

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DOROTHY GAUTREAUX, et al.	)	
	)	
Plaintiffs,	)	
	)	No. 66 C 1459
v.	)	
	)	Hon. Marvin E. Aspen
CHICAGO HOUSING AUTHORITY, et al.	)	
	)	
Defendants.	)	

*Bible  
Alex  
Julie  
Kara  
Hoy*

**BRIEF BY *AMICI CURIAE* LATHROP LOCAL ADVISORY COUNCIL, LATHROP  
LEADERSHIP TEAM, LOGAN SQUARE NEIGHBORHOOD ASSOCIATION, LOGAN  
SQUARE ECUMENICAL ALLIANCE, LA CASA NORTE, LATIN UNITED  
COMMUNITY HOUSING ASSOCIATION, HISPANIC HOUSING DEVELOPMENT  
CORPORATION, CENTER FOR CHANGING LIVES, METROPOLITAN TENANTS  
ORGANIZATION, CHICAGO HOUSING INITIATIVE, ONE NORTHSIDE, JANE  
ADDAMS SENIOR CAUCUS, PEOPLE FOR COMMUNITY RECOVERY, CHICAGO  
AREA FAIR HOUSING ALLIANCE, ACCESS LIVING OF METROPOLITAN  
CHICAGO, OPEN COMMUNITIES, THE KENWOOD OAKLAND COMMUNITY  
ORGANIZATION, MARY PATTILLO, ALLISON BETHEL, THE NATHALIE P.  
VOORHEES CENTER FOR NEIGHBORHOOD AND COMMUNITY  
IMPROVEMENT, PILSEN ALLIANCE, AND  
THE SARGENT SHRIVER NATIONAL CENTER ON POVERTY LAW  
IN SUPPORT OF THE PLAINTIFFS**

---

## INTRODUCTION

*Amici* submit this brief in support of that part of Plaintiffs' motion requiring the replacement of 525 General Area Dwelling units lost as part of the Julia C. Lathrop Homes redevelopment. The history of discrimination at the Julia C. Lathrop Homes, combined with the longstanding loss of housing opportunities on the north side of Chicago for families of color, underscore the need for the Court's involvement. A court order mandating the manner and form of this replacement housing will ensure that current and former Lathrop Homes residents as well as other low-income families of color in need will enjoy the benefits of living in an economically rich, integrated community.

## IDENTITY AND INTERESTS OF AMICI CURIAE

**Lathrop Local Advisory Council** ("Lathrop LAC") is the elected residents' council at the Julia C. Lathrop Homes. Lathrop LAC was formed and is organized under federal regulations promulgated by the United States Department of Housing and Urban Development ("HUD"), at 24 C.F.R. Part 964. Lathrop's LAC Board of Directors consists of public housing residents who were elected by residents of Lathrop Homes. CHA and HUD have recognized the Lathrop LAC as the duly elected resident council representing public housing residents of Lathrop Homes. Lathrop LAC, and its constituents, has an interest in preserving low-income housing in integrated neighborhoods on the north-side of Chicago.

**Lathrop Leadership Team** ("LLT") was founded in 2005. The LLT is a committee led by Lathrop residents that has grown to also include former residents, neighbors and area religious and community leaders. The LLT has long fought to preserve all 925 units of public housing at Lathrop. The LLT serves as the coordinating body of the Preserve Lathrop

Campaign. Over the years, the LLT has fought to put vacant units back into service, to eliminate market rate from the plan for redevelopment, and, most recently, to secure a commitment and plan to replace the 525 public housing units slated to be eliminated under that plan. In November 2016, the Lawyers Committee for Better Housing recognized the LLT's accomplishments with its Barbara Grau Award for outstanding housing advocacy.

**Logan Square Neighborhood Association** ("LSNA") engages families in Chicago's Logan Square, Avondale, Hermosa and Lathrop Homes' communities through 40 member institutions. With LSNA partners, LSNA develops leaders, organizes issue campaigns and operates innovative programs on housing, education, immigration and other issues. LSNA's education model for urban low-income and immigrant community-based schooling is widely respected & replicated. In 2004, LISC chose LSNA to coordinate a 10-year community development process, leveraging more than \$200 million in public & private investment, including the \$95 million 606 linear park. LSNA has successfully led coalition campaigns to secure new policies to reduce housing displacement, including the Affordable Requirements & Keep Chicago Renting Ordinances. LSNA has worked with Lathrop residents and institutions for more than 30 years. Since 2005, LSNA has staffed and guided the Preserve Lathrop Campaign through the Lathrop Leadership Team, a committee led by Lathrop residents that also includes former residents, neighbors and area religious and community leaders. Over the past year, the campaign has won two commitments that are unprecedented in the 17-year history of CHA's Plan for Transformation.

**Logan Square Ecumenical Alliance** ("LSEA") has been actively involved in supporting the residents of the Lathrop Homes to preserve public housing onsite and on the north side of the city. The Kimball Avenue Church, located at 3413 W. Medill Ave. in Chicago, is a member



congregation of the Ecumenical Alliance. LSEA has been very concerned about the dismantling of public housing throughout the city and the impact the CHA's Plan For Transformation at Lathrop Homes will have for poor working families seeking affordable housing near jobs and transportation. LSEA is very concerned that the elimination of public housing units at Lathrop will speed gentrification in the surrounding communities and return racial and economic segregation to the North Side. In conjunction with residents and allies, the LSEA has held Las Posadas at Lathrop each Advent prior to Christmas. LSEA has organized an interfaith Call to Action march on City Hall, asking the mayor and CHA to revise the Plan for Lathrop since the development sits within an "opportunity zone". LSEA has even occupied a unit at Lathrop to call attention to the thousands of people on the CHA waiting lists while units at Lathrop remain empty—some for almost 15 years. LSEA has also been supportive of the "Keeping the Promise" ordinance to hold CHA accountable to its mission.

**La Casa Norte's** ("LCN") mission is to serve youth and families confronting homelessness. LCN provides access to stable housing and deliver comprehensive services that act as a catalyst to transform lives and communities. LCN operates a range of programming structured to assist those who are homeless or at risk of homelessness. LCN's overall Continuum of Care programs focus on assisting families and unaccompanied homeless youth, helping them to move towards housing stability through the provision of culturally competent bilingual services appropriate for the youth or family's circumstances. La Casa Norte, which is headquartered in the historically Latino neighborhoods of Humboldt Park, Logan Square and Back of the Yards, is closely involved with efforts to advocate for the housing rights of community residents amid neighborhood change. La Casa Norte assists a large number of local residents who use CHA housing and vouchers, including those who were once residents of



Lathrop Homes. Additionally, La Casa Norte advocates for equity in the policies of the Chicago Housing Authority through its work with coalitions such as Logan Square Neighborhood Association's Members Action Council, Chicago Coalition for the Homeless, the Puerto Rican Agenda and the Latino Policy Forum's Housing Acuerdo.

**Latin United Community Housing Association** ("LUCHA") was founded in 1982 by residents of Humboldt Park, West Town and Logan Square to combat displacement and preserve affordable housing in the communities it serves. Since its founding, LUCHA has helped more than 88,000 low-to-moderate income families rent quality, affordable housing, obtain rental assistance, purchase good homes, improve dilapidated buildings, make homes more accessible or energy efficient, and beautify their neighborhoods. LUCHA has also provided foreclosure prevention and legal assistance to thousands of individuals throughout the Midwest in recent years.

A HUD-certified agency, LUCHA's mission is to advance housing as a human right by empowering communities- particularly the Latino and Spanish-speaking populations - through advocacy, education, affordable housing development and comprehensive housing services. In advancing our mission, LUCHA has worked with past and present tenants of the Lathrop Homes in securing quality, affordable homes and protecting their individual rights as tenants. Moreover, as members of collaborative groups like the Puerto Rican Agenda, the Latino Policy Forum's Housing Acuerdo and the Chicago Area Fair Housing Alliance, LUCHA has advocated with its partners for greater equity in the distribution of housing resources from the CHA and other governmental agencies.

**Hispanic Housing Development Corporation** ("Hispanic Housing") was established 40 years ago to develop affordable housing within Latino communities of Chicago. To-date, the

organization has developed 54 projects containing 4,200 apartments and is housing over 12,000 residents. Hispanic Housing also managed CHA scattered-site (Gautreaux) units and free-standing senior projects for over 25 years. Hispanic Housing currently manages Lathrop Elderly Housing.

**Center for Changing Lives** (“CCL”) builds a community where everyone thrives. The twenty-seven year old organization partners with those held back by lack of resource and economic opportunity in order to uncover possibilities, overcome barriers, and realize potential. CCL works on the northwest side of Chicago to increase access to economic opportunity by building household’s financial capacity. CCL focuses on providing services to households experiencing financial hardships or homelessness in three economic domains: resource, income, and credit and assets. Partnership with clients takes the following forms: coaching on financial, employment and resource mobilization goals that enhance lives; training and educating on coaching and financial and workforce topics, and coalition building, advocating and organizing for policy and practices that open up opportunities and resources. CCL’s work connects people, resources and opportunities to build households’ economic capacity to achieve their goals.

CCL has long been involved in Lathrop Homes, both as an advocate for the preservation and replacement of public housing on and around the site and as a service provider who partnered with the Mary Crane Center and Logan Square Neighborhood Association to support residents. CCL has also been involved in the broader issues of the Chicago Housing Authority's commitment to serving Latinos, as a proportionally underrepresented group within their resident population, through the Latino Policy Forum.

**Metropolitan Tenants Organization** (“MTO”) is the largest organizer of tenants and tenants associations in Chicago and advocates to preserve, improve, and expand low-income

rental housing, prevent displacement, and advance racial and economic equity. MTO has organized and advocated in solidarity with the residents at Lathrop Homes for the preservation of public housing on-site at the current Lathrop footprint, and, as needed, the off-site replacement of as many as 525 family public housing units currently on the Lathrop footprint that CHA plans to demolish/convert, within the immediately surrounding north side communities, which are areas of opportunity that low-income families and families of color must have expanded (rather than diminished) access to. Since 2014, MTO has been organizing with the Chicago Housing Initiative Coalition for a citywide policy in the Chicago City Council to mandate preservation of all standing public housing units on a one-for-one basis in future redevelopments.

**Chicago Housing Initiative** (“CHI”) is a citywide coalition comprised of 10 community-based organizations whose mission is to preserve, improve, and expand low-income rental housing, prevent displacement, and advance racial and economic equity and inclusion. Since CHI’s inception in 2007, Chicago Housing Initiative has organized and advocated in solidarity with the residents at Lathrop Homes for the preservation of public housing on-site at the current Lathrop footprint, and, as needed, the off-site replacement of as many as 525 family public housing units currently on the Lathrop footprint that CHA plans to demolish/convert, within the immediately surrounding north side communities.

**ONE Northside** is a community-based organization serving the Uptown, Rogers Park, Edgewater, Lincoln Park, Lake View, North Center, and Lincoln Square community that organizes and advocates to preserve, improve, and expand low-income rental housing, prevent displacement, and advance racial and economic equity. ONE Northside has organized and advocated in solidarity with the residents at Lathrop Homes for the preservation of public housing on-site at the current Lathrop footprint, and, as needed, the off-site replacement of as



many as 525 family public housing units currently on the Lathrop footprint that CHA plans to demolish/convert, within the immediately surrounding north side communities, which are areas of opportunity that low-income families and families of color must have expanded (rather than diminished) access to. Since 2014, ONE Northside has been organizing with the Chicago Housing Initiative Coalition for a citywide policy in the Chicago City Council to mandate preservation of all standing public housing units on a one-for-one basis in future redevelopments.

**Jane Addams Senior Caucus** (“JASC”) has organized and advocated in solidarity with the residents at Lathrop Homes for the preservation of public housing on-site at the current Lathrop footprint, and, as needed, the off-site replacement of as many as 525 family public housing units currently on the Lathrop footprint that CHA plans to demolish/convert, within the immediately surrounding north side communities, which are areas of opportunity that low-income families and families of color must have expanded (rather than diminished) access to. Since 2014, JASC has been organizing with the Chicago Housing Initiative Coalition for a citywide policy in the Chicago City Council to mandate preservation of all standing public housing units on a one-for-one basis in future redevelopments.

**People for Community Recovery** (“PCR”) is a community-based organization serving the (Altgeld Gardens) community that organizes and advocates to preserve, improve, and expand low-income rental housing, prevent displacement, and advance racial and economic equity. PCR has organized and advocated in solidarity with the residents at Lathrop Homes for the preservation of public housing on-site at the current Lathrop footprint, and, as needed, the off-site replacement of as many as 525 family public housing units currently on the Lathrop footprint that CHA plans to demolish/convert, within the immediately surrounding north side communities, which are areas of opportunity that low-income families and families of color must

have expanded (rather than diminished) access to. Since 2014, PCR has been organizing with the Chicago Housing Initiative Coalition for a citywide policy in the Chicago City Council to mandate preservation of all standing public housing units on a one-for-one basis in future redevelopments.

**Chicago Area Fair Housing Alliance** (“CAFHA”) is a non-profit consortium of fair housing and advocacy organizations, government agencies, and municipalities committed to the value of fair housing, diversity, and integration. CAFHA works throughout the Chicago region to combat housing discrimination and promote integrated communities of opportunity through education, advocacy, and collaborative action. CAFHA provide fair housing education, training, and technical assistance and convenes coalitions around fair housing policy and advocacy initiatives. As a fair housing organization, CAFHA’s interest in this issue is centered on the stabilization of affordable housing in the opportunity-rich area of North/ Northwest Chicago. Moreover, CAFHA promotes best practices regarding the obligation to affirmatively further fair housing and resources to address our region’s particularly troublesome levels of racial segregation, including those historic and current policies and practice of the CHA that ultimately serve to perpetuate segregation.

**Access Living of Metropolitan Chicago** (“Access Living”) is one of the nation’s largest, most experienced, and most prominent disability rights organizations that is governed and staffed by people with disabilities. As a Center for Independent Living (CIL) established under the federal Rehabilitation Act, Access Living’s statutorily-mandated mission includes advocacy to ensure the independence, integration, and full citizenship of people with disabilities. *See* 29 U.S.C. § 796f. Because housing is so critical to this mission, Access Living has historically

worked to promote affordable, accessible, and integrated housing for people with disabilities, and to reverse the long history of segregation perpetuated against the disability community.

In furtherance of its housing work, Access Living: (a) collaborates with private and public partners on the local, state, and national level to recommend policy changes to increase affordable, accessible, and integrated housing; (b) educates housing providers, consumers, advocates, and the general public about the fair housing rights of people with disabilities; (c) organizes people with disabilities into a collective voice to demand government agencies and public officials honor their fair housing obligations and address housing barriers, and (d) provides legal advice, counseling, and representation to people with disabilities who confront discrimination in the rental or sale of housing.

Access Living's interest in the replacement of the hundreds of lost units at Lathrop Homes is manifest. The lack of affordable housing in Chicago and across the country is well-documented, and is particularly problematic for the disability community, which is largely poor and unemployed. The failure to replace the units at Lathrop means fewer housing opportunities for people with disabilities, which can and often does lead to homelessness and/or institutionalization for the disability community.

**Open Communities'** ("OC") mission is to educate, advocate and organize to promote just and inclusive communities in north suburban Chicago. OC is a leading voice for housing, economic and social justice, working to promote inclusive communities that are welcoming to all. OC works with current and prospective residents and local groups to promote economically and culturally diverse communities. OC provides fair and affordable housing counseling services, community education, advocacy, and organizing for welcoming communities. As a



local Fair Housing and housing justice agency, Open Communities is concerned about Lathrop as our service area surrounds that area and is impacted by it as well. We advocate for inclusive and integrated communities, affordable housing and housing free of discrimination of all kinds.

**Kenwood Oakland Community Organization** (“KOCO”) is a community-based organization serving the North Kenwood-Oakland community that organizes and advocates to preserve, improve, and expand low-income rental housing, prevent displacement, and advance racial and economic equity. KOCO has organized and advocated in solidarity with the residents at Lathrop Homes for the preservation of public housing on-site at the current Lathrop footprint, and, as needed, the off-site replacement of as many as 525 family public housing units currently on the Lathrop footprint that CHA plans to demolish/convert, within the immediately surrounding north side communities, which are areas of opportunity that low-income families and families of color must have expanded (rather than diminished) access to. Since 2014, KOCO has been organizing with the Chicago Housing Initiative Coalition for a citywide policy in the Chicago City Council to mandate preservation of all standing public housing units on a one-for-one basis in future redevelopments.

**Mary Pattillo** is a professor of sociology and African American studies at Northwestern who has studied public housing in Chicago for nearly 20 years. Given the severe dearth of affordable housing in Chicago and especially on the North Side, Ms. Pattillo has advocated with the residents for the preservation of Lathrop Homes for the past 10 years. While Ms. Patillo thinks the best strategy is the full protection and rehabilitation of the Lathrop Homes on site, if needed, she supports the off-site replacement of as many as 525 family public housing units currently on the Lathrop footprint that CHA plans to demolish/convert. That replacement should be within the immediately-surrounding north side communities, which are areas of opportunity

that low-income families and families of color must have expanded (rather than diminished) access to.

**Allison K. Bethel** is the Director of the John Marshall Law School Fair Housing Legal Clinic and has focused her practice on civil rights with an emphasis in fair housing for the past twenty years. Since 1992, the Clinic has litigated precedent setting fair housing cases throughout the Chicago metropolitan area and trained scores of future lawyers in fair housing principles and practice. The Clinic's advocacy has also included conducting various studies, legislative initiatives and outreach programs designed to further the integration mandate of the fair housing laws. For many years, the Clinic has been funded in part by a FHIP grant from HUD. Ms. Bethel is interested in this issue because of its importance to improving housing and life opportunities for at risk communities in Chicago.

