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*Park:* Federal Agencies - other than NPS  
*Project:* Federal Actions In and Adjacent to Jackson Park: UPARR Amendment and  
Transportation Improvements Jackson Park, City of Chicago, Illinois  
*Document:* Environmental Assessment for 30-Day Public Review

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*Comments:* October 30, 2020

Mr. Todd Wyatt City of Chicago Department of Planning and Development 121 N. LaSalle Street, Room 1000 Chicago, IL 60602

RE: Openlands Public Comments regarding "Federal Actions In and Adjacent to Jackson Park: UPARR Amendment and Transportation Improvements" (Sec. # 17-B7203-00-ES) Submitted electronically on Friday, October 30, 2020 to:  
<https://parkplanning.nps.gov/commentForm.cfm?documentID=106746>

Dear Mr. Wyatt, the National Park Service, and Federal Highway Administration:

We are pleased to submit our comments regarding the Environmental Assessment (EA) of "Federal Actions In and Adjacent to Jackson Park: UPARR Amendment and Transportation Improvements," pursuant to the National Environmental Policy Act (NEPA) and the numerous laws that fall under its umbrella. We appreciate the opportunity to participate as a Consulting Party to the Section 106 review process and have been involved since the first public NEPA hearing on September 17, 2018. Over these two years, there has been much work to protect both the park and the adjacent neighborhoods from negative impacts of the proposed Obama Presidential Center (OPC), conversion of parkland subject to the Urban Park and Recreation Recovery (UPARR) Act, and related roadway closures and improvements.

Despite these welcome advancements to protect the integrity of the park and surrounding communities, we recommend that the National Park Service and the Federal Highway Administration, along with the U.S. Army Corps of Engineers, do not issue a Record of Decision until it repairs several fatal flaws in the EA that render the study susceptible to further scrutiny:

- The magnitude of impacts and public controversy surrounding the OPC and related projects requires an Environmental Impact Statement, since it satisfies several factors that agencies utilize to determine whether an action is "significant" and mandates a full study.

- The purpose and need for the federal actions are not accurately articulated, and are contorted to presuppose the need for the Obama Presidential Center and overlapping projects, such as the golf course, stating that it is outside the scope of the EA to evaluate them since they are beyond the lead agencies' jurisdiction.
- The EA relies upon a false baseline “no action” alternative that presumes the OPC and other overlapping or related projects will be built, seriously skewing the forecasts, projections and alternatives for the EA.
- The EA inappropriately segments the review of all related projects, even though the alternatives cater to these invisible uses, which are the main force and focus behind the federal actions in the EA.
- The EA excluded critical information that is central to its alternatives analyses and forms the factual basis as to whether substantive review criteria under statutes such as Section 106 and Section 404 are met.
- Proposed mitigation developed pursuant to the Section 106 process is not adequate to justify a finding of no significant impact to the historic parkland and area resources that will be damaged or destroyed as a result of the true scope of the projects at issue.

NEPA requires agencies to use a systematic interdisciplinary approach to incorporate environmental considerations into their planning and decision-making process. For qualifying projects, agencies must prepare detailed statements (commonly referred to as an environmental impact statement or “EIS”) that assess “the environmental impact and alternatives to major federal actions significantly affecting the environment.” 42 U.S.C. 4332(C). If it is questionable whether the project may significantly impact surrounding natural, cultural and historic resources, agencies can first prepare an Environmental Assessment to determine whether to prepare an EIS.

Done correctly, this NEPA process serves two critically important functions. First, it helps agencies make fully informed and well-considered decisions by ensuring that significant environmental impacts are not overlooked or underestimated, and alternative methods for addressing an identified need are considered. *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989). Second, the process provides important information about a project to the public, which may then, in turn, assist the agency in making better decisions through the comment process. *DuBois v. U.S. Dep't of Agriculture*, 102 F.3d 1273, 1285-86 (1st Cir. 1996). These goals, however, will be achieved only if the agency fully and objectively analyzes all reasonable alternatives and their environmental impacts, and this analysis is fully provided to the public.

#### I. The Proposed Federal Actions Involve Significant Impacts to the Human Environment that Qualify under Several Factors for the Performance of an Environmental Impact Statement.

