PROGRAMMATIC AGREEMENT

AMONG

THE CITY OF CHICAGO,
THE CHICAGO HOUSING AUTHORITY,
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
AND THE ILLINOIS STATE HISTORIC PRESERVATION OFFICER

REGARDING REDEVELOPMENT OF THE JULIA C. LATHROP HOMES,
CITY OF CHICAGO, COOK COUNTY, ILLINOIS

RECITALS

WHEREAS, the Chicago Housing Authority ("**CHA**") is a public housing agency engaged in the development and operation of safe, decent and sanitary housing throughout the city of Chicago for low-income families in accordance with the United States Housing Act of 1937, 42 U.S.C. §1437 *et seq.*, and regulations issued by the United States Department of Housing and Urban Development ("**HUD**"); and

WHEREAS, CHA plans to redevelop the existing Julia C. Lathrop Homes ("**Lathrop**") public housing development by creating a mixed income/mixed use community including 1,208 dwelling units, up to 50,000 square feet of retail, a boat house and other improved riverfront amenities (the "**Project**") on the property to provide safe and decent housing and help rebuild the lives of residents; and

WHEREAS, CHA is also a HUD Moving to Work Agency ("**MTW**") that is allowed fungibility in its funding, and while funding sources are still to be determined, CHA will likely include capital funds, operating funds and/or other funds ("**MTW Funds**") to fund the Project, thereby making the Project an undertaking subject to review under Section 106 of the National Historic Preservation Act of 1966, 54 U.S.C §306108, and its implementing regulations at 36 CFR Part 800 (collectively, "**Section 106**"); and

WHEREAS, under the National Environmental Policy Act of 1969, 42 U.S.C. §4321 *et seq.* ("**NEPA**"), and its implementing regulations at 24 CFR Part 50, HUD has previously borne responsibility for conducting environmental reviews applicable to HUD federal funding awarded to CHA, including MTW Funds; and

WHEREAS, pursuant to 24 CFR Part 58, responsible entities may be designated to assume the responsibility for environmental review, decision-making, and action that would otherwise apply to HUD under NEPA, and the city of Chicago (the "**City**") has assumed that responsibility; and

WHEREAS, for the purposes of this Programmatic Agreement ("**PA**"), the City will be represented by its Department of Fleet and Facility Management; and

WHEREAS, the City has defined the undertaking's Area of Potential Effect ("**APE**") as the Lathrop property, bounded by the North Branch of the Chicago River on the south and west, North Damen Avenue on the east, North Clybourn Avenue on the north and east, North Leavitt Street on the west, West Oakdale Avenue on the north, and a line from West Oakdale Avenue to the Chicago River on the west, as shown on the existing site plan included and made a part hereof as **Attachment A**; and

WHEREAS, Lathrop was listed on the National Register of Historic Places on February 12, 2012, at the national level of significance, as an example of an early federally-supported planned housing community set in a Jens Jensen-designed landscape; and

WHEREAS, the City has determined that the Project will have an adverse effect on Lathrop including demolition of ten (10) historic buildings on the property and modification of the original landscape plan; and

WHEREAS, the CHA and/or its developer, Lathrop Community Partners, LLC, will consult with the Illinois State Historic Preservation Officer ("**SHPO**") and the National Park Service **("NPS")** to rehabilitate the remaining 21 buildings in accordance with the Secretary of the Interior's Standards for Rehabilitation as codified in 36 CFR 67, and the NPS will be reviewing and approving Part 2 and Part 3 applications for the property in order to receive the tax incentives established by the Tax Reform Act of 1986 (PL 99-514; Internal Revenue Code Section 47); and

WHEREAS, the City has consulted with the SHPO in accordance with Section 106, and SHPO has concurred with the City's finding of adverse effect and will consult with the City regarding the proposed rehabilitation of the remaining buildings at Lathrop; and

WHEREAS, in accordance with 36 CFR §800.6(a)(1), the City has notified the Advisory Council on Historic Preservation ("**ACHP**") of its adverse effect determination by providing the specified documentation, and the ACHP has chosen to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, Phase 1 as depicted on the Lathrop Homes Graphic Plan, included and made a part hereof as **Attachment B**, has been extensively reviewed by SHPO, NPS, the City and the consulting parties and provides for the rehabilitation of 20 of the 21 remaining contributing structures, the construction of two compatible new construction buildings, and the rehabilitation of the contributing landscape north of West Diversey Parkway, and its approval is explicitly granted by this PA, provided there are no substantive changes or modifications; and

WHEREAS, recognizing the government-to-government relationship with federally-recognized Indian tribes, the City invited the following tribes to participate in consultation pursuant to 36 CFR § 800.2(c)(2)(ii): Forest County Potawatomi Community; Citizen Potawatomi Nation; Prairie Band of Potawatomi Nation; and Hannahville Indian Community; and

WHEREAS, the Forest County Potawatomi Community ("**FCPC**") chose to participate in consultation and the City has invited the tribe to sign the PA as an invited signatory; and

WHEREAS, the City included FCPC on all consulting party communication, notably December 15, 2015, July 21, 2016, August 8, 2016, and September 20, 2016, and will continue to do so in the future; and

WHEREAS, FCPC has yet to acknowledge the City's invitation to sign the PA and did not respond to the City's October 14, 2016 letter, November 16, 2016 phone call, or November 16, 2016 email requesting confirmation to be retained as an invited signatory; and

WHEREAS, as part of the Section 106 consultation and following the recommendation of SHPO and the FCPC, CHA commissioned the Public Service Archaeology & Architecture Program of the University of Illinois at Urbana-Champaign to conduct an archeological evaluation of the APE, and the Research Report No. 173 entitled "An Evaluation of Archeological Potential for the Lathrop Homes Redevelopment in Chicago, Illinois" by Dr. Cynthia Balek, Dr. Kevin McGowan and Mr. Christopher Flynn, dated June 6, 2014, concluded that no further archeological investigation is required; and

