

October 30, 2020

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

RE: "Federal Actions In and Adjacent to Jackson Park: UPARR Amendment and Transportation Improvements" (Sec. # 17-B7203-00-ES)

Dear Mr. Wyatt:

We submit for your consideration Preservation Chicago's comments to the Environmental Assessment of "Federal Actions In and Adjacent to Jackson Park: UPARR Amendment and Transportation Improvements."

Environmental Impact Statement

An Environmental Impact Statement, prepared with updated data and research based on current and future conditions is essential to completing this NEPA review effectively and with the utmost respect to the NEPA process which has been in place since 1970. President Richard Nixon advanced NEPA into law on January 1, 1970, and every president since then has defended and upheld it.

As we understand the National Environmental Policy Act, an Environmental Assessment is used if a federal action is not determined to be categorically excluded. An Environmental Impact Statement (EIS) is warranted if there do appear to be impacts, and if the controversy around a particular plan warrants that extra scrutiny. Controversy succinctly defines the Obama Presidential Center (OPC) proposed location in Jackson Park, and the federal actions as a part of that proposal.

Additionally, the collective impact of current and future plans in the Jackson Park area must be included in an EIS. The previously advanced plan for a PGA-level golf course in Jackson Park and the South Shore Cultural Center must be included in this assessment. While our City considers two projects that will substantially alter a historic park on the National Register of Historic Places and Lake Shore Drive (also on the National Register), it is negligent for this federal NEPA review to ignore both projects fully in its evaluation of the social, economic and environmental impacts of the proposed Obama Presidential Center.

We have a nationally significant, world-renowned landscape at risk. Viewsheds from multiple National Register-listed sites nearby are at risk. There are historic buildings on the National Register are at risk. Natural areas actively being restored to their pre-settlement diversity are at risk. This site is along the shore of one of the Great Lakes which seethes, rises, shrinks and batters on a rapidly fluctuating basis as a direct result of climate change. The Woodlawn community has been largely dismissed and ignored as governmental agencies and large institutions plan around them for their own needs and not so much the greater community which will be impacted by their actions. Woodlawn is predominantly African-American, and its current residents – who are traditionally marginalized -- trend toward the lower end of

the income scale based on Chicago's median area income. Any one of these risks by itself might warrant an Environmental Impact Statement. All of them collectively mandate an EIS completed with the fullest and deepest regard for the principles and values that NEPA itself was created to uphold.

Social impact. How will this development change the neighborhood and community cohesion? What will selling off a parcel of parkland for the OPC mean long-term for the future of all of Chicago's parks, particularly those on the lakefront? As proposed, the OPC will be 230-foot structure (equivalent to a 20-story office building) in a park which by definition is a respite from the steel and concrete high-rises that like to dominate most lakefronts. Chicago is unique in its commitment to protect its lakefront parks and keep them free from development. This proposal has been an affront to that dedication to free and open parks. The current Environmental Assessment does not adequately address these and other critical questions that would be appropriate to include in a proper assessment of impacts. We have been able, as a City, to keep our glorious Lake Michigan lakefront parks free and open for all Chicagoans and guests to this wonderful city. If we allow this precedent to go forward, we may as well put a "For Sale or Lease" sign on all Chicago parkland.

Our parks are a respite – a sanctuary – for people to enjoy equally. Leasing land for private development takes away that full accessibility – limiting it in this case at times to equal access. They are an environmental, emotional, and social sanctuary for people to gather regardless of race, gender, country of origin, or income. We can gather collectively – open to all and always.

Environmental impact. How will this development impact the natural buffer that is Jackson Park? The buffer between higher-density development and the shores of Lake Michigan? How will drainage and aquifers be impacted by so much disruption below and above ground? These are questions that do not appear to be adequately addressed in the deficient Environmental Assessment.

Alternatives

There is an abundance of vacant and underdeveloped land in Woodlawn that would be an ideal alternative for an Obama Presidential Center. These locations would see the same positive economic impact for the City and Woodlawn specifically, and it would minimize impacts to traffic and the environment compared to a Jackson Park location for the Obama Presidential Center.

It is regularly reported that all other options were vetted, but they were not evaluated to the fullest extent possible. For instance, land at Dr. Martin Luther King Jr. Drive and Garfield Boulevard is owned by the City of Chicago, the University of Chicago, and the Chicago Transit Authority. It is just west of historic Washington Park, and it is immediately adjacent to an elevated train station – offering up affordable and accessible means by which more people can visit the Obama Presidential Center.

Environmental Assessment Flaws

We concur heartily with the flaws in the EA as articulated by Openlands in its response to this NEPA review. If this is the only review we will be afforded under this NEPA process, it should be reopened to address these shortcomings.

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A Record of Decision cannot be executed on this NEPA review until these significant issues are addressed. We look forward to an open, inclusive, and thorough response to the comments and concerns submitted through this process, and we look forward to a next review that is carried out in the true spirit and intent of the National Environmental Policy Act.

We urge you to reevaluate this project and return to this community a thorough, objective, and essential report on impacts and alternatives.

Thank you for your thoughtful consideration of these comments. We look forward to the next steps.

Sincerely,



Ward A. Miller
Executive Director



Mary Lu Seidel
Director of Community Engagement