**The Nathalie P. Voorhees Center for Neighborhood and Community Improvement** (Voorhees Center) is a 39 year old community-focused research center at the University of Illinois at Chicago. Its mission is to improve the quality of life for all residents of the City of Chicago and the metropolitan area through research and technical assistance to organizations and local government agencies in their efforts to improve neighborhoods and communities.

The Voorhees Center has worked in the past with and continue to support the residents at Lathrop Homes for the preservation of public housing on-site at the current Lathrop footprint, and, as needed, the off-site replacement of as many as 525 family public housing units within the immediately surrounding north side communities, which are areas of opportunity that low-income families and families of color must have expanded (rather than diminished) access.

**Pilsen Alliance** is a community-based organization serving the Pilsen community that organizes and advocates to preserve, improve, and expand low-income rental housing, prevent displacement, and advance racial and economic equity, among other key issues in our community. Pilsen Alliance has organized and advocated in solidarity with the residents at Lathrop Homes for the preservation of public housing on-site at the current Lathrop footprint, and, as needed, the off-site replacement of as many as 525 family public housing units currently on the Lathrop footprint that CHA plans to demolish/convert, within the immediately surrounding north side communities, which are areas of opportunity that low-income families and families of color must have expanded (rather than diminished) access to. Since 2016, Pilsen Alliance has been organizing with the Chicago Housing Initiative Coalition for a citywide policy in the Chicago City Council to mandate preservation of all standing public housing units on a one-for-one basis in future redevelopments.

**Sargent Shriver National Center on Poverty Law** (“Shriver Center”) is a national non-profit legal and policy advocacy organization based in Chicago. The Shriver Center’s housing unit primarily focuses its work on public and subsidized housing, fair housing, and the housing rights of survivors of violence. The Shriver Center actively works, through litigation and policy advocacy, to promote racial and economic integration through the preservation and siting of affordable housing in communities of opportunity. As counsel to public housing residents throughout Chicago, the Shriver Center has observed how the CHA’s commitments to the replacement of public housing units in Chicago, particularly with respect to family housing in communities of opportunity, is continually falling short and subject to undue delay.



## ARGUMENT

### **I. IT IS CRITICAL THAT CHA BE BOUND BY A COURT ORDER OBLIGATING IT TO REPLACE 525 UNITS OF FAMILY AFFORDABLE HOUSING ON CHICAGO'S OPPORTUNITY RICH NORTH SIDE.**

*Amici* submit to the Court a Racial Impact Statement (“RIS”) concerning the Julia M. Lathrop Homes. *See* RIS, Exh. A. The RIS sets forth how the failure to replace 525 Julia M. Lathrop Homes family public housing units in low-poverty, high opportunity neighborhoods of Chicago’s north side creates an adverse disparate impact, perpetuates segregation, and violates the CHA’s duty to affirmatively further fair housing in violation of civil rights laws, including the Fair Housing Act of 1968, as amended, 42 U.S.C. § 3601 *et seq.*, 42 U.S.C. § 3608, Title VI of the Civil Rights Act of 1964, 42 U.S.C.A. § 2000d *et seq.*, As further detailed in the RIS, CHA long history of discrimination and neglect with respect to the Lathrop Homes and the housing needs of thousands of low-income families on its public housing waitlist and in Chicago generally compels an outcome here on the side of civil rights. For these reasons, *Amici* urge the Court to grant that part of Plaintiffs’ motion requiring the replacement of 525 General Area Dwelling Units that are not otherwise to be replaced as part of the Lathrop redevelopment and for those units to be designated as long-term family units.

Notably, CHA has been intentionally vague in its language concerning its commitment to replace the 525 housing units lost at Lathrop. As CHA acknowledges in its brief, its Chief Executive Officer has stated that he intends to provide 525 “new housing opportunities” on the north side of Chicago, to compensate for the loss of units at Lathrop. Def.’s Br. at 3. Left out of this written “commitment” to local alderman however is any description of what “housing opportunities” mean, both in terms of whether it would be senior-designated or family housing or whether it would be hard units or Housing Choice Vouchers. The details matter here however

and have the potential to create serious civil rights implications if left undefined. Indeed, Lathrop's history, the history of CHA's Housing Choice Voucher program resulting in largely segregative housing patterns, and the failure of the CHA to meet the housing needs of families on CHA's public housing waitlist and in the community, compel a court order entered in the manner proposed by the Plaintiffs.

**A. The History of the Lathrop Homes Mandates That A Court Order Concerning the 525 Units of Replacement Family Housing Be Required.**

CHA's historic and ongoing policies and practices with respect to the Lathrop Homes provide context for why the Court should grant Plaintiffs' motion. Lathrop's history begins with a sad chapter of intentional segregation and steering, where Lathrop stood out among public housing projects in Chicago as an all white enclave of public housing residents until the *Gautreaux* decisions put a stop to it. *Id.* at 5-7. As the development became more integrated, the area surrounding the Lathrop Homes became increasingly white, affluent, and opportunity rich. *Id.* at 8. The area surrounding Lathrop now is a thriving job center for Chicago, providing employment to nearly 10,000 workers across a diverse range of sectors, including many that provide employment in industries likely to employ Lathrop residents. *Id.* at 11. As well, the schools that serve Lathrop and the surrounding area are some of the best funded in the Chicago Public School system, thereby providing the children in that community a rare opportunity among other public housing households in Chicago. *Id.* at 12.

However, at the same time opportunity was coming to the Lathrop community, CHA began a policy and practice of intentional depopulating Lathrop Homes. *Id.* at 8. Since 2000, CHA stopped leasing at Lathrop Homes, more than a decade before any redevelopment plan was even in place. *Id.* at 13. This depopulation policy resulted in a significant loss of educational and employment opportunities for displaced predominately minority families and a loss of

prospective opportunity for the predominately minority households on CHA's public housing waitlist and other low-income families in need. *Id.* at 14. The CHA's historical actions and omissions here mandate that a court order governs its actions moving forward so as to remedy the past harms. Such a court order is consistent with the general admonition in the *Gautreaux* order that CHA must "affirmatively administer its public housing system in every respect" and CHA's obligations under civil rights laws, including CHA's duty to affirmatively further fair housing, which mandate meaningful steps intended to overcome impediments to fair housing choice. Pl.'s Br. at 5. *See also NAACP v. Secretary of Housing and Urban Development*, 817 F.2d 149, 154 (1st Cir. 1987)(§3608 "requires something more ... than simply to refrain from discriminating itself or purposely aiding the discrimination of others..., [rather, it] reflects the desire to have [HUD] grant programs ... assist in ending discrimination and segregation, to the point where the supply of genuinely open housing increases...").

**B. CHA Voucher Program Has A Long History Of Failing To Provide An Integrative Housing Opportunity for the Majority of Voucher Households And Cannot Be The Vehicle For Replacement of Any of the 525 Units.**

The harm caused by the failure of the CHA to replace the 525 units as hard units of family housing is further amplified by the experience of the majority of CHA's Housing Choice Voucher program participants, many of whom are former public housing residents. In a review of CHA's Housing Choice Voucher data for 2015, only 11 HCV households were found to live in the area surrounding Lathrop. *Id.* at 15. Indeed, the vast majority of CHA's nearly 44,000 voucher holders – who are overwhelmingly African-American – live in racially concentrated, high-poverty neighborhoods on the South and West Sides of Chicago. *Id.* This pattern of CHA voucher holders living in racially concentrated, high poverty communities in Chicago has remained constant for more than a decade. *See, e.g., Wallace v. Chi. Hous. Auth.*, 224 F.R.D.



420, 422-23, U.S. Dist. LEXIS 27160 (Oct. 7, 2004)(proposed certification of a class of current and former CHA residents who alleged CHA had a policy and practice of relocating residents with Housing Choice Vouchers into neighborhoods of high poverty and racial concentration, granted in part). HOUSING ACTION ILLINOIS, NATHALIE P. VOORHEES CENTER FOR NEIGHBORHOOD AND COMMUNITY IMPROVEMENT, UNIVERSITY OF ILLINOIS AT CHICAGO, AND THE SARGENT SHRIVER NATIONAL CENTER ON POVERTY LAW, MOVING OR MOVING UP? UNDERSTANDING RESIDENTIAL MOBILITY FOR HOUSING CHOICE VOUCHER FAMILIES IN ILLINOIS (2011), *available*

at [http://www.housingactionil.org/downloads/IHARP\\_State\\_report\\_JS\\_Final\\_4-6-11.pdf](http://www.housingactionil.org/downloads/IHARP_State_report_JS_Final_4-6-11.pdf). Thus, only the replacement of lost family affordable housing units as hard units on the opportunity-rich north side of Chicago will provide a meaningful opportunity to advance opportunity and integration for low-income families of color.

**II. GIVEN THE DEMONSTRATED NEED FOR NON-SENIOR DESIGNATED HOUSING, CHA SHOULD BE REQUIRED TO DESIGNATE THE 525 UNITS AS DWELLING UNITS PURSUANT TO THE GAUTREAUX JUDGMENT ORDER**

CHA argues that any replacement units should be allowed to be designated as senior units, in part because of those households still living at Lathrop, more than 28% are seniors. Def.'s Br. at 3. This argument however conveniently sidesteps CHA's own actions with respect to removing families from Lathrop and denying new families housing there. *Id.* at 13. It also ignores data on the existing housing needs of low-income non-seniors and families. *Id.* at 17. For both CHA's Housing Choice Voucher and Public Housing Program waitlists, demand for assisted housing that is not age restricted is substantial. As well, families with children and persons with disabilities in Chicago experience poverty at significantly higher rates than households 65 and older in Chicago. In 2014, more than 282,000 households applied for a place

on the CHA's Housing Choice Voucher and Public Housing waitlists. At the end of 2015, there were 39,596 applicants on the Federal MTW Public Housing Units Community-Wide (Family Housing) waitlist, compared to 14,532 on the Federal MTW Public Housing Units Site-Based (Senior) waitlist. While the CHA has not yet released information for 2016, data from September 2016 indicates that the number of needy households has grown substantially, with approximately 96,000 households now on CHA's waitlist for non-age restricted housing. Zach Mortice, *When Public Housing Goes Private*, September 28, 2016, available at <http://chicago.curbed.com/2016/9/28/13063710/chicago-public-housing-cha>

Indeed, these findings are consistent with citywide estimates of need and eligibility for affordable housing among families with children and persons with disabilities. More than 27% of families with children in Chicago and more than 22% of persons with disabilities have incomes below the federal poverty line, compared with 17.1% of people age 65 and over. U.S. CENSUS BUREAU, 2010-2014 American Community Survey 5-Year Estimates Table DP03 (2010-2014) available at [http://factfinder.census.gov/bkmk/table/1.0/en/ACS/14\\_5YR/DP03/1600000US1714000](http://factfinder.census.gov/bkmk/table/1.0/en/ACS/14_5YR/DP03/1600000US1714000); ADA Chicago 25, *Disability Statistics* (2015) available at <http://www.ada25chicago.org/wp-content/uploads/2015/07/Disability-Statistics.docx>.

Currently, in Cook County, there are 170,000 households in need of affordable housing than there are units of affordable housing. Institute for Housing Studies at DePaul University, *2016 State of Rental Housing in Cook County*, May 11, 2016, available at <https://www.housingstudies.org/research-publications/state-of-housing/2016-state-rental-housing-cook-county/#section-7>. Thus, the failure to replace this housing as non-age restricted housing runs counter to demonstrated need.

It is also important to note that CHA has a commitment under its Moving To Work Agreement with HUD to replace the same number of bedroom sizes as were present at the start of the Plan For Transformation, irrespective of the composition of the households remaining at Lathrop or elsewhere. *See* CHA's Amended and Restated Moving to Work Agreement at par. II(D)(iii)(The Agency shall: ... (iii) maintain a comparable mix of families by family size, as would have been served or assisted had the amounts not been used under the demonstration.""). This is a critical obligation for CHA to meet for low-income families, particularly families of color, where affordable housing on the opportunity-rich northside remains in short supply. This MTWA provision serves as an important obligation of CHA, particularly when it is likely easier to replace units as senior-designated than as housing available to all households, including families and persons with disabilities. Thus, even in the absence of the "one for one" replacement requirement under the United States Housing Act, CHA's abidance of civil rights laws and its MTW Agreement remain intact and obligate the CHA to replace these units as "dwelling units" pursuant to the *Gautreaux* order. Pl.'s Br. at 8.

Finally, any commitment to replace this lost housing at Lathrop is rendered meaningless if the units secured do not provide a long term source of replacement housing. These long term commitments provide a stable source of housing supply and more importantly, long term integrative opportunities for all.

### CONCLUSION

*Amici* join their voices with the Plaintiffs to ask this Court to use its powers to require the replacement of 525 General Area Dwelling Units that are not otherwise to be replaced as part of the Lathrop redevelopment and for those units to be designated as long-term dwelling units as defined by the Judgment Order.



Dated: December 5, 2016

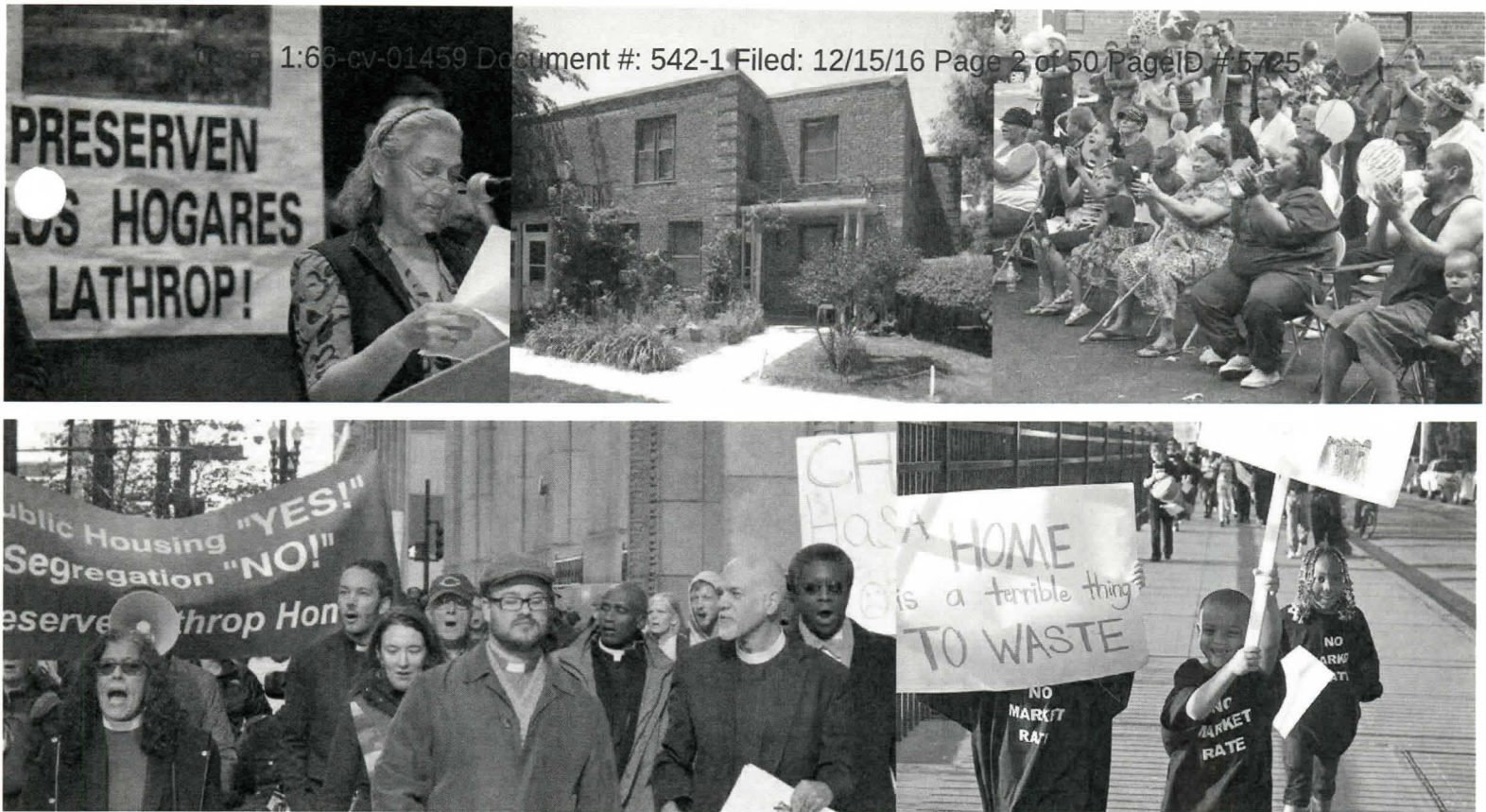
Respectfully submitted,

By: /s/Katherine E. Walz

Katherine E. Walz  
Emily J. Coffey  
SARGENT SHRIVER NATIONAL  
CENTER ON POVERTY LAW  
50 E. Washington, Suite 500  
Chicago, IL 60602  
E: [katewalz@povertylaw.org](mailto:katewalz@povertylaw.org)  
T: 312-368-2679  
F: 312-368-2679

*Attorneys for Amici Curiae*

# **EXHIBIT A**



## A RACIAL IMPACT STATEMENT ON THE REDEVELOPMENT OF LATHROP HOMES<sup>1</sup>

The Julia C. Lathrop Homes, a low-rise development of walk-up apartment buildings and two-story row houses, is the only major family public housing development remaining on Chicago's North Side. It is located in one of the highest opportunity areas in the city. Lathrop is immediately adjacent to an area that has seen booming residential and commercial development in recent years and is as well a job rich area for low-income residents. Lathrop is one of the only racially integrated family public housing developments in the City of Chicago. At least 753 of the 925 units of public housing at Lathrop are vacant and unavailable to families in need, and many of those units have been kept vacant for more than ten years. The CHA's plans to redevelop Lathrop – which calls for the elimination of 525 of family public housing units at Lathrop to be replaced elsewhere in the City of Chicago – entirely ignore the serious civil rights implications of that decision.

