



August 30, 2019

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

RE: Response to request for comments on the Assessment of Effects to Jackson Park Historic District and Midway Plaisance

Dear Ms. Monroe:

As a Section 106 Consulting Party, Friends of the Parks is pleased to submit our comments regarding the Assessment of Effects (AOE) to the Jackson Park Historic District and Midway Plaisance associated with the proposed road and park changes to accommodate the Obama Presidential Center. The city, state and federal agencies have acknowledged an “Adverse Effect” finding in the AOE, and Friends of the Parks agrees with the adverse effect findings.

We echo the concerns of many other Consulting Parties. Many of the comments speak very formally in response to a very formal federal process. But rather than repeat that language and each of those topics, Friends of the Parks seeks to focus our attention, that of the Lightfoot administration, and that of the public on a few key problem areas that others may not stress in this particular manner. We imagine that the new Lightfoot administration may not be aware of all the conversations and processes that did and did not take place under the Emanuel administration.

While Section 106 is a federal process, it is City staff that is managing it, which in and of itself is problematic in terms of conflict of interest, especially when the former mayor had previously been the chief of staff to the president whose center is in question. Since the City staff continues to manage the process, though under different leadership, we call upon the Mayor Lightfoot to manage this process according to the higher standards articulated by the new administration, whose stated priorities include: Transparency, Transformation, Accountability, Equity, and Diversity and Inclusion.

To live up to the spirit of transparency, the Lightfoot administration cannot allow this process to continue to move forward under the cover of darkness that is reflected in the failure to document consideration of avoidance of adverse effect.

This Section 106 processes has immediately bypassed “avoidance” and goes straight to “minimization” and “mitigation.” And then the examples that are offered for mitigation are ridiculous. The Consulting Parties were not consulted in the discussion or development of avoidance or minimization efforts as we should have been. And the suggestion that was presented to the public as an appropriate example of

mitigation—the mere putting up of a sign to denote the historic significance of the area—is simply offensive.

Though we call for Consulting Parties to be invited to participate in conversation about potential avoidance and minimization measures, if this process is going to go straight to mitigation, then:

- 1) The Obama Foundation should pay for actual mitigation in a way that reflects the \$175 million public investment that is required to facilitate the plan that they insist on. While Friends of the Parks has not taken a position on the road closures, any straightforward examination of the process will reveal that there has not been any public consideration of any options other than closing the roads—a very costly measure. (Even though green space organizations like ours can appreciate the closure of roads, we have also seen the Chicago Park District employ traffic calming measures in other large parks in Chicago. These options—minimizing the number of lanes and adding crosswalks and islands to facilitate pedestrians crossing the street—have not been offered for public vetting in this case.)
- 2) Additionally, the conflation of the South Lakefront Framework Plan process that often takes place in the broader Jackson Park community with the design of the Obama Presidential Center leads many in the community to be confused about what amenities the community is getting back in replacement for the 19.3 acres of the Obama campus. Many people in the community believe that the amenities laid out in the South Lakefront Framework plan are promised to come to fruition. Per our conversations with the Chicago Park District, the park district does not have funding for much of that plan at all. They are hoping that sometime in the next couple of decades they might be able to find money for some of those things. Friends of the Parks understands that such is typically how things go with park framework plans. But much of the public does not know this, and they are being duped. Even if the public agreed that those items constituted appropriate mitigation for the construction of the Obama Presidential Center in Jackson Park, there is no money committed by anyone for most of it. And it still doesn't provide a plan for the replacement of the baseball field that is being displaced by the new track and field because the previous track and field is being displaced by the Obama Center. As such, if this is the only opportunity to call for mitigation measures, we would name appropriate mitigation as the replacement of 19.3 acres of green space by the creation of parks and playlots throughout the communities surrounding Jackson Park, according to the needs and desires of those communities. And we call for the Obama Foundation to pay for a new field house in Jackson Park and new sports fields conceived of in the South Lakefront Framework Plan—conversations which we have already had with them and the Chicago Park District repeatedly.

Additionally as it relates to transparency, the South Lakefront Framework Plan public process took place long before the Section 106 process was announced. Regardless of one's opinion of the usefulness of that process, it is not honest or straightforward to suggest that questions that are legitimately being asked now by Consulting Parties and community residents during the formal Section 106 process had space to be asked in the very different process that was that framework plan process. The public sessions called for by the Section 106 process cannot be satisfied by meetings that took place before it was announced.

The Obama Foundation met with Friends of the Parks and then with the Midway Plaisance Advisory Council with Friends of the Parks staff and board members who live in Hyde Park present back in Winter 2017-2018 to pitch the idea of some set of us centering community conversations about what should be done with the east end of the Midway. It was suggested back then that a new and very inclusive Midway Framework Plan process be initiated, and it was suggested by the Obama Foundation that they would pay for the process and the community-derived outcome. Yet here we are, in 2019, with the Obama

Foundation having abandoned that conversation. No such community conversations ever moved forward. But a mysteriously-derived proposal to put a playground on the east end of the Midway did move forward as a Section 106 response to the UPARR requirement that existing parkland be replaced. And now the public is asked to trust that whatever conversations happen in the future will be robust, inclusive, and not based on done deals. This comes after the City has already decided, as expressed at several recent Section 106-related meetings, to move forward with a playground proposal recommendation for the east end of the Midway and pitch it to the community as a done deal. That is on top of the fact that the playground proposal has not been approved by the National Park Service. This does not rise to the level of transparency and transformation that we would expect of the new mayoral administration.

Finally, it is absurd to replace a baseball field with a playground, anyway. Regardless of what a community-led conversation about what is best for the east end of the Midway would come up with, the UPARR requirements call for an amenity that serves the same user community. Those who use a baseball facility at a huge park like Jackson Park and those who use a playground for children at a neighborhood park are not the same user community.

Again, we call upon the City to revisit avoidance and minimization opportunities. But if Consulting Parties are not given that opportunity, we also call for minimization efforts in the vein of planning ahead to assure that the Obama Presidential Center does not cause displacement, as we have seen in Chicago regarding The 606 and has happened across the country in relation to other park development efforts. The City should explore programs to help create healthy, mixed-income communities in the neighborhoods around Jackson Park. Certainly, this transformation opportunity should also include pocket parks and other appropriate green spaces for the health of the community.

Thank you for this opportunity to speak into the Section 106 process regarding the Obama Presidential Center.

Sincerely,

A handwritten signature in black ink, reading "Juanita Irizarry". The signature is fluid and cursive, with the first name "Juanita" being larger and more prominent than the last name "Irizarry".

Juanita Irizarry  
Friends of the Parks