

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

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

**JOINT MOTION OF PLAINTIFFS AND DEFENDANT
CHICAGO HOUSING AUTHORITY FOR AN ORDER
DESIGNATING THE ICKES REVITALIZING AREA**

Plaintiffs Dorothy Gautreaux, et. al. and defendant Chicago Housing Authority ("CHA") by their respective attorneys, respectfully move the Court as follows:

- A. To designate as the Harold Ickes Revitalizing Area ("Revitalizing Area") that portion of the City of Chicago that lies within the following boundaries: Cermak Road on the north, the Stevenson Expressway on the south, Dearborn Street on the west and State Street on the east (including three parcels east of State Street at the southeast corner of State and 23rd Streets); and,
- B. To authorize the development of approximately 244 public housing units in mixed income buildings within the Revitalizing Area on the site previously occupied by CHA's Harold L. Ickes Homes; and,

- C. Notwithstanding the provisions of this Court's order of August 6, 2015, to allow the CHA to provide to families with children Dwelling Units above the third story in several structures in the Revitalizing Area; and,
- D. To amend the current Tenant Selection and Assignment Plan (TSAP) to allow priority for the public housing units first to eligible CHA families relocating under the CHA's Plan for Transformation/Plan Forward, with a priority for families from the Ickes Homes Development, then to eligible families on the CHA's public housing waiting list.

In support of this motion, the parties state as follows:

1. For the reasons stated herein, the parties believe the proposed development of the Ickes site into a proposed new mixed income, mixed use development renamed "Southbridge" is "designed to achieve results consistent with [the Judgment Order]" in this case, and that the Court therefore has authority to enter the proposed order pursuant to paragraph X of the Judgment Order. 304 F. Supp. 736, 741 (N.D.Ill. 1969.)

2. On several occasions the Court has authorized development of non-elderly public housing to proceed in "Limited Areas" that were deemed to be "revitalizing": Henry Horner in 1995, amended in 1996, 1998 and 2002; North Kenwood-Oakland in 1996, amended in 2000, further amended in 2002 to include Madden-Wells; Near North/Cabrini-Green in 1997, amended in 2000 and 2015; ABLA in 1998, amended in 2005; and Stateway in 2005 and 2013. In each of these cases, plaintiffs and the defendant represented to the Court that the proposed revitalizing areas had experienced a substantial

increase in public and private investment, including private residential rehabilitation and new construction. Plaintiffs and the defendant advised the Court that such development activity, completed or already underway, combined with the proposed large-scale, mixed-income redevelopment of sites previously designated as exclusively public housing, made economic integration likely in the short run with a possibility that racial integration might follow in the long run. The parties believe the same to be true of the proposed Southbridge development.

Southbridge Master Plan

3. The Southbridge master plan calls for construction of approximately 877 new housing units on the site of the former Harold L. Ickes Homes public housing development. (See Southbridge site map, attached hereto as Exhibit A.) The total anticipated units are approximately 877. Approximately 770 units of those units will be rental housing, of which approximately 244 units are intended for public housing families, approximately 151 will have rents affordable for low or moderate income households, and approximately 375 units will be unsubsidized and available for households paying market rents. Approximately 107 townhomes will also be for sale, some to be marketed through the CHA's "Choose to Own Homeownership Program (CTO) that allows qualified public housing families to use their housing subsidy toward a mortgage payment.

4. Phase 1A and 1B of the construction will consist of 206 rental units, including 68 public housing units, 26 affordable units and 112 market rate units. (See affidavit of Chicago Housing Authority Development Director Ann McKenzie, attached hereto as Exhibit B, pp. 1-3, ¶¶ 3-7.)

Evidence of Revitalizing Activity in the Proposed Revitalizing Area

5. The substantial and dramatic changes to the area surrounding the former site of the Harold Ickes Homes is detailed in the McKenzie affidavit attached hereto as Exhibit B, beginning at paragraph 11, pages 3-7. A map of the Revitalizing Area is attached hereto as Exhibit C. First, the proposed Revitalizing Area lies within a section of the City of Chicago that is undergoing and has already undergone substantial institutional and market-driven development activity. The proposed on-site development is approximately two miles from the heart of downtown Chicago and one mile from the City's lakefront. (*Id.* at ¶ 11.a.) It is well-served by prominent streets and expressways. The Chicago Transit Authority's Green line station is adjacent to the site and the Red line station is two blocks away. (*Id.* at ¶ 11.a.i.)