WHEREAS, the archaeological evaluation report and recommendation was forwarded to FCPC on July 22, 2014 with no further comments received from FCPC, and SHPO approved the report in a letter dated July 16, 2014; and

WHEREAS, the City has consulted with other consulting parties as set forth on the list included and made a part hereof as **Attachment C** regarding the effects of the undertaking on historic properties, resolving adverse effects, and developing mitigation strategies, and has provided responses to comments received; and

WHEREAS, the City and CHA have provided additional opportunities for involvement by the general public as set forth on the list included and made a part hereof as **Attachment D**; and

WHEREAS, consideration was given to alternatives and measures throughout the project development process to avoid, minimize, and mitigate impacts to historic properties listed on or eligible for the National Register of Historic Places ("**NRHP**") while meeting the stated purpose of the Project; and

WHEREAS, the City supports the ACHP's "Policy Statement on Affordable Housing and Historic Preservation" and has taken this into account during consultation;

NOW, THEREFORE, the City, CHA, SHPO and ACHP agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The foregoing recitals constitute an integral part of this agreement and are incorporated herein by this reference with the same force and effect as if set forth herein as stipulations. The stipulations below apply to all subsequent phases of the proposed undertaking, and a flow chart outlining the major steps in future phases, together with a list of consultation requirements, are attached hereto and incorporated herein as **Attachment E**. The City in coordination with CHA shall ensure that the following measures are carried out:

I. DEMOLITION

A. CHA shall not demolish any historic properties until building permits for each new building are secured or site improvements for a specific phase are approved and permitted, and they have been documented in accordance with Stipulation II (A). This means that CHA may not demolish any historic structures in advance of receiving permits for those structures. If the development plan for the site

changes, there must be an opportunity to reconfigure the site to ensure the preservation of more buildings or different buildings. SHPO and the consulting parties shall have an opportunity of not less than thirty (30) days to review and comment on substantive revisions to approved plans, and SHPO shall approve final revisions. Substantive revisions must also be approved by SHPO and NPS as part of the federal HTC application. Prior to the start of construction, CHA shall share phasing plans with consulting parties and submit a phasing plan, with dates of phases, to the City for review.

B. This PA does not modify in any way the obligation of CHA to independently comply with review and approval of proposed demolitions under either: Section 18 of the United States Housing Act of 1937 (42 U.S.C. 1437p) regarding approval for demolition and disposition of existing public housing buildings, or the terms and conditions of the Rental Assistance Demonstration Project (RAD) authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved November 18, 2011).

II. MITIGATION REQUIREMENTS

A. Documentation.

i. Photographs. CHA and/or its developer, Lathrop Community Partners, LLC, shall retain a qualified architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards (https://www.nps.gov/history/local-law/arch_stnds_9.htm) to document the Lathrop buildings and landscape in black-and-white, archivally processed photographs that meet the specifications in the guidelines. The documentation shall be completed prior to commencement of demolition and construction. The photographs shall consist of images of the setting, designed landscape, and exterior and interior views of the buildings, including important architectural and landscape details. Copies of the documentation, with original photographs, shall be deposited with SHPO, the Commission on Chicago Landmarks, and the National Public Housing Museum.

ii. Plans and Drawings. Copies of any original architectural drawings or landscape plans shall be deposited with SHPO, the Chicago Landmarks Commission, and the National Public Housing Museum.

B. Interpretation

i. CHA shall prepare and construct in a conspicuous location on site or in an interior public space, prior to final occupancy of the final phase, a permanent exhibit about the history of Lathrop and biographical information about Julia C. Lathrop.

ii. As part of this process, CHA will evaluate the feasibility of removal and preservation of resident-produced artwork and potential re-use on the site or with the National Public Housing Museum or other appropriate collection.

iii. As part of this process, CHA will work with the National Public Housing Museum, SHPO, and/or other appropriate entities, for a period of up to two years, to evaluate the feasibility of collecting oral histories from residents and/or local architectural historians. This determination of feasibility will be based on the ability to obtain volunteer participation to record the oral histories. If determined to be feasible, audio or video

recordings and written transcripts shall be deposited with SHPO and the National Public Housing Museum.

iv. The exhibits and presentation will be shared with consulting parties in either an in-person or teleconference format and a 30-day comment period will be established to take consulting party comments and provide responses to comments. The final proposed exhibit and presentation must be approved by SHPO.

v. The name of the proposed Project shall be re-branded, but interpretative materials and exhibits displayed on the site shall contain the name Julia C. Lathrop Homes in order to identify the historic area.

C. Education

i. The CHA and/or its developer, Lathrop Community Partners, LLC, will coordinate with the National Trust for Historic Preservation (the Trust) to offer at least one educational session about issues related to the preservation and redevelopment of the Lathrop public housing complex during the Trust's 2017 *PastForward* conference, to be held in Chicago. The educational content of the session will be coordinated with SHPO.

ii. Should an educational session during the Trust's 2017 *PastForward* conference in Chicago not be possible, the parties shall coordinate to provide a two-hour panel discussion on issues related to the preservation and redevelopment of the Lathrop Homes public housing complex, and a Lathrop site tour, which may be adjacent to the conference—occurring a day before its start or a day after its closing—in order to include as wide a national audience as possible.

iii. Should this panel discussion not be possible to schedule adjacent to the Trust's 2017 *PastForward* conference in Chicago, the parties shall coordinate to provide a two-hour panel discussion, and a Lathrop site visit, on this same topic at the National Public Housing Museum or other venue in Chicago, to be determined. The CHA, and/or its developer, Lathrop Community Partners, LLC, shall work with SHPO and ACHP to ensure that the panel discussion is promoted to as wide a national audience as possible. The educational content will be coordinated with SHPO. This panel discussion should be held within two years of the execution of this PA.

