner plantings, as well as provide access to the existing memorial and proposed play area. There would be no alterations to the configuration of existing roadways or walking paths. The concept plan establishes a design envelope for the purpose of analyzing potential impacts to historic properties. Within these parameters, the City would 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 would be announced by the City following completion of the Federal review process.



Figure 12: Alternative B Proposed UPARR Replacement Land on the Midway Plaisance



Existing Layout



Proposed Layout

Figure 13: Existing and Proposed Conceptual Recreation Replacement Opportunities on the East End of the Midway

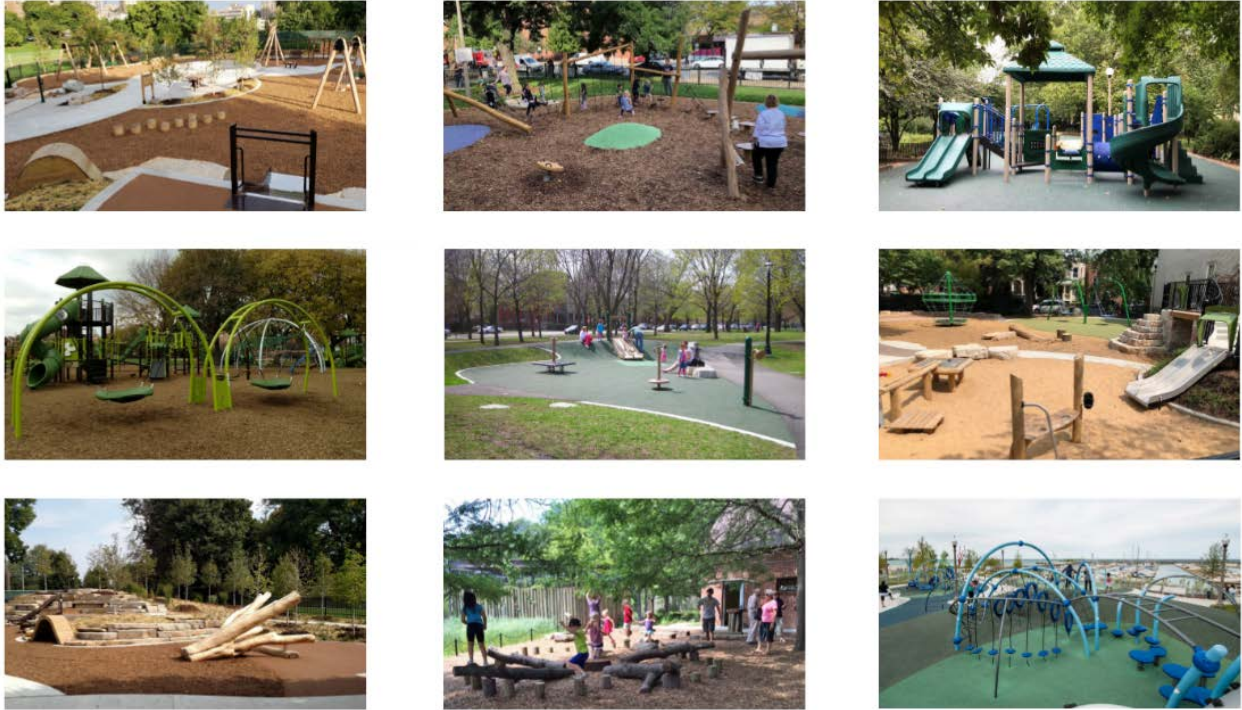


Figure 14: Proposed Conceptual Recreation Replacement Opportunities on the East End of the Midway Plaisance

Opportunities Lost

The proposal for Midway Plaisance, as discussed above, includes modifying the sunken grade of the lawn to facilitate infiltration and drainage in order to enhance use of the open field, and adding playground facilities. Adding the natural play features and inclusive play features would result in the loss of some open recreation space. The open recreation space in this area is informal recreation in an open green space and includes pick-up games, walking, gathering, or open play, in addition to sidewalks for walking and biking.

Opportunities Reconfigured

Recreational opportunities would be reconfigured on the site. In addition, the provision of play facilities would reconfigure informal recreation opportunities by creating more formal facilities intended primarily for children.

