



DEPARTMENT OF PLANNING AND DEVELOPMENT
CITY OF CHICAGO

MEMO

Date: October 25, 2023

To: Irene Pantoja, Environmental Protection Specialist
Illinois Division, Federal Highway Administration
Irene.Pantoja@dot.gov

From: 
Patrick Murphy, Acting Commissioner
City of Chicago, Department of Planning and Development

Cc: Kenya Merritt, Deputy Mayor, City of Chicago Mayor's Office
Kathleen Dickhut, Deputy Commissioner, City of Chicago Dept of Planning and Development
Tom Carney, Acting Commissioner, City of Chicago, Department of Transportation
Rosa Escareno, General Superintendent, City of Chicago Park District
Lisa Misher, Deputy Corporation Counsel, City of Chicago Department of Law

Re: 2023 Annual Report on the MOA for Projects in Jackson Park, Chicago, Cook County, Illinois

In accordance with Section IV - Schedule, Monitoring and Reporting of the Memorandum of Agreement (MOA) related to projects in Jackson Park in Chicago, Illinois, which was finalized in December 2020, we submit the attached Annual Report on the eight (8) mitigation measures outlined in the MOA.

The *2023 Annual Report on Progress of the Jackson Park MOA Mitigation Measures* (attached), reports on the City's endeavors to undertake the Measures specified in Stipulation I according to the Target Schedule (MOA Attachment C). While the City continues to make significant progress on the work of several mitigation measures, the Chicago Park District (CPD) has experienced a substantial loss of staff in their Planning and Construction Department which has impacted our ability to fully adhere to the MOA's Attachment C - Target Schedule. Due to these unforeseen circumstances, CPD revised the target dates for measures 1.C Cultural Landscape Report, 1.E. English Stone Comfort Station, and 1.F. Statue of the Republic, as identified in the attached table.

Additionally, the City confirms that aside from the circumstances outlined above, we have not encountered any other problems, disputes, or objections in our efforts to carry out the terms of the MOA. CDOT will ensure that the annual reports are made available to the public on a City website.

Please contact Todd Wyatt, City of Chicago Department of Planning and Development at 312-744-9145 if you have any questions or need for additional information.