D. National Register Designation and CHA Property Inventory

i. Upon completion of the Project, the City, CHA and/or its developer shall ensure that the National Register of Historic Places nomination for Lathrop is revised to include all changes to the nationally-significant historic district, including demolition, rehabilitation, and new construction of buildings and landscape. The nomination revision shall be completed by a historian or historical consultant meeting the Secretary of the Interior's Professional Qualifications. The revised nomination must be reviewed and accepted by SHPO and National Park Service staff.

ii. Recognizing the importance of continual tracking of CHA-owned buildings for potential historic significance and ongoing coordination with the SHPO:

a. CHA shall provide a spreadsheet listing of its major public housing complexes to SHPO. This list will serve as a planning tool for future coordination efforts with the SHPO. The spreadsheet listing shall summarize information contained on the CHA website and include at minimum: information on site name, address, community location, property type, and date built where applicable to CHA-owned buildings. For buildings at least 50 years in age, photographs will be provided of the property.

b. Upon the direction of the City or SHPO, or as additional information or photographs are provided on CHA-owned properties by CHA or other entities, CHA shall update its public website at least annually to share historically significant information for CHA-owned buildings, including photographs and historical background narrative information, with the public and other interested parties. Any updates to the website to include additional historical information shall be reviewed by CHA not less than annually and reported to SHPO during annual telephone conferences on the status of execution of this Programmatic Agreement described in Stipulation VI.

c. As part of annual telephone conferences on the execution of this Programmatic Agreement described in Stipulation VI, SHPO, CHA, and the City shall review this property listing, identify any expected CHA projects over the next year related to this list, and identify any new additions or deletions to this list.

d. Any modifications planned to CHA-owned resources which require use of federal funds shall be subject to review and further historic analysis and documentation under Section 106 of the National Historic Preservation Act for those specific projects and will be considered separate from requirements for proper execution of this Programmatic Agreement. These future studies would be performed by a qualified historian meeting the Secretary of the Interior's Professional Qualifications.

E. Maintaining Historic Properties

i. CHA shall maintain Buildings E and F of Lathrop, including the characteristics that qualify the buildings for inclusion in the National Register of Historic Places. CHA agrees to maintain the buildings in good repair, in a clean and safe condition, and in a manner that will not exacerbate the normal aging process, nor accelerate its deterioration.

III. DURATION

This PA will expire if its stipulations are not carried out within ten (10) years from the date of its execution. Prior to such time, the City may consult with other signatories to amend the PA in accordance with Stipulation VIII.

IV. INVOLVEMENT BY OTHER FEDERAL, STATE, AND LOCAL AGENCIES

In the event that another federal agency not initially a party to or subject to this PA receives an

application for funding/license/permit for the Undertaking as described in this PA, that agency may fulfill its Section 106 responsibilities by stating in writing it concurs with the terms of this PA and notifying the City, SHPO, and the ACHP that it intends to do so. Such agreement shall be evidenced by execution of an amendment in accordance with Stipulation VIII.

V. POST-REVIEW DISCOVERIES

If potential historic properties are discovered or unanticipated effects on historic properties found, the City shall implement the discovery plan included and made a part hereof as **Attachment F**.

VI. MONITORING AND REPORTING

Each year following the execution of this PA until it expires or is terminated, CHA shall provide all parties to this PA a summary report detailing work carried out pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received by CHA during their efforts to carry out the terms of this PA. Each year, CHA will schedule a telephone conference during which the parties will discuss the annual report and any issues related to this PA.

VII. DISPUTE RESOLUTION

Should any signatory to this PA object at any time to any actions proposed, or the manner in which the terms of this PA are implemented, the City shall consult with such party to resolve the objection. If the City determines that such objection cannot be resolved, the City will:

A. Forward all documentation relevant to the dispute, including CHA's proposed resolution, to the ACHP. The ACHP shall provide the City with its advice on the resolution of the objection within 30 days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the City shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. The City will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the 30-day time period, the City may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the City shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the PA, and provide them and the ACHP with a copy of such written response.

C. CHA has the authority and responsibility to carry out all other actions subject to the terms of this PA that are not the subject of the dispute. Those terms remain unchanged.

VIII. EXECUTION AND AMENDMENTS

This PA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP. This Agreement may be executed in several counterparts and all such executed counterparts shall

constitute one agreement, binding on all the parties hereto.

IX. TERMINATION

If any signatory to this PA determines that the terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulation VIII, above. If within 30 days (or another time period agreed to by all signatories) an agreement to amend cannot be reached, any signatory may terminate the PA upon written notification to the other signatories.

Once the PA is terminated, and prior to work continuing on the undertaking the City must either (a) execute a new PA or MOA pursuant to 36 C.F.R. § 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7. The City shall notify the signatories as to the course of action it will pursue.

IN WITNESS WHEREOF, the undersigned have each duly executed this Programmatic Agreement as of April 13, 2017.

SIGNATORIES:

City of Chicago, Department of Fleet and Facility Management

By: _____
David J. Reynolds
Commissioner

SIGNATORIES (CONTINUED):

Illinois Historic Preservation Agency

By: _____
Heidi Brown-McCreery
Director and State Historic Preservation Officer

SIGNATORIES (CONTINUED):

Advisory Council on Historic Preservation

By: _____
John Fowler
Executive Director

INVITED SIGNATORIES:

Chicago Housing Authority

By: _____

Eugene E. Jones, Jr.
Chief Executive Officer

INVITED SIGNATORIES (CONTINUED):

City of Chicago, Department of Planning and Development

By: _____

David L. Reifman
Commissioner

INVITED SIGNATORIES (CONTINUED):

Forest County Potawatomi Community

By: _____

Harold Frank
Chairman

CONCURRING PARTIES:

1st Ward

By: _____
Proco "Joe" Moreno
Alderman

32nd Ward

By: _____
Scott Waguespack
Alderman

Preservation Chicago

By: _____
Ward Miller
Executive Director

Landmarks Illinois

By: _____
Bonnie McDonald
President

Friends of the Parks

By: _____
Juanita Irizarry
Executive Director

Lathrop Homes Local Advisory Council

By: _____
Jaunita Stevenson
President

CONCURRING PARTIES (CONTINUED):

Lathrop LAC

By: _____
Name:
Title:

Central Advisory Council

By: _____
Christopher Wilmes
Attorney

Logan Square Neighborhood Association

By: _____
John McDermott
Housing and Land Use Director

Lathrop Leadership Team

By: _____
J.L. Gross
Chair

Logan Square Preservation

By: _____
Andrew Schneider
President

Kimball Avenue Church

By: _____
Bruce Ray
Reverend

CONCURRING PARTIES (CONTINUED):

Lathrop Homes/Cotter Boys & Girls Club Alumni Association

By: _____
Barbara Burns
Title:

D. Bradford Hunt

By: _____
D. Bradford Hunt
Title:

South Lakeview Neighbors

By: _____
Steven Stern
President

Hamlin Park Neighbors, NFP

By: _____
Charles Beach
President

Roscoe Village Neighbors

By: _____
David Kerber
President

Business and Professional People for the Public Interest (BPI)

By: Julie Elena Brown
Julie Elena Brown
Senior Staff Counsel|Director, Public Housing
Counsel for Gautreaux Plaintiffs

CONCURRING PARTIES (CONTINUED):

Wrightwood Neighbors Association

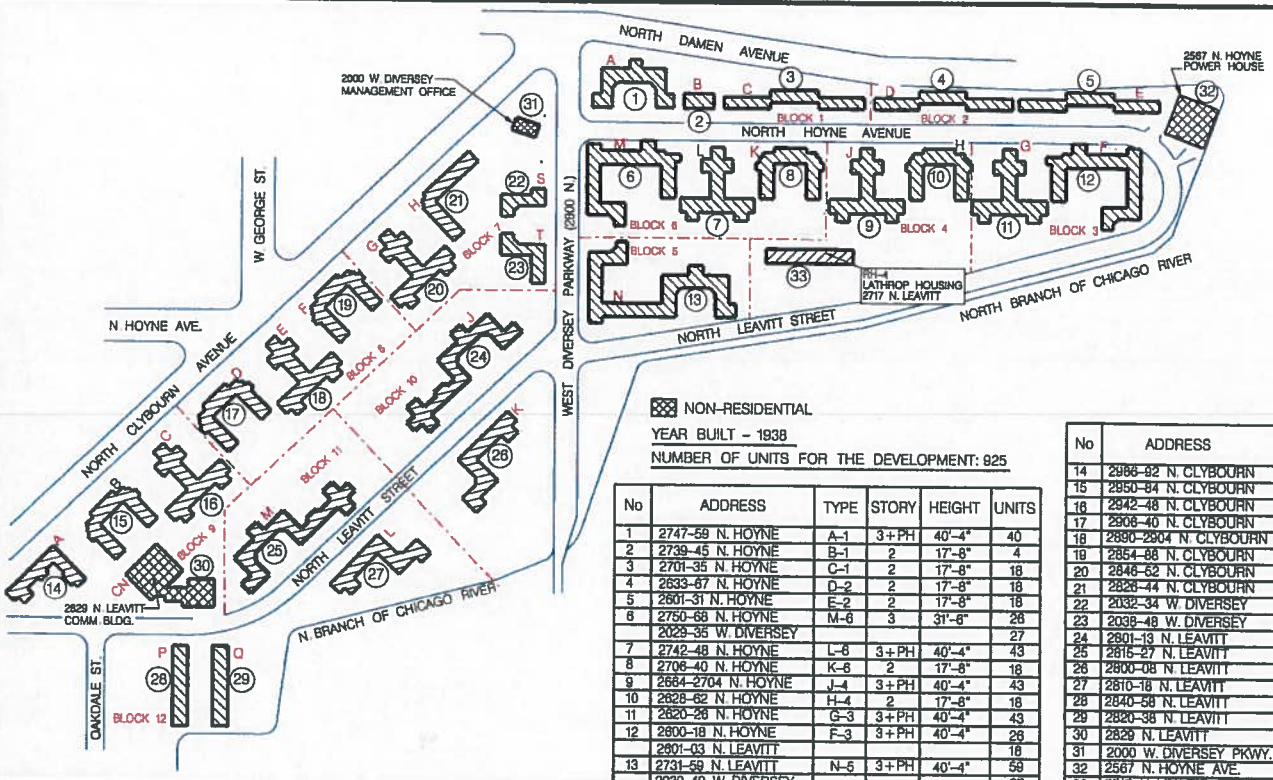
By: _____
Gary Wigoda
President

WELD Neighborhood Community

By: _____
Liz Terrones
Title:

ATTACHMENT A

Attachment A - Existing Site Plan of Julia C. Lathrop Homes



NON-RESIDENTIAL

YEAR BUILT - 1938

NUMBER OF UNITS FOR THE DEVELOPMENT: 925

No	ADDRESS	TYPE	STORY	HEIGHT	UNITS
1	2747-59 N. HOYNE	A-1	3+PH	40'-4"	40
2	2739-45 N. HOYNE	B-1	2	17'-8"	4
3	2701-35 N. HOYNE	C-1	2	17'-8"	18
4	2633-67 N. HOYNE	D-2	2	17'-8"	18
5	2601-31 N. HOYNE	E-2	2	17'-8"	18
6	2750-68 N. HOYNE	M-6	3	31'-6"	26
	2029-35 W. DIVERSEY				27
7	2742-48 N. HOYNE	L-6	3+PH	40'-4"	43
8	2706-40 N. HOYNE	K-6	2	17'-8"	18
9	2664-2704 N. HOYNE	J-4	3+PH	40'-4"	43
10	2628-62 N. HOYNE	H-4	2	17'-8"	18
11	2620-26 N. HOYNE	G-3	3+PH	40'-4"	43
12	2600-18 N. HOYNE	F-3	3+PH	40'-4"	26
	2601-03 N. LEAVITT				16
13	2731-59 N. LEAVITT	N-5	3+PH	40'-4"	59
	2039-49 W. DIVERSEY				27