6. Substantial public and private investment, including rehabilitation and new construction projects, can be found throughout the neighborhood that surrounds the Southbridge site. These improvements include:

A. The Chicago Transit Authority completed a \$50 million rehabilitation of the Green Line station and previously rehabilitated the Red Line station, both on Cermak close to the site. (*Id.*) In 2017, the Wintrust

Arena, a 10,000-seat sports arena, opened. Since the Ickes buildings were torn down, McCormick Place has continued creating new event and commercial space, now totaling 2.6 million square feet, making it the nation's largest convention center. (Ex. B, ¶ 11.a.ii.a.)

B. A new hotel, the Hyatt Regency McCormick Place has been added close to the site. (Ex. B, ¶ 11.a.ii.b.)

C. Community institutions and outdoor attractions exist in the area including: Chinatown Branch of the Chicago Public Library and Ping Tom Memorial Park which includes outdoor space, bamboo gardens, a field house, playground, gymnasium, swimming pool and kayak rentals and public boat dock. (*Id.* at ¶ 11.b.)

7. The National Teacher's Academy, 55 W. Cermak Road, a Chicago Public School ("CPS") Neighborhood School, is adjacent to the site. (*Id.* at ¶ 11.a.iii.) The land south of the school is used for athletic fields for schools including Jones College Prep. *Id.*

8. Large, high-rise luxury apartments and condominiums have been constructed in the area as well, including the Lex, a luxury, high-rise apartment building designed by Helmut Jahn at 2025-35 S. Indiana Street, South Loop Apartments, 2101 S. Michigan and other developments. (Ex. B, ¶ 11.d.) Such activity has generated an increasing amount of private residential and commercial construction and rehabilitation, a trend which is expected to continue to attract higher-income renters and market-rate purchasers to the area.

9. Based on the foregoing, the general improvements in the area and economic integration that has already taken place, and on the attached Affidavit of Ann McKenzie, Exhibit B, the parties believe that a responsible forecast of economic integration, with a longer term possibility of racial integration, can be made for the Harold Ickes Revitalizing Area. For the several reasons stated above, the Parties respectfully request an order designating the Harold Ickes Revitalizing Area and authorizing the development of public housing units constituting the Southbridge development, subject to certain conditions, set out in this motion.

Units Above the Third Floor

10. On July 1, 1969, this Court entered the Judgment Order in this case, which prohibits CHA from concentrating "large numbers of Dwelling Units in or near a single location." The Judgment Order also provided that the Court may give special approval for developments that do not meet all the Judgment Order's specific requirements but are "specifically designed to assist in achieving the purposes" of the order. 304 F. Supp. 736, 739 (N.D. Ill. 1969).

11. On August 6, 2015, this Court entered an order modifying the Judgment Order to automatically waive the restriction on families above the third floor in buildings that meet the following criteria: 1) the structure is located in a General or Opportunity Area; 2) public housing units comprise no more than one-third of all units within the structure; 3) no more than 20 percent of all units within the structure contain three or more bedrooms; 4) each "unit size" (i.e. the number of bedrooms within a unit) within the structure is available to both

public housing and non-public housing families, unless the structure contains only one unit of a particular unit size; 5) among units containing more than two bedrooms, no more than 75 percent of the same units size will be public housing units, unless the structure contains only one unit of that particular size; and 6) the public housing units are and remain well dispersed throughout the structure.

12. While this is a revitalizing area, Southbridge is providing 244 public housing units as part of a mixed-income development in which public housing will ultimately comprise approximately 28% of the total units and will be dispersed throughout the development. The parties therefore move that the Court enter the proposed Agreed Order waiving the restriction on families with children living above the third floor.

Amending the Tenant Selection and Assignment Plan

13. The parties also move this Court to amend the current Tenant Selection and Assignment Plan (TSAP) to allow the public housing replacement units that are the subject of this motion to be made available first to eligible CHA families relocating under the CHA's Plan for Transformation/Plan Forward, with a priority for families from the Ickes Homes Development, then to eligible families on the CHA's public housing waiting list.

15. On February 1, 2018, this Court amended the TSAP to allow for implementation of a site-based wait list program for CHA's general and community wait lists. Paragraph 17 of that order provided that previous orders allowing specific mixed-income development to house families covered under the

CHA's Plan for Transformation/Plan Forward would remain in effect, and provided that prior references to the CHA's general public housing wait list shall be deemed to refer to the new site-based wait list.

16. Because the site in question is replacement housing for residents from the Harold I. Ickes Homes development, the parties request that the Court require that the public housing replacement units that are the subject of this motion to be made available first to eligible CHA families relocating under the CHA's Plan for Transformation/Plan Forward, with a priority for families from the Harold Ickes Homes Development, then to eligible families on the CHA's public housing waiting list.