Opportunities Gained

The City proposes to improve the recreational utility of the east end of Midway Plaisance to replace lost recreational opportunities within the existing Section 1010 boundary. The City proposes the addition of various play features and improvements in landscaping to make the area more appealing for recreation. Facilities would include nature play facilities (opportunities for natural plantings and structures such as tree sundials, mud kitchens, and log steppers) in addition to inclusive play facilities for people with a wide range of disabilities. These inclusive play facilities may include activity tables, swings, slide mounds, and quiet spaces.

With removal of the wetland, the proposed flexible open space would accommodate a variety of activities such as walking dogs, picnicking, and holding soccer practice. It is approximately the size of one junior soccer field.

4.3.1.3 Proposed Roadway Closures

To accommodate the OPC construction and aspects of the SLFP, the City intends 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.

As part of Alternative B, Cornell from 62nd Street to 59th Street and the eastbound portion of Midway Plaisance from Stony Island Avenue and Cornell Drive would be removed. 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.

4.3.2 Indirect Impacts – City Actions

4.3.2.1 OPC Site Development

Opportunities Lost

There is general construction and reconfiguration of recreation within certain areas of Jackson Park. Some changes are related to the OPC and some are independent (see Section 3.1). From the recreation user standpoint, construction and reconfiguration would not result in the loss of recreation opportunities in Jackson Park overall, although one ball diamond will not be replaced in the park. If demand warrants, the park district would consider adding an additional diamond in the community. The following recreation opportunities (shown on Figure 15 below) are impacted and considered lost under UPARR due to the conversion footprint: the picnic grove, the track and field, and open space.