No	ADDRESS	TYPE	STORY	HEIGHT	UNITS
14	2966-92 N. CLYBOURN	A-9	3+PH	40'-4"	28
15	2950-64 N. CLYBOURN	B-9	2	17'-8"	18
16	2942-48 N. CLYBOURN	C-9	3+PH	40'-4"	43
17	2906-40 N. CLYBOURN	D-8	2	17'-8"	18
18	2890-2904 N. CLYBOURN	E-8	3+PH	40'-4"	43
19	2854-88 N. CLYBOURN	F-8	2	17'-8"	18
20	2846-52 N. CLYBOURN	G-7	3+PH	40'-4"	43
21	2828-44 N. CLYBOURN	H-7	3/2	31'-6"	20
22	2032-34 W. DIVERSEY	S-7	3	31'-6"	15
23	2038-48 W. DIVERSEY	T-7	3	31'-6"	21
24	2801-13 N. LEAVITT	J-10	3+PH	40'-4"	60
25	2815-27 N. LEAVITT	M-11	3+PH	40'-4"	37
26	2800-08 N. LEAVITT	K-10	3+PH	40'-4"	37
27	2810-18 N. LEAVITT	L-11	3+PH	40'-4"	60
28	2840-58 N. LEAVITT	P-12	2	17'-8"	10
29	2820-38 N. LEAVITT	Q-12	2	17'-8"	10
30	2829 N. LEAVITT	CN-9	1	COMM. BLDG.	
31	2000 W. DIVERSEY PKWY.	AB-7	1	MGMNT. OFFICE	
32	2567 N. HOYNE AVE.	—	—	POWER HOUSE	
33	2717 N. LEAVITT	—	8	SENIOR BLDG.	

DATE 9.27.02	JOB NO.
DRAWN L.K.	SCALE N.T.S.
CHECKED	APPROVED

JULIA LATHROP HOMES, IL.2-024

ASSOCIATED ARCHITECTS

CHICAGO HOUSING AUTHORITY

CAPITAL CONSTRUCTION DIVISION
ARCHITECTURAL/ENGINEERING SERVICES
626 W. JACKSON BLVD., CHICAGO, IL
312-742-5500 FAX 312-742-7416

31

31 OF 95

ATTACHMENT B

Lathrop Homes Graphic Plan

Michael Van Valkenburgh Associates

ATTACHMENT C

Attachment C – Lathrop Section 106 Consulting Parties and Meeting Dates

	Consulting Party
1	Preservation Chicago
2	Landmarks Illinois
3	Friends of the Parks
4	Alderman Proco Joe Moreno, 1st Ward
5	Alderman Scott Waguespack, 32nd Ward
6	Lathrop Homes Local Advisory Council
7	Lathrop LAC
8	Central Advisory Council
9	Logan Square Neighborhood Association
10	Lathrop Leadership Team
11	Logan Square Preservation
12	Kimball Avenue Church
13	Lathrop Homes/Cotter Boys & Girls Club Alumni Association
14	D. Bradford Hunt
15	South Lakeview Neighbors
16	Hamlin Park Neighbors, NFP
17	Roscoe Village Neighbors
18	Business and Professional People for the Public Interest (BPI)
19	Wrightwood Neighbors Association
20	WELD Neighborhood Community
21	Forest County Potawatomi Community of Wisconsin
22	Advisory Council on Historic Preservation
23	Illinois Historic Preservation Agency
24	Chicago Department of Planning and Development – Historic Preservation Division

Consultation Meeting Dates

1. February 20, 2013 – Initiate Consultation, Identify Historic Properties, Assess Adverse Effects
2. March 20, 2013 – Identify Historic Properties, Assess Adverse Effects
3. July 3, 2013– Identify Historic Properties, Assess Adverse Effects
4. August 1, 2016 – Reinitiate Consultation, Assess Adverse Effects, Address Adverse Effects
5. October 4, 2016 – Address Adverse Effects
6. March 9, 2017 – Address Adverse Effects, Discuss Draft Programmatic Agreement

ATTACHMENT D

ATTACHMENT D:
Lathrop Homes Redevelopment
Public Involvement Summary

The Chicago Housing Authority (CHA), the development team, the U.S Department of Housing and Urban Development (HUD), and the City of Chicago have conducted a multi-year process to involve the public and complete consultation requirement of Section 106 of the National Historic Preservation Act (36 CFR 800) in the development of the Lathrop Homes Redevelopment Planning. Since early 2011, the public has been engaged in redevelopment planning at Julia C. Lathrop Homes through a series of stakeholder interviews, community meetings, and community open houses. Through these outlets the public has provided valuable comments and input on potential redevelopment plans for the site, including the treatment of the site's historic resources.

As part of that outreach, historic adverse effects were shared, and a number of community groups and locally elected officials requested to become consulting parties in the Section 106 consultation process. Public involvement efforts, including consulting party meetings, completed to date for the redevelopment project are summarized below.

Documentation of these efforts will also be provided in the Environmental Assessment being conducted for the project and the Administrative Record for the Environmental Assessment will contain documentation and supporting materials for this outreach.