When agencies evaluate whether projects impacts are “significant”, they are to consider ten factors to measure the intensity or severity of impacts. The projects at issue, and corresponding federal actions, trigger several of these factors.

- First, the OPC, golf course, and related infrastructure accommodations threaten “the unique characteristics of the geographic area such as proximity to historic or cultural resources, park land ... wetlands ... or ecologically critical areas,” and loss of part of

this significant scientific, cultural, and historic resource.” 40 C.F.R. 1508.27(b)(3), (b)(8).

- Second, in acknowledging the proposed federal action would disturb state-listed plants, this triggers the factor that it “may adversely affect state-listed endangered or threatened species or its habitat.” 40 C.F.R. 1508.27(b)(9).
- Third, the proposed actions, alone and as extensions of the underlying projects, raise possible unique and unknown (as well as known) risks to a GLFER project. 40 C.F.R. 1508.27(b)(5).
- Fourth, rewiring the infrastructure and establishing mitigation to accommodate the underlying projects at issue would likely create cumulatively significant impacts to the surrounding natural areas. 40 C.F.R. 1508.27(b)(7).
- Fifth, the totality of damage from the proposed actions and underlying projects have proven to be highly controversial, warranting over 50 meetings with the City. 40 C.F.R. 1508.27(b)(4). This alone is grounds for an EIS.
- Last, the circumvention of the main projects at issue sets precedent for future actions and represents a decision in principle about a future consideration - from the OPC to the Golf Course and other uses. 40 C.F.R. 1508.27(b)(6). It validates contorting baseline “no action” alternatives and fundamental purpose and need statements to skirt around rather than address head on the actual reason behind and need for proposed work.

Triggering at least seven out of 10 factors, the environmental study should have afforded the public process, safeguards, and in-depth alternatives analysis of an Environmental Impact Statement. There is enough complexity and inconsistency associated with both the NEPA documents and the associated substantive reviews under Sections 106, Section 4(f), Section 404, and Section 408 to call for a deeper examination of this project. The Section 106 process revealed adverse impacts on Jackson Park as a historic resource. Moreover, the proposed OPC tower will be located approximately a tenth of a mile from arguably one of the City’s most beloved destination for bird watching on the Wooded Island, a fact that is mentioned in the transportation analysis of the road closures, but an impact that is wholly missing in the discussion of the proposed OPC campus itself.

The recently installed GLFER restoration project increases habitat, but a deeper understanding of the undertaking’s impacts on these wildlife and habitat areas are not well understood. Similarly, the air and water quality impacts from the undertaking are also not well understood. We know that stormwater must be addressed on-site as part of the City of Chicago requirements. We also know that the proposed redesign of the historic Women’s Garden serves solely as a stormwater retention area for the OPC site to meet the City requirements. Simultaneously, as the recently updated Bulletin 70 indicates, Chicago is currently experiencing increasingly larger storm events. How will the undertaking and the proposed stormwater strategies serve to deal with the increasing amounts of precipitation? We do not know because this important analysis is missing. Finally, while there has been much movement to satisfy demands pertaining to the socio-economic analysis, it still is not clear what impacts this will have to issues such as affordability and gentrification because these are not included but should be.

At each of our comment submissions, Openlands, as a Section 106 Consulting Party, has indicated and reiterated our support for the OPC on the south side of Chicago.

But as the EA indicates, the undertaking to date has flaws and serious impacts on Jackson Park as a historic and regional resource. Therefore, we request that the both the NPS and FHWA recognize the synergies and various tensions of this undertaking and commit to an EIS. While this is a longer process, it is imperative that the avoidance and minimization alternatives other than mitigation be explored so that the impacts to this historic and officially recognized park are fully minimized to the extent possible. II. The Purpose and Need Statements in the EA are Fatally Flawed, Setting the Stage for an Inadequate Review under NEPA and the Substantive Processes within the Study.

The purpose and need statement for the EA is fatally flawed in that it is in part absent, and in part reliant upon a flawed baseline.

Agencies must define the purpose and goals of the proposed project in a way that is broad enough to allow for the consideration of reasonable alternatives. 40 C.F.R. § 1502.13; *Simmons v. U.S. Army Corps of Engineers*, 120 F.3d 664, 666 (7th Cir. 1997). An environmental study does not comply with NEPA if it sets forth a purpose and need that is so narrow that it forecloses the consideration of otherwise reasonable alternatives. *Simmons*, 120 F.3d at 666.