---

<sup>1</sup> Prepared by the Sargent Shriver National Center on Poverty Law on behalf of the *Amici Curiae*.



## Executive Summary

1. A historical perspective is important here, as the original siting and leasing policies of Lathrop were motivated by race discrimination, by creating an enclave of all white public housing on the City's historically white north side.
2. In 1969, the *Gautreaux* court determined that the CHA had unlawfully imposed racial quotas at four predominately white sites, including the Lathrop Homes. Despite the court's order, continued resistance from white neighborhoods and elected officials – and foot-dragging by the CHA – meant that the creation of new housing units ground to a halt between 1969 and 1979 (particularly on the North Side).
3. Both Lathrop and the surrounding area grew increasingly racially and ethnically diverse during the 1970s and 1980s.
4. Since the 1980s, the area surrounding the Lathrop Homes has become increasingly white and affluent.
5. The area surrounding Lathrop is job rich and provides employment to nearly 10,000 workers across a diverse range of sectors, including many that provide employment in industries likely to employ Lathrop residents. There has also been a significant growth in the number of big box retail stores within walking distance of Lathrop.
6. The schools that serve Lathrop and the surrounding area are some of the best funded in the Chicago Public School system, thereby providing the children who reside at Lathrop a rare opportunity among other public housing households in Chicago.
7. As a result of the Chicago Housing Authority's intentional depopulation of Lathrop Homes since 2000, there has been a significant loss of educational and employment opportunities

for displaced predominately minority families and a loss of prospective opportunity for the predominately minority households on CHA's public housing waitlist.

8. CHA's failure to maintain and lease units at Lathrop Homes is part of CHA's pattern and practice of substantially reducing its available supply of family public housing. CHA's actions adversely impact the low-income African-American and Latino families who need this housing and contravene its duty to affirmatively further fair housing.
9. CHA's Housing Choice Voucher data for 2015 indicates that only 11 HCV households live in the area surrounding Lathrop. Indeed, the vast majority of CHA's nearly 44,000 voucher holders – who are overwhelmingly African-American – live in racially concentrated, high-poverty neighborhoods on the South and West Sides of Chicago.
10. CHA's delivery of replacement housing must ensure it is available for all and created as a long-term source of affordable housing.
11. CHA's plans for Lathrop must ensure that all public housing is replaced in racially integrated, low- poverty areas of the North Side. It also is critical that a significant portion of that housing be replaced in the immediate neighborhood surrounding Lathrop, so as to preserve its rich, integrative community.

**The siting and leasing of early CHA housing developments was racially motivated, ensuring that families of color were excluded from high opportunity areas in Chicago, including the Lathrop Homes.**

The siting and leasing policies of Lathrop and other early CHA developments were motivated by race. CHA's first housing developments were initially leased nearly exclusively to

white households. While 2.5% of the units at the Jane Addams Houses were initially leased to black families, those families lived in a segregated wing, separate from white households.<sup>2</sup>

In 1939, only 35 of the 2,414 households assisted by the Chicago Housing Authority were African-American, despite the fact that African-American households in Chicago overwhelmingly faced poor housing conditions.<sup>3</sup> Nevertheless, the agency insisted that there was “no color line” at Lathrop or at the Trumbull Park Homes (the third of the earliest CHA developments) but that “it just happens that there have been no applications” from African-American households.<sup>4</sup>



**Figure 1** White family moving in to Lathrop, 1938 via Chicago Patterns (chicagopatterns.com)



**Figure 2** All-white Lathrop Women's Club, 1940, via the University of Illinois at Chicago Archives

However, later in 1939, Elizabeth Wood, then head of the Chicago Housing Authority acknowledged the intentional racial segregation of the CHA projects. Wood explained that “tenants were selected in accordance with the racial makeup of the neighborhood in which each project is located,” and stated that “no colored families were living on the sites of Julia Lathrop

<sup>2</sup> *Negroes Charge Jim Crowism in Federal Housing*, CHICAGO DAILY TRIBUNE, June 28, 1939, at 4.

<sup>3</sup> *Only 35 Negro Families in 3 Home Projects*, CHICAGO DAILY TRIBUNE, June 25, 1939, at B10.

<sup>4</sup> *Negroes Charge Jim Crowism in Federal Housing*, CHICAGO DAILY TRIBUNE, June 28, 1939, at 4.



and Trumbull Park Homes before they were constructed. Therefore, none are housed in these projects.”<sup>5</sup>

Such tenant selection and siting policies ensured that Lathrop Homes would serve as housing for white households living on Chicago’s North Side. The Lathrop site straddles the Chicago’s Lincoln Park and North Center community areas. The immediate area was home to several major industrial companies from the 1890s through the 1980s.<sup>6</sup> Lathrop was built on the site of a former International Harvester storage and mill facility to replace local housing “deteriorated by the coming of industry.”<sup>7</sup> When the site was chosen by the federal government in the 1930’s, it was physically separated from most of its white neighbors by industrial land uses and the Chicago River.

The Public Works Administration acquired the site in 1935, and Lathrop’s construction was completed in 1938. As the “largest and most architecturally elaborate of the initial public housing projects constructed by the Housing Division of the PWA,” the development’s physical buildings and landscape are of historical significance.<sup>8</sup>

**In 1953, facing pressure from the NAACP, the CHA admitted that it actively segregated housing developments by race, and deliberately refused to place African-American households in Lathrop and other all white developments**

In 1952, the CHA announced a policy of non-discrimination in placing families in publicly funded developments. However, in 1953, facing pressure from the NAACP, the CHA admitted that it actively segregated housing developments by race, and deliberately refused to

---

<sup>5</sup> *Only 35 Negro Families in 3 Home Projects*, CHICAGO DAILY TRIBUNE, June 25, 1939, at B10.

<sup>6</sup> *PWA Takes Over North Side Site for 565 Homes*, CHICAGO DAILY TRIBUNE, August 14, 1935, at 5.

<sup>7</sup> Gladys Priddys, *North Center A “Workaday” World in City*, CHICAGO DAILY TRIBUNE, March 7, 1954, at N5.

<sup>8</sup> Logan Square Neighborhood Association, *U.S. Department of the Interior National Register of Historic Places Registration Form for Lathrop Homes*, (2010) available at

[http://www.lsna.net/uploads/lsna/documents/4\\_lathrop\\_homes\\_national\\_register\\_nomination\\_2010.pdf](http://www.lsna.net/uploads/lsna/documents/4_lathrop_homes_national_register_nomination_2010.pdf).

place African- American households in Lathrop and other all white developments.<sup>9</sup> African- American applicants on the waitlist were routinely and deliberately passed over in favor of white households.

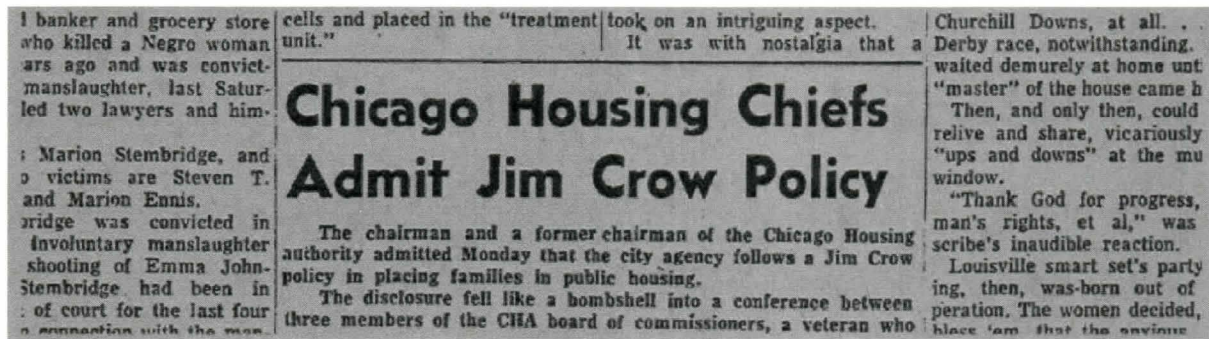


Figure 3 “Chicago Housing Chiefs Admit Jim Crow Policy” May 9, 1953, via the Chicago Defender

The former chairman of the CHA, Wayne McMillen, said he believed that the CHA had pledged to keep developments like Lathrop and Trumbull Park “all white” and added that “the worst thing that could happen to the public housing program is for it to become all Negro.”<sup>10</sup> Despite the fact that approximately 60% of households assisted by CHA in 1953 were African- American, Lathrop was almost exclusively white, with a small number of Latino families.<sup>11</sup>

In 1954, the CHA formed a “biracial committee” to “advise, observe, and participate in the policy of the Chicago Housing Authority of nondiscrimination in tenant selection.”<sup>12</sup> Yet, despite the CHA’s non-discrimination policy, McMillen’s admission, the CHA’s nondiscrimination committee, and state law forbidding such discriminatory steering, Lathrop “endured only token integration” between 1954 and 1965.<sup>13</sup> By 1965, only 32 of Lathrop’s 925 households – or 3.5% – were African-American.

<sup>9</sup> *Chicago Housing Chiefs Admit Jim Crow Policy*, CHICAGO DAILY DEFENDER, May 9, 1953, at 1.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> *Create Group to Aid CHA on Tenant Policy*, CHICAGO DAILY TRIBUNE, January 12, 1954, at A7.

<sup>13</sup> ARNOLD R. HIRSCH, *MAKING THE SECOND GHETTO: RACE AND HOUSING IN CHICAGO, 1940-1960* 239 (Cambridge University Press 1985) (1984).

In 1966, *Gautreaux et al. v. Chicago Housing Authority* was filed, charging the CHA with perpetuating and deliberately promoting segregation by siting public housing only in African-American neighborhoods. Aldermen and residents of Chicago's all white neighborhoods had aggressively opposed the development of public housing in their communities. By contrast, the agency had maintained Lathrop as an overwhelmingly white development. Prior to the court ruling in favor of the plaintiffs in 1969, the CHA's practice was to clear prospective public housing sites with the City Council. From 1950 to 1967, 32 of the 33 public housing sites proposed by the CHA were located in high poverty, predominantly African-American neighborhoods.

**The Gautreaux court determined that the CHA had unlawfully imposed racial quotas at four predominately white sites, including Lathrop.**

In 1969, the court ordered the CHA to cease the practice of clearing sites with City Council; to build 700 units of family public housing in predominantly white neighborhoods; and, going forward, to build at least 75% of public housing developments in predominantly white neighborhoods.<sup>14</sup> The ruling also placed limits on the size and height of future public housing developments. The Gautreaux court also determined that the CHA had unlawfully imposed racial quotas at four predominately white sites, including the Lathrop Homes.<sup>15</sup> However, in spite of the court's order, continued resistance from white neighborhoods and elected officials – and foot-dragging by the CHA – meant that the creation of new housing units ground to a halt between 1969 and 1979.

---

<sup>14</sup> *Gautreaux et al. v. Chicago Housing Authority*

<sup>15</sup> Donald Mosby, *Stop Segregation, U.S. Court Tells CHA: Judge Gives 30-Day Deadline*, CHICAGO DAILY DEFENDER, Feb 11, 1969, pg. 3.



Beginning in the 1970s, industrial uses around Lathrop declined, leading to a significant drop in jobs available to residents. Both at Lathrop and in the broader community, unemployment grew substantially during this period, leading to a rise in crime. The area's challenges during this period protected it from the rapid gentrification occurring nearby in eastern and central Lincoln Park and Lakeview. Due in part to these dynamics and the Gautreaux ruling, both Lathrop and the surrounding area grew increasingly racially and ethnically diverse during the 1970s and 1980s.<sup>16</sup>

**However, the CHA's more recent plans to eliminate a substantial portion of the public housing units at Lathrop came as the surrounding area became more affluent and white.**

Since the 1980s, the area surrounding the Lathrop Homes has become increasingly white and affluent.<sup>17</sup> Several industrial sites have been replaced with gated communities of townhouses, and many older houses have been torn down and replaced with luxury homes. Since 1980, the area's white population increased by 48.2%, while the African-American population fell by 8.3% and the Hispanic or Latino population plummeted by nearly 60%.<sup>18</sup>

---

<sup>16</sup> From 1938 to 1954, no African-American households lived at Lathrop. After a decade of token attempts at integration, by 1965 3.5% of Lathrop households were African-American. Twelve years later, in 1977, 17.0% of Lathrop households were African-American and 27.6% were Hispanic or Latino households. HUD does not provide development level data for the years between 1977 and the early 1990s. However, by 1996 African-American households made up 56% of Lathrop's population. In 1998, on the eve of the Plan for Transformation, 65% of Lathrop households were African-American and 22% were Hispanic or Latino. CHA has not reported statistics on Lathrop's occupants since 2014, but at that time 56% of remaining households were African-American and 37% were Hispanic or Latino. U.S. DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT, *Picture of Subsidized Households – Project: Lathrop Homes* (1977, 1996, 1998, 2014), available at [www.huduser.gov/portal/datasets/picture/yearlydata.html](http://www.huduser.gov/portal/datasets/picture/yearlydata.html).

<sup>17</sup> "Area surrounding Lathrop" or "the neighborhood around Lathrop" analyzes data from Census Tracts 513, 626, 627, and 706 – which are census tracts that are immediately adjacent to the census tracts encompassing the Lathrop Homes. References to "Lathrop Homes" analyze data from Census Tracts 514 and 707. See Appendix A for maps of each set of tracts.

<sup>18</sup> U.S. CENSUS BUREAU, Decennial Census, 1980, SF: 1 (generated by the Sargent Shriver National Center on Poverty Law, using American FactFinder; <http://factfinder2.census.gov>; and the Brown University US2010 Project; <https://s4.ad.brown.edu/Projects/Diversity/Researcher/LTBDDload/DataList.aspx>) (Dec. 5, 2016). U. S. S. CENSUS

Historically, a majority of the area's African-American and Latino families lived in or near Lathrop. Prior to 2010, individuals living in or near the Lathrop Homes, accounted for more than 80% of the area's African-American population.<sup>19</sup>



**Figure 4** Older home and new construction Condo building across the street from Lathrop, 2007, via Google Maps



**Figure 5** The same street address, now with two Condo buildings, 2016, via Google Maps

Starting in 1980, the neighborhood around Lathrop experienced a large decrease in poverty, an increase in condominiums and single family homes, and a sharp drop in the African-American and Latino households. In contrast, in spite of a rapid increase in the overall population of North Center, only 101 African-Americans have moved into the surrounding area since 1980.<sup>20</sup> That same area experienced a dramatic drop in the number of people living in poverty, declining by more than 60% between 1980 and 2010. Since 1980, this community experienced a huge uptick in condominium and single family home ownership, growing by

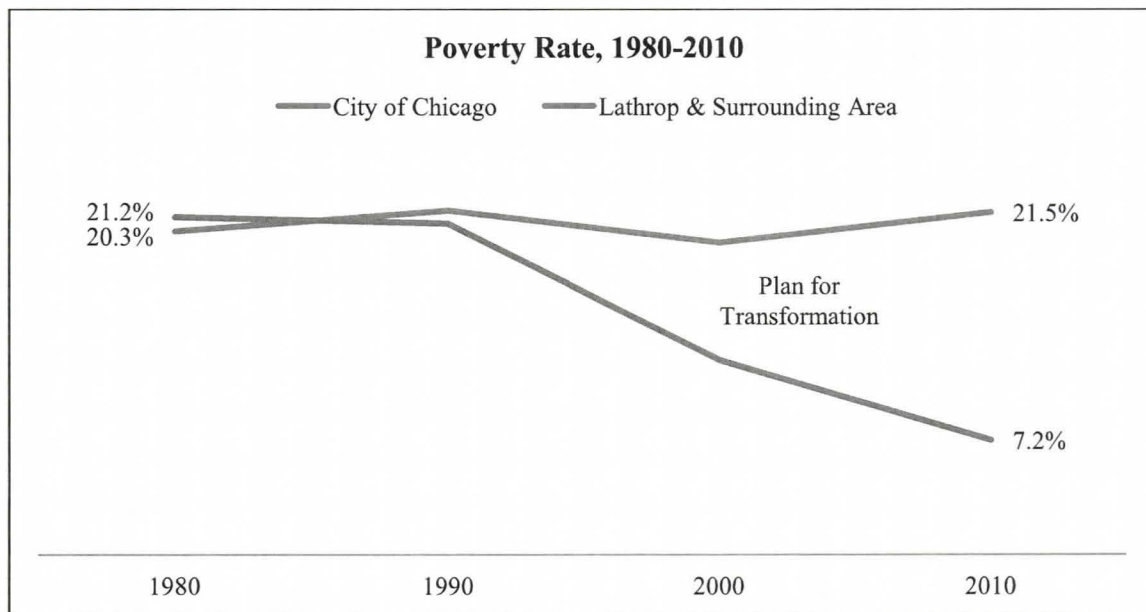
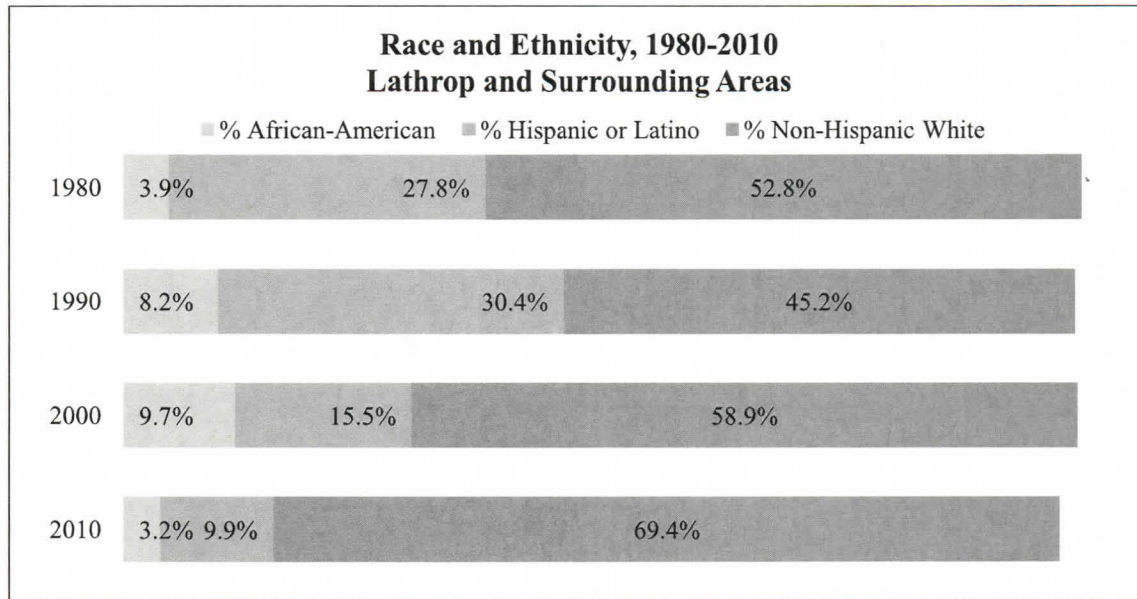
---