Stakeholder Interviews – February 2011

In February 2011, individual interviews were conducted with community stakeholders to identify issues important to the redevelopment of Lathrop Homes. Over 250 individuals and organizations were contacted via mail, email, and phone in an effort to garner a high level of participation. A total of 119 individuals were interviewed including 28 current Lathrop residents and 11 former residents. Organizations, agencies, businesses and educational institutions that participated in the interviews were: Active Transportation Alliance, Alderman Joe Moreno, Alderman Waguespack, Archi-Treasures, Audubon- Chicago Region, Blacks in Green, Boys & Girls Club, Business and Professional People For The Public Interest (BPI), Chicago Botanic Garden, Chicago DOH: Economic Development, Chicago Housing Authority (CHA), Chicago Metropolitan Agency For Planning (CMAP), Chicago Park District, Chicago Rehab Network, Chicago Transit Authority (CTA), Chicagoland Cande Base, ComEd, CPS Friedrich Ludwig Jahn Elementary School, DePaul University, Driehaus Foundation, Enterprise Foundation, Erie Neighborhood House, Friends of the Chicago River, Galvin Electricity Initiative, Green Exchange, Hamlin Park Neighbors, Hispanic American Construction Industry Association (HACIA), Illinois Department of Natural Resources, Illinois Historic Preservation Agency (IHPA), Kimball Avenue Church, Lakeview Action Coalition, Lakeview Lutheran Church, Landmarks Illinois, Lathrop Leadership Team, Lathrop Local Advisory Council, LEED Council, LISC Chicago, Logan Square Chamber of Commerce, Logan Square Neighborhood Association, New Community Covenant Church, New Life Community Church, New Tiberia Missionary Baptist Church, Northwestern University, Openlands Project, Partnership For Men Communities, Preservation Chicago, Roscoe Village Neighbors, Sheffield Neighborhood Association, Strack & Van Til's, The Resource Center, The Summit Foundation, and Welbourn Row Condominium Association.

ATTACHMENT D:
Lathrop Homes Redevelopment
Public Involvement Summary

Planning Process Public Kick-Off Meeting – November 2011

On November 16, 2011, a public kick-off meeting for the Lathrop Homes planning process was held at New Life Community Church at 2958 N. Damen Avenue, approximately ¼ mile north of the Lathrop Homes site. Members of the public were invited to the event through mailers, mass emails, flyers posted throughout Lathrop Homes and the surrounding neighborhoods, and postings on the Lathrop Community Partners (LCP) website. Information presented included the structure of the project team, the schedule and goals of the planning process, and the ways through which the public was encouraged to be involved. Community involvement was invited through future meeting attendance, as well as by the distribution of the LCP website address, phone number, email, and text update option.

The kick-off meeting was attended by 106 members of the public. Among the attendees were representatives from local community and preservation advocacy groups including Friends of the Chicago River, Hamlin Park Neighbors, the Jewish Council on Urban Affairs, Landmarks Illinois, Lathrop Homes Alumni, Lathrop Homes Local Advisory Council, LEED Council, Logan Square Neighborhood Association, and New Life Community Church. Local staff from the U.S. Environmental Protection Agency (EPA) also attended. Spanish-language translators were made available and comment cards in both English and Spanish were distributed to attendees.

Community Workshops – December 2011

A series of three community workshops followed the kick-off meeting. The interview process in February 2011 helped determine key topics for further discussion during the community workshops. The community workshops were held on December 8, 2011, December 10, 2011, and December 13, 2011. The workshops were held at the same location as the kick-off meeting, the New Life Community Church at 2958 N. Damen Avenue. Members of the public were invited to the workshops through mailers, mass emails, flyers posted throughout Lathrop Homes and the surrounding neighborhoods, and postings on the LCP website. Each workshop had a theme: Workshop #1 Greening of Lathrop, Workshop #2 Education and Community, and Workshop #3 Livable Communities. The workshops included presentations and "break-out" sessions, all of which encouraged public input. Spanish-language translators were made available during the workshops.

Community Workshop #1 was attended by 49 members of the public. Among the attendees were representatives from local community and preservation advocacy groups including Friends of the Chicago River, Hamlin Park Neighbors, the Jewish Council on Urban Affairs, Landmarks Illinois, Lathrop Homes Local Advisory Council, LEED Council, Logan Square Neighborhood Association, Mary Crane Center, New Life Community Church, Preservation Chicago, and Roscoe Village Neighbors. Local staff from the EPA also attended.

Community Workshop #2 was attended by 16 members of the public. Among the attendees were representatives from local community and preservation advocacy groups including Hamlin Park Neighbors, Lathrop Homes Alumni, Lathrop Homes Local Advisory Council, Logan Square Neighborhood Association, Mary Crane Center, and New Life Community Church.

Community Workshop #3 was attended by 53 members of the public. Among the attendees were representatives from local community and preservation advocacy groups including Hamlin Park Neighbors, Lathrop Homes Alumni, Lathrop Homes Local Advisory Council, Landmarks Illinois, Logan

ATTACHMENT D:
Lathrop Homes Redevelopment
Public Involvement Summary

Square Neighborhood Association, Mary Crane Center, New Life Community Church, and Preservation Chicago.

Community Open Houses – November 2012

On November 15, 2012 and November 17, 2012 community open houses were held at New Life Community Church at 2958 N. Damen Avenue to present three potential planning concepts for the Lathrop Homes site. Members of the public were invited to the events through mailers, mass emails, flyers posted throughout Lathrop Homes and the surrounding neighborhoods, and postings on the LCP website. Three concepts – "Riverworks," "Gateways," and "Greenscapes" – were presented informally on large graphics boards and in looping videos with LCP team members available to answer questions. Public participants were invited to linger at each concept board and to engage with LCP team members and with fellow participants. Spanish-language translators were made available during the open houses. Detailed English and Spanish-language questionnaires were distributed and posted online to allow for maximum public input on the three concept proposals.