The EA falls short of defining the purpose and needs of the Federal Highway Administration (FHWA) and National Park Service (NPS), framing only part of the equation by in essence focusing on the effects of larger projects that are driving the need for federal action. The purpose and need statements for both Agencies appears in Sections 3.1.2 for UPARR, and in 3.2.2 for the road closures.

“The purpose of the FHWA funding is to (1) address changes in travel patterns resulting from closing roadways in Jackson Park and (2) improve bicycle and pedestrian access and circulation.” Both of these are reactions to the to the placement and location of the proposed presidential center and golf course and would not occur but for these projects occurring. Despite multiple references to the South Lakefront Framework Plan, the need for the road closures and improved circulation would not occur but for the Obama Presidential Center. The proposed golf course is also directly influencing the route of certain roads.

For the NPS, the purpose logically is to evaluate whether the City’s proposed partial conversion [of land subject to UPARR grants caused by OPC, road closures and changes] meets the requirements of the UPARR Act and Regulations and, if so, to amend the UPARR grant agreement accordingly. Yet, the NPS is not allowed to truly evaluate alternatives to this conversion. Instead, the EA cites to this being beyond the jurisdiction of the NPS. It states “the decision to site the OPC in Jackson Park, the design of the OPC campus, and the related closure of roadways in Jackson Park do not require federal approval or funding.” NEPA has historically reached beyond the jurisdiction of the lead agency to evaluate, and publicly air the full effect of an action, and reasonable alternatives, regardless of whether they involve another agency’s actions. It is a stop and think statute that is designed to create a robust public forum to test actions against reasonable alternatives so as to “promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man.” 42 U.S.C. § 4321. This has borne out in environmental studies of road projects that have included transit alternatives when both were critical parts of a transportation equation or shown conjointly in planning initiatives. Similarly, the OPC, golf course, and the network of supporting transportation infrastructure, is shown in the South Lakefront Framework Plan (SLFP). To artificially constrain the scope of the purpose statement cuts the process

off at its knees, rendering the subsequent analysis an exercise of mitigation for larger predetermined outcomes.

The EA fails to define the true need for either the FHWA or NPS federal action. The EA simply never provides a statement of the need for the partial conversion of the UPARR land. It merely references that it arises out of the City's intent to site the OPC and alter roads. This demonstrates the lack of independent utility that the NPS has in relation to the OPC project. The need is similarly missing from the FHWA section, which again quotes what it arises from, rather than addressing what it is. The EA states the need is a "result of changes in travel patterns caused by the closed roadways." (emphasis added). Inasmuch, neither need is defined, only the conditions that bring about the need. This is a serious failing in the study, which is evidenced by the failure to conduct a requisite evaluation of all practical alternatives to the proposed under the UPARR Act (54 U.S.C. §200507, and regulations under 36 CFR §72.72). This essential element of the UPARR review cannot be ignored by artificially constraining the NEPA review process.

### III. The EA Uses an Improper Baseline That Overwrites the True "No-Action" Alternative, and then Relies on this False Floor for its Forecasts, Projects, and Alternatives Analysis.

Regardless of whether an agency conducts an EA or an EIS, both are required to be benchmarked against a true "no action" baseline alternative to understand the full brunt of impacts, and objectively evaluate alternatives to the proposed action. The No Build alternatives in the EA, and the forecasts and alternatives that flow from it, are fatally flawed. The projections should be set against existing conditions, known as the "no build alternative" - present traffic configurations, rather than roads altered to accommodate the OPC.

This failure is similar to the manipulation that was rejected in a case regarding the Illiana Tollway where IDOT assumed in its projections that the road would be built. The United States District Court for the Northeastern District of Illinois, in *Openlands et al v. U.S. Dept. of Transportation* rejected the flawed "no build" forecasts as the "foundation for the Agencies' projection of future traffic in the study area and their conclusion that the existing roadways cannot adequately serve the future transportation needs." (*Openlands et al. v. U.S. Dept. of Transportation et. al.*, 13-cv-04950 (2016), p. 16. The court concluded that "the purpose and need for the Illiana Corridor identified in the EIS are derived directly from the faulty 'no build' analysis. Because that analysis does not substantiate the purpose and need, the FHWA's approval of the ROD and final EIS is arbitrary and capricious and in violation of NEPA." *Id.* at p. 17. The court ruled that, "absent a supported no build analysis, the EIS does not comply with NEPA's directive to analyze the project's direct impacts." *Id.* at p. 18.

