



DEPARTMENT OF PLANNING AND DEVELOPMENT
CITY OF CHICAGO

June 25, 2020

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

Subject: Section 106 Consulting Party Comments Regarding Location and Design of Obama Presidential Center

Dear Ms. Kocher:

Thank you for your June 9, 2020 letter seeking the City's response to suggestions received from the Section 106 consulting parties asking that the Obama Presidential Center (OPC) be relocated outside of Jackson Park or, in lieu of relocation, that the design be modified to further minimize effects to historic properties. The City appreciates the active engagement of the consulting parties in the Section 106 process as well as the substantial attention that you and your staff have given to this matter.

We will address specific design suggestions for the Women's Garden and the pathway replacing Cornell Drive below (beginning on page 5), but first we would like to explain our general position regarding alterations to the location and design of the OPC. As you state in your letter, the Federal Highway Administration (FHWA) has received objections to the location and design of the OPC throughout the Section 106 process, but has concluded that it lacks authority to require changes to the OPC. We agree, and wish to emphasize that the Section 106 process cannot displace the duly enacted ordinances and resolutions of the City of Chicago and the Chicago Park District with respect to purely local projects. Jackson Park is not part of the national park system, and the federal government is not permitting or financing the construction of the OPC. As detailed below, the decision to permit the construction and operation of the OPC in Jackson Park was a local decision. The unanimous or nearly-unanimous findings and conclusions of the City Council, the Chicago Plan Commission, and the Chicago Park District relating to the OPC over the last five years were based on the application of state and local law to the Foundation's construction and use proposal, including the Illinois Park District Aquarium and Museum Act (70 ILCS 1290), and included substantive reports, recommendations of staff, testimony, and public comment regarding the appropriateness of siting the OPC in Jackson Park and the campus design.

The timeline that follows demonstrates the lengthy and thorough public process that led to the selection of Jackson Park as the future home of the OPC and the City's approval of the OPC design and uses. We are summarizing important milestones here in order to emphasize the local nature of the process and project.

2014

- In March 2014, the Obama Foundation (Foundation) initiated a nationwide search for the future home of the OPC with a Request for Qualifications (RFQ), which then was followed with an RFP issued to a select number of respondents to the RFQ.
- In December 2014, the Foundation announced that two Chicago proposals – one from the University of Illinois-Chicago (UIC) and the other from the University of Chicago – were among the four finalists of the RFP process. UIC proposed locating the OPC in the North Lawndale neighborhood near West Roosevelt Road and South Kostner Avenue, with an ancillary location on the east end of UIC's campus for a visitor center and academic institute. The University of Chicago proposed three potential locations for the future presidential center: Washington Park, Jackson Park, and the South Shore Cultural Center Park.

2015

- In January 2015, the Park District, as the owner of the three park locations, hosted community meetings with thousands of residents in Woodlawn and Washington Park to discuss the proposed use of approximately 20 acres in either Jackson Park or Washington Park as the site for the OPC. (The City and the Park District ruled out the South Shore Cultural Center location from consideration as a potential site for the OPC.)
- On February 11, 2015, the Park District's Board of Commissioners authorized the transfer of land in either Jackson Park or Washington Park to the City of Chicago for use by the Foundation to build and operate the OPC. The meeting was open and members of the public submitted oral and written comments.
- On March 9, 2015, the Chicago Plan Commission adopted resolutions finding that the transfer of land in either Jackson Park or Washington Park from the Park District to the City for the OPC was in conformance with the City's long-range planning objectives. The Chicago Park District's presentation from this meeting (attached as Exhibit A hereto) shows that the use of parkland for the OPC and the history of building museums in Chicago's public parks was considered and addressed from the very beginning of the legislative process over 5 years ago. The resolution approving the City's acquisition of the Jackson Park site for the OPC (attached as Exhibit B hereto) lays out the City's reasons for supporting the OPC in the park, none of which has changed over the last 5 years:
 - The City's long range planning objectives include encouragement of civic and cultural institutions that attract region-wide users, such as museums, and expansion of cultural activities and opportunities.
 - The property, located in the Jackson Park community area, has a zoning classification of POS-1 (Regional or Community Park), which expressly

allows "cultural exhibits and libraries" (including museums) as planned developments.