2023 Annual Report on Progress of the Jackson Park MOA Mitigation Measures

Type	Measure		MOA description	MOA Attachment "C" - Target Schedule	Tentative Phasing	Tentative Start	Status
Research and Documentation	I.A	Updated NRHP Documentation	CDOT and the Chicago Park District in consultation with the Illinois SHPO will prepare an updated nomination of the Jackson Park Historic Landscape District and Midway Plaisance to the National Register of Historic Places (NRHP). The updated nomination will conform to the current standards for nominations to the NRHP and will be available to the public in digital form once final. The updated nomination will be prepared by or under the supervision of individuals who meet the relevant Secretary of the Interior's (SOI) Professional Qualification Standards for history or architectural history (48 Fed. Reg. 44738- 44739, Sept. 29, 1983).	Submission of the updated nomination to Illinois SHPO: to be submitted by the end of 2025	N/A	2024	CPD will contract with an consultant to prepare the submission documents. Goal is to submit an RFP for proposals by the beginning of Q1 2024. Deviation from the target schedule is not anticipated at this time
	I.B	Field Documentation	CDOT and the Chicago Park District will prepare photographs and drawings documenting existing conditions on (a) the 19.3-acre site planned for the OPC, (b) the east end of the Midway Plaisance, and (c) the areas planned for traffic improvements in Jackson Park. The work will be prepared consistent with the Historic American Landscape Survey (HALS) guidelines for an existing conditions plan, vegetative plan, field photographs keyed to a site plan, and aerial photographs. The work will be prepared by or under the supervision of individuals who meet the relevant SOI Professional Qualification Standards for history or historic landscape architecture (62 Fed. Reg. 33720-33721, June 20, 1997).	Final portfolio of documentation: to be completed by the end of 2021	N/A	N/A	Completed January 2021. The City closely collaborated with the IL SHPO to complete the Field Documentation Report for Portions of Jackson Park and the Midway Plaisance during the winter of 2020. An approval letter from IDNR to the SHPO dated January 21, 2021 concurred that the field documentation report was acceptable and fulfilled the MOA requirement.
	I.C	Cultural Landscape Report	CDOT and the Chicago Park District, in consultation with the SHPO, will prepare Part 1 (site history, existing conditions, and analysis/evaluation) and Part 2 (long-term preservation strategy) of a Cultural Landscape Report (CLR) for Jackson Park, consistent with federal guidance for cultural landscape reports in: Robert R. Page, Cathy A. Gilbert, and Susan A. Dolan, A Guide to Cultural Landscape Reports: Contents, Process, and Techniques (Washington, DC: U.S. Department of the Interior, National Park Service, CulturalResource Stewardship and Partnerships, Park Historic Structures and Cultural LandscapesProgram, 1998). The CLR will assemble and analyze pertinent historic documentation and will provide recommendations for the long-term management of Jackson Park based on significance,existing condition, and use, taking into consideration all changes to Jackson Park that are proposed as part of the undertaking. The work on the CLR will be prepared by or under the supervision of individuals who meet the relevant SOI Professional Qualification Standards and are experienced in cultural landscape identification and evaluation and in the application of the SOI Standards for the Treatment of Cultural Landscapes.	Final Cultural Landscape Report: to be submitted by 2024	Part 1 (site history, existing conditions, and analysis/evaluation)	2023	CPD will be issuing an RFP for public bid to contract with appropriate and qualified parties. The RFP scope is still in development. Target issuance is for Q1 2024. Due to staffing shortages, CPD's revised target date for submission of the Part 1 report is the end of 2024.
					Part 2 (long-term preservation strategy)	2024	Scope for Phase 2 of the project will be included in the RFP for Phase 1 and developed following the completion of Phase 1. Final target submission will be delayed by staffing challenges which have reduced the Chicago Park District's capacity. CPD's revised target date for submission of the final Cultural Landscape Report is the end of 2025.