The same fundamental issue is present in the EA, as evidenced by the FHWA conclusions that the OPC will be built:

"Without improvements to address the road closures, many intersections would experience considerable increases in delay and operate over capacity. Thus, there is a need to improve roadway and intersection facilities to accommodate the future changes in travel patterns and provide desirable levels of intersection safety and operation...." EA, pp. 13-14.

Ironically, the EA does include a true "no action" alternative in Section 4 of the EA, then summarily dismisses it in favor of "Alternative B", which assumes the OPC will

be built upon and require reconfiguration of numerous roads in and around Jackson Park. The EA then compares Alternative B as a false baseline against Alternative C. If done correctly, the real no action alternative (Alternative A) would have been compared to Alternative C and would have served as the basis for all the projections, forecasts, and underlying assumptions in the study. As it is, the skewed Alternative B “no build” alternative establishes a faulty foundation for the FHWA projection of future traffic in the study area” and generates a pre-determined outcome of the need for road projects. This results in a failure to address the underlying question as to the “need” for and full impacts of the OPC and golf course projects.

#### IV. The EA Segments the Core Projects into Parts, Depriving the Public of a Full and Comprehensive Review of and Analysis of the Cumulative Impacts to the Interrelated Actions.

The EA inappropriately segments the review of the reaction to road closures and traffic adjustments to accommodate the OPC and proposed golf course, and the impacts of and mitigation for one pre-determined alternative that would convert UPARR land. Neither the road alterations nor the conversion analysis has independent utility, and are bound up in the larger proposed projects captured in the belated 2018 SLFP.

Yet, the EA does not consider the rehabilitation of the golf courses within Jackson Park, stating that “while a golf course project was noted in the SLFP, the final plans and design for the golf course project are not yet approved.” This is in error since the project has a foreseeable cumulative adverse impact on resources in the project area. The roads that FHWA considers are even designed to accommodate it. It makes no sense to state that the road work that FHWA is contemplating must accommodate a project that is premature to consider but is certain enough to reconfigure roads for that use. See EA, p. 33.

Reviewing each element as they are in a silo fails to evaluate the cumulative force of all the impacts inherent in the full ensemble of actions. NEPA is to act like a mirror held up to alternatives to vividly see and compare the impacts of different solutions to the purpose and need for action. When you crack the mirror, and only look at each broken piece of glass, the outcome is more likely to result in a “death of a thousand cuts.” This process has been severed into numerous pieces, with no overarching view that NEPA should provide of the foreseeable indirect and cumulative impacts resulting from the proposed alternatives.

For instance, there have been multiple comment deadlines for the Section 106 process, as well as the FHWA 4(f) review, the United States Army Corps of Engineers (USACE) Section 408 comments. In total, this is the ninth set of comments submitted for official public review since the Section 106 process began in December of 2018. The Section 404 / NEPA merger process, which should combine and include comments on the analysis of actions that would require a Section 404 permit are considered separate from the EA, and mentioned as a side process by a “coordinating” agency. The Section 404 permit review process also requires an evaluation of all alternatives that is separate and in ways more stringent than the EA analysis. This entire section should be included in and evaluated as both its own section and as part of the combined impacts of the interrelated projects.

Last, but most significantly, the EA relies upon the passage of the South Lakefront Framework Plan as a reason to not fully evaluate alternatives to the conversion of parkland in this study for the OPC, golf course, and related project work. This segmentation deprives the public of a full view of alternatives and corollary impacts.

Perhaps this is most evident through the “project website” which is difficult to navigate and near impossible to find references from the associated reviews.

#### V. The EA Fails to Include Critical Facts and Analyses, With Vague Links External to the EA that are Not Discernable to the Public.