BUREAU, Decennial Census, 1990, SF: 1 (generated by the Sargent Shriver National Center on Poverty Law, using American FactFinder; <http://factfinder2.census.gov>; and the Brown University US2010 Project; <https://s4.ad.brown.edu/Projects/Diversity/Researcher/LTBDDload/DataList.aspx>) (Dec. 5, 2016). U.S. CENSUS BUREAU, Decennial Census, 2000, SF: 1 (generated by the Sargent Shriver National Center on Poverty Law, using American FactFinder; <http://factfinder2.census.gov>; and the Brown University US2010 Project; <https://s4.ad.brown.edu/Projects/Diversity/Researcher/LTBDDload/DataList.aspx>) (Dec. 5, 2016). U.S. CENSUS BUREAU, Decennial Census, 2010, SF: 1 (generated by the Sargent Shriver National Center on Poverty Law, using American FactFinder; <http://factfinder2.census.gov>; and the Brown University US2010 Project; <https://s4.ad.brown.edu/Projects/Diversity/Researcher/LTBDDload/DataList.aspx>) (Dec. 5, 2016).

<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

129%. At the same time, the number of renter households in the Lathrop community dropped by 8%.<sup>21</sup>



<sup>21</sup> *Id.*



**The number and quality of jobs in the North Branch Industrial Corridor provides a unique opportunity for low-income residents of Lathrop and the surrounding area.**

The area surrounding Lathrop is job rich and provides employment across a diverse range of sectors, including many that provide employment in industries likely to employ Lathrop residents. Lathrop is located in the North Branch Industrial Corridor, a City of Chicago Planned Manufacturing District. While heavy industrial use has declined over the past 30 years, the City has been aggressive in encouraging and planning land uses that will encourage job growth.<sup>22</sup> Although the area around Lathrop has lost approximately 1,000 manufacturing jobs since 2002, proactive efforts by the City and community organizations have successfully brought new light industrial and retail jobs to the area.

From 2002 to the present, approximately 500 moving and storage jobs, and nearly 2,000 new leisure and hospitality jobs were created in the area during this period.<sup>23</sup> There has also been a significant growth in the number of big box retail stores within walking distance of Lathrop. Stores like Costco, Target, Home Depot, and Menards provide stable, easily accessible employment for Lathrop residents. Overall, nearly 10,000 workers are employed in light industrial manufacturing, food and beverage companies, technology companies, distribution firms, and big box retail stores within the North Branch Industrial Corridor.

This number and quality of jobs in the North Branch Industrial Corridor provides a unique opportunity for low-income residents of Lathrop and the surrounding area. In major metropolitan areas across the country, job proximity has fallen substantially for low-income

---

<sup>22</sup> North Branch Works, *Modern Manufacturing Alliance Factsheet*, 2016, available at northbranchworks.org.

<sup>23</sup> *Id.*

workers of color, leading to a rise in expensive, lengthy commutes.<sup>24</sup> Research shows that proximity to jobs has a significant impact on the employment outcomes of people with low-incomes. Workers who live near their jobs are more likely to work, and proximity to employers help low-income people find work more quickly and reduce the length of periods of unemployment.<sup>25</sup> This is particularly relevant in Chicago, where poor public transportation options and a dearth of jobs in areas on the South and West sides mean that many households assisted by the Chicago Housing Authority face substantial commutes and spend significant portions of their income on simply getting to and from work.<sup>26</sup>

The schools that serve Lathrop and the surrounding area are some of the best funded in the Chicago Public School system.<sup>27</sup> As the number of affluent families in the area has increased, parent fundraising efforts for North Side public schools have grown substantially.<sup>28</sup> In 2016, at least two North Center schools brought in more than \$300,000 from parent fundraising alone, and all other schools where parents raised such amounts are located on the North Side of the city. As the sole remaining family public housing development on the North Side of the city, Lathrop residents are some of the only households assisted by the Chicago Housing Authority that are able to send their children to neighborhood schools benefiting from this extreme growth in parent fundraising and participation.

---

<sup>24</sup> ELIZABETH KNEEBONE & NATALIE HOLMES, *THE GROWING DISTANCE BETWEEN PEOPLE AND JOBS IN METROPOLITAN AMERICA* 1 (2015), *available at* [https://www.brookings.edu/wp-content/uploads/2016/07/Srvy\\_JobsProximity.pdf](https://www.brookings.edu/wp-content/uploads/2016/07/Srvy_JobsProximity.pdf).

<sup>25</sup> *Id.*

<sup>26</sup> Kevin Stark, *For Chicago's Riverdale, long commute times exacerbate a cycle of unemployment*, NORTHWESTERN UNIVERSITY – MEDILL SCHOOL OF JOURNALISM SOCIAL JUSTICE NEWS NEXUS, August 1, 2016, *available at* <http://sjnnchicago.medill.northwestern.edu/blog/2016/08/01/chicagos-riverdale-long-commute-times-exacerbate-cycle-unemployment>.

<sup>27</sup> Sarah Karp, *The price of fundraising*, CATALYST CHICAGO, May 26, 2015, *available at* <http://catalyst-chicago.org/2015/05/the-price-of-fundraising>.

<sup>28</sup> *Id.*

As a result, the Chicago Housing Authority's intentional depopulation of Lathrop Homes has resulted in a significant loss of educational opportunities for displaced families. This is part of a larger pattern in the City—as increasingly affluent communities lose African-American, Hispanic, and Latino households, fewer and fewer students of color benefit from the unprecedented levels of funding enjoyed by area schools.<sup>29</sup>

Since 2000, when it imposed a leasing freeze, the CHA has systematically emptied most of the Lathrop Homes – preventing new low-income residents from living in this integrated upper-income neighborhood and enjoying the many amenities in the area. For years, when residents asked what would happen to Lathrop, they were told the development's future was “to be determined.” At the same time, the CHA promoted the use of Housing Choice Vouchers, consolidated residents in one half of the development and failed to properly maintain occupied units, prompting many families to leave. These policies have adversely impacted African and Latino households and families with children in violation of civil rights laws.



**Figure 6** Board-ups at Lathrop Homes, 2014 via the Shriver Center

Current and former residents of Lathrop Homes have endured years of uncertainty, the physical deterioration of their development, involuntary moves and threats of further involuntary

---

<sup>29</sup> *Id.*



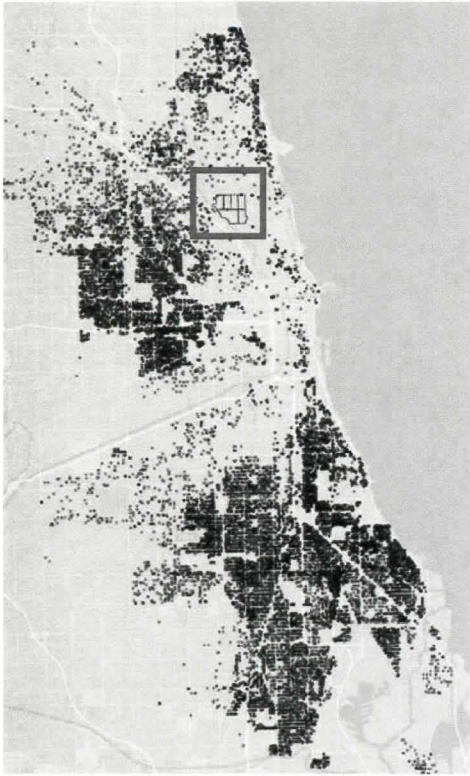
displacement out of their historic low-rise homes and into areas of racial segregation and concentrated poverty. While the CHA has allowed hundreds of units at the Lathrop Homes to remain vacant, thousands of families on the CHA's wait lists – as well as former Lathrop residents with a Right to Return under the 2001 Relocation Rights Contract – have been deprived of an opportunity to live in structurally sound low-rise buildings in an opportunity area.

**The CHA's plans perpetuate, rather than remedy, the disparate harm suffered by African-American and Hispanic and Latino households in Chicago.**

CHA's failure to maintain and lease units at Lathrop Homes is part of CHA's pattern and practice of substantially reducing its available supply of family public housing under the Plan for Transformation – and not delivering the modest number of replacement units it committed under that plan. CHA's actions adversely impact the low-income African-American and Latino families that need this housing. CHA's failure to maintain and lease units at the Lathrop Homes also directly contravenes its duty to affirmatively further fair housing.

Today, CHA's master plan for Lathrop includes the net loss of 524 units of family public housing from one of the areas of highest opportunity (and potential integration) in the city. Instead of redeveloping all 925 of the existing units of public housing at Lathrop, CHA plans to replace only 401 deeply subsidized units, over several phases, while adding 494 market rate units and 222 tax-credit affordable units to an area already surrounded by high-end market-rate housing with predominately white residents. This massive loss of public housing units from an area of high opportunity imposes an unlawful disparate impact on African-American and Latino households who desperately need the opportunities that public housing units at Lathrop could provide.

## **Housing Choice Vouchers (“HCV”) do little to remedy the disparate harm suffered by African- American and Latino households due to the loss of units at Lathrop.**



**Figure 7** Housing Choice Voucher locations, 2015. The census tracts which encompass Lathrop and its surroundings are shown within the red box.

CHA’s Housing Choice Voucher data for 2015 indicates that only 11 HCV households live in the area surrounding Lathrop.<sup>30</sup> Indeed, the vast majority of CHA’s nearly 44,000 voucher holders – who are overwhelmingly African-American – live in racially concentrated, high-poverty neighborhoods on the South and West Sides of Chicago.<sup>31</sup> The CHA’s history of voucher segregation is well documented and has been the source of prior litigation against the CHA for violations of civil rights laws.<sup>32</sup>

The ability of voucher holders to move to communities of opportunity is challenging. First, Chicago’s rental market is tight, and higher rents in strong markets make it challenging for HCV holders to lease units in areas of opportunity. Citywide rental vacancy rates have fallen below 5% since 2010, increasing

competition for available units.<sup>33</sup> Predominately white neighborhoods in areas of opportunity have rental vacancy rates below 3% – rates equivalent to or lower than current vacancy rates in

<sup>30</sup> U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, *Picture of Subsidized Households* (2016), available at <https://www.huduser.gov/portal/datasets/picture/yearlydata.html>

<sup>31</sup> Maya Dukmasova and Meribah Knight, *The CHA’s “Supervoucher” Program: A Desegregation Strategy that Never Was*, Apr. 28, 2016, available at <http://www.chicagoreader.com/chicago/cha-supervoucher-program-fair-housing-integration-controversy/Content?oid=21891804>; Illinois Assisted Housing Action Research Project, *Moving or Moving Up? Understanding Residential Mobility for Housing Choice Voucher Families in Illinois* (2011).

<sup>32</sup> See, e.g., *Wallace v. Chi. Hous. Auth.*, 224 F.R.D. 420, 422-23, U.S. Dist. LEXIS 27160 (Oct. 7, 2004)

<sup>33</sup> A 5% vacancy rate is the commonly accepted equilibrium vacancy rate. Generally, when the vacancy rate is at 5%, supply of rental units is equal to demand for rental units. As such, vacancy rates below 5% suggest an undersupply of rental units relative to demand. Eric S. Belsky, *Rental Vacancy Rates: A Policy Primer*, 3(3) Housing Policy Debate (1992).



San Francisco<sup>34</sup> – while predominately African-American communities have vacancy rates above 10%.<sup>35</sup> When rental vacancy rates are below 5%, the rate of rent increases speeds up, and median rent grows 1% to 2% faster than it would in a market at or above 5% vacancy.<sup>36</sup> These increased rents make it hard for voucher holders to find and keep rental housing. Moreover, the CHA's exception rents are insufficient to help most tenants overcome the substantial market based obstacles to renting a unit in low poverty, racially integrated neighborhoods.<sup>37</sup>

Voucher holders don't just struggle to find rental housing within the rent amount offered on their voucher. They face another serious impediment: discrimination. This is particularly true for families attempting to move to communities of opportunity, even though voucher discrimination is illegal in Chicago and Cook County.<sup>38</sup> Voucher holders also often face discrimination on the basis of race, national origin, and familial status.

### **CHA's delivery of replacement housing must ensure it is available for all and created as a long-term source of affordable housing.**

Both for CHA's Housing Choice Voucher and Public Housing Program waitlists, demand for assisted housing that is not age restricted is substantial. As well, families with children in

---

<sup>34</sup> Erin Carlyle, *San Francisco Tops Forbes' 2015 List of Worst Cities for Renters*, FORBES, April 16, 2015, available at <http://www.forbes.com/sites/erincarlyle/2015/04/16/san-francisco-tops-forbes-2015-list-of-worst-cities-for-renters/#3203e8ed56e7>.

<sup>35</sup> Nick Kotecki, *The Most Vacant Neighborhoods in Chicago*, TIME OUT CHICAGO, Sept. 18, 2015, available at <http://www.timeout.com/chicago/blog/the-most-vacant-neighborhoods-in-chicago-091815>.

<sup>36</sup> Mary Umberger, *Apartment Renters Face a Tight Market*, CHICAGO TRIBUNE, Jan. 19, 2014, available at [http://articles.chicagotribune.com/2014-01-19/classified/sc-cons-0116-umberger-20140119\\_1\\_rents-labor-market-apartment-market](http://articles.chicagotribune.com/2014-01-19/classified/sc-cons-0116-umberger-20140119_1_rents-labor-market-apartment-market).

<sup>37</sup> Marisa Novara, *The real challenge with Housing Choice Vouchers isn't lake views. It's segregation*, March 30, 2016, available at <https://www.metroplanning.org/news/7292/The-real-challenge-with-Housing-Choice-Vouchers-isnt-lake-views-Its-segregation>

<sup>38</sup> More than two thirds of the housing discrimination complaints brought before the Chicago Commission on Human Relations in 2014 concerned source of income discrimination and most often involved discrimination against Housing Choice Voucher holders. City of Chicago Commission on Human Relations, *2014 Activity Concerning Discrimination Cases Filed under the Chicago Human Rights Ordinance and Chicago Fair Housing Ordinance* (2015), available at <http://www.cityofchicago.org/content/dam/city/depts/cchr/AdjSupportingInfo/AdjAnnualReports/2014AnnualReportOnAdjudicationActivities.pdf>



Chicago experience poverty at significantly higher rates than households 65 and older in Chicago. In 2014, more than 282,000 households applied for a place on the CHA's Housing Choice Voucher and Public Housing waitlists. At the end of 2015, there were 39,596 applicants on the Federal MTW Public Housing Units Community-Wide (Family Housing) waitlist, compared to 14,532 on the Federal MTW Public Housing Units Site-Based (Senior) waitlist.<sup>39</sup> While the CHA has not yet released information for 2016, data from September 2016 estimates that this number of needy households has grown substantially, with approximately 96,000 households now on CHA's waitlist for non-age restricted housing.<sup>40</sup>

Indeed, these findings are consistent with citywide estimates of need and eligibility for affordable housing among families with children and persons with disabilities. More than 27% of families with children in Chicago and more than 35% of persons with disabilities have incomes below the federal poverty line, compared with 17.1% of people age 65 and over.<sup>41</sup> Currently, in Cook County, there are 170,000 households in need of affordable housing than there are units of affordable housing.<sup>42</sup>

**CHA's plans for Lathrop must ensure that all public housing is replaced in racially integrated, low-poverty areas of the North Side.**

The increasingly tight rental market, skyrocketing rents, and high levels of discrimination against HCV households in predominately white communities mean that few CHA households live in areas of opportunity. CHA's plans for Lathrop must ensure that all public housing is replaced in racially integrated, low-poverty areas of the North Side. It also is critical that a

---

<sup>39</sup> 2015 Moving to Work Annual Report 28 available at <http://www.thecha.org/file.aspx?DocumentId=1911>

<sup>40</sup> Zach Mortice, *When Public Housing Goes Private*, September 28, 2016, available at <http://chicago.curbed.com/2016/9/28/13063710/chicago-public-housing-cha>

<sup>41</sup> U.S. CENSUS BUREAU, 2010-2014 American Community Survey 5-Year Estimates Table DP03 (2010-2014) available at [http://factfinder.census.gov/bkmk/table/1.0/en/ACS/14\\_5YR/DP03/1600000US1714000](http://factfinder.census.gov/bkmk/table/1.0/en/ACS/14_5YR/DP03/1600000US1714000)

<sup>42</sup> Institute for Housing Studies at DePaul University, *2016 State of Rental Housing in Cook County*, May 11, 2016, available at <https://www.housingstudies.org/research-publications/state-of-housing/2016-state-rental-housing-cook-county/#section-7>

significant portion of that housing be replaced in the immediate neighborhood surrounding Lathrop, so as to preserve the rich, integrative community.