- Chicago has a long history of allowing and establishing museums in its parks as evidenced by the eleven museums currently operating on parkland, including the Museum of Science and Industry in Jackson Park and the DuSable Museum of African American History in Washington Park.
 - The 1972 Lakefront Plan of Chicago celebrates the history of museums and other major cultural institutions on the lakefront. The Lakefront Plan expressly states that cultural institutions "are appropriately sited within the lakeshore parks," but also recommends that "large park locations elsewhere in the City or region should also be considered when locating such facilities in the future." Jackson Park is an example of one such large park location.
 - Locating the Presidential Library and Museum in Jackson Park would also generate further momentum for the development of a "Museum Campus South," one of the initiatives identified in the Chicago Cultural Plan 2012.
- On March 18, 2015, following a public meeting before a Joint Committee (comprised of the Budget and Government Operations Committee, the Housing and Real Estate Committee, and the Special Events, Cultural Affairs and Recreation Committee), the Chicago City Council unanimously approved an ordinance to accept land in either Jackson Park or Washington Park from the Park District for the development of the OPC. The ordinance includes these recitals:
 - The City wishes to demonstrate its robust commitment to bringing the Presidential Center to Chicago, as it would indelibly seal President Obama's close and abiding relationship to the City, as well as provide a unique cultural and economic opportunity for Chicago's residents and, therefore, the City is committed to doing everything it reasonably can to help both universities and their respective bids remain competitive.
 - The City Council finds that the development of the Presidential Center in Chicago will expand the City's cultural resources, promote economic development, strengthen surrounding communities, beautify and increase the use of existing park land or vacant land (depending on which institution and which site is selected), bring greater national and international visibility to the City, and serve other important public purposes.
 - On May 12, 2015, the Foundation announced that the University of Chicago proposal to locate the OPC in a park on the South Side of Chicago was the winning proposal. The Foundation took time following this announcement to study the two park locations.

2016-17

- In July 2016, the Foundation announced that it had selected Jackson Park as the site of the OPC.
- Over the next two years, the City and the Park District held or participated in over 50 meetings to discuss the OPC campus location, the design and uses of the proposed buildings, proposed roadway changes, and proposed park improvements. There were over 6,000 total attendees at these various meetings, which ranged from two large gatherings at the McCormick Place Convention Center to a handful of area residents in building-specific discussions. During this period, the Foundation worked with the City and the Park District through an iterative process to refine the design of the campus. After the initial design for the OPC was completed, the Foundation began a practice of regularly convening public meetings across the area to gather feedback. It solicited input from thousands of neighborhood stakeholders and residents through both these in-person meetings and online comments. Also during this period, the Park District initiated a community planning process to help comprehensively update a long-term vision for the future of Jackson Park and South Shore Cultural Center Park that culminated in the publication in 2018 of the South Lakefront Framework Plan. The OPC is one of a number of major improvements considered in the South Lakefront Framework Plan. The plan also considers the closure of four road segments in Jackson Park, and the construction of a variety of transportation improvements through the park—for example, through the widening of Lake Shore Drive and Stony Island Avenue and the construction of additional pedestrian underpasses, signalized crossings and pedestrian refuge islands.

2018

- On February 14, 2018, the Park District’s Board of Commissioners approved the vacation and dedication of parkland for the roadway changes and confirmed authorization to transfer the OPC site (reconfigured to include a portion of Cornell Drive and the eastbound lanes of Midway Plaisance Drive) in Jackson Park to the City. The meeting was open and members of the public were able to address the Board.
- On May 17, 2018, the Plan Commission held a public hearing on the Foundation’s proposed planned development for the OPC site. The Plan Commission recommended approval of the OPC planned development and adopted the Department of Planning and Development’s staff report as its findings of fact. (See Exhibit C attached hereto.) At the same meeting, the Plan Commission reviewed and unanimously approved the construction of the OPC under the Lake Michigan and Chicago Lakefront Protection Ordinance, Municipal Code of Chicago, § 16-4-010, et seq. (Lakefront Protection Ordinance), finding that the proposal complied with the applicable policies of the 1972 Lakefront Plan of Chicago and the purposes of the Lakefront Protection Ordinance, including (1) “to insure that the lakefront parks and the lake itself are devoted only to public purposes and to insure the integrity of and expand the quantity and quality of the lakefront parks,” and (2) “to promote and provide for pedestrian access to the lake and lakefront parks from and through areas adjacent thereto at regular intervals of one-fourth mile and additional places wherever possible, and to protect and enhance visits at these locations and wherever else possible.” *Id.* at §§ 16-4-030(e), (g). The Plan Commission

also reviewed and approved the City’s proposed roadway closures and transportation improvements in and adjacent to Jackson Park, and the Park District’s proposal to relocate the track and field under the Lakefront Protection Ordinance. More than 75 members of the public commented at the hearing on May 17.