Key information is missing or incomplete and cannot be evaluated at this time. For instance, the FHWA analysis of 11 alternatives fails to even list the considered alternatives. The EA instead refers to a general web page by the City of Chicago, which includes a laundry list of links. The only link that may be relevant is an April 2018 preliminary draft analysis of road alternatives. The 2018 draft also seems to evaluate “a range of alternatives for mobility improvements to support the South Lakefront Framework Plan (SLFP)”. Yet this NEPA document is specifically for road improvements due to closures from the OPC siting in Jackson Park. It is unclear whether this is the referenced document in the EA, or whether this is the foundation for the Draft EA, and the actual subject matter which forms the substance of the alternatives section, is simply missing. The public cannot evaluate and comment on an alternatives analysis that is not included in the body of the document, or even as an exhibit to the section.

In addition, information on the affected environment and environmental consequences was cursory and vague. For instance, The EA concludes that it will avoid impacts to state listed threatened or endangered species, such as Seaside spurge, sea rocket, or Pitcher’s (Dune) Thistle are found in the project area, specifically west of LSD. However, it includes no discussion on how it will avoid such impacts, or even what those impacts are. Similarly, the EA concludes that water resources will be impacted, but doesn’t state how. Highway traffic noise is only studied in regard to people, concluding that any accommodations were not cost reasonable. The EA doesn’t study whether increased noise, light, pollution, salt spray or splash, vibration or other impacts will adversely affect wildlife known to frequent the area, especially resident and migratory birds along the flyway. Similarly, the EA doesn’t disclose whether noise due to construction will impact nesting birds or other species that live in or use the natural areas within the vicinity of the projects.

For stormwater, there is neither upfront acknowledgement nor discussion of how stormwater from the OPC will be discharged into the lagoon as identified in, impacting millions of dollars already spent on the Great Lakes Fishery and Ecosystem Restoration (GLFER) project within the Jackson Park Lagoons.

The EA also fails to provide adequate information on mitigation measures as well as the conclusions and decisions from related reviews, specifically the Section 106 review, the Section 4(f) review, the USACE Section 404 review, and the USACE Section 408 review. We remain unclear about mitigation measures for impacts to properties protected pursuant to Section 4(f) of the U.S. Department of Transportation Act. We also have no information as to how mitigation of potential threatened and endangered habitat and avoidance of taking certain species will occur, or even where the suite of options and areas of impact may be other than vague and conclusive references in the EA. Furthermore, the Section 106 process altogether ignored avoidance, adopted negligible minimization measures, and instead focused on trivial mitigation measures for what the project deserves.

While mitigation may be, under some circumstances, a reason given in an EA to find no significant impacts will occur, in this instance, it was not demonstrated that mitigation will be adequate to compensate for severe disturbances. The EA process is designed to “show one’s homework” by laying out both the threatened harm and

specific avoidance, minimization and mitigation solutions that will result in no significant environmental impacts. Since the EA lacks both the content and transparency, it must be revised to include such, and be reopened to provide an opportunity for the public to comment on such information.

It is inadequate for the EA to provide bare conclusions, shielding from public view the underlying factual basis and analysis underlying their decisions. This undercuts one of the primary purposes of NEPA to provide important information about a project to the public, which may then, in turn, assist the agency in making better decisions through the comment process. *DuBois v. U.S. Dep't of Agriculture*, 102 F.3d at 1285-86.

VI. The EA Conflates and then Does not Evaluate Statutory Requirements under NEPA and other Statutory Provisions, such as the Section 106 Review Process NEPA requirements are different than other related substantive review processes, such as the Section 106 review, the Endangered Species Act consultations, the Section 404 and 408 Clean Water Act review processes, and the UPARR review of conversion criteria. Yet the EA conflates the different requirements, and then does not provide information that is critical to all essential legal elements to conduct a complete review of the proposed actions.

A. The EA Conflates the UPARR Review Process and then Bars Relevant Information from Consideration as Required in Both the EA and the UPARR Statutory Review. The EA states that, since the NPS does not have jurisdiction over where to site the OPC, it cannot consider alternative locations as part of the NEPA review process. Although the Section 106 process conducted a brief investigation of alternatives, this did not translate into the EA. As stated previously, NEPA review has often involved relevant considerations beyond the jurisdiction of the lead agency to provide a comprehensive analysis of the baseline, alternatives, and associated impacts. Whether the City ultimately approves the final siting of the OPC is irrelevant to satisfying this core function and requirement under NEPA.

