



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, DC 20240

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DEC 21 2015

PRESERVATION SERVICES

December 17, 2015

Mr. Jacques Sandberg
Lathrop Community Partners
350 West Hubbard Street, Suite 300
Chicago, IL 60654-5798

Dear Mr. Sandberg:

PROPERTY: Julia C. Lathrop Homes (Lathrop Homes)
PROJECT NUMBER: 30753
APPLICATION: Description of Rehabilitation (Part 2)
DECISION: Hold

The National Park Service (NPS) is in receipt of your Historic Preservation Certification Application-Part 2 describing the proposed redevelopment and rehabilitation of the Julia C. Lathrop Homes (Lathrop Home) in Chicago. The application was submitted as part of the eligibility process for Federal historic tax credits. Material supplemental to your application has been received on December 8, 2015 and has been considered as part of your Part 2 Application.

The project is to be undertaken in three phases, of which the first phase is covered in your application. The first phase describes the rehabilitation of the north campus and the construction of new mixed-used buildings on the site of the historic administration building and south campus buildings A and B. Phases 2 and 3 will be submitted "when designs are complete" and will include "the reuse of the Power House for commercial or community programming; the demolition of remaining south campus buildings; and the construction of new mixed-use buildings and infrastructure."

Because the proposed work for Phases 2 and 3 will involve extensive demolition of historic buildings and major new construction, the NPS strongly urges that information describing these phases in more detail be submitted well in advance of completed design plans, especially considering that we have previously identified substantive problems with earlier schematic plans that you have shared with this office. Since the proposed work in Phases 2 and 3 will have a major impact on the historic character of Lathrop Homes effecting whether the overall project meets the Secretary of the Interior's Standards for Rehabilitation, the NPS has placed your current application submission on hold, pending receipt of sufficient information describing Phases 2 and 3 for the NPS to take this work into consideration in its review of your current Part 2 Application.

HISTORIC SIGNIFICANCE

Lathrop Homes was listed in the National Register of Historic Places on February 21, 2012. A historic district consisting of 29 historic functionally-related buildings and two non-contributing buildings, the site covers 35.3 acres. The areas of significance listed in the National Register nomination are architecture, landscape architecture and community planning and development. The period of significance identified for Lathrop Homes is 1938 through 1961.

According to the National Register nomination, Lathrop Homes "is one of the largest, and is the most architecturally elaborate of the fifty-two initial public housing projects in the United States, constructed by the HD [Housing Division] of the PWA [Public Works Administration]." It is a "nationally-significant example of first phase public housing in the United States" and also nationally significant as an "example of Regional Planning Association of America (RPAA) community building and early public housing architecture." It is one of the most intact survivors of the period and is also the most important surviving project of this type in Chicago.

Architecturally, Lathrop Homes retains its historic integrity. Though two newer buildings have been added to the site, the nomination goes on to state that "the integrity of location, design, setting, workmanship, and feeling have not been significantly impacted." Of the 29 historic residential structures, there are 15 apartment buildings, six row house structures and eight buildings that mix apartments, row houses, and flats. The other two contributing buildings are a power plant and the administration building.

Lathrop Homes is a functionally-related complex, consisting of what is generally known as a north and south campus. The two campuses are bisected by Diversey Parkway and were built at the same time as a cohesive unit. Fourteen historic buildings comprise the south campus while the north campus consists of seventeen historic buildings. Jen Jensen, noted landscape architect, was responsible for much of the historic landscape plan which devoted 66% of the land to landscaped open space.

BACKGROUND

Substantive review by the NPS of the Lathrop Homes development plans has only occurred quite recently. Following the City of Chicago's selection in 2010 of Lathrop Community Partners (LCP) as the developer, several brief discussions were held between 2010 and 2012 with representatives of Related Midwest on behalf of LCP and the NPS. These discussions were limited to the scope of review as a functionally related complex and possible demolition of two buildings for increased parking.

In December 2012, LCP met with the Illinois State Historic Preservation Office (SHPO) as part of the Section 106 review process at which time a new plan was considered involving the substantial demolition of historic buildings, particularly on the south campus. The SHPO explained the difference in scope and requirements between Section 106 review and review for purposes of the Federal historic tax credit. The SHPO advised LCP if it was going to pursue historic tax credits that it should meet with NPS, because the extent of demolition now being proposed would impact the possible use of historic tax credits. The City of Chicago had also advised LCP along similar lines.

Not until 19 months later in July 2014 did LCP submit to NPS materials for preliminary review describing the current plan involving substantial demolition and new construction. Following a request from LCP to meet with NPS, LCP then requested a postponement of both the meeting and preliminary review of the submitted material by the NPS.

In March 2015, the first meeting occurred between LCP and NPS regarding the concept plans which called for substantial demolition in the south campus, major new construction, substantial interior demolition and other changes to the remaining historic buildings, and significant changes to the historic landscape. While this was intended to be an informational meeting, NPS did provide comments for general guidance and specifically expressed concerns with the extent of demolition and new construction, extent of changes to the historic landscape, and the “gateway” changes along Diversey Parkway.