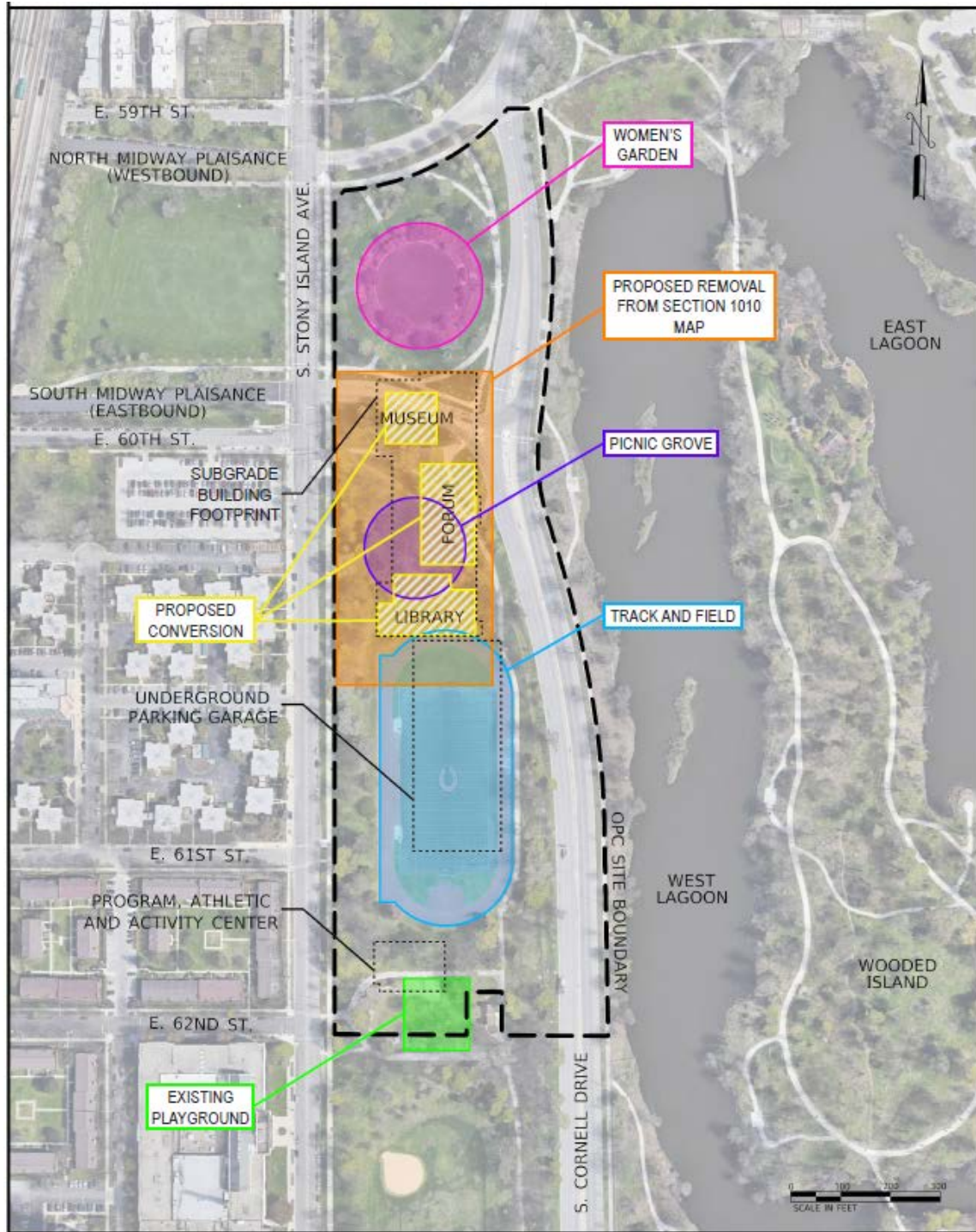


Figure 15: Current Recreation Uses within the 4.6-Acre OPC Site Conversion Area

Table 3, below, outlines specific recreation opportunities and uses currently within the conversion proposal area of 4.6 acres within the OPC site:

Table 3: Recreation Opportunities and Uses Currently within the 4.6 Acre OPC Site Conversion Area

Recreation Facility/Area	Existing Formal Opportunity Uses	Existing Informal Opportunity Uses
A portion of the Track & Field	Track practice and competition, football practice and competition	Exercise, running, walking, pick-up games (football, soccer)
Picnic Grove (0.55 acres)	Picnicking - family reunions, birthday celebrations, etc.	Walking, sitting, gathering, pick-up games (soccer, other), play, special events, picnicking
Informal Recreation (remainder of site acreage)	None	Walking, sitting, nature observation, pick-up games (soccer, other), buffer/plantings

Opportunities Reconfigured

Elements impacted by the OPC development, on the site as a whole, would be reconfigured. Although reconfiguring these elements does 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.

Several picnicking opportunities would be available across the larger OPC campus. Those areas include: the Community Grove, Lagoon View Lawn, the Great Lawn, and the Lagoon Grove among other spaces. There would be a minimum of one acre of informal picnicking space collectively within these spaces.

The Perennial or Women's Garden is used for gardening, aesthetic enjoyment, and commemorations and for sitting, walking, nature observation, meditation, gathering, and play. It would be temporarily impacted by construction, but 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.

For example:

- The restored garden would replicate key historic features of the space, including the original garden's dimensions, shape, aesthetics, feeling, plant beds, and plant types.
- Changes to the garden are being implemented to make the space accessible, including removing steps currently surrounding the garden, and introducing new accessible paths around the perimeter and down to the garden bowl.
- The symmetrical triangular path intersections at the east side of the space that define the transition from the Midway Plaisance to Jackson Park would be replaced with asymmetrical paths.
- The symmetrical layout of concentric rings of planting beds and paths would be replaced with a series of asymmetrical winding paths, gathering spaces, stormwater catchment areas, and plant beds.

Opportunities for informal recreation include areas used informally for sitting, walking, gathering, pick-up games (soccer, other), play, and for landscaping or as buffer between recreation areas and sidewalks,

paths, and roadways. These opportunities would continue to exist on the OPC site as well as in new landscaped areas made available by the closure of certain roads on the site, as discussed below.

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. Table 4 below summarizes the recreation opportunity impacts on the proposed OPC conversion site.

Table 4: OPC Site Recreation Opportunities Impact Summary

Recreation Facility or Area	Changes	UPARR Effect
Open space	Conversion of informal recreation space within the 4.6 acre carve-out area includes footprints of the campus buildings and driveways and adjacent land.	Lost
Track and Field	A corner of the existing track and field is under the footprint of a planned (non-recreational) OPC building. The existing track would be temporarily inaccessible until the replacement track is constructed.	Partially lost
Picnic Grove	Jackson Park users would still be able to utilize the OPC site and other parts of Jackson Park for picnic activities. Informal picnicking would be available within the Lagoon View Lawn, Community Grove, Lagoon Grove, Great Lawn, and other green areas of the OPC Site including within the playground, on the roof of the Forum building, in the Women's Garden, etc.	Lost