## **APPENDIX A:**

Census Tract Maps of Lathrop Homes and the Surrounding Neighborhood





## **APPENDIX B:**

Voorhees Center:

Chronology of depopulation & changing plans for the Lathrop Homes, 2000-2017

**Lathrop Homes Chronology through 2017 – From CHA’s Plan for Transformation**

Dr. Janet L Smith, Associate Professor, Urban Planning and Co-Director Nathalie P. Voorhees Center for Neighborhood and Community Improvement, University of Illinois at Chicago

The following outlines the changes in CHA’s Plan for Transformation regarding the status of Lathrop Homes. The questions we should ask include: who allowed this to happen, based on what evidence and reasons, and why is the US Department of Housing and Urban Development (HUD) NOT holding CHA accountable to its original commitment?

**2000:** The CHA submitted its Plan for Transformation to HUD, which approved it under the Moving to Work (MTW) Agreement. In that document, the following was laid out for Lathrop Homes:

Lathrop Homes was classified as Category 4: Non-202 Family Property, which meant it was not subject to the viability test. Ten developments fit this category. CHA’s plan included \$107 million to “rehabilitate all units with the exception of Lawndale Complex, which is slated for demolition, and Washington Park Low-rises, where it estimated that half the units will be demolished based on their condition” (p. 16). Furthermore, CHA’s plan stated that “[i]n order to maximize funds the CHA will seek development partners for Category 4 properties. **Because of their age and design, modest density reduction is also anticipated for a number of properties in this category**” (p. 16, emphasis added). The process for selecting these partners was outlined in the plan.

In its Capital Plan, CHA identified 925 units at Lathrop, of which 747 were occupied as of 10/1/99. These 747 units were all included in the total number of Category 4 PUBLIC HOUSING units that CHA said it would produce “after revitalization” (see p. 17).

**2001:** In the 2001 Annual MTW plan submitted to HUD, CHA again included Lathrop in its Category 4 and included all the occupied units in its commitment of public housing (actually listed 707 units, which is assumed a mistake since in subsequent years it is 747). The total number of “planned” public housing units “after revitalization” in this category dropped from 2,254 in 2000 to 2,163 in 2001. A note says “some modest density reduction is assumed in Category 4. The actual numbers, by property, will not be known until after the completion of the respective plans” (see Master Capital Construction Schedule, p. 11).

For Category 4 developments, the CHA laid out how it would develop plans to “redevelop these properties in four stages.” Lathrop Homes was included in the second stage along with LeClaire Extension and Lawndale Complex (which was empty and slated for demolition). The CHA described its plan for this stage:

The agency intends to redevelop these properties using CHA capital funds and low income housing tax credits. The Agency will issue an RFQ for developers in the 1<sup>st</sup> quarter of 2001. Site planning would begin between the 2<sup>nd</sup> quarter and 3<sup>rd</sup> quarter of 2001. The construction phase would begin 3<sup>rd</sup> quarter 2002....**About 30 percent of the units redeveloped at Lathrop and LeClaire are expected to be reserved for tax credit families and the rest for traditional public housing** (p. 16).



This schedule is reflected in a table showing the 5 year capital construction / rehab schedule for all Category 4 developments (p.17). In this diagram, no demolition is shown even though there is a line there for it. This is true for all developments in this table except Lawndale Complex and Washington Park Homes Low-rises.

**2002:** In CHA's 2002 MTW plan approved by HUD, a new category is introduced: "Undecided properties" that includes Lathrop Homes along with LeClaire Courts, Lawndale Complex (all still are also identified as Category 4 as well), Cabrini Rowhouses, Harold Ickes, Dearborn Homes (all Category 5A: 202 mid/low rise), 1230 N Burling, Frances Cabrini Extension, William Green Homes, Washington Park High-rises, and Randolph Towers (all Category 5B: 202 High rise). In "Table 1: Units to be rehabilitated or constructed" the total number of occupied units at Lathrop as of 10/1/99 is 747; however under the heading "total planned units 10/1/01" all undecided properties have TBD (to be determined). The total units indicated for "production" for this category is 2,844. The total occupied units 10/1/99 was 4,369; however, the total occupied units as of 10/1/01 (2 years later) was 3,864. **This meant a loss of 505 families from 11 developments in 2 years. Of this total, 109 "lost families" had been at Lathrop, which had lost the second largest number of families after Ickes (166 families).**

In the narrative describing what is happening at each Category 4 development, the CHA says under "redevelopment status" that "Plans have not been developed for Lathrop Homes and LeClaire Extension but are being considered for potentially mixed-income and mixed finance properties" (p. 91). The CHA goes on to describe what is to happen next:

Planning for Lathrop Courts, a City/State seniors building located on the Lathrop Homes campus, will start in 2002. Issuance of an RFP for a developer for those properties will also be conducted. Working Groups will be formed in 2002 to review plans for Lathrop Homes and LeClaire Extension and related properties. Lathrop Homes and LeClaire Extension will receive targeted capital improvements in 2002. These will enhance the viability of these properties pending future planning for complete redevelopment (p.92).

**2003:** The MTW plan in 2003 approved by HUD indicates that all "undecided properties" are now classified as "Rehabilitated or Redeveloped". With exception of Washington Park low-rises, the number of planned units for these sites was still "undecided"; however the total for "production" had increased from the previous year to 3,099 (increase of 255 units). This is based on a production schedule of about 775 units annually beginning in FY 2006 to be completed in FY 2009 (see p. 8). **The CHA indicated that Lathrop occupancy as of 9/30/02 was 587, down 51 families from previous year (p. 72).**

In its description of the planning process for Lathrop, the CHA says that "planning will begin in late FY 2002 with the Working Group" and that until it is decided what will happen for all developments in the category (including the decision on whether or not to make them a mixed-income/mixed-finance community), "the CHA maintains its commitment to provide approximately 25,000 units of public housing through its implementation of the Plan" (p. 26).

**2004:** In the MTW plan approved by HUD this year (Year 5 of the plan), the CHA has now further sorted the undecided properties into “redevelopment,” “rehabilitation” or “redevelopment or rehabilitation.” The only development in this last category is Lathrop Homes. The CHA says “Lathrop Homes will be evaluated in FY2004 to decide whether to rehabilitate or redevelop this property” (p. 5). CHA still lists the same number of occupied units as of 10/1/99 (747). **Occupancy as of 7/1/03 is 534, which is down another 53 families from the previous year (p. 65).**

**2005:** In the MTW plan approved by HUD, the CHA continues to list Lathrop as “to be rehabilitated or redeveloped (undecided).” In the Public Housing Unit Completion Schedule for all “to be redeveloped” developments, Cabrini Rowhouses, LeClaire and Washington Park low-rise have been moved to “rehabilitation.” – which means 962 fewer households as of 10/1/99 are in undetermined developments. Furthermore, the CHA indicates that the Dearborn Homes will be rehabilitated as “traditional public housing” (no unit count provided) and Ickes will be rehabilitated as a traditional public housing family development (no unit count provided).

This is an important decision to note since assuming the CHA is still planning to maintain the same number of public housing units at each of these sites as there were households as of 10/1/99, which would then mean 1,426 units of the total 2,115 units of public housing are now committed to in this category.<sup>1</sup> This means that at the remaining developments there could be only a combined total of 689 units of public housing. This would mean significantly reducing public housing units at either Cabrini (Extension South/Green Homes/1230 Burling), which had a total of 1,130 occupied units as of 10/1/99 or at Lathrop, which had 747 units occupied, or reducing public housing at both since combined it is a total of 1,877 units.

**Total occupancy at Lathrop as of July 1, 2004 is 460 – a loss of 74 families in a year (p. 17 Appendix). The CHA narrative says: “The CHA will evaluate Lathrop Homes and decide whether or not to rehabilitate or redevelop the property. While the decision is pending, current residents have access to a growing number of amenities...” (p.42).**

**2006** In the MTW plan approved by HUD, the CHA has determined that Lathrop will be mixed-income with 400 units of public housing. While classified as “redevelopment/rehabilitation,” the narrative on p. 30 indicates that the CHA will solicit redevelopment plans (while not explicitly stated, this appears to mean demolition and new construction) with plans to “finalize a master redevelopment plan for this mixed-income community in FY2007” (p.30). The first 50 public housing units will be completed in 2011, with 50 then 100 units added annually thereafter through 2015.

**Total occupancy at Lathrop as of June 30, 2006, is 340 units – a loss of 120 families in a year (p. 124). This represents a total loss of 407 families since the Plan for Transformation was approved by HUD.**

<sup>1</sup> The unit count for this category at the end of the plan (FY2009) is a total of 2,115 public housing units—this is 1,346 fewer than in 2004. While some of this is accounted for with the shift of three developments to the rehab category, that still only accounts for a maximum of 962 units (number of households in all three developments as of 10/1/99; see p. 2). It is still “to be determined” how the total will be distributed across these developments.



**2007** From the FY08 plan: “The planned redevelopment of Lathrop Homes will result in a total of 1,200 units, divided equally into public housing units, affordable units, and market-rate units.” The plan also says that public housing units are to be delivered in 100 unit increments beginning FY2012.

Also, “In FY2008, the CHA intends to negotiate a Memorandum of Agreement (MOA) with the Illinois State Historic Preservation Office, convene working group meetings, and finalize a request for proposal for the redevelopment of Lathrop Homes in accordance with the MOA provisions.

Under the “proposed demolition schedule” the CHA indicates 480 Lathrop Homes units will be demolished in FY09.

Under a section in the Appendix dealing with “deconcentrating poverty” the plan states: “The planning for the redevelopment of this site is in progress. The CHA will be incorporating deconcentration strategies into the final redevelopment plan. See MTW Statutory Objective I: Chapter 1. Public Housing Revitalization for more information.”

**There were 311 occupied units – a loss of 29 families since the previous year.**

*In the comments section the following were made about Lathrop.*

Comment #13 Central Advisory Council (CAC): The working groups at LeClaire Courts and Lathrop Homes are essential given that these properties are projected to be mixed- finance developments, which will probably have site- specific criteria that must be finalized at least one year before units are offered for occupancy. The CHA should move forward with meaningful activity at both LeClaire Courts and Lathrop Homes and should ensure that the working groups meet on a regular basis and continue to progress towards start and completion dates at these sites.

CHA response: Working Group meetings will be scheduled in FY2008 and will include resident leadership participation.

Comment #24 Chicago Rehab Network: Our immediate concern is the future of Lathrop Homes. The plan released last year states that Lathrop's 925 public housing units would be replaced with only 400, to be matched by the same number of affordable and market- rate units. The plight of Lathrop is a strong illustration of the need to secure appropriate funding, and the dangers of relying too much on mixed-income redevelopment in an environment where the greatest market demand is by far for affordable housing. On a positive note, it is also a once in a lifetime opportunity to transform a scarce piece of land into an affordable community that will be valued for years to come.

CHA response: The CHA is committed to rehabilitating or redeveloping 25,000 public housing units. Although the total number of units at Lathrop may change, there will still be replacement units located at other CHA developments. For accurate unit count information, please refer to the Unit Completion Schedule located in MTW Statutory Objective I. Chapter 1. Public Housing Revitalization in the FY2008 Annual Plan. Lathrop Homes will be redeveloped as a mixed income/mixed-finance community, which will help integrate public housing residents into their surrounding neighborhoods.

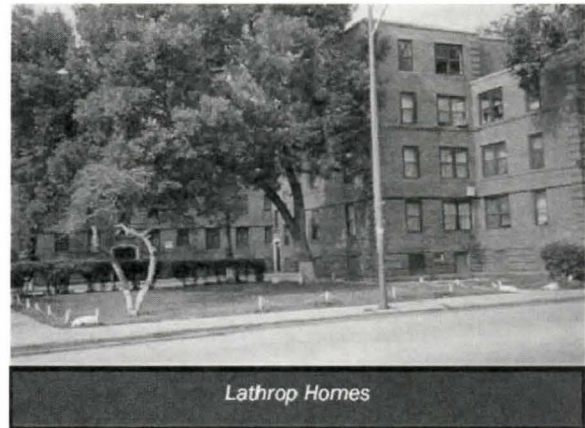
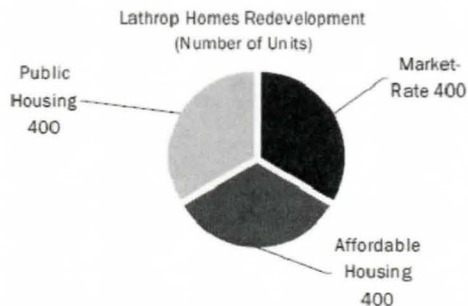


**2009 From MTW plan**

The CHA applies for various types of financial assistance to help fund redevelopment. In the event that HUD issues a Notice of Funding Availability (NOFA) in FY2009 for housing, community development, and/or demolition, the CHA may submit a HOPE VI application for one or more of the following sites: Grace Abbott Homes/Robert H. Brooks Homes and Extension/Loomis Courts/Jane Addams Homes, Lathrop Homes, LeClaire Courts Extension, Stateway Gardens, Ida B. Wells, William Green Homes, and/or Washington Park Homes. (For a complete list of development numbers, refer to Appendix 8: Development Number Translation Table).

**Lathrop Homes**

Street Boundaries: Clybourn/Damen/Chicago River  
Development Number: IL002022000



- The CHA plans to deliver 400 public housing, 400 affordable, and 400 market-rate units by the end of the Plan for Transformation. In total, 1,200 revitalized units will comprise this community.
- The CHA plans to re-institute a working group, which will serve to assist in creating the redevelopment plans at Lathrop Homes.
- The CHA will work with HUD, the Illinois State Historic Preservation Office, and key stakeholders to address historic preservation concerns.
- The CHA anticipates that the delivery of public housing units at Lathrop Homes will begin in FY2012.

Lathrop Homes Public Housing Unit Delivery Plan

Total Planned Units	Units Delivered Through FY2008*	Units Under Construction FY2009	FY2009 Planned Units	FY2010 Planned Units	FY2011 Planned Units	FY2012 Planned Units	FY2013 Planned Units	FY2014 Planned Units	FY2015 Planned Units
400	0	0	0	0	0	100	100	100	100

\*Includes units projected by year end FY2008.

The plan indicates the CHA will demolish 478 units in FY2010 (year 11)

**At the time there were 264 occupied units and 489 people.**

In the comments:

3	8/18/2008	Jonathan Clark	A working group, consisting of resident leaders, CHA Staff, other city officials and community organizations, was recently formed to assess the most effective strategy for revitalizing the community surrounding Lathrop Homes. How do I attend these meetings or find out more information?	Currently, there is no working group for Lathrop Homes. For more information regarding the redevelopment plans for Lathrop Homes, refer to the Lathrop Homes section of the FY2009 Annual Plan which is located in Section II: General Housing Authority Operating Information, Chapter 1: Housing Stock Information.
---	-----------	----------------	--	---

## **2010**

In the general HA operating expenses, the estimated expenditures for Lathrop are:

- \$320,000 capital fund grant FY2010
- \$1,007,424 from MTW fund
- \$1,327,424 Total

Not clear what it will be used for – no units added during this time.

**No data on occupancy or occupied units was provided in this plan.**

The following is provided on the status of Lathrop homes:

### **Reduce Costs and Achieve Greater Cost Effectiveness in Federal Expenditures**

#### **Energy Efficiency and Environmental Sustainability**

CHA anticipates incorporating energy efficiency and environmental sustainability components into future redevelopment projects, in order to both reduce energy costs for residents and decrease energy consumption at large public housing developments. In FY2010, CHA will undertake a community planning process for Lathrop Homes (022000), which will identify strategies to develop a Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND) certified community. A LEED-ND community seeks to maximize energy efficiency not only at a building level but also for environmentally sustainable solutions at a community level. The goal is to create a redevelopment plan that outlines energy conservation measures that could be obtained in the future redevelopment of Lathrop Homes.



**2011** No data on occupancy is provided, only the following:

Lathrop has 92 Project Based Vouchers (former city-state site) that CHA will count toward its commitment to 25,000 units.

*The plan also indicates for the first time that Lathrop will be "removed through disposition":*

FY2011 Planned Property to Be Removed through Disposition Activity (continued)							
PIC Number	Development/Site	Northern Boundary	Southern Boundary	Eastern Boundary	Western Boundary	Type of Disposition	Type of Property/Purpose for Disposition
IL002022000	Lathrop Homes	Wellington	Wrightwood	Clybourn/Damen	Chicago River	Ground Lease or Fee simple	Disposition is for the development of mixed income residential housing. CHA will enter into ground leases with the selected developer and may also convey portions of land for retail or other uses with the selected developer.

