

Friends of the Parks Statement issued October 30, 2020

OPC Environmental Review Comments

Dear friend of the parks,

Today the next round of public comments are due for the federal review process as is required for the construction of the Obama Presidential Center (OPC) in Jackson Park.

Since Jackson Park is a part of the Urban Park and Recovery Program (UPARR), any changes made to the park trigger the need for the National Environmental Policy Act (NEPA) review and an environmental assessment.

Below are the comments we submitted to the National Park Service, which is leading the NEPA review process for the environmental assessment of the OPC.

Friends of the Parks (FOTP) has participated as a consulting party to the Section 106 compliance review, and attended meetings and webinars related to the Environmental Assessment (EA) per the National Environmental Policy Act (NEPA) for the proposed Obama Presidential Center (OPC) in Jackson Park. FOTP is an Illinois not-for-profit organization founded in 1975 and dedicated to promoting healthy parks in the City of Chicago. Our mission includes ensuring park lands are equitably distributed and managed across the city to support healthy communities and a healthy environment.

Since 2014, FOTP has been in support of Chicago having a once-in-a-lifetime opportunity to host President Obama's legacy on the city's South Side where he and the first lady, Michelle Obama, have a deep connection to the community. Nonetheless, FOTP has also strongly maintained that we object to the use of utilizing existing parkland for the center; we repeatedly have suggested the alternative use of available vacant land across the street from Washington Park. Since this option has not been considered seriously, we have since maintained the position that the Obama Presidential Center should replace in surrounding communities any parkland acreage that gets taken up by the OPC.

FOTP maintains our objection to utilizing existing parkland for the privately-owned Obama Presidential Center, and the NEPA process continues to raise concerns regarding the impact to environmental factors in and near the park.

- The National Environmental Policy Act (NEPA) requires agencies including the Federal Highway Administration and the National Park Service to evaluate the impact to the environment based on their proposed actions and changes regarding the construction of the OPC. However, the EA fails to consider alternatives beyond what was proposed by the City of Chicago and does not include an Environmental Impact Statement (EIS). The failure to include an EIS suggests that a proper analysis of all alternatives was not considered and that concerns regarding the impact to the natural environment in Jackson Park were not adequately analyzed. Furthermore, the public hearing on the NEPA EA did not cover specific environmental impacts, but rather explained the city's proposed changes to Jackson Park based on the 3 alternatives while failing to elaborate on how the natural environment in the park would be impacted by these alternatives. The absence of a proper EIS limits public

collaboration. The EIS process would provide the space to analyze the impacts on the environment that various groups have noted in public comments throughout the NEPA and Section 106 process. In addition to the NEPA process being behind by some months, the OPC NEPA webinar in October 2020 was not an adequate replacement for a public hearing. The webinar did not provide opportunity for any public discussion outside of prepared public statements that were made at the end of the call.

- The EA divides the “Purpose and Needs” assessment into categories based on the agency that oversees them (NPS, FHWA, and USACE). This is not an adequate analysis of environmental impacts because it fails to view all conversions or changes as one project, the OPC. Separate “purpose and needs” does not consider how all changes as a result of the OPC will affect the natural environment in the park and how it will impact the park and nearby communities as a whole.
- The EA does not address foreseeable future actions on Jackson Park which is deeply troubling due to the inevitable effects of climate change. There must be an ongoing, public conversation throughout this process on how climate change will be addressed in the park, including ensuring that there are trees and other plants that can sustain current and evolving environments. Not considering climate change a foreseeable future action demonstrates that the process at this point is not considering all reasonable alternatives. Additionally, the potentially unmanageable impact that climate change will have provides adequate reasoning to reconsider the proposed site, located west of Washington Park, which was originally evaluated as the best alternative. This site would not trigger a lengthy Federal review process, as was required of Jackson Park, and would bring economic investment to a community in need.
- The way in which the alternatives were presented to the public falsely communicated that there will be an increase in parkland in both Alternative Plan B and Alternative Plan C. There will be 20 acres of parkland eliminated and there has yet to be replacement parkland identified for this shortcoming. The City of Chicago has not provided any reasonable explanation as to why parkland was required for the construction of the OPC.