Conclusion

17. For the several reasons stated above, the Parties respectfully request an order designating the Harold Ickes Revitalizing Area and authorizing the development of public housing units constituting the Southbridge development, subject to the following conditions:

- A) in addition to the approximately 244 public housing units to be built in Southbridge, an additional 172 affordable and 461 market-rate units (including 107 townhomes to be sold fee simple, 21 to moderate income residents) will be built and marketed roughly simultaneously with the public housing units;
- B) the public housing units shall be and remain well-distributed among the non-public housing units in the development;

- C) notwithstanding the provisions of this Court's order of August 6, 2015, that the CHA shall be free to provide to families with children Dwelling Units above the third story in a structure; and
- D) The current Tenant Selection and Assignment Plan (TSAP) will be amended to allow the public housing replacement units that are the subject of this motion to be made available first to eligible CHA families relocating under the CHA's Plan for Transformation/Plan Forward, with a priority for families from the Harold Ickes Homes Development, then to eligible families on the CHA's public housing waiting list.

WHEREFORE, plaintiffs and the defendant Chicago Housing Authority request that the Court to enter an order substantially in the form of the draft order attached hereto.

Respectfully submitted,

/s/ Thomas N. Osran and Elizabeth M. Silas

Attorneys for Defendant CHA

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)	
-vs-)	No. 66 C 1459
)	
CHICAGO HOUSING AUTHORITY, et al.,)	Judge Aspen
Defendants.)	

AGREED ORDER

This matter coming to be heard on the Joint Motion of Plaintiffs and the Defendant Chicago Housing Authority for an order: 1) designating the Harold Ickes Revitalizing Area; 2) authorizing the development of approximately 244 total public housing units as part of a mixed-income, mixed-use development to be known as Southbridge and located in the Revitalizing Area; 3) allowing families with children to reside in dwelling units above the third story in two buildings in Phase 1 of Southbridge; and 4) amending the current Tenant Selection and Assignment Plan (TSAP) to require that the public housing units in Southbridge be offered first to eligible CHA families relocating under the CHA's Plan for Transformation/Plan Forward, with a priority for families from the Ickes Homes Development, and then to eligible families on the CHA's public housing waiting list.

The Court having heard from the parties concerning the proposed order and being advised in the premises; and

The Court being cognizant that the principal remedial purpose of the

orders previously entered in this case has been to provide plaintiff class families with desegregated housing opportunities; and

The Court being authorized to issue orders in this case “designed ... to achieve results consistent with [the Judgment Order]” found at 304 F.Supp. 736, 741 (N.D. Ill. 1969); and

The Court being of the view, based on the representations of the parties, that the proposed order is designed to achieve results consistent with the Judgment Order previously entered in this case;

NOW THEREFORE IT IS HEREBY ORDERED THAT:

1. The Court hereby designates as the Harold Ickes Revitalizing Area, hereinafter the “HIRA”, the following geographic area: within the City of Chicago the area that is bounded by Cermak Road on the north, the Stevenson Expressway on the south, Dearborn Street on the west and State Street on the east, as well as two parcels on the southeast corner of State Street and 23rd Street. A map of the HIRA is attached as Exhibit A and made a part hereof.

2. Subject to the conditions stated in this Order, the Chicago Housing Authority shall be free to develop, cause to be developed or otherwise acquire approximately 244 non-elderly public housing units within the HIRA. Such units may include Project Based Voucher units provided through HUD’s Rental Assistance Demonstration Program (RAD).

3. The non-elderly public housing (or RAD) units authorized by this Order shall be built and marketed roughly simultaneously with the

approximately 172 affordable (including moderate income) units and approximately 461 market rate units planned to be developed within the HIRA, and shall be and remain dispersed and well-distributed among the non-public housing units across the HIRA.

4. The CHA shall be free to provide to families with children public housing units above the third floor in two buildings in Phase 1A and 1B of Southbridge, provided that the such units are well distributed throughout each building. Counsel for the plaintiffs and CHA shall approve the initial locations of each such public housing unit.

5. The Chicago Housing Authority Tenant Selection and Assignment Plan, approved by this Court's order of February 1, 2018, is hereby amended to require that the non-elderly public housing (or RAD) units authorized by this Order, shall be made available first to eligible former residents of the Harold L. Ickes Homes who have not yet been afforded replacement housing; second, to eligible families from other CHA developments relocating pursuant to the Plan for Transformation/Plan Forward; and thereafter to families on the CHA public housing waiting list.

ENTER:

Judge Marvin E. Aspen

Dated: _____

Within the City of Chicago the area that is bounded by Cermak Road on the north, the Stevenson Expressway on the south, Dearborn Street on the west and State Street on the east, as well as 3 parcels on the southeast corner of State Street and 23rd Street.
Cermak-Chinatown