Interpretation	I.D	Interpretive Materials	CDOT and the Chicago Park District will develop and implement a plan (the plan) to install interpretive materials or carry out programs to commemorate and present the cultural and natural historical contributions of Jackson Park and its use by South Side residents. The plan for interpretive materials may encompass different formats for interpretation such as a digital program components and interpretive displays. The draft plan will be created in consultation with Consulting Parties, local museums, community groups, schools and universities, to determine the appropriate content, format, and locations for interpretive materials. The draft plan will be made available for 45-day review and comment by signatories, invited signatories, and concurring parties to this MOA. CDOT and Chicago Park District will prepare and provide a comment/response document summarizing the comments received. In light of these comments, CDOT and Chicago Park District will prepare the final plan and provide it to signatories, invited signatories, and concurring parties to this MOA before implementing the final plan.	Draft plan for interpretive materials: to be initiated in 2021	Phase 1: Project initiation	N/A	The draft report for Interpretive Materials in Jackson Park was completed in December of 2022 by SOM, outlining various opportunities for location, materials, and content.
					Phase 2: Draft plan creation and review	2024	Project planning and community engagement are the next phase of the project and anticipated to begin in Q1 of 2024. The initial report is complete and ready for 45 day review by the signatories followed by community engagement.
					Phase 3: Implementation	Pending	The timeline for implementation for the interpretive materials will be contingent upon community engagement and results from phase 2 of the project.
Rehabilitation	I.E	English Stone Comfort Station	CDOT and the Chicago Park District will prepare a Historic Structures Report (HSR) for the English Stone Comfort Station and will rehabilitate it in light of the recommendation from the HSR. The English Stone Comfort Station is located on the western perimeter of Jackson Park. The recommendation provided in the HSR will be consistent with applicable SOI Standards for Rehabilitation (36 C.F.R. § 68.3(b)). The HSR and future rehabilitation design will be provided to the Illinois SHPO for 45-day review and comment. CDOT and Chicago Park District will prepare and provide a comment/response document summarizing the comments received and will finalize the HSR and rehabilitation design in light of comments. The HSR and the final rehabilitation design will be performed by or under the direction of individuals meeting the SOI Professional Qualification Standards for historic architects (48 Fed. Reg. 44739, Sept. 29, 1983).	Final Historic Structures Report: to be submitted by the end of 2023	Phase 1: historic structures report	2024	Due to staffing shortages, the Chicago Park District remains in phase of developing the RFP scope of this project. The submission of the final Historic Structures Report will be delayed. CPD's revised target date for submission of the final Historic structures Report is the end of 2024.
				Rehabilitation work: to be initiated following approval of the Historic Structures Report and rehabilitation design.	Phase 2: rehabilitation	2025	Pending the necessary rehabilitation work identified in the Historic Structures Report, work is tentatively scheduled to begin in 2025.
	I.F	Statue of the Republic	CDOT and the Chicago Park District will prepare a conservation assessment and rehabilitation plan for the Statue of the Republic and will implement the rehabilitation in phases. The Statue of the Republic is located at the intersection of East Hayes Drive and South Richards Drive in Jackson Park. The rehabilitation plan will be consistent with applicable SOI Standards for Rehabilitation (36 C.F.R. 68.3(b)). The draft rehabilitation plan will be provided to the Illinois SHPO for 45-day review and comment. CDOT and Chicago Park District will prepare and provide a comment/response document summarizing the comments received and will finalize the documents in light of comments. The assessment, plan, and rehabilitation will be performed by or under the direction of professional objects conservators with experience in applying the SOI Standards for Rehabilitation and conserving outdoor statues.	Final conservation assessment and proposed rehabilitation plan: to be submitted by the end of 2023	Phase 1: Conservation Assessment	2024	Due to staffing shortages, the Chicago Park District remains in the RFP scope development phase. Conservation assessment and rehabilitation work on the statue will require the engagement of external organization partners, requiring additional coordination. CPD's revised target date for submission of the final assessment and proposed rehabilitation plan is the end of 2024.
				Rehabilitation work: to be initiated following approval of the conservation assessment and proposed rehabilitation plan	Phase 2: Rehabilitation	Pending	Pending

Design Review	I.G	Design Review for the East End of the Midway Plaisance	CDOT and the Chicago Park District plan modifications to the east end of the Midway Plaisance consistent with SOI Standards for the Rehabilitation of Historic Properties with respect to standards 9 and 10, which address compatible new additions. CDOT and the Chicago Park District will provide the draft design for 45-day review and comment by the public and signatories, invited signatories, and concurring parties to this MOA concerning landscaping features and other character-defining elements of the design. In furtherance of the City's responsibilities under UPARR, the final design for the east end of the Midway Plaisance will include new play area features whose ultimate selection will be made by the City after seeking public comment and consultation with the NPS on the final play-area design options from the Chicago Park District. CDOT and the Chicago Park District will prepare and implement a final design in light of comments concerning the draft design and the play area features.	Input on the draft design from the public, signatories, invited signatories and concurring parties, and public input on the play area features: to be completed by 2022	N/A	2021	The project is currently out for bid / award with proposals due from General Contractors on October 18, 2023. CPD anticipates issuing a NTP to the Contractor in the First Quarter of 2024. Construction will begin pending SHPO approval of the design, submitted on March 3, 2023. Additional information was provided on September 27, 2023. Construction completion anticipated late 2024.
Planting Review	I.H	Review of Planting Plans for Required Tree Replacement	CDOT and the Chicago Park District will ensure that planting plans detailing the species and placement of native plantings required in the GLFER mitigation areas are consistent with the original GLFER approval. USACE will be provided the final plans for review consistent with Section 408.	Submission of planting plans: prior to planting of related replacement plants	N/A	Pending	The Park District is reviewing the landscape restoration plan (65% drawings) that includes tree (re)placement, new natural areas to mitigate for lost GLFER areas, and restoration of dunes/berms and GLFER areas impacted by construction. The Park District continues to work with the historic landscape consultant to provide comments and edits to the plan that will be necessary before work proceeds. The Park District estimates that the project will be bid sometime in 2023.