The two community open houses were attended by 366 members of the public. Among the attendees were representatives from local community and preservation advocacy groups including Hamlin Park Neighbors, Landmarks Illinois, Lathrop Homes Advisory Council, Logan Square Neighborhood Association, New Life Community Church, Preservation Chicago, Roscoe Village Neighbors, West DePaul Neighbors, and Wrightwood Neighbors. Community open house attendees turned in a total of 258 completed surveys, a 70% response rate, while a follow-up online survey added an additional 54 responses. In January 2013, all 312 completed community open house questionnaires were scanned and posted for public viewing on LCP's website along with a summary of questionnaire findings.

Consulting Party Meetings – 2013

Three consulting party meetings were held in 2013 (February 20, 2013, March 20, 2013, and July 3, 2013). These meetings were led by HUD. The meetings initiated Section 106 consultation, identified historic properties, and assessed adverse effects.

- February 20, 2013: The meeting updated the consulting parties on the ongoing planning process, presented the three current redevelopment concepts ("Riverworks," "Gateways," and "Greenscapes"), and accepted questions and comments from consulting parties. Participants present included Preservation Chicago, Landmarks Illinois, Friends of the Parks, Advisory Council on Historic Preservation (ACHP), Alderman Scott Waguespack 32nd Ward, Alderman Proco Joe Moreno 1st Ward, City of Chicago, IHPA, Lathrop Homes Local Advisory Council, Central Advisory Council, Logan Square Neighborhood Association, Lathrop Leadership Team, CHA, HUD, and CHA's development team.

- March 20, 2013: The meeting provided responses to comments from the February 20, 2013 meeting and further detailed the "Riverworks" and "Gateways" concept designs ("Greenscapes" was removed from consideration). Consulting parties were provided an opportunity to ask questions and make comments. Participants present included Preservation Chicago, Landmarks Illinois, Friends of the Parks, ACHP, Alderman Scott Waguespack 32nd Ward, Alderman Proco Joe Moreno 1st Ward, City of Chicago, IHPA, Lathrop Homes Local Advisory Council, Central Advisory Council, Lathrop LAC, Logan Square Neighborhood Association, Logan Square Preservation,

ATTACHMENT D:
Lathrop Homes Redevelopment
Public Involvement Summary

Lathrop Homes Alumni Association, Hamlin Park Neighbors, Roscoe Village Neighbors, BPI, Lathrop Leadership Team, CHA, HUD, and CHA's development team.

- July 3, 2013: The meeting focused on the initial master plan for the site and allowed the opportunity of consulting parties to ask questions and make comments. Participants present included Preservation Chicago, Landmarks Illinois, ACHP, Alderman Scott Waguespack 32nd Ward, City of Chicago, IHPA, Lathrop LAC, Logan Square Neighborhood Association, Logan Square Preservation, Lathrop Homes Alumni Association, Hamlin Park Neighbors, Roscoe Village Neighbors, BPI, Lathrop Leadership Team, South Lakeview Neighbors, Wrightwood Neighbors, WELD Neighborhood Community, CHA, HUD, and CHA's development team.

Master Plan Meetings – 2016

Throughout 2016 there were various meetings in which the public had an opportunity to comment on the master plan for the site. The zoning application process for the site included a January 28, 2016 resident meeting, a February 3, 2016 community meeting at Alcott School, and a February 18, 2016 plan commission meeting. The TIF application process for the site included an April 5, 2016 public meeting at New Life Community Church. In addition, a TSP public meeting was held at New Life Community Church on May 24, 2016.

Consulting Party Meetings – 2016 and 2017

All consulting parties previously involved in the Section 106 process in 2013 were contacted in December 2015 and January 2016 to confirm their interest in remaining a consulting party as part of the re-initiation of the Section 106 process with 2FM now serving as the responsible entity. Three consulting party meetings were held (August 1, 2016, October 4, 2016, and March 9, 2017). A comment period was provided following each meeting and consulting parties were encouraged to submit comments. Responses to comments were provided to all consulting parties.

- August 1, 2016: The consultation/public meeting notice was disseminated to the consulting parties and stakeholders via email on July 18, 2016, posted by CHA at the Julia C. Lathrop Homes, and made available at the July 21, 2016 City of Chicago Plan Commission meeting to ensure adequate opportunity for the public to become involved in the process. The meeting covered the Section 106 consultation history and eligibility findings for the site and provided an overview of the current site plan. The effects on historic resources were discussed, as well as a discussion on preliminary mitigation measures. Meeting participates were invited to ask questions and provide comments.

  Participants present included Preservation Chicago, Landmarks Illinois, Friends of the Parks, ACHP, Alderman Scott Waguespack 32nd Ward, Lathrop Homes Local Advisory Council, Central Advisory Council, City of Chicago, IHPA, Logan Square Neighborhood Association, Lathrop Homes/Cotter Boys & Girls Club Alumni Association, Hamlin Park Neighbors, BPI, Lathrop Leadership Team, Wrightwood Neighbors, Richard H. Driehaus Foundation, Antunovich Associates, CHA, HUD, and CHA's development team.

- October 4, 2016: The consultation/public meeting notice was issued to consulting parties and stakeholders via email on September 20, 2016 and posted by CHA at the Julia C. Lathrop Homes. The meeting covered a revised site plan that took into consideration comments

received from consulting parties from the August 1, 2016 meeting and further discussed mitigation measures to address the adverse effects. The draft Programmatic Agreement was also discussed, particularly in relation to mitigation measures. Meeting participates were invited to ask questions and provide comments.

Participants present included Preservation Chicago, Landmarks Illinois, ACHP, Alderman Scott Waguespack 32nd Ward, Lathrop Homes Local Advisory Council, Central Advisory Council, City of Chicago, IHPA, Logan Square Neighborhood Association, Hamlin Park Neighbors, BPI, Lathrop Leadership Team, Wrightwood Neighbors, Kimball Avenue Church, WELD Neighborhood Community, Richard H. Driehaus Foundation, Illinois Housing Development Authority, CHA, HUD, and CHA's development team.

