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January 3, 2018

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

Dear Ms. Monroe,

Openlands, as a Section 106 Consulting Partner for Jackson Park, believes that the proposal by the Obama Foundation to locate the Obama Presidential Center in Jackson Park on Chicago's South Side is an opportunity for the City of Chicago, the Park District, and the adjacent neighborhoods and institutions to honor, restore, and reinvigorate both the legacy and the future vision for Chicago's historic parks and their surrounding neighborhoods. Chicago can give the Center a spectacular setting, and the Center can provide a catalyst for enduring benefits for the citizens of Chicago.

In the late 1800s, Frederick Law Olmsted and Calvert Vaux, the designers of the parks, believed that urban parks not only provided refuge from the stresses of city life, but also were democratic and cultural places for all classes of people to interact. This influence on history and culture is still true today. The cultural and historic value of these great park landscapes should not be underestimated nor should the value of the Presidential Center in providing the spark necessary for their restoration, rediscovery, and reinvigoration. Jackson Park can once again be vibrant community amenities for the neighbors as well as for people from all over the city and the world who will visit the Presidential Center.

As part of the Section 106 review, Openlands supports the following principles:

Principle 1: Minimize building in the parks

The Presidential Center building footprint should be minimal and be placed in the most appropriate location vis-à-vis not just cultural and historical propriety, but a range of sound site planning considerations gleaned from a rigorous analytical process of the site and its surroundings.

Principle 2: Replace any land used for buildings with new or reclaimed park acreage

Any taking of parkland for the entire Center needs to be replaced with additional acreage of new park space and, where appropriate, the removal of service structures and underutilized buildings that populate Jackson Park. Additional spaces need to be identified and determined both in advance and within the framework of the Section 106 process in order to understand

all relevant historical impacts of the project. We note here that greening of vacated roads does not constitute new park space.

Principle 3: Provide convenient public access and transportation

Seize the opportunity to create a regional transportation hub to serve multiple cultural and neighborhood amenities. All automobile parking for the Center must be outside the parks or underground. The road system should be improved for walkability and access to trail systems, but also with community needs in mind.

Principle 4: Exploit synergies with existing community and cultural institutions

The Section 106 process should integrate plans and enhance connections with nearby institutions of significant cultural and historic value. There is a unique opportunity to illustrate sustainability principles and practices (green infrastructure, native landscaping, energy efficiency, etc.) in partnership with the Museum of Science and Industry and others.

Principle 5: Restore and revitalize the parks

Chicago must renew its commitment to restoring and revitalizing Washington and Jackson Parks and the Midway Plaisance. If carefully considered and constructed, the Library could enhance prime features of these treasured public parks which in turn can provide amenities for local communities and spaces for people to connect to nature.

The park system was created in order to provide the residents of Chicago with beautiful and inviting spaces for people to recreate, for wildlife to thrive, and communities to gather. The plan to build the Presidential Center should honor the legacy which both protected open spaces and made them accessible to people. A visionary plan guided by clear principles must lay the foundation for this ambitious plan.

To this end, Openlands finds the fractious and siloed nature of the planning process in and of itself problematic. The four different planning processes represented by the Chicago Park District's Framework Plan, the CDOT Transportation Plan, the Obama Center Plan now including the parking garage located on the Midway, and the Golf Chicago Plan. These different processes all serve to deny both agency accountability and legitimate public input via separate but related interests. As part of these separate processes, realistic alternatives to basic elements such as the redesign of the roadway network, the location of the library garage, and the proposed golf course, have never been shown, but mysteriously are well coordinated between each of the processes and interests. We hope and trust that the NEPA and Section 106 process will not only lend accountability to these disparate processes, but also will lend legitimacy through the exploration of alternatives if and when historic and cultural impacts are present. With this in mind, the Area of Potential Effects (APE) scope should be expanded to at least include the Golf Course Plan.

As part of the Section 106 review, Openlands urges the Lead Agencies to request from all parties a comprehensive plan that takes into account not just the historic and cultural significance of these parks, but a unified comprehensive planning process that allows for accountability, public input, and the testing of alternative solutions. Specifically, a holistic planning process should at a minimum consider the following:

- how the proposed changes will affect both the historic and cultural elements of the park(s) and the surrounding neighborhoods. These decisions cannot be made without good information. We have heard nothing on how the proposed road closings will impact traffic patterns and the adjacent neighborhood;

- the City's plans to avoid massive gentrification and displacement of present residents, thereby impacting the historic and cultural fabric of Woodlawn, South Shore, and to an extent Washington Park and Hyde Park;
- how a championship-caliber golf course will remain an affordable community asset and they have not offered details on how they will replace existing recreation resources slated for removal;
- plans for the merger of the golf courses will expand the new course beyond the current footprint, remove hundreds, if not thousands of the park's mature trees, destroy the beloved South Shore Nature Sanctuary, and reduce existing parkland;
- at this time there is no information addressing how the city intends to mitigate the loss of natural resources in Jackson Park or how these changes fit into a comprehensive plan for reinvestment in the three South Side parks.

Based on these cultural and historic impacts, we request the Section 106 process recommend to unify the planning process to explore meaningful alternatives, and include all of the Midway and perhaps even Washington Park in the APE. Openlands well understands the effort required to inventory and understand the impacts to historic structures. Openlands also understands that a thoughtful investigation cannot take place concurrently between four planning processes.

Once again, we reiterate our request that as part of the Section 106 review, Openlands urges the Lead Agencies to request from all parties a comprehensive plan that takes into account not just the historic and cultural significance of these parks, but a unified comprehensive planning process that allows for accountability, public input and the testing of alternative solutions. To this end, there must be a proactive, comprehensive plan that lays out a vision for our parks and a framework to evaluate how future developments will impact transportation, affordable housing, nature and wildlife, economic growth, and public access to park amenities. Only in this manner can the Presidential Center, which we support, serve as a catalyst for meaningful change yet preserve the historic and cultural significance of the South Parks.

Sincerely,



Gerald W. Adelman, President and CEO

About Openlands

Founded in 1963, Openlands is one of the nation's oldest and most successful metropolitan conservation organizations, having helped secure, protect, and provide public access to more than 55,000 acres of land for parks, forest preserves, land and water greenway corridors, and urban gardens. For more information, visit www.openlands.org.