PUBLIC COMMENTS: FY2011 Moving to Work Annual Plan - Plan for Transformation Year 12 Public Comment Period			
Row #	INDIVIDUAL OR ORGANIZATION	COMMENT	CHA RESPONSE
35	Robert Whitfield, on behalf of the Central Advisory Council (CAC)	The chart also indicates that 2 million in capital funds are to be spent at LeClaire Courts Extension in FY2011, and another 1.8 million in capital funds targeted for Lathrop Homes. The CAC is not aware of any specific redevelopment and or rehabilitation contracts approved for either site, and is requesting clarification as to what specific activity will be funded at these sites in FY2011. The chart also indicates that 16.9 million in capital funds is targeted for the Cabrini Green Row Houses. However, other sections of the Draft FY2011 Plan do not indicate whether any rehabilitation work and or units are to be completed at the Cabrini Green Row Houses in FY2011. The chart on page 20 of the Plan shows no planned units for the Cabrini Green Homes Row Houses in FY2011. Further, the language on page 21 of the Draft plan has vague language that appears to indicate that no further rehabilitation of existing public housing units will occur in FY2011. The CAC is requesting specific clarification as to whether the CHA will or will not continue the rehabilitation of existing public housing units at the Cabrini Row Houses, and if so, the number of existing Row House public housing units planned for rehabilitation in FY2011.	The LeClaire Working Group was formed in 2010 and is in the process of developing a Request for Qualifications for the procurement of a real estate development team that will work with the LeClaire Working Group to create a redevelopment plan in FY2011. The \$2 million in Capital funds are targeted for demolition activities. CHA formed a working group at Lathrop and has selected a real estate development team to undertake a community planning process that will commence either late FY2010 or early FY2011. CHA is currently seeking board authorization to enter into negotiations for a master development agreement. The funding identified in the plan are for predevelopment expenses projected to be incurred at Lathrop.  CHA has conducted discussions with the Cabrini-Green LAC and partners about future plans for this site. Construction activities may start in FY2011 pending decisions by CHA, the LAC, and partners.
37	Robert Whitfield, on behalf of the Central Advisory Council (CAC)	The charts and information on pages 22 and 23 of the CHA Draft Plan contain information about which properties are projected for demolition or disposition in FY2011. These charts do not appear to be consistent. For example, the chart on page 22 indicating which CHA units are proposed for demolition shows a total of 407 units scheduled for demolition in FY2011. The chart indicates that demolition in FY2011 will occur at William Green Homes, Cabrini Green Extension, and Scattered Sites West. The third chart on page 23 lists CHA property to be removed through disposition process in FY2011. It is assumed that the term "property" in the third chart refers to CHA residential housing, since the first and second chart specifically refer to non-dwelling CHA properties. The third chart lists the Cabrini Green Row Houses, Henry Horner Homes, Lathrop Homes, and Henry Horner Homes (Villages of Westhaven) as CHA properties to be removed in FY2011 by disposition; and specifically states that these four CHA properties are to be removed by Ground Lease or Fee Simple.	Pursuant to paragraph 10, of the former Consent Decree, CHA is in discussions with the Horner Resident Committee and its counsel on the future of the Westhaven Superblock. Subject to an approved redevelopment plan by the court, the disposition would be for the development of mixed income residential housing. CHA would enter into a ground lease with a selected developer and may also convey portions of land for retail or homeownership opportunities in detached single family housing.



PUBLIC COMMENTS: FY2011 Moving to Work Annual Plan - Plan for Transformation Year 12 Public Comment Period			
Row #	INDIVIDUAL OR ORGANIZATION	COMMENT	CHA RESPONSE
38	Robert Whitfield, on behalf of the Central Advisory Council (CAC)	Disposition by a public housing authority (PHA) by Ground Lease or Fee Simple generally implies that the property will either be sold (Fee Simple), or that the PHA property will be leased for a lengthy period of time, a method used at almost all the CHA mixed finance sites to date. This would mean that CHA is proposing to either sell these four properties, or to enter into long term ground leases similar to those used at CHA mixed finance sites. The CAC has reviewed recent CHA resolution and was unable to find any instance where residential CHA units were sold through the Fee Simple real estate process. This would imply that the four properties identified above will have long term ground leases as part of a CHA mixed finance development. The CAC is not aware that any specific redevelopment or rehabilitation activity has been approved for the Lathrop Homes site. If so, why is CHA listing Lathrop Homes for disposition by Ground Lease or Fee Simple in FY2011? The Cabrini Row Houses, which previous CHA Plans indicated would be rehabilitated, is now listed for disposition in FY2011 by Ground Lease or Fee Simple. This is contrary to the vague language that is contained elsewhere in the Plan referring to future discussions with the Cabrini LAC to determine what will happen at the Cabrini Row Houses. This chart suggests that the decision on the Cabrini Row Houses has already been made by CHA. The CAC is requesting that CHA clarify in the Draft Plan what it is proposing to do with the Row Houses in FY2011.	24 CFR 970 require the Chicago Housing Authority to apply for disposition authority from the U.S. Department of Housing and Urban Development (HUD) whenever the PHA contemplates the demolition or disposition of any of its inventory. Lathrop, Westhaven and Cabrini Row Houses have been the subject of redevelopment discussions. The CHA in consultation with the Lathrop LAC and Lathrop Working gGroup has decided to redevelop the Lathrop property into a mixed income community. The CHA and Lathrop working group have selected a developer and is awaiting authorization to enter into negotiations to execute a master developer agreement. If authorized the CHA will work with the Lathrop working group to develop a plan through a community planning process.  Pursuant to paragraph 16, of the Homer Consent Decree, CHA is in discussions with the Homer Resident Committee and its counsel on the future of the Westhaven Superblock. Subject to an approved redevelopment plan by the court, the disposition would be for the development of mixed income residential housing. CHA would enter into a ground lease with a selected developer and may also convey portions of land for retail or homeownership opportunities in detached single family housing.  As previously stated, the CHA has not made a final decision on whether to redevelop the Cabrini Row Houses into a mixed-income community or rehabilitate as 100% public housing. In the event the CHA decides to pursue a mixed income/mixed finance approach the several ground leases will need to be entered into to maintain long term affordability. HUD considers such long term leases and fee simple conveyances as dispositions and therefore are subject to 24 CFR 970 review and approval.
39	Robert Whitfield, on behalf of the Central Advisory Council (CAC)	CHA has consistently maintained that no decision has been made yet on what type of redevelopment and or rehabilitation will take place at Lathrop Homes, and has repeatedly stated this to Lathrop Homes residents in various Town Hall meetings with the residents. The chart on page 23 indicates that CHA may have already decided on what specific redevelopment activity will take place at Lathrop Homes. It is essential that Lathrop Homes residents be advise as soon as possible as to what redevelopment activity is planned for Lathrop Homes, and more specifically what activity if any is planned for this site for FY2011, so they can make informed choices about their housing options while they wait for the redevelopment of Lathrop. Lathrop Homes residents, the same as Cabrini Green Row Houses residents, have waited for the rehabilitation of their units since the plan began in 2000, and should receive accurate and complete information on CHA proposed plans at the Lathrop Homes site as soon as possible. The CAC is requesting that CHA meet with the CAC and the Lathrop Homes LAC as soon as possible to discuss what activities are proposed for FY2011 at Lathrop Homes, and to clarify why Lathrop Homes is listed in the Draft plan as being disposed of in FY2011 by Ground Lease and or Fee Simple.	CHA has had numerous discussions with stakeholders regarding the rowhouses, which discussions have included numerous resident advocates. No firm decisions have been made regarding the rowhouses, but stakeholders and resident advocates have been advised of CHA's intent to include the rowhouses for possible inclusion in redevelopment planning.

**2012** No data on occupancy, only the following:*City/State PBVs*

CHA continues to administer 339 PBV units across three city-state sites: Harrison Courts, Loomis Courts, and Lathrop Elderly. These 339 PBV units are located in Chicago and counted toward overall unit delivery progress.

City/State	Lathrop Elderly	92	92	2717 N. Leavitt Avenue, original HAP was signed in 2005; Elevator Building for seniors
------------	-----------------	----	----	--

Regarding redevelopment at Lathrop, the plan states the following:

***Lathrop Homes (IL002022000)***

In FY2010, CHA's Board of Commissioners accepted the recommendation of the Lathrop Homes Working Group to enter into negotiations with Lathrop Community Partners, a five-party development team, for the revitalization of Lathrop Homes as a sustainable mixed-income community. The development team is comprised of Related Midwest, Heartland Housing, Bickerdike Redevelopment Corp., Magellan Development Group and Ardmore Associates. One of the primary goals for the development is attaining Gold or Platinum level certification from the United States Green Building Council for Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND). The robust community master planning process is planned to be completed in FY2012. Initial phase design and finance development is also planned for FY2012.

***CHA Redevelopment Activities***

- In response to a Choice Neighborhoods or other Federal Notices of Funding Availability (NOFAs) released in FY2012, CHA may submit application(s) for grant funding for redevelopment at Cabrini Extension South (IL002089000), William Green Homes (IL002030000), Frances Cabrini Rowhouses (IL002039000), and Lathrop Homes (IL002022000).

Selected comments and replies:

7	Robert Whitfield [robertdwhitfield2@yahoo.com]	I did not find any reference in the Draft FY 2012 Plan to any current and or proposed redevelopment activity at Lathrop Homes, or Le Claire Courts. Does this mean that there will be no redevelopment or rehabilitation taking place at these sites in FY 2012? It seems to me that residents awaiting housing at these sites are severely disadvantaged in making informed choices about their permanent housing if they are not aware generally about what is currently happening at these sites, and what if anything is planned by CHA at these sites for FY 2012 and beyond. Does the absence of information about these sites mean that CHA has revised prior plans and now will not redevelop these sites? Certainly many current and former CHA residents still awaiting permanent housing may think that unless CHA provides specific information about each of these sites, A proposed CHA plan that completely omits these sites is puzzling. CHA should amend the Plan to include information on planned or proposed activity FY 2012 at both sites.	Thank you for your comment. The CHA will revise the Annual Plan to indicate the CHA will work with the Lathrop Working group and residents (both on site and neighbors) to redevelop the Lathrop community into a mixed-income community. Furthermore, the CHA will revise the annual plan to indicate that the CHA will select a developer for the future redevelopment of LeClaire into a mixed-income community and will work with the LeClaire working group, residents and neighbors on a plan to redevelop lckes.
24	Sandra Cornwell	We will see how I do. I am a resident of Lathrop Homes. I have volunteered on the river front. And I was told that if we – if the trees and flowers and took care of the land, that we would place – there would be a place here for us. That our community would be here to stay. That in the future, young families could find a home in Lathrop Homes. Now, we have been told differently. Now we are being lied to, abused and cheated out of our community. What will happen to us? I'm still asking, what will happen to Lathrop Homes? I'm Sandra Cornwell, Lathrop, LAC, secretary.	Families who were residents of Lathrop Homes at the time of the 2011 consolidation were offered the option of remaining at Lathrop Homes as the planning process proceeds. These families were not forced to leave Lathrop Homes. It is the CHA's hope that residents and other community members will be engaged in this very important community planning process that will help shape the future of Lathrop Homes.
	[robertdwhitfield2@yahoo.com]	December, 2000. That CHA MTW Plan contained capital construction charts that indicate that construction and rehabilitation at Lathrop Homes would begin in August, 2003, and be completed in December, 2004. (page 17) The Year Two Plan also indicates that the rehabilitation of the Cabrini Row Houses would begin in April, 2003, and be completed in December, 2004 (page 19). Neither chart indicated any demolition occurring at either site. The MTW Plan for Year Four indicates that Lathrop Homes and the Cabrini Row Houses had been placed in an "undecided" category. The residents associated with the Lathrop Homes and Cabrini Working Groups do not recall discussions or decisions by those Working Groups agreeing to the placement of these sites in the category of "undecided". The CAC commented on this in its comments on the CHA Draft MTW Plan for Year Four.	authority decides will undergo mixed-income development. The purview of working groups is to provide the CHA input on the redevelopment of a site into a mixed-income community. The unit projections in the annual plan are based on a myriad of factors. When a particular working group reaches the planning stage of a specific phase, the CHA and developer will share with the working group its refined unit delivery projects for that phase.



**2013** No data on occupancy, only the following:

**City/State PBVs**

CHA continues to administer 339 PBV units across three city-state sites: Harrison Courts, Loomis Courts, and Lathrop Elderly. These 339 PBV units are located in Chicago and counted toward overall unit delivery progress.

City/State	Lathrop Elderly	92	92	2717 N. Leavitt Avenue, original HAP was signed in 2005; Elevator Building for seniors
------------	-----------------	----	----	--

Regarding redevelopment plans, the following is provided:

**Lathrop Homes (IL002022000)**

In FY2011, CHA along with the developer Lathrop Community Partners and the Lathrop Working Group launched a comprehensive community engagement planning process. In addition, in FY2011, CHA conducted relocation for consolidation from the north end of the site to the south end in order to ensure efficient heating operating costs.

In FY2012, Lathrop Community Partners continued the robust community planning process by presenting several schemes for the site. In FY2013, the schemes will be revised and synthesized to develop a final Master Plan that addresses historic preservation, overall unit mix, density and mixed uses for the site, and may include demolition of units. Resulting from the Master Plan, in FY2013 the working group and development team will devise a phasing plan that focuses on minimal disruption to residents living on the south end of the site.

In response to concerns about “off-line” units:

Units pending redevelopment/planning

A significant number of units are offline due to pending redevelopment plans, primarily at Lathrop Homes, Altgeld Gardens/Murray Homes and Frances Cabrini Rowhouses. While planning is underway for the redevelopment of these sites, the number of offline units in this category will not fluctuate significantly in FY2013. However, CHA is moving forward to expedite the finalization of plans to the extent possible given community planning processes and key stakeholder input.

**Lathrop Homes – 748 offline units**

- CHA is in the last stages of finalizing the plan for Lathrop Homes in coordination with the Chicago Department of Housing and Economic Development and other key stakeholders. The final plan will also address phasing issues and will determine the ability to return quickly units on the north side of the property.
- CHA remains committed to delivering 400 units of replacement family public housing units and retaining the 92 senior public units at the existing Lathrop Elderly (city/state project-based) property.
- Simultaneously, the Section 106 process is ongoing and all current plan options preserve the majority of the north side of the property in anticipation of utilizing historic tax credits.
  - Through the 106 process, CHA is working with the Illinois Housing Preservation Agency to provide an archaeological survey of the site requested by the Potawatomi Cultural Center and Museum. Pending the results, redevelopment plans could potentially be delayed 6-12 months.
- Construction Start: 1<sup>st</sup> Quarter 2015 (Phase I, pending archeological survey results)
- Unit Delivery: 3<sup>rd</sup> Quarter 2016 (Phase I, pending archeological survey results)



**2014** No data on occupancy, only the following:*City/State PBVs*

CHA continues to administer 339 PBV units across three city-state sites: Harrison Courts, Loomis Courts, and Lathrop Elderly. These 339 PBV units are located in Chicago and counted toward overall unit delivery progress.

City/State	Lathrop Elderly	92	92	2717 N. Leavitt Avenue, original HAP was signed in 2005; Elevator Building for seniors
------------	-----------------	----	----	--

Regarding redevelopment plans, the following is provided:

Lathrop Homes (IL002022000)

In FY2013, CHA along with the developer, Lathrop Community Partners, and the Lathrop Working Group continued with the robust community planning process and delivered a Master Plan for the redevelopment of the Lathrop Homes. The development is planned to be a combination of historically preserved housing, new housing, retail and other amenities on the former Julia C. Lathrop Homes property. CHA may submit in FY2014, a demolition/disposition application for all or some of the 925 non-rehabilitated units at this site. Depending on the timing of the application, some demolition may occur in FY2014. In FY2014, CHA and the developer will undertake the site and architectural design process in preparation for a Phase I closing in FY2015.

*Public Housing Units to Be Removed from Inventory in FY2014*

CHA anticipates the following potential demolition activity in FY2014, pending finalization of plans and HUD approval of associated future demolition applications.

*Lathrop Homes*

As part of the redevelopment of Lathrop Homes, CHA may submit in FY2014, a demolition/disposition application for all or some of the 925 non-rehabilitated units at this site. Depending on the timing of the application, some demolition may occur in FY2014.

**2015** No data on occupancy, only the following:City/State PBVs

CHA continues to administer 341 PBV units across three city-state sites: Harrison Courts, Loomis Courts, and Lathrop Elderly. These 341 PBV units are located in Chicago and counted toward overall unit delivery progress.

Regarding redevelopment plans, the following is provided:

Lathrop Homes – 753 offline units (IL002022000)

CHA remains committed to delivering 400 units of replacement family public housing units through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community. In FY2014, the master plan for Lathrop Homes was finalized and planning and predevelopment work for Lathrop Phase I began. CHA continues to work with the Chicago Department of Planning and Development and other key stakeholders to pursue zoning approvals, financing and implementation plans for Phase I redevelopment in FY2015. The preliminary Phase I unit mix consists of 497 rental units, including 180 CHA, 111 affordable and 206 market rate units.

### General Description of Planned Capital Fund Expenditures During FY2015

CHA's anticipates a total of \$237.7M in planned capital expenditures for FY2015.

- \$62.8M in planned construction activities, upgrades and repairs at CHA family properties, including Altgeld Gardens/Phillip Murray, Dearborn homes, Lowden, Horner and the Jane Addams Resource Center.
- \$14.90M in planned construction activities, upgrades and repairs at CHA scattered sites properties.
- \$87.6M in planned construction activities, upgrades and repairs at CHA senior buildings. This includes required life safety and fire sprinklers and other rehabilitation work at Caroline Hedger Apartments, Minnie Ripperton Apartments, Armour Square Apartments, Lincoln Perry Apartments, Major Lawrence Apartments, Judge Slater Annex, Judge Fisher Apartments, and Lidia Pucinska Apartments.
- \$72.4M in construction or planning/pre-development activities for mixed-income/mixed-finance properties, including Rosenwald, City Gardens, Clybourn & Division, Sterling, Horner Superblock, Parkview/Fannie Emanuel, St. Edmund's Oasis, Harold Ickes, Parkside of Old Town Phase IIB, Casa Queretara, Lathrop, Real Estate Acquisition Program and other master planning activities.

