



SCOTT WAGUESPACK

COMMITTEE MEMBERSHIPS

CITY COUNCIL CITY OF CHICAGO

COUNCIL CHAMBER

CITY HALL—ROOM 300
121 NORTH LASALLE STREET
CHICAGO, ILLINOIS 60602
TELEPHONE: 312-744-6567

ALDERMAN, 32ND WARD
2657 NORTH CLYBOURN AVENUE
CHICAGO, ILLINOIS 60614
TELEPHONE: (773) 248-1330
FAX: (773) 248-1360

COMMITTEES, RULES AND ETHICS

EDUCATION AND
CHILD DEVELOPMENT

HOUSING AND REAL ESTATE

HUMAN RELATIONS

SPECIAL EVENTS AND
CULTURAL AFFAIRS

November 9, 2012

Charles Woodyard
CEO
Chicago Housing Authority
60 E Van Buren
Chicago, IL 60605

In August 2012 Lathrop Community Partners (LCP), the development team selected to implement redevelopment of Julia C. Lathrop Homes, released three development scenarios for the site. After a thorough review of these three development scenarios, I have concluded that they are lacking in several key respects, including:

- Excessive and unprecedented density,
- Lack of meaningful public participation in the planning process,
- Failure of any scenario to preserve the historic character of the site, and
- Failure to meet CHA's goal of LEED ND platinum or gold certification.

The primary concern, shared by each of the undersigned neighborhood community organizations, is the unprecedented and inappropriate level of density of up to 1,600 units. I will not accept the premise that revitalization of Lathrop Homes should be accomplished primarily through excessively dense high-rise residential development, regardless of whether these units are market rate or affordable. This approach is fundamentally flawed because it attempts to solve one problem, segregated public housing, by replacing it with another equally damaging problem, excessive density. In so doing, LCP demonstrates a lack of concern for the implications of the plan for Lathrop on the long term health and vitality of the surrounding neighborhoods.

The Chicago Housing Authority (CHA) selected LCP after issuing a Request for Qualifications (RFQ) on January 7, 2010. This RFQ detailed some very specific expectations for the scope of the proposed redevelopment. It is particularly disturbing that the LCP plans do not follow the parameters of the RFQ, which were developed in extensive consultation with elected officials, neighborhood representatives, and Lathrop residents. This RFQ describes the redevelopment scope as,

"Approximately 800-1,200 units of market quality, new and/or rehabilitated mixed-income housing, both ownership and rental, approximately 1/3 of which must be public housing."

None of the three proposed development scenarios falls within these specifications with respect to density—the number of residential units—or the proportion of public housing units.

I appreciate the willingness of you and other senior CHA staff to meet with myself and Alderman Moreno recently to discuss these concerns. My objective now is to work with the CHA to reintroduce the public participation that the RFQ stressed—a necessary element absent over the past ten months. I am under no illusion that it will be easy to reach the appropriate balance among the varied interests at play in developing a plan for Lathrop. However, in my experience when communities have a meaningful voice in land use planning decisions, they demonstrate a remarkable capacity for the type of informed compromise necessary to facilitate true progress.

The following points elaborate on the primary concerns I and our neighborhood community organizations have with both the proposed development scenarios and the process that led to their creation.

Density—There are no objective planning principles that support the proposed level of density at this site. The proposed scenarios are completely inconsistent with the context and character of the surrounding development. The levels of density LCP is proposing, up to 33 percent in excess of the amount called for in the RFQ, and the associated building heights of up to 28 stories, are only appropriate in or very nearby dense urban cores and close to transit hubs. The intersection of Damen / Diversey / Clybourn has neither the transit service nor the wealth of nearby services, amenities, and attractions essential to make high-rise residential development livable and feasible. It is no accident that the proposed density is well in excess of anything north of North Avenue and off of the Lakefront.

CHA's stated goal of integrating the site with its surrounding neighborhoods will not be practical unless the density and scale of the proposed structures is compatible with the residential areas that border the site. The objective of increasing linkages between the site and its surroundings is unachievable so long as building heights reminiscent of the high rises the CHA has recently torn down elsewhere dominate the plan. As a community we must demand better planning than a revival of the Tower in the Park style of isolated groups of high-rise residential towers, which these scenarios represent. This style of development amounts to a vertical suburb that isolates its residents, rather than a pedestrian-oriented, interesting urban neighborhood capable of complementing its surroundings.

We have seen the devastating effects of consolidating public housing units in high rise towers. The CHA, in consultation with its court appointed receiver, has demolished these towers and replaced them with predominately low to mid-rise units that resemble the scale of the existing buildings at Lathrop. It defies explanation that, just as the CHA is emerging from receivership, it would propose to reverse this trend by replacing the neighborhood oriented two and three-story walkups at Lathrop with high rise and mid rise towers.

The area's transportation network simply cannot accommodate anywhere near 1,600 units without slipping inexorably into gridlock given the lack of high-capacity, fixed-route transit service to the site. The over 2,000 cars that would be accessing the site on a daily basis associated with the residential units alone, not counting the traffic associated with up to 70,000 square feet of automobile-oriented retail,

would easily overwhelm the surrounding street network. Existing congestion in this area is so severe that the City, working in conjunction with my office, is currently planning to invest \$36 million to improve the Damen / Elston / Fullerton intersection just on the other side of the Damen Avenue bridge. The traffic volume generated by these proposed scenarios would override the mitigation of congestion this investment would otherwise achieve.