In addition, the EA does not evaluate a key statutory prerequisite under UPARR, which must be addressed to convert protected land. Conversions must be in accord with the then-current (as opposed to just “current”) local park and recreation recovery action program, with necessary conditions that the City ensures providing adequate recreation properties and opportunities of reasonably equivalent location and usefulness. 54 U.S.C. §200507 (emphasis added). This seems to be an important distinction since the City emphasizes the continuous evolution of the use and programming of the historic space as one of the rationales behind allowing for the OPC change.

The EA wrongly concludes that, since NPS is not authorized to decide whether to site OPC in Jackson Park or approve the design of the campus, that it also need not conduct the requisite analysis under the UPARR statute as to whether the proposed siting of the OPC, and the conversion that flows from it, is inconsistent with the local park and recreation recovery action program from the 1980s. This must be evaluated per UPARR before NPS can authorize the conversion for that decided siting and design. Instead, the EA jumps ahead to the post-requisite condition of providing adequate replacement recreation properties and opportunities of reasonably equivalent usefulness and location for the 9.8 acres of converted UPARR recreational land. (The EA cites to 4.6 acres due to the OPC and 5.2 acres from road “improvements”.) This is short of the short of the 20 acres of lost land and outside of the Section 1010 boundary.



Under regulations that flow from the UPARR statute, Section 3.1.2 includes five prerequisites that must be met before NPS can approve the conversion of UPARR land: Evaluation of practical alternatives; Evaluation of plans and programming between old and new; Evaluation of relevant equivalencies; Evaluation of recreational viability of the remainder of Jackson Park; and Evaluation of environmental requirements for the proposed site. See 36 C.F.R. § 72.72(b). The EA essentially argues that, since the NPS is not authorized to site OPC in Jackson Park or approve the design of the campus, that it also does not have jurisdiction under UPARR to evaluate whether the proposed siting is consistent with all of these UPARR prerequisite conditions, including whether alternatives to the current proposal would avoid such conversion. As a result, alternatives that did not require conversion were never explored in the EA.

Moreover, neither the City nor NPS has constituent group or community approval for its proposed UPARR replacement location on the east end of the Midway Plaisance. Furthermore, many community groups have suggested alternative replacement parkland in “park poor” areas within the adjacent communities. This is relevant because Chicago’s “Park Score” on the Trust for Public Lands rating website is constrained only by the amount of Chicago’s actual park acreage, leaving the insistence that replacement parkland on a park across the street the best location for replacement parkland questionable at best.

The EA needs to untangle the requirements specific to each the NEPA review and the UPARR review, and then produce a comprehensive analysis under both sections per each statutory area.

B. The Traffic Projections for the Federal Actions Utilize Outdated Data, Especially in Light of the New Normal that will Exist Due to COVID-19. The traffic study for the EA was performed in 2016 conforming to GoTo 2040 traffic projections supplied by the Chicago Metropolitan Agency for Planning. Since that date four years ago, CMAP released a new long-range regional plan, titled OnTo 2050. The study is also now outdated in that COVID-19 has altered how people move and work throughout the region. Companies are rethinking whether it is better for their bottom line to allow people to work remotely. The emerging “new normal” diverges enough from traditional projections that, alone, it justifies revising the current study.

C. The EA Does Not Reflect Serious Socio-Economic Issues Inherent in the Underlying Projects The socio-economic appendix includes typical information but does not touch upon the tensions that exist from decades of institutional racism due to historic practices such as “Redlining” and resource allocation. Furthermore, contextual discussion from the recent social unrest has also gone unmentioned. These issues are pervasively threaded into the very fiber of this project, but have yet to be satisfactorily addressed.

VII. Conclusion. Given the historic significance of Jackson Park, the conversion of parkland subject to UPARR, the natural value of the GLFER project and areas that may harbor threatened and endangered species, as well as the significance of this open space to the surrounding communities, we strongly recommend resolving the serious issues in the EA, including the completion of a justified EIS for this project.

Sincerely,

Gerald Adelman President & CEO Openlands

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