Opportunities Gained

The OPC would add certain recreational features to the public opportunities available within and adjacent to Jackson Park. Although these features do not count towards replacement recreation opportunities under UPARR, this description provide 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 campus would remove current roadways to better connect the park to the lakefront and other local South Side institutions. It would include winding landscapes, a sledding hill, and quiet spaces to read or reflect. The four buildings, including the museum, a branch of the Chicago Public Library, and a forum as part of the main campus area and a Program, Athletic, and Activity Center, would all provide spaces open to the public for exhibitions and various informal and formal events. Spaces to enjoy the park, such as the top floor of the museum building that would offer views of Lake Michigan and the south side of Chicago, would also be provided. The roof of the library would include a fruit and vegetable garden which would 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.

The site would include a playground that would be equipped with a wide variety of experiential and exploratory play opportunities; its proximity to the Program, Athletic and Activity Center would also allow for more coordinated indoor/outdoor recreation programs. The Program, Athletic and Activity Center

would provide space for public activities and provide 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 Great Lawn 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 between the Promenade and other multi-use paths leading to and around the Great Lawn.

Much of the OPC site would remain subject to UPARR restrictions. The Program, Athletic and Activity Center would provide a new opportunity for public recreational programs and uses and does not constitute a conversion under UPARR. Neither the new playground nor the Program, Athletic and Activity Center would be located within the 4.6-acre conversion area; therefore, each would remain UPARR-protected public recreational land. Other new recreation amenities planned for the OPC project outside of the conversion area include: a sledding hill, great lawn, nature trail, and woodland walk.

4.3.2.2 Track and Field Relocation

Recreation opportunities related to the existing track and field would be temporarily displaced as it would be removed due to construction of the OPC. The construction of the OPC would impinge upon the existing track and field facility, which is nearing the end of its useful life according to the CPD. The construction of a new track and field facility elsewhere in the park would change and improve current recreational opportunities and uses in a small portion of Jackson Park. 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 would be moved within Jackson Park.

4.3.3 Cumulative Impacts

Certain projects unrelated to the OPC project, 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 Other Improvements on the Wooded Island, Jackson Park Harbor Navigation Improvement Project, and Clarence Darrow Bridge reconstruction. All of these projects would facilitate informal recreation experiences and interconnectedness within Jackson Park by easing pedestrian and recreational transit within the park and improving certain opportunities. Alternative B would therefore contribute a beneficial cumulative impact to recreation.

4.4 Alternative C: NPS + FHWA Action (Preferred Alternative)

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 would only discuss the additional impacts to recreation associated with Alternative C.

4.4.1 Direct Impacts

4.4.1.1 Transportation Improvements

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 (CDOT 2020). A new north/south path, 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 new pedestrian refuge islands, and spot improvements including new pedestrian refuge islands and curb extensions to reduce crossing distances.

The planned roadway changes, as described in Table 5 and depicted in Figure 16 below, would have negligible adverse effects on various open park spaces used for informal recreation as well as some sidewalks and pathways used for walking, jogging, and biking. The 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 would not prevent park users from continuing to use the adjacent open areas of the park for recreation. Overall, the CPD does not expect any impact on the use of existing open spaces and has worked closely with CDOT to reconfigure pathways and open space following construction.

Table 5: Roadway Improvements

Location	Need	Acreage Impacted
Stony Island Avenue (67th Street to 59th Street)	Widen Stony Island Avenue	2.4 Acres
Lake Shore Drive (Hayes Drive to 57th Drive)	Widen Lake Shore Drive	1.3 Acres
Hayes Drive / Cornell Drive / 63rd Street Intersection	Intersection Reconfiguration	0.7 Acres
Hayes Drive / Richards Drive Intersection	Intersection Reconfiguration	0.1 Acres
Hayes Drive / Lake Shore Drive Intersection	Intersection Reconfiguration	0.2 Acres
Cornell Drive (65th Place to Hayes Drive)	Convert roadway to two-way	0.2 Acres
North Midway Plaisance (Stony Island Avenue to Cornell Drive)	Convert roadway to two-way	0.3 Acres

