



February 18, 2020

Ms. Arlene K. Kocher  
Division Administrator  
Federal Highway Administration  
3250 Executive Park Drive  
Springfield, IL 62703

cc: Mr. Matt Fuller, Environmental Programs Engineer, Federal Highway Administration, [matt.fuller@dot.gov](mailto:matt.fuller@dot.gov)

cc: Ms. Abby Monroe, Public Participation Officer, City of Chicago, Department of Planning and Development (DPD), [abby.monroe@cityofchicago.org](mailto:abby.monroe@cityofchicago.org)

RE: *Obama Presidential Center Mobility Improvements to Support the South Lakefront Framework Plan City of Chicago, Cook County, Illinois*

Dear Ms. Kocher,

As a Section 106 Consulting Party, Friends of the Parks is pleased to submit our comments regarding the *Assessment of Effects to Historic Properties: Proposed Undertaking In and Adjacent to Jackson Park, Jackson Park, Chicago, Illinois*, January 2020 (AOE) prepared by the City of Chicago Dept. of Planning and Development on behalf of the Federal Highway Administration (FHWA).

We again 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 are aware that the Lightfoot administration may not be aware of all the conversations and processes that did and did not take place under the Emanuel administration, as we recently heard in the media that they mayor said she has not been part of any conversations about replacing the park acreage taken up by the proposed Obama Center in the neighborhoods surrounding Jackson Park.

While Section 106 is a federal process, it is City staff that is managing it. We continue to have concern about the process, and we continue to call upon the Mayor Lightfoot to manage this process according to the administration's standards as: Transparency, Transformation, Accountability, Equity, and Diversity and Inclusion.

Though we continue to 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 has funding for only a little bit of that plan. 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 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. We appreciate that the City is exploring programs to help create healthy, mixed-income communities in the neighborhoods around Jackson Park. Certainly, we appreciate that there has been some conversation about pocket parks and other appropriate green spaces for the health of the community. But, this transformation opportunity calls for a lot more acreage than what has been presented to the public thus far.

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

Sincerely,

A handwritten signature in cursive script that reads "Juanita Irizarry". The signature is written in a dark ink and is positioned to the left of the typed name.

Juanita Irizarry  
Friends of the Parks