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August 10, 2020

Mr. Matt Fuller  
Environmental Program Engineer  
Federal Highway Administration  
3250 Executive Park Drive  
Springfield, IL 62703

**Via email:** [Matt.Fuller@dot.gov](mailto:Matt.Fuller@dot.gov)

**Re: Draft MOA for Section 106 review of the Obama  
Presidential Center**

Dear Mr. Fuller:

As outlined in the draft Memorandum of Agreement, plans for the Obama Presidential Center (OPC) will result in “adverse impacts” to historic Jackson Park and the Midway Plaisance. The OPC covers more than 19 acres and includes four new buildings, a new parking garage, major roadway modifications and closures, and a new active recreation area in the Midway Plaisance. The combined effect of these proposed changes will be to destroy the integrity of this historic and nationally recognized landscape designed by visionary social reformer Frederick Law Olmsted.

The City and the Obama Foundation know there are alternative locations that would allow for a new Center with all its amenities, without radically altering Jackson Park and the Plaisance. The fact that this desirable outcome—and other avoidance measures—were never genuinely explored illuminates the flawed process that has produced the MOA. Indeed, the process bears little resemblance to the Section 106 mandate to “develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties.” 36 C.F.R. § 800.6(a).

The draft MOA virtually ignores the diverse and thoughtful comments and suggestions made in good faith by the consulting parties. Instead, city residents and visitors who have enjoyed this landscape treasure are left with the promise of a few interpretive signs, a restored “comfort

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station,” and the suggestion that this radically transformed historic landscape will somehow remain on the National Register.

Bottom line: **The adverse impacts cannot be mitigated in ways that will retain the integrity of Jackson Park and Olmsted’s work.**

NAOP solidly supports the planning and construction of a vibrant presidential center to honor our 44<sup>th</sup> president in a locale that will retain and recognize the value of Chicago’s historic Olmsted parks. However, the current construction plans in Jackson Park and the minimal mitigation efforts set out in the MOA are unacceptable.

Accordingly, the National Association for Olmsted Parks will not be a signatory.

Sincerely,



Anne Neal Petri  
President and CEO

cc: Todd Wyatt, [todd.wyatt@cityofchicago.org](mailto:todd.wyatt@cityofchicago.org)

***The National Association for Olmsted Parks is the only national organization dedicated to the stewardship of Olmsted landscapes. Since our founding in 1980, we have helped preserve and protect historic Olmsted landscapes; provided advocacy as well as technical assistance at the national and local level; offered key resources and educational material, and published and promoted definitive scholarship through the Papers of Frederick Law Olmsted. NAOP now serves as the managing partner of Olmsted 200, the national bicentennial celebration of the birth of Frederick Law Olmsted.***