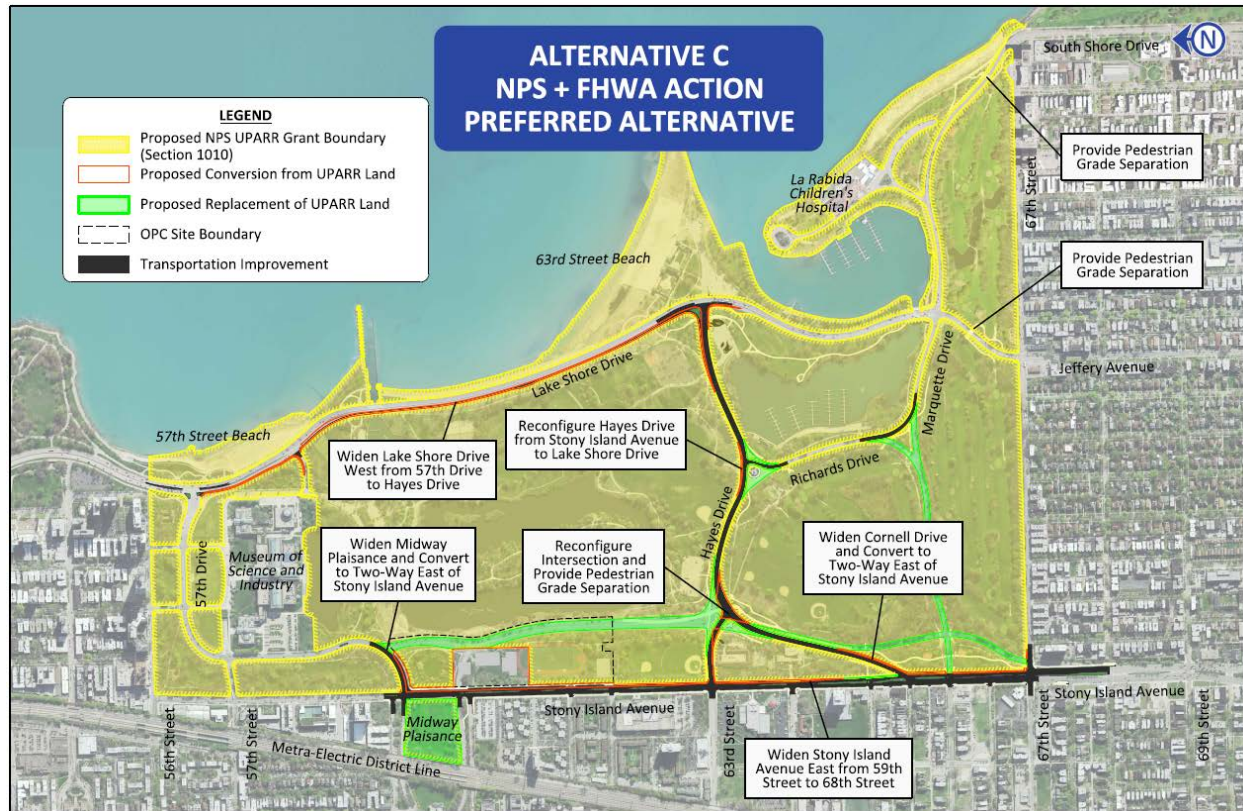


Figure 16: Planned Changes to UPARR Designation after Roadway Improvements

As part of Alternative C, the closed roadways within Jackson Park would 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. These changes are depicted in Figure 16, above. Tables 6 below highlight all areas within Jackson Park where existing roadways would be converted to park space (which totals 11 acres), entirely offsetting the recreational acreage lost due to other roadway work.

Table 6: Roadway Closures and Conversions to UPARR Designated Land outside OPC Site Boundary

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 new recreation area east of Stony Island Avenue would predominantly include new informal recreation space, but would also include new pathways, sidewalks, and underpasses that are incorporated in the roadway improvements (Figures 17 and 18 below). The City intends for the roadway closures to improve park cohesiveness through better connected parkland; opportunities for expanded multi-use trails within the park; and improved safety accessibility within the park as a result of this increased trail system. As described in the tables below, this added area would provide similar, but improved recreation opportunities as the open space areas lost due to roadway improvements. Opportunities include informal recreation trails, and multi-use recreation opportunities.