Developments Planned to be Under Construction in FY2015 using MTW TDC	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units
St. Edmund's Oasis	18	1	19
Casa Queretaro	11	4	15
City Gardens	16	9	25
Rosenwald	34	26	60
Sterling	50	16	66
Clybourn & Division	19	6	25
Lathrop Phase 1	116	64	180
Washington Park Phase I: 45 <sup>th</sup> & Cottage	12	5	17
Roosevelt Square Market Rate Rental	21	9	30
<b>Total Units</b>	<b>297</b>	<b>140</b>	<b>437</b>



**2016** No data on occupancy, only the following:

City/State PBVs

CHA continues to administer 341 PBV units across three city-state sites: Harrison Courts, Loomis Courts, and Lathrop Elderly. These 341 PBV units are located in Chicago and counted toward overall unit delivery progress.

Regarding redevelopment plans, the following is provided:

City/State Sites

CHA continues to administer 341 project-based units across three city-state sites under HAP contracts with HUD: Harrison Courts, Loomis Courts, and Lathrop Elderly. These 341 units are located in Chicago and counted toward overall unit delivery progress.

Lathrop Homes – 753 offline units (IL002022000)

CHA remains committed to delivering 400 units of replacement family public housing units through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community. In FY2016, CHA and its development partner plan to close a real estate transaction for the first phase of redevelopment at Lathrop Homes.

**General Description of Planned Capital Fund Expenditures During FY2016**

CHA's anticipates a total of \$291.4M in planned capital expenditures for FY2016.

- \$97.3M in planned construction activities, upgrades and repairs at CHA family buildings including Altgeld Gardens/Phillip Murray, Cabrini, Washington Park, Brooks and Horner.
- \$89.2M in planned construction activities, upgrades and repairs at CHA senior buildings. This includes required life safety and fire sprinklers and other rehabilitation work at Caroline Hedger Apartments, Judge Slater Apartments, Judge Slater Annex, Minnie Ripperton Apartments, Major Lawrence Apartments, Judge Fisher Apartments, Dearborn Apartments and Albany Terrace. This amount includes \$40M of repairs at senior buildings that will transition to the Rental Assistance Demonstration (RAD) program.
- \$13.2M in planned construction activities, upgrades and repairs at various CHA scattered sites properties.
- \$16.8M in construction management fees and planned construction activities, upgrades and repairs at CHA community buildings.
- \$74.9M in construction or planning/pre-development activities for mixed-income/mixed-finance properties, including Sterling Apartments, City Gardens, St. Edmund's Oasis, Fannie Emanuel/Parkview, Clybourn & Division, Horner Superblock, Harold Ickes- Phase 1, Park Boulevard Phase IIIA, Lathrop, 45th Cottage Grove, Parkside IIIA Condo, Oakwood Shores IIB, Roosevelt Square – Phase IIA, Real Estate Acquisition Program and other master planning activities.



Additional Developments Planned to be Under Construction in FY2016 using MTW TDC	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units
Park Blvd. IIIA For Sale	12	0	12
Clybourn and Division	21	5	26
Lathrop Phase 1	120	60	180
45th and Cottage Grove	13	4	17
Total Units	166	69	235

While no units have been developed or rehabbed at Lathrop, CHA included all 400 proposed units in its Rental Assistance Demonstration program application that is also summarized in the 2016 plan:

	PIC AMP	RAD Type	Total Units	Unit Mix Pre- Conversion / Post- Conversion	Pre-RAD Type	Transfer of Assistance Proposed	Capital Fund Allocation
Lathrop Homes*	IL002022000	PBV	400	1BR-454/1BR-TBD 2BR-401/2BR-TBD 3BR-63/3BR-TBD	Mixed- Income	Yes – locations TBD	TBD

#### General Description of Planned Capital Fund Expenditures During FY2016

CHA's anticipates a total of \$291.4M in planned capital expenditures for FY2016.

- \$97.3M in planned construction activities, upgrades and repairs at CHA family buildings including Altgeld Gardens/Phillip Murray, Cabrini, Washington Park, Brooks and Horner.
- \$89.2M in planned construction activities, upgrades and repairs at CHA senior buildings. This includes required life safety and fire sprinklers and other rehabilitation work at Caroline Hedger Apartments, Judge Slater Apartments, Judge Slater Annex, Minnie Ripperton Apartments, Major Lawrence Apartments, Judge Fisher Apartments, Dearborn Apartments and Albany Terrace. This amount includes \$40M of repairs at senior buildings that will transition to the Rental Assistance Demonstration (RAD) program.
- \$13.2M in planned construction activities, upgrades and repairs at various CHA scattered sites properties.
- \$16.8M in construction management fees and planned construction activities, upgrades and repairs at CHA community buildings.
- \$74.9M in construction or planning/pre-development activities for mixed-income/mixed-finance properties, including Sterling Apartments, City Gardens, St. Edmund's Oasis, Fannie Emanuel/Parkview, Clybourn & Division, Horner Superblock, Harold Ickes- Phase 1, Park Boulevard Phase IIIA, Lathrop, 45th Cottage Grove, Parkside IIIA Condo, Oakwood Shores IIB, Roosevelt Square – Phase IIA, Real Estate Acquisition Program and other master planning activities.

**2017** Submitted to HUD in Fall 2016

No data on occupancy, only the following:

City/State PBVs

CHA continues to administer 341 PBV units across three city-state sites: Harrison Courts, Loomis Courts, and Lathrop Elderly. These 341 PBV units are located in Chicago and counted toward overall unit delivery progress.

Regarding redevelopment plans, the following is provided:

- CHA remains committed to delivering 400 units of family public housing units onsite at Lathrop Homes through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community. Redevelopment activities for the first phase will begin in 2017.

*Lathrop Homes – 753 offline units (IL002022000)*

CHA remains committed to delivering 400 units of family public housing units onsite at Lathrop Homes through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community. In FY2017, rehabilitation activities will begin for the first phase of development at Lathrop Homes.

**General Description of Planned Capital Fund Expenditures During FY2017**

CHA's anticipates a total of \$272.4M in planned capital expenditures for FY2017.

- \$57.4M in planned construction activities, upgrades and repairs at CHA family buildings including Altgeld Gardens, Trumbull Park, Dearborn, Brooks, Horner Homes, and Wentworth Gardens.
- \$26.2M in planned construction activities, upgrades and repairs at CHA senior buildings. This includes required life safety and fire sprinklers and other rehabilitation work at Albany Terrace Apartments, Irene McCoy Gaines Apartments, Flannery Apartments, elevator modernization and Senior Amenities Program Phase II at various senior buildings.
- \$7.5M in planned construction activities, upgrades and repairs at CHA scattered sites properties.
- \$33.7M in architectural and engineering fees and other planned construction activities, upgrades and repairs at CHA community buildings.
- \$71.3M in construction or planning/pre-development activities for mixed-income/mixed-finance properties, including Fannie Emanuel/Parkview, Villages of Westhaven, Presbyterian Homes, St. Edmund's Oasis, Harold Ickes- Phase 1A and Phase 1B, Park Boulevard Phase IIIA, Lathrop Homes Phase 1A and Phase 1B, 45th Cottage Grove, Parkside III Condo, Oakwood Shores IIB (TWO), Roosevelt Square – Phase IIA, Real Estate Acquisition Program and other master planning activities.
- \$76.3M in planned construction activities, upgrades and repairs for senior buildings that will transitions to the Rental Assistance Demonstration (RAD) program.



## Comments regarding location of Lathrop replacement homes:

Comment #	Individual/ Organization	Comment	CHA Response
49	Ellen Ray, Executive Director Center for Changing Lives	<p>On behalf of the more than six hundred households served by Center for Changing Lives, I am writing to urge the Chicago Housing Authority to remove 111 inappropriately designated units from consideration as family public housing replacement units on Chicago's North and Northwest sides. Center for Changing Lives partners with households held back by lack of resource or economic opportunity in order to uncover possibilities, overcome barriers, and realize their potential. CCL provides HUD certified housing counseling to households seeking housing options within their budget as part of its financial coaching program. Regularly, CCL encounters the challenge of a lack of affordable housing options on the north and northwest side when assisting households with housing opportunities. CCL appreciates that, in February, CHA wisely committed to replace the 525 public housing units that will be eliminated at the Lathrop Homes by "producing 525 new housing opportunities in general and opportunity areas in the north side of the city." However, CCL is disappointed that CHA's Draft Annual Plan lists 111 units that are utterly inappropriate to be included as Lathrop replacement units (The units are listed in the CHA's RAD conversion table, on pages 104 and 105). The inclusion of these units is ridiculous for the following reasons: 78 units are senior units, when Lathrop Homes has been family housing. Mulvey Place and Crowder Place - with a combined total of 78 units - are existing senior buildings, while the Lathrop Homes has always been family housing. Chicago's North and Northwest sides have a significant number of CHA senior buildings, but need much more low-income family housing. CHA is to be commended for purchasing these buildings, along with Devon Place, early in 2016. However, that's no excuse for supplanting family housing with senior housing. Most of the 78 units in the Mulvey and Crowder buildings and 30 units at Devon Place are already occupied; none of them represent new housing opportunities. The 525 replacement units must be new, family housing opportunities to be considered replacements for Lathrop Homes units lost. 24 units are studio apartments (three at Devon Place and twenty one units in the Mulvey and Crowder buildings). Studios cannot replace Lathrop Homes apartments, which are one, two or three-bedroom homes. They must be replaced with no loss of bedrooms. Replacing the 525 Lathrop units is a vital opportunity for the CHA to move toward meeting the Fair Housing Act's mandate to "affirmatively further fair housing" in an economically thriving, but increasingly exclusive, part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard and must be removed.</p>	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.



Comment #	Individual/ Organization	Comment	CHA Response
3	Mary E Pattillo	The 2017 Proposed Moving to Work Plan discusses the replacement units for the Lathrop Homes. The CHA has promised 525 replacement units off site, but has never given concrete information about when or where. This plan lists 111 replacement units at Crowder Place, Mulvey Place, and Devon Place and 60 units at 6418 N. Sheridan. But these buildings already exist and are occupied and are currently senior buildings. How does this constitute replacement units for the 525 that will be lost at Lathrop? As a result, this still represents a net loss in family public housing opportunities in Chicago and no net gain in affordable housing opportunities overall, since this was already affordable housing, just under different management. This is outrageous.	The proposed property at 6418 N. Sheridan is planned to provide new construction, family units. CHA is continuing to work with developers, Alderman and other partners to provide additional units. CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city.

### References:

All information above can be found in the Chicago Housing Authority MTW Plans and Reports available at <http://www.thecha.org/about/plans-reports-and-policies/>.

## **APPENDIX C:**

Historical News Articles

# Chicago Housing Chiefs Admit Jim Crow Policy

The chairman and a former chairman of the Chicago Housing authority admitted Monday that the city agency follows a Jim Crow policy in placing families in public housing.

The disclosure fell like a bombshell into a conference between three members of the CHA board of commissioners, a veteran who has been trying for six years to get into Julia Lathrop homes, and four members of the Chicago chapter of the National Association for the Advancement of Colored people.

Wayne McMillen, who recently resigned as chairman of the authority, but still remains as a commissioner, told the group that he personally had instructed the staff not to place Negro families in Trumbull homes on the far Southside.

Wilfred Sykes, present chairman

See HOUSING, Page 2, Col. 3



(Continued from Page 1)

confirmed that CHA has deliberately refused to place Negro families in Lathrop, Lawndale, Trumbull and Bridgeport homes.

Mortimer B. Harris, another commissioner was present. Harry A. Kruse, CHA vice chairman, and John Yancey, sole Negro member, were absent.

McMillen, a University of Chicago professor, said he believed that CHA had pledged several years ago to keep Trumbull homes all white.

The statements were made in response to demands by Mrs. Cora Patton, Mrs. Sadie Nesbitt, James Wells, the veteran who has tried to get into a public housing project for six years, and two other NAACP representatives.

They wanted to know why Wells, who works near Lathrop homes, and other Negro families with high move-in priorities had been bypassed in renting space in the four all-white developments.

Sykes disclosed that the housing authority is planning to hire a private firm to conduct a survey to determine whether move-ins by Negro families in the four projects can be made without incidents.

This follows the line of a suggestion by Mayor Martin H. Kennelly.

McMillen said the authority has conferred with a number of groups, all of which agreed the worst thing that could happen to the public housing program is for it to become all Negro. Present occupancy is 60 per cent Negro, he added.

According to him, for every eligible white family which applies for space in a housing project, there is an eligible Negro family with a greater need for the space.

Replying to Sykes' disclosure about the proposed survey, Mrs. Nesbitt said "I don't see how any outside group can get any more information about this type of problem. After all, we have a half million eyes watching you."

Sykes replied that there are a half million Negroes "but you must remember there are three million whites."

Last August, CHA announced a policy of non-discrimination in placing families in the developments built with public money.

Projects in fringe or changing areas, such as Addams, Cabrini, Dearborn and Le Clair on the boundary of Cicero have interracial occupancy and no trouble. Lathrop homes houses a number of Puerto Ricans, who though classified as white by federal law, are dark brown in color.

## CREATE GROUP TO AID CHA ON TENANT POLICY

A special citizens' advisory committee consisting partly of representatives of Negro organizations was created yesterday by the Chicago housing authority to help carry out a policy of nondiscrimination in the selection of tenants for public housing projects.

The committee was authorized by the CHA board in a resolution presented by John Yancey, a CIO representative on the board. The resolution supplemented a policy adopted by the board last August permitting minority groups to occupy four projects which have had only white tenants.

### Will Advise CHA

Members of the committee are to be one representative each from the Council Against Discrimination, the National Association for the Advancement of Colored People, the Anti-Defamation League, the Chicago Round Table of Christians and Jews, the Chicago Urban League, and the Chicago Defender, Negro newspaper.

The resolution stated that the committee is "to advise, observe, and participate in the implementation of the policy of the Chicago housing authority of nondiscrimination in tenant selection."

The nondiscrimination resolution of last August was adopted during the disturbance that developed at the Trumbull Park project, 108th st. and Bensley av., when the family of Donald Howard moved in.

### Delay Kruse Proposal

Three projects still remain without minority group occupancy. These are the Julia Lathrop homes, Clybourn av. and Diversey pkwy.; Lawndale Gardens, 26th st. and California av., and Bridgeport Homes, 31st st. and Lituanica av.

Henry A. Kruse, who is resigning as CHA chairman, attempted to get a vote on a proposal that would put all department heads and other supervisory personnel under more direct control of the board, but other commissioners asked that the matter be deferred until a full board could be present.

The board authorized the payment of \$429,191 to local taxing bodies as the CHA's 1952 contribution for services on its projects in lieu of taxes. A partial payment to the city of Chicago of \$250,000 also was authorized on money advanced by the city for the veterans' temporary housing projects.



# NEGROES CHARGE JIM CROWISM IN FEDERAL HOUSING: ONLY 35 FAMILIES ASSISTED, LEADERS ASSERT

Chicago Daily Tribune (1923-1963) Jun 28, 1939. ProQuest Historical Newspapers: Chicago Tribune  
Case: 1:66-cv-01459 Document #: 542-1 Filed: 12/15/16 Page 44 of 50 PageID #:5767  
pg. 4

## NEGROES CHARGE JIM CROWISM IN FEDERAL HOUSING

### Only 35 Families Assisted, Leaders Assert.

Negro leaders of the city charged yesterday that officials of the Chicago Housing authority have discriminated against their race in selecting tenants for Chicago's three big government built housing projects. They pointed out that of the 2,414 dwelling units in the projects, only thirty-five are occupied by colored families. These thirty-five families are

grouped in the Jane Addams houses on the west side. There are no colored families in the Julia Lathrop homes on the north side or the Trumbull park homes in South Chicago.

#### Secretary Explains Policy.

Miss Elizabeth Wood, executive secretary of the Chicago Housing authority, which operates the projects under lease from the government, explained that tenants were selected in accordance with the racial makeup of the neighborhood in which each project is located. Because colored families were living in homes on the site of the Jane Addams project before it was built, a percentage of colored families have received housing in the project, she said.

No colored families were living on the sites of the Julia Lathrop and Trumbull park homes before they were constructed. Therefore, none is housed in these projects, she said. Miss Wood explained that this is in line with the established policy of the authority.

#### Leaders Assail System.

Negro leaders spoke bitterly of this policy, which they assert has drawn a color line banning all but a small

percentage of colored families from the new homes. The statements of three of the leaders follow:

Horace Cayton, director of a Negro research project for the University of Chicago—"Negro families have applied to the housing authority for permission to live in the projects and have not been accepted. It is my feeling that the authority should make a statement of its policy in regard to Negroes, and that it should demonstrate by making public its records that there has been no discrimination. I understand that, even in the Jane Addams houses, Negroes are confined to one wing."

#### Pastor Airs His Views.

The Rev. A. L. Scott, pastor of the Lincoln Memorial Congregational church—"It is elementary knowledge that Negroes are not wanted in these projects. When they apply for admittance, they are approached and addressed in such a way that they soon leave, knowing they are not wanted. The housing condition among Chicago's Negro population is one of the most crying disgraces in the city. They are not given the opportunity to live decently."

F. T. Lane, civic director of the

Chicago Urban league—"Negroes have applied for admittance to the projects, but have not been admitted. I know personally of two families which made application long before the projects were actually opened for use. These families were not admitted."

Reproduced with permission of the copyright owner. Further reproduction prohibited without permission.