On May 2015, NPS met with the preservation consultant for LCP and then held a subsequent teleconference with LCP representatives and the consultant that covered eight specific items of immediate NPS concern or where additional information would be needed for review. On October 2015, NPS received the Historic Preservation Certification Application—Part 2 for review. The application package was essentially the general plan discussed back in March 2015, along with more detailed information and some improved changes to the landscape, and possible reuse with changes to two buildings on the edge of the north campus. The December 8, 2015 supplemental material showed some additional improved changes, including the elimination of the proposed parapet extensions on the historic buildings, and changes to the treatment of the proposed MEP. It was also indicated that the recreation building on the north campus will now be retained.

NPS REVIEW CONSIDERATIONS

While additional information as indicated below is needed for the NPS to issue a decision on your Part 2 Application request, we wish to reiterate what had been previously indicated to you in the spring of this year regarding some of the work described in your application specific to Phase 1 work and also provide some additional comments that should be addressed in amending your current application.

Demolition—The historic tax credits are designed to encourage the rehabilitation of historic buildings and not their demolition. In May 2015 and reaffirmed by this letter, NPS would consider demolition of certain historic buildings on the south campus as part of an overall project provided that (1) LCP can provide the necessary supporting documentation to show that building G and building L are structurally deficient and beyond reasonable condition of repair as has been represented and (2) building A and the administration building at the corner of Diversey Parkway, Damen Avenue and Clybourn Avenue are retained. With adequate supporting documentation on the condition of buildings G and L, and the retention of the two historic buildings at the corner of Diversey Parkway, the NPS would consider a revised proposal that would result in the demolition on the south campus of the two buildings that are purported to be beyond repair and eight other specifically identified historic buildings. This extent of demolition would require that all other substantive review concerns of NPS identified in this letter be resolved.

Diversey Parkway Streetscape—The Diversey Parkway streetscape is an important part of Lathrop Homes, not only because the parkway divides the north and south campuses, but because the buildings and related landscape lining the street serve as an important visual connection linking the two campuses and their historic setting and environment. It is important that this part of Lathrop Homes be preserved without the loss of any of the historic buildings lining the street nor the introduction of major new construction. Relative to your plans described in the Part 2 Application, this means that both building A and the administration building across the street be retained. These two buildings and their associative landscape are located at the “gateway” to Lathrop Homes at the prominent intersection of Diversey Parkway, Damen Avenue and Clybourn Avenue, and are important both as historic buildings, as part of the Diversey Parkway streetscape and gateway, and in retaining the historic character and appearance of the overall property. .

Proposed New Construction—Even though little information has been provided to NPS concerning proposed new construction, NPS has cautioned that the new construction should be compatible with the historic character of the National Register-listed property. Regarding new construction on the south campus, this means, for example, that the new buildings in the immediate vicinity of the historic buildings along Diversey Parkway and those near the power plant at the opposite end of the south campus should be respectful of the historic character of these particular buildings and as well as of the overall historic property. Also, the two large new buildings proposed for construction under phase one along Diversey Parkway gateway would need to be deleted from your plans.

Proposed Changes to Historic Buildings Being Rehabilitated—The historic interiors of all the historic buildings covered by Phase 1 are proposed for substantial gutting, and the proposed new interior plans provide little resemblance to the historic plans.

The exteriors of various historic buildings to be rehabilitated under Phase 1 would be changed as well. For example, the facades of buildings B, D, and F facing the prominent courtyards will be significantly altered with the proposed introduction of upper level entrance stairs and decks and changes to numerous window and door openings. These proposed exterior changes reflect the loss of the historic interior plans of the buildings. Other exterior changes are proposed for various historic buildings and require additional information for NPS review, such as the treatment of buildings P and Q.

The proposed changes to historic buildings being rehabilitated in phase 1 as described in your Part 2 Application would preclude many of the buildings from individually meeting the Standards for Rehabilitation. Since Lathrop Homes is a functionally-related complex comprising 29 historic buildings and a related historic landscape, the overall project and not each individual building must meet the Secretary of the Interior’s Standards for Rehabilitation.

Proposed Changes to the Historic Landscape—The current proposal regarding the treatment of the great lawn on the north campus and the reduction in the area devoted to parking represent commendable improvements over what had been part of the preliminary material reviewed by NPS earlier this year. The Part 2 application includes construction of hardscape courts between buildings, for which NPS has requested and received additional information. Clarification is still needed as to whether these areas

are to have flat planting beds along the perimeters or whether walls or fencing will be introduced as well. New fencing along the street elevations of buildings A, B, D, F and H is proposed on the drawings yet not described. This fencing would introduce a new feature that is not common to the open historic landscape and further information and justification is needed. If the proposed new fencing and any new walls are approved by NPS, there remains the concern over the substantial change to the historic landscape design by Jensen for the south campus, including the impact on the street grid and treatment of open space relative to the site and buildings. Until additional information regarding Phase 3 work is provided for review, the NPS is unable to consider the work relating to changes to the south campus historic landscape.

APPLICATION ON HOLD FOR ADDITIONAL INFORMATION

The review considerations discussed above identify areas where additional information is being requested as well as certain specific items of work that will need to be changed or eliminated altogether. Revisions to the work that LCP proposes to make in response to this letter as well as the requested additional information should be included in an amendment to your Part 2 Application. To expedite the review process, you may submit your amendment simultaneously to the Illinois SHPO and this office. Once the application is complete, and we have had an opportunity to review it, the NPS will make a decision regarding your certification request.

If you have any questions in the meantime, please feel free to contact Chuck Fisher or Kaaren Staveteig of the National Park Service.

Sincerely



Charles E. Fisher
Technical Preservation Services