Figure 17: Alternative C – Existing Trails and Sidewalks (2017 Aerial and Trails)



Figure 18: Alternative C – Proposed Trails and Sidewalks (2017 Aerial and Trails)

4.4.2 Indirect Impacts – City Actions

No additional indirect impacts to recreation are anticipated under Alternative C. The indirect impacts of the project would be associated with the NPS action, which are discussed under Alternative B in section 4.3.2 above. Roadway improvements under Alternative C would improve the overall traffic conditions in Jackson Park and are not expected to induce changes in the patterns of land use, population density, or growth rate in the vicinity of Jackson Park. Therefore, no additional indirect impacts to recreation are expected as a result of the roadway improvements under Alternative C.

4.4.3 Cumulative Impacts

Other past, present, or reasonably foreseeable future projects unrelated to the OPC project, 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 Other Improvements on the Wooded Island, Jackson Park Harbor Navigation Improvement Project, and Clarence Darrow Bridge reconstruction (see section 5.2.1 of the EA). Collectively, these projects would contribute a beneficial increment to the cumulative impact to recreation. Alternative C would contribute additional benefits to recreation 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.

5.0 Recreation Equivalency Under UPARR

UPARR requires consideration of specific factors when taking action on a conversion request, including whether the proposal assures replacement opportunities of “reasonably equivalent usefulness and location.” The regulations in 36 C.F.R. 72.72(b)(3) articulate criteria to frame the consideration of equivalence: (i) evaluation of recreation “resources and opportunities” served by existing facilities as compared to the types of recreation needs that would be served by the substitute property; and (ii) evaluation of the location of the site – while generally it should serve “the same community(ies) or area as the converted site,” there is administrative flexibility.

NPS would make a determination as to whether the proposal satisfies this regulatory requirement in its decision under UPARR. In the 4.6 acres of the OPC site subject to the conversion request, areas of informal and formal recreation would be lost including open space, a picnic grove, and the partial loss of the track and field. Lost opportunities are formal activities that use these spaces as well as informal recreational activities such as picnicking, walking, and pick-up games. The City proposes to provide replacement recreation opportunities on the east end of the Midway Plaisance, an area that is 5.2 acres in size to offset the losses from the conversion of the 4.6-acre area within the OPC site. The east end of Midway Plaisance would have two general recreation elements with opportunities for formal and informal recreation. Specifically, the City proposes enhancing the proposed replacement area on the east end of the Midway Plaisance to accommodate a combination of open space and play facilities. The installation of a missing historic walk and tree patterns would rehabilitate historic spatial organization, to a historically open character with corner plantings. The sunken grade of the lawn area would be modified to facilitate infiltration and drainage of the 0.436-acre wetland 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 open space area would be the size of one junior soccer field (approximately 30 by 50 yards). Facilities would include both nature play facilities (opportunities for natural plantings and structures such as tree sundials, mud kitchens, and log steppers) and inclusive play facilities. Inclusive play facilities, designed for people with a wide range of disabilities, may include activity tables, swings, slide mounds, and quiet spaces. 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.

With respect to the loss of 5.2 acres of parkland caused by roadway improvements, as described in this document, 11 acres of existing roadways would be closed and refashioned as park land for informal recreation use in Jackson Park and would be included within the UPARR Section 1010 boundary. The losses occasioned by the roadway improvements impact linear spaces that serve as buffer to roadways and including some sidewalks and paths. Uses of this space include running and walking. The additional UPARR land resulting from the roadway changes would include new and improved paths, underpasses, and other 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 the park. Further, new sidewalks in the areas of the roadway improvements would offer improved opportunities for pedestrians and runners. These losses and gains are generally of the same recreational resources and opportunities because they afford similar opportunities for walking, running, and use of informal spaces.

Given the location of the replacement sites in or immediately adjacent to Jackson Park and the OPC site, both would serve the same or similar communities as the current UPARR acreage. The physical attributes of the sites are similar in that the sites are generally open or landscaped spaces that allow for formal and informal recreation activities. The replacement sites offer a generally equivalent recreational experience to the opportunities lost in that they include open space, built recreation facilities, and opportunities for other informal recreational activities. The reclaimed roadway areas would enhance the informal recreation areas available adjacent to the OPC site; the improved Midway Plaisance would be similar to the area removed from the UPARR boundary in that it provides open spaces and landscaped areas. Both the converted areas and replacement sites provide opportunities for strolling, running, picnicking and other informal recreation opportunities. In addition, the open recreation space on the Midway Plaisance and planned improvements would provide enhanced opportunities for children with the creation of play facilities.

Further, the plans for the Midway Plaisance, as described above, include space large enough for soccer games and other pick-up team sports. Thus, under the City's proposal there will be no loss of public recreation opportunity as the replacement is "reasonably equivalent" to existing opportunities at both the OPC site and sites along the areas of roadway improvements.

6.0 Summary

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 partial conversions from recreation to non-recreation uses within the park require NPS review.

As a result of constructing the OPC, there would be a partial conversion of recreation use. To compensate for part of the conversion, the City proposes replacement UPARR land and amenities on the east end of the Midway Plaisance. The City also proposes an additional partial conversion for road improvements and proposes closed roadways within Jackson Park as replacement land.

In deciding whether to approve the proposed conversion, NPS would consider the information generated under the various statutes applicable to the proposal and evaluation of the federal agencies.

Figure 19 shows a summary of the NPS action as well as the FHWA Action.

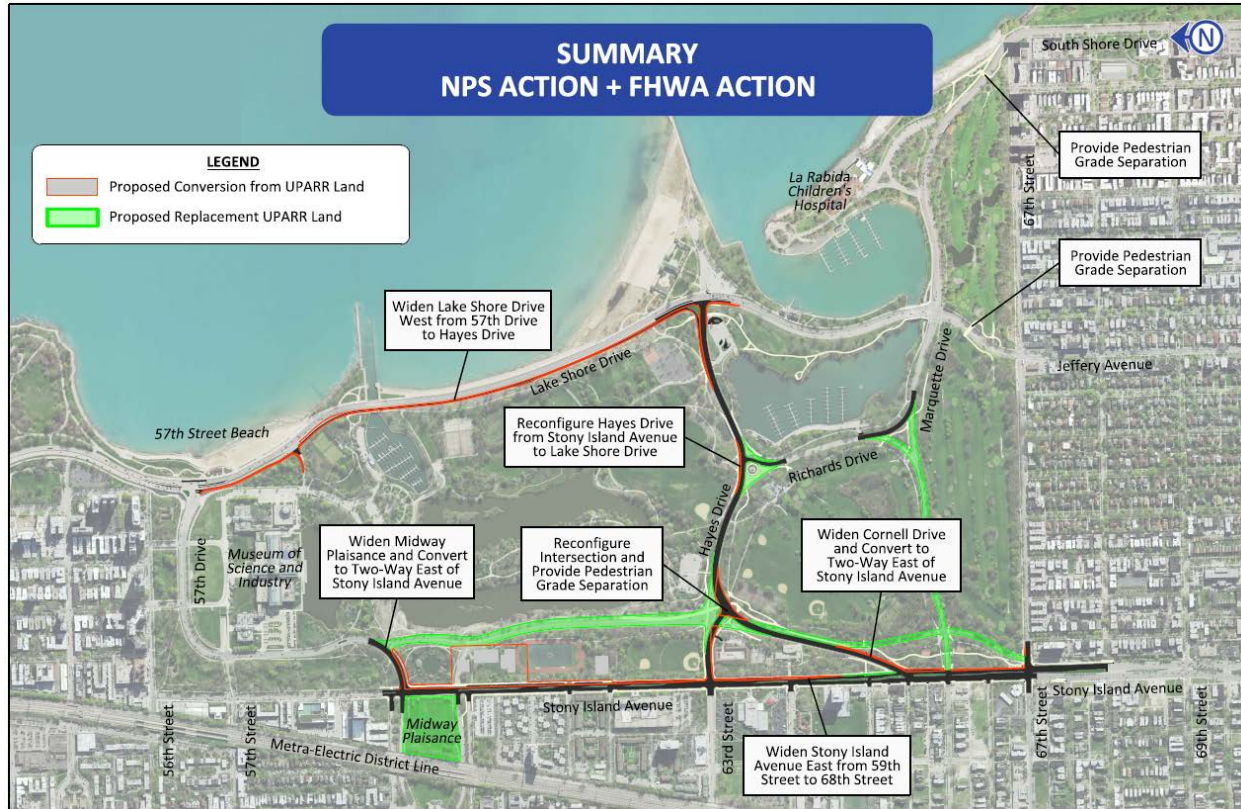


Figure 19: Planned Changes to UPARR Designation after Roadway Improvements

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