Process—The CHA’s RFQ detailed requirements for a vigorous, community based planning process. The RFQ stated that the successful candidate should possess:

“demonstrated ability to manage an open, public planning process with a wide range of participants.”

LCP held an initial round of three meetings billed as workshops to provide the public with background necessary to participate in a series of public design charrettes. However, LCP scrapped the charrettes without explanation. Over the past ten months there have been no opportunities for public input as LCP developed the three scenarios. It follows that the scenarios are devoid of any evidence that key concerns of surrounding residents were incorporated into the plans.

Preservation—Julia C. Lathrop Homes, the first federal public housing development in Chicago, is on the National Register of Historic Places. Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to take into account the effects of their undertakings on such historic properties. These regulations highlight the important role of public input in the Section 106 process,

“Public involvement is a key ingredient in successful Section 106 consultation, and the views of the public should be solicited and considered throughout the process.”

Outside the initial series of interviews at the very outset of their contract with the CHA, LCP has failed to solicit any public input on the historic characteristics of Lathrop Homes.

LCP conceded when presenting the three scenarios to the working group that none of them would be eligible for federal historic tax credits because of their inability to sufficiently preserve the historic content and character of Lathrop. Abandoning any possibility of attaining historic tax credits without any opportunity for public involvement is the antithesis of the spirit of Section 106, and the process described in the CHA’s RFQ for Lathrop. Instead, LCP is proposing that the project receive \$30 million or more in public subsidies from the establishment of a new tax increment financing district.

Nearby residents express an understandable desire to reinvent the physical context and character of the site to remove a stigma caused by decades of CHA neglect. Preservation advocates have fought for preserving as many of the existing buildings as possible. The existing two-story townhomes and three-story walk-ups complement the surrounding neighborhoods exceedingly well in terms of their height and building scale. However, there is no question that the existing buildings will require extensive renovations to bring them up to modern standards in terms of room sizes and amenities.

Preservation of a site such as Lathrop Homes is a complex issue. I am aware that many of the nearby neighborhood organizations, and my constituents who comprise their membership, have disparate

views on the extent to which the existing buildings can or should be preserved. However, there is no disputing the historic importance of Lathrop. I will not accept that decisions about preservation should be made by LCP in isolation. I have no doubt that a vigorous public discussion about the disposition of the existing buildings will be challenging. However, rather than accepting the notion that these interests cannot be reconciled, the decision about the future of the existing structures must revolve around what is best for both existing residents and surrounding neighborhoods.

Sustainability—The RFQ cites LEED for Neighborhood Development (LEED ND) Gold or Platinum Certification as a key goal of the redevelopment plan. The LEED ND Rating System integrates the principles of smart growth, urbanism and green building into the first national system for neighborhood design. Each of the three LCP scenarios abandons key elements of the LEED principles.

A review of the LEED ND guidelines quickly reveals that one of the primary challenges for the site to earn credits is its lack of proximity to transit. The high level of density reflected in the scenarios, despite the lack of this transit access, makes it difficult to overcome this disadvantage with other sustainable design elements. Other credits the site could qualify for, such as a significant influence on walkability and connectivity, are overwhelmed by the effort to cram unreasonable amounts of residential units, retail space, and parking on the site.

Next Steps

As Alderman of the 32nd Ward I had an obligation to share the information I received on these development scenarios with my constituents so that I could work in concert with them to initiate a coordinated response to the unreasonable and damaging elements in these plans before it was too late. LCP stated in its presentation of these scenarios that it was going to finalize the planning process by February. Delaying the presentation of these plans to the public, for whatever reasons, between August and November with a goal of finalizing the plans by February is unacceptable. Moving forward, I anticipate working with CHA staff and LCP to help recalibrate the levels of density, building heights, retail space, and parking to levels that are capable of complementing, rather than overwhelming, the surrounding neighborhoods. I appreciate the attention of you and your staff to these serious concerns over the future of the Lathrop Homes Community.

The following neighborhood community organizations have signed onto this letter in support of the concerns over the course of the planning process and the results to date:

Hamlin Park Neighbors Executive Board

Roscoe Village Neighbors

West Lakeview Neighbors Association

South Lakeview Neighbors

West DePaul Neighborhood Association

Wrightwood Neighbors Association

Sheffield Neighborhood Association

Bucktown Community Organization

Wicker Park Committee

Ranch Triangle Association

Preservation Chicago

Logan Square Preservation

LEED Council/North Branch Works

Cc: Mayor Rahm Emanuel
1st Ward Alderman Proco Joe Moreno
Daniel Levin, Chairman of The Habitat Company
Andrew J. Mooney, Commissioner, Department of Housing and Economic Development
Eleanor Gorski, Assistant Commissioner, Landmarks Division
Patricia Scudiero, Zoning Administrator, Department of Housing and Economic Development
Mike Jackson, Chief Architect, Illinois Historic Preservation Agency
Robert Whitfield, Attorney for the Central Advisory Council
Lathrop Community Partners