- On May 22, 2018, the City Council’s Committee on Zoning, Landmarks and Building Standards held a public meeting on the planned development ordinance for the OPC site and considered public testimony provided at this meeting. The Committee voted to recommend approval of the ordinance, and the full City Council did so in a 47-1 vote on May 23, 2018.
- On October 11, 2018, the City Council’s Committee on Housing and Real Estate held a public meeting with testimony from members of the public and City officials on an “Operating Ordinance” for the OPC, allowing the City to accept title from the Park District to a 19.3-acre site in Jackson Park and to enter into agreements governing the Foundation’s use of the site. The Committee voted to recommend approval of the ordinance, and on October 31, 2018, the full City Council voted unanimously to approve the ordinance and agreements.
- On October 25, 2018, the City Council’s Committee on Transportation and Public Way held a public meeting with testimony from members of the public and City officials on CDOT’s proposal to vacate and dedicate portions of the public way required to complete the OPC. The Committee voted unanimously to recommend adoption of the ordinance, and the full City Council did so on October 31, 2018.

As shown in the timeline above, the City, the Park District, and their elected and appointed representatives engaged in an open, transparent and democratic process with multiple opportunities for public comment prior to approving the Foundation’s proposal. During that process, City officials fully considered suggestions that the OPC be located outside of Jackson Park, as well as comments regarding the OPC design. The Section 106 process does not present an opportunity to re-visit legislative decisions regarding the siting and design of the OPC, a non-federal project. Nonetheless, the City takes the Section 106 process very seriously and has been closely analyzing the various mitigation proposals from consulting parties to determine feasibility. The following section addresses specific “design review” suggestions in the SHPO letter.

DESIGN REVIEW

The SHPO letter asks the City to consider three specific “design review” suggestions. We address each in turn below:

First, the letter suggests “[s]hift[ing] the proposed Obama Presidential Center campus south to allow the historic roadway connection between the Midway and Jackson Park to remain in place and to avoid the demolition [of] the historic Women’s Garden.”

This is essentially a recommendation to return to the original site configuration, proposed by the University of Chicago in its RFP response to the Foundation at the outset of the municipal process and approved by the City Council on March 18, 2015. The original site was in fact located south of the Midway Plaisance. After selecting the University of Chicago’s proposal and later selecting Jackson Park for the site, however, the Foundation proposed a different configuration (the current one) and the City Council approved the revised configuration in 2018. This was not a rash or casual decision. The reasons for shifting the site to the north and east are explained in detail in the Plan Commission staff report (Exhibit C), and are summarized in the October 31, 2018, ordinance approving the revised site boundaries, as follows:

WHEREAS, after passage of the 2015 Ordinance and with the benefit of in-depth engagement with neighboring communities spanning over two years, the Foundation, the Chicago Department of Planning and Development (“**DPD**”), the Chicago Department of Transportation (“**CDOT**”) and the Park District determined that the construction of the OPC presented a rare opportunity for the City, in coordination with other local, state and federal entities, to enhance the Foundation’s investment in the park by improving the road and trail network, reconnecting fragmented park land, improving bicycle and pedestrian connectivity to the lagoons and lakefront, improving traffic safety, reducing vehicle conflict with visitors to the park and enhancing outdoor spaces that currently exist; and

WHEREAS, in order to help accomplish this vision, and to improve the connection of the OPC Site to the Museum of Science and Industry, the Foundation has proposed shifting the boundaries of the Original Site to the north and east to incorporate portions of the Midway Plaisance and Cornell Drive, and CDOT has proposed closing these and additional road segments within the park and making additional Transportation Improvements (as hereinafter defined); and

WHEREAS, the City Council has determined it advances the public interest to accept such proposals; and

....

WHEREAS, in its current state, the OPC Site is isolated from the rest of Jackson Park and from the surrounding neighborhood by busy roadways, including six lanes of traffic on South Cornell Drive to the east, two lanes of traffic on South Stony Island Avenue to the west, two lanes of traffic on the westbound Midway Plaisance to the north, and two lanes of traffic on East Hayes Drive to the south; and

WHEREAS, residents and visitors using the OPC Site in its current state cannot access the contiguous parts of Jackson Park, such as the lagoons and the lakefront, without crossing six lanes of traffic at road-level on South Cornell Drive; and

....

WHEREAS, the location of the OPC in Jackson Park will underscore the vital role the OPC plays in the public life of Chicago and will encourage greater use and enjoyment of the park and lakefront; and

These “Whereas” clauses represent the findings of the City Council, adopted less than two years ago after fully considering the new site boundaries and testimony for and against shifting the site to the north and east. The decision was deliberative and substantive and intended to improve safety and access to the lagoons and lakefront. The Section 106 process is not the appropriate forum for reconsideration of a foundational legislative determination regarding a local project in a local park as a mitigation measure, especially when all of the current objections to the siting and design of the OPC were also made during the municipal approval process.

With respect to the Women’s Garden, the Foundation has made changes to its design in response to public comment. The Foundation originally intended to replace the Women’s Garden with a water feature that Olmsted had proposed but was never built. Upon hearing comments regarding the importance of the garden to the community, the Foundation eliminated the water feature and agreed to rebuild the Women’s Garden in its current location with dimensions, aesthetics, and plant types that are highly similar to the current experience of the garden. While the Women’s Garden will be temporarily impacted by construction of the OPC, the Foundation will reestablish its key features. Specifically, the OPC design will maintain the same critical character-defining elements of a sunken circular lawn, a stratified limestone retaining wall, and perimeter planting beds. These retained elements would be implemented with high sensitivity and with recovery of existing materials. For example, the sunken lawn bowl within the limestone walls will be rebuilt in the same location and approximate dimensions as the existing sunken lawn bowl, the retaining wall will offer the same character as the existing wall, and stone salvaged from the existing wall will be used to construct a new retaining wall modeled on the existing one. Plantings will include a mix of perennials, shrubs, and native grasses similar to those featured in the existing garden. Moreover, the new garden will be enhanced to be compliant with Americans with Disabilities Act standards making the sunken lawn bowl accessible for all visitors, including those with disabilities.

Second, the SHPO letter states that “[t]he work (UPARR conversion) to the east end of Midway Plaisance must meet the Standards for Rehabilitation, as determined by the IL SHPO.” The City has committed to undertaking the work on the east end of the Midway Plaisance in accordance with the Standards for Rehabilitation.

Third, the SHPO letter states that “[t]he pedestrian path that will replace Cornell Drive should have its placement, cross section, surface, edges and plantings reconstructed to their Olmsted appearance.” The design of West Lagoon Road has changed in multiple ways following the 1895 Revised General Plan for Jackson Park, by Olmsted, Olmsted, and Eliot. This includes design modifications that were made before the road itself was built, as well as significant alignment adjustments that were not part of the 1895 plan. Cornell Drive, the current 6-lane automobile thoroughfare, does not match the width or location of the carriage path shown in the 1895 plan, which predated modern Cornell Drive. In fact, the proposed pedestrian promenade better matches Olmsted’s carriage path than current Cornell Drive in this area both in terms of the location and experience with respect to its sweeping curves. The promenade will have the same

or similar landscape plants as the 1895 design, and it will have the same strong relationship with the lagoon edge. Returning the promenade fully to the historic carriage path design is not practical because the carriage path was significantly wider than the proposed promenade to allow carriages to travel on it in both directions and because the rest of the historic carriage path circulation pattern within Jackson Park has been thoroughly altered, eliminating the 1895 context. Further, the OPC promenade design offers important benefits to future users of the park. It will be a generous ped/bike thoroughfare that connects to existing park circulation networks and prioritizes user safety and experience. It removes a significant barrier to accessing and enjoying park features like the lagoons and Wooded Island, provides full accessibility for all visitors, and accommodates the needs of park users rather than prioritizing vehicular access through the park.

In conclusion, the City is committed to working with the federal agencies and consulting parties to identify appropriate measures for inclusion in the Section 106 Memorandum of Agreement. At the same time, the City is bound by the prior legislative decisions of its elected representatives regarding the siting and design of the OPC. These decisions benefitted from significant input from the public and reflect the considered and deliberate judgment of the City of Chicago and the Chicago Park District with respect to a local treasure (Jackson Park) and a very rare and historic opportunity (the OPC). The City looks forward to continuing to work with you and your staff on this project.

Sincerely,



Eleanor Gorski, AIA
First Deputy Commissioner

Cc: Matthew Fuller
Joel Lynch
Morgan Elmer