# **NORTH CENTER A 'WORKADAY' WORLD IN CITY**

## **Community Fact Book Cites Statistics**

*This is the second of two stories on the findings of the Chicago Community Inventory on North Center.*

**BY GLADYS PRIDDY**

North Center, an "east bank" community along the Chicago river and North Shore channel between Montrose av. and Diversey pkwy. and as far east as Ravenswood av., is a workaday world statistically.

Geographically, also, it always has attracted industrial plants—first from the pioneer yards to a pattern of change, development, and expansion which has been going on since 1890, or practically since annexation. That occurred in 1889.

### **Settled Near Work**

Early settlers were workmen who liked living near their work. In the days of slow or nonexistent transportation, this was necessary, of course. Today's North Center, taken from the Local Community Fact Book for Chicago, 1950, shows a community with a median family income of \$3,996, or just over the city-wide median of \$3,956. A median is the value dividing the distribution into two equal parts.

The fact book, which uses figures and boundaries from the United States census, is a publication of the Community Inventory, University of Chicago, and it is the source of material in this article.

Other figures in North Center's generally middling path show that for its residents of 25 and over among the total population of 47,787 in 1950, the educational median was 9 years in school; city-wide median is 9.5 years. Of its work-

ers, 6.5 per cent is in professional or technical occupations; city-wide ratio is 8.9 per cent.

### **Relief, Birth Rates**

Population density runs 23,700 per square mile, or greater than the city's over-all rate of 17,200 and also more than the 18,500 of Lincoln Square. But compared to its eastern neighbor, Lake View, with a density of 39,500 per square mile, North Center is open country.

It isn't too crowded indoors, either, because only 1.6 per cent of its 15,402 dwelling units has 1.51 or more persons per room. City-wide crowding is 6.4 per cent. Its public assistance rate is middling, running 11.5 persons per 1,000 receiving public aid; city-wide, 31.2 per 1,000 are on relief.

Birth rate also is below average amounting to 76.5 per 1,000 women in the 15-44 age bracket; city average is 89.3. The 1950 rent median of \$39 was \$5 below the city-wide figure. The average of 3.12 persons per regular household was lower than the 3.18 city figure, also.

### **North Center Aging**

North Center is a generally household loving spot, however, for 99.5 per cent of its people live in what is classified as "regular households" meaning not hotels or rooming houses or institutions. City-wide rate is 95.5 per cent household living. The community had 12,330 married couples in 1950, and 93.9 per cent of them had their own households; city-wide rate is 90.6 per cent.

Median age of North Center residents is 36.2, or a couple of years older than the 34.1 of the 1940 census. Sex ratio is 90 men to every 100 women of 15 years or over. Dr. Philip M. Hauser, a Fact Book editor, has pointed out that in pioneer or frontier communities, men outnumber women. North Center, by that rule, is aging.

Heavy industry entered and expanded in the southern part of the community in the 1890-1920 period. Since 1920,

plants devoted to light industry have increased along Ravenswood, Lincoln, and Western avs. and Diversey pkwy. Their coming has been at the expense of homes of lower income working men.

### **Redeem Dumps**

The excavations left by the brickyards early in the 1890-1920 growing period—North Center achieved a population of 44,331 and residential maturity in 1920—first were utilized as garbage dumps; since much of it then was unsuitable for building. Later, the land was taken over for residential, commercial, and industrial purposes.

A well known landmark in the area, Riverview park, was started in 1904 at Belmont av. and the river, a site formerly

occupied by Sharpshooters park.

Everything considered, however, North Center up until 1950 had remained primarily residential with a third of its structures the single family, one story frame house, and another third, the two family, two story type. Most of the large apartment buildings were put up after 1922. There has been comparatively little residential building since World War I, but there has been a steady increase in conversions. In 1940, last date when information was available, 16 per cent of the community's residential structures had been converted.

### **Increased Conversions**

The Julia C. Lathrop homes, built by the government in the

late 1930s at Clybourn and Damen avs. and the river, lie about half in North Center and is in an area which had deteriorated with the coming of industry. It is operated by the Chicago Housing authority on lease from the federal government.

Increased percentage of conversions, decreased percentage of home ownership, and increasing inroads of industry point toward making the community relatively less stable, the fact book findings show.

But the figures also show that there still are many people in North Center who own and keep up their own homes. And good community housekeeping is but an extension of good individual housekeeping.

## Only 35 Negro Families in 3 Home Projects

Only thirty-five of the 2,414 dwelling units in the three big government built housing projects in Chicago are occupied by colored families. Miss Elizabeth Wood, executive secretary of the Chicago housing authority, which operates under lease the Jane Addams houses, on the west side, the Julia Lathrop homes on the north side, and the Trumbull park homes in South Chicago, made this disclosure yesterday.

All of the thirty-five colored families are housed in the Jane Addams houses. There are no colored residents in the north side or South Chicago projects, Miss Wood said.

### No Color Line Drawn.

There is no color line, however, in any of the three federal housing projects, she said. It just happens that there have been no applications of these families in the list of tenants accepted for the Julia Lathrop homes or the Trumbull park homes, she asserted. The Jane Addams houses project is just north of one of Chicago's most densely populated colored areas—the territory south of Roosevelt road.

There are 1,027 dwelling units in the Jane Addams houses; 925 units in the Julia Lathrop homes, and 462 in the Trumbull park homes. The three projects are 100 per cent occupied, it is said, and house 9,257 persons.

### Plan Another Project.

Architects are busy on plans for the South Park gardens at Cottage Grove avenue and East 37th street, which will cost \$9,500,000, according to Miss Wood. They will have 1,662 living units and house 6,500 persons, it is estimated.

Theoretically, these will be occupied by colored families. It was pointed out, however, that there will be no distinction as to color. White families may live there if they care to and can qualify as to income and other points required by the CHA.



# PWA TAKES OVER NORTH SIDE SITE FOR 565 HOMES

**Acquire Old Deering Plant  
—\$2,750,000 Project.**

*(Picture on back page.)*

Options on seventeen acres of the original Deering works of the International Harvester company on the north side were secured yesterday by the Public Works administration as the site for a contemplated \$2,750,000 federal housing project, according to an announcement by Public Works Administrator Ickes in Washington yesterday.

The property is bounded on the south by Diversey parkway, on the east by Clybourn avenue, on the north by Oakdale avenue, and on the west by Leavitt street and the north branch of the Chicago river. Ickes said that fireproof homes for 565 families will be erected shortly on this tract.

## **Work May Start Soon.**

All the buildings on the site except the old Deering rolling mill, which is to be razed, have been wrecked. With the land entirely clear, PWA officials say work can start shortly.

Eighty per cent of the proposed 565 dwelling units, containing 1,970 rooms, will be in three story apartments and the balance in two story row houses and flats.

Central heating, hot and cold running water, and refrigeration will be provided.

## **Property to Be Landscaped.**

Only 30 per cent of the site will be occupied by buildings. The balance will be landscaped with trees, shrubs, and flowers.

Although local housing officials declined to comment on proposed rentals, Washington advices said the schedules would be between \$5 and \$6 per room.

# MERGER PARLEYS OF METHODISTS GET UNDER WAY

Preliminary sessions of the joint commissions of three branches of American Methodism were held yesterday to complete plans for reunification of those churches. The meetings are being held at the North Shore hotel in Evanston.

The three churches are the Methodist Episcopal church [northern], the Methodist Episcopal church, South, and the Methodist Protestant church. Yesterday's meeting was presided over by Bishop Edwin Holt Hughes, of Washington, D. C., northern church leader, and former head of the Chicago area.

Today's sessions will be the first embracing the entire commission, which is composed of about 50 persons. It has been announced that virtually all details of the plan of reunion, together with important reorganization of the proposed reunited church, will be completed before the commission adjourns from its Evanston sessions late this week. The churches have been seeking a basis of reunion since 1920.

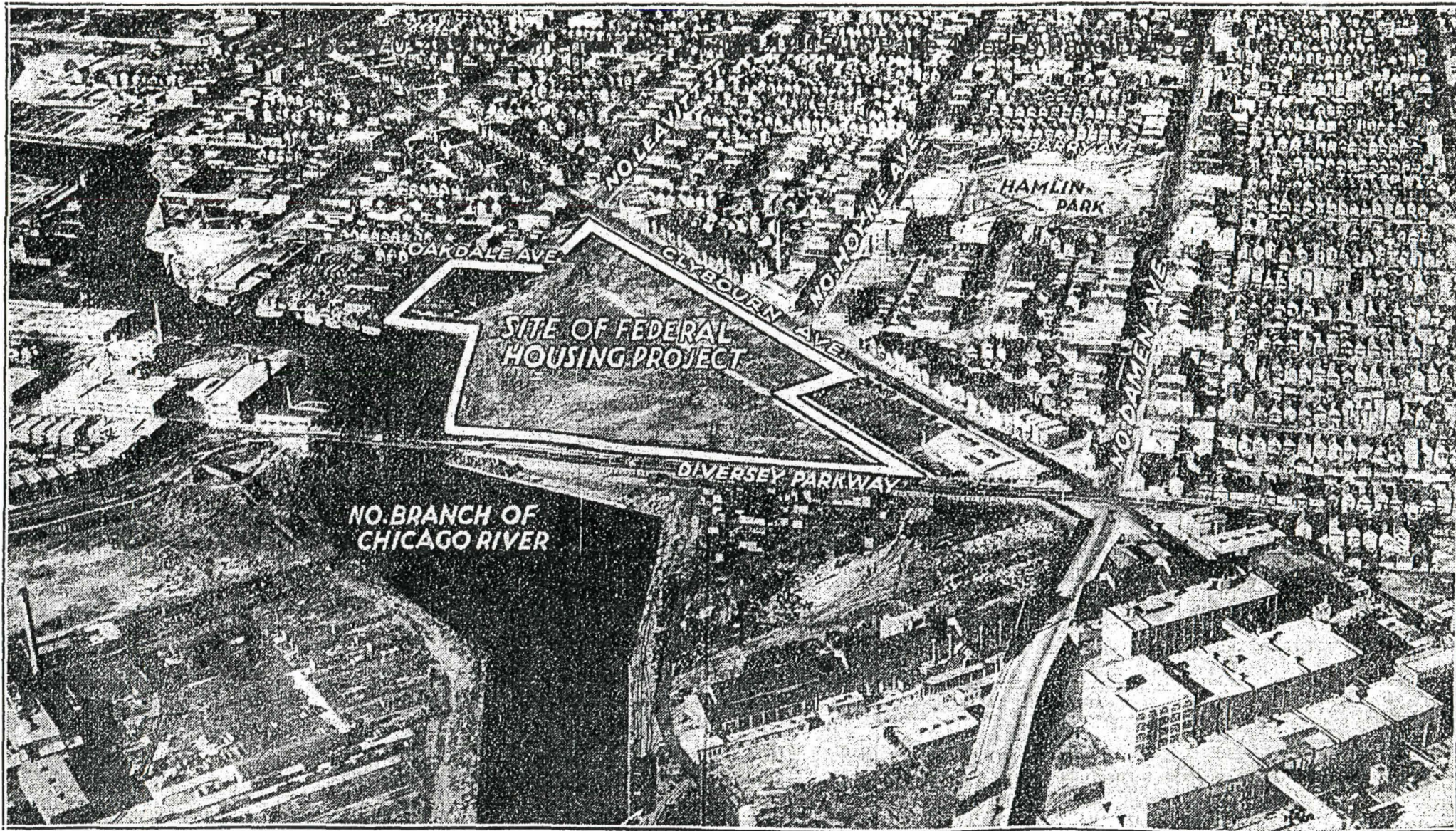
## **PAIR ROBBED OF CAR AND CASH.**

William Kiefer, 114 Callan avenue, Evanston, and his wife, Marie, were robbed of \$50 cash and jewelry and their automobile yesterday by a bandit with a false mustache who held them up at the rear of their home.

## **Denies Writ to Put Tax Instalment Law in Force**

Circuit Judge George Fred Rush upheld yesterday an opinion of Attorney General Kerner by denying a motion for a writ of mandamus which, if granted, would have put the Salliel seven instalment delinquent tax payment act into operation. The measure was passed by the general assembly, but by virtue of Kerner's opinion both State's Attorney Courtney and County Judge Jarecki have ignored it as unconstitutional. Former State Senator Roy C. Woods and Attorney William F. Struckmann plan an appeal.





[Copyright: By Chicago Aerial Survey Company.]

**GOVERNMENT GETS SEVENTEEN ACRE PLOT ON THE NORTH SIDE OF CHICAGO FOR HOUSING PROJECT**—Aerial view of the housing site taken on option yesterday by the government from undisclosed owner, together with the surrounding territory. The ground was formerly occupied by the Deering works of the International Harvester company, and its factory building at the lower, right hand corner of plot will be razed. The project will house 565 families at cost of \$2,750,000.

(Story on page 5.)

Reproduced with permission of the copyright owner. Further reproduction prohibited without permission.



**Stop Segregation, U. S. Court Tells CHA: Judge Gives 30-Day Deadline**

DONALD MOSBY Daily Defender Staff Writer Case No. 1459 Document #: 542-1 Filed: 12/15/16 Page 49 of 50 PageID #:5772

*Chicago Daily Defender (Daily Edition) (1960-1973); Feb 11, 1969;*

ProQuest Historical Newspapers: Chicago Defender

pg. 1

## **U. S. Sets 30-Day Deadline**

# **COURT ORDERS CHA: STOP SEGREGATION**

See Page 3

Reproduced with permission of the copyright owner. Further reproduction prohibited without permission.



# Stop Segregation, U. S. Court Tells CHA

By DONALD MOSBY  
(Daily Defender Staff Writer)

## Judge Gives 30-Day Deadline

approved, while 49 sites in black communities have been approved.

Plaintiffs in the suit were Dorothy Gautreaux, Odell Jones, Doretha R. Crenshaw, Eva Johnson, James Rogers, and Robert M. Fairfax.

The suit was initiated by the Westside Federation in August 1965 in a complaint made to Robert Weaver, former U. S. secretary of housing and urban development, who headed the Public Housing administration at the time of the complaint.

On July 23, 1968, a motion for summary judgment was filed in the Northern District Court of Illinois, and a summary judgment was rendered Monday.

Organizations involved in the suit were, in addition to the Westside Federation, the ACLU, the American Jewish Congress, the Community Legal Council, and the Chicago Urban League, which provided extensive research data.

A team of six lawyers was headed by Alexander Polikoff, vice-chairman of the Illinois division of the ACLU.

One of the most important desegregation decisions by a federal judge since the 1954 Supreme Court's ruling on public schools was rendered in Chicago by Federal Judge Richard B. Austin Monday.

Austin found for six black Chicago Housing Authority tenants, who charged that the institution did and does practice discrimination in the selection and building of public-housing sites and the leasing of apartments.

The suit charged that for more than 15 years, CHA has selected public-housing sites, almost exclusively in black ghetto areas, "thereby violating the rights of tenants under the Fifth and Fourteenth amendments to the U. S. Constitution and the 1964 Civil Rights Act."

The suit further charged that the CHA entered into an agreement with the City Council to present proposed site selections to aldermen on an informal basis.

State law requires that the City Council approve all public-housing sites.

By submitting the proposed site selections to aldermen, prior to formal requesting, white aldermen were given the opportunity to veto site selection in their wards.

The two-count suit asked a declaratory judgment on CHA's discriminatory practices, and it sought to have a permanent injunction issued against the racially discriminatory aspects of the public housing system.

In handing down his decision, Judge Austin for the plaintiffs on Count One and denied plaintiffs' motion on Count Two.

Count One was an assertion that CHA discrimination exists.

Count Two sought an injunction prohibiting the use of federal funds for public-housing construction until the situation is remedied. Judge Austin said such an injunction would hurt the very people CHA is designed to serve.

The jurist said: "A final judgment embracing all claims for relief will not be entered

for 30 days. During that time, the parties should attempt to formulate a comprehensive plan to prohibit the future use and to remedy the past effects of CHA's unconstitutional site selection and tenant assignment procedures.

The suit charged also that in the instance of four housing developments, Trumbull Park, Lathrop Homes, Lawndale Homes, and Bridgeport Homes, all of which were built before 1944 in areas which were and are now substantially all-white, the CHA discriminated against black applicants, and until 1954, refused to permit black families to live in those projects.

A further charge was that a quota system presently exists in the granting of leases for black tenants to these four projects.

The suit cited Trumbull Park as an example, wherein when the number of black families living in the development reached 35, "a hold to maintain the occupancy at that le-

vel would be instituted."

Mrs. Louise Webb, in charge of processing tenant applications for CHA, confirmed statements by other CHA officials that quotas are now enforced.

It was further stated that precautions instituted in the wake of violent incidents that occurred when black families moved into previously all-white areas — such as notifying police and the Human Relations Commission — are no longer taken when Negroes move into white projects.

The suit charged that Negroes are discriminated against in that 99.5 per cent of public housing units operated by CHA are located in all-black areas.

It also said 90 per cent of the applicants for public housing in Chicago are black and that these persons were discriminated against by the quota systems instituted by the public agency for certain projects.

Since 1955, only two sites in white communities have been



**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DOROTHY GAUTREAUX, et al.	)	
	)	
Plaintiffs,	)	
	)	No. 66 C 1459
v.	)	
	)	Hon. Marvin E. Aspen
CHICAGO HOUSING AUTHORITY, et al.	)	
	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that I am the attorney representing the AMICI in this action and that a copy of the attached ***AMICI CURIAE BRIEF IN SUPPORT OF PLAINTIFFS*** was served by electronic filing on all participants registered through the Court's CM/ECF system on December 15, 2016.

/s/ Katherine E. Walz  
Katherine E. Walz  
Sargent Shriver National Center on Poverty Law  
50 E. Washington, Suite 500  
Chicago, IL 60602  
(312) 368-2679  
katewalz@povertylaw.org