- March 9, 2017: The consultation/public meeting notice was issued to consulting parties and stakeholders via email on March 3, 2017. The meeting covered a revised site plan and the current draft Programmatic Agreement that took into consideration comments received from consulting parties from the October 4, 2016 meeting. Mitigation measures in the draft Programmatic Agreement to address the adverse effects were discussed. Meeting participants were invited to ask questions and provide comments.

  Participants present included Preservation Chicago, Landmarks Illinois, ACHP, Alderman Scott Waguespack 32nd Ward, Lathrop Homes Local Advisory Council, City of Chicago, IHPA, Hamlin Park Neighbors, BPI, Lathrop Leadership Team, Wrightwood Neighbors, Friends of the Parks, Richard H. Driehaus Foundation, National Public Housing Museum, Illinois Housing Development Authority, CHA, HUD, and CHA's development team.

ATTACHMENT E

REHABILITATION AND NEW CONSTRUCTION

A. CHA shall retain at least seventeen (17) historic buildings and the brick colonnades along North Clybourn Avenue north of West Diversey Parkway, and at least four (4) historic buildings south of West Diversey Parkway, inclusive of the Power House, as per the site plan in Attachment B. These retained buildings and structures shall be rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation ("Standards"). These buildings collectively will retain sufficient integrity to allow for the property to remain on the National Register and qualify as certified historic structures to utilize federal historic rehabilitation tax credits ("HTC"). SHPO shall review and approve the plans for compliance with the Standards and shall recommend to the NPS Part 2 approval for the federal HTC. If the Project qualifies for the federal HTC, Part 2 approval by the NPS shall also evidence compliance with the Standards.

B. The proposed adaptive reuse of the "T" building located at 2890-2904 North Clybourn Avenue as a commercial space shall conform to the Standards.

C. CHA shall design and construct or shall cause its contractors to design and construct new buildings on the site which conform to the Standards' guidance on compatible new construction in order to maintain the property's eligibility for the National Register. The new buildings may be readily distinguishable from, but compatible with, the historic structures in scale, proportion, materials and color. SHPO shall have an opportunity to review and comment on the architectural plans as they develop and shall approve final plans for the new construction for compliance with the Standards. NPS shall also review plans for the new construction for compliance with the Standards, as part of the federal HTC application.

D. CHA shall design or shall cause its contractors to design site improvements and landscaping that comply with the Standards and the National Park Service's "Guidelines for the Treatment of Cultural Landscapes." To the extent possible, CHA will attempt to reflect the characteristics and significant design features from the original landscape plan by Jens Jensen. As decisions continue to be made for subsequent phases of landscape design, SHPO and NPS shall have an opportunity to review and comment on draft landscape plans. Based on updates to landscape plans made through SHPO and NPS review, CHA will share draft final landscape plans electronically with consulting parties and will provide a thirty (30) day comment period to take comments on such landscape plans. SHPO shall approve the final landscape plan for compliance with the Standards and NPS shall approve the final landscape plan as part of the federal HTC application. The final landscape plan shall include a maintenance component.

Coordination Process for Future Phases of Development

STEP 1

Determine scope and size of next phase of development

CHA and Development Team Coordination

STEP 2

Conceptual Design and Schematic Design Documents

CHA and Development Team coordination with IHPA and NPS

STEP 3

Design Development Documents

Documentation will include site plan, landscape plan, building elevations and renderings

CHA and Development Team continue coordination with IHPA and NPS regarding plans and tax credit applicability

Share plans with Consulting Parties and provide 30-day comment period to take comments on the proposed phased design plan

Make any further refinements to plans, as appropriate, based on consulting party input and submit to IHPA and NPS

STEP 4

Construction Documents

CHA and Development Team develop construction documents and obtain permits, as needed

ATTACHMENT F

ATTACHMENT F
JULIA C. LATHROP HOMES PROGRAMMATIC AGREEMENT
CHECKLIST: INADVERTENT DISCOVERIES

The following checklist guides the Section 106 Coordinator, City of Chicago Department of Fleet and Facility Management (2FM) and the Cultural Resource Management (CRM) Team for the Julia C. Lathrop site through the process of assessing inadvertent discoveries. The CRM consists, at a minimum of the General Contractor (during construction), the owner entity - Lathrop Homes IA, LP, the Chicago Housing Authority and the property manager (after construction).

The following information will be collected by the party discovering the resource, the CRM, the Illinois Historic Preservation Agency (IHPA) and other parties as appropriate. These parties will decide the best course of action.

[ ] Inadvertent discovery identified

Name: Date:

Notes:

[ ] Work stopped

Name: Date:

Notes:

[ ] Harm avoided or minimized

Name: Date:

Describe method:

[ ] Made preliminary determination of National Register eligibility

Name: Date:

National Register eligible: _____ Yes _____ No

Notes:

[ ] Notifications within 24 hours of discovery to:

[ ] IHPA

Name: Date:

[ ] THPO

Name: Date:

[ ] Federally recognized tribes

Name: Date:

[ ] Other parties

Name: Date:

[ ] Conducted field evaluation within 48 hours, or as soon as possible

Name: Date:
Professional qualifications:

Representatives of tribes or other parties:
Name: Date:
Position:

Methods of documentation:

Notes:

[ ] Found human remains or cultural material falling under NAGPRA provisions

_____ Yes (Follow NAGPRA and ARPA guidance) _____ No

Name: Date:

Notes:

[ ] Made determination of National Register eligibility: ____ Eligible_____ Not eligible

Name: Date:

Notes:

[ ] SHPO or THPO concurrence: ____ Agrees with park _____ Disagrees with park

Name: Date:

Notes:

[ ] Decided upon treatment

Description:

Performed by: Date:

[ ] After-action notification completed

Name: Date:

Method and location of copy:

To whom sent:

[ ] Documentation filed

Name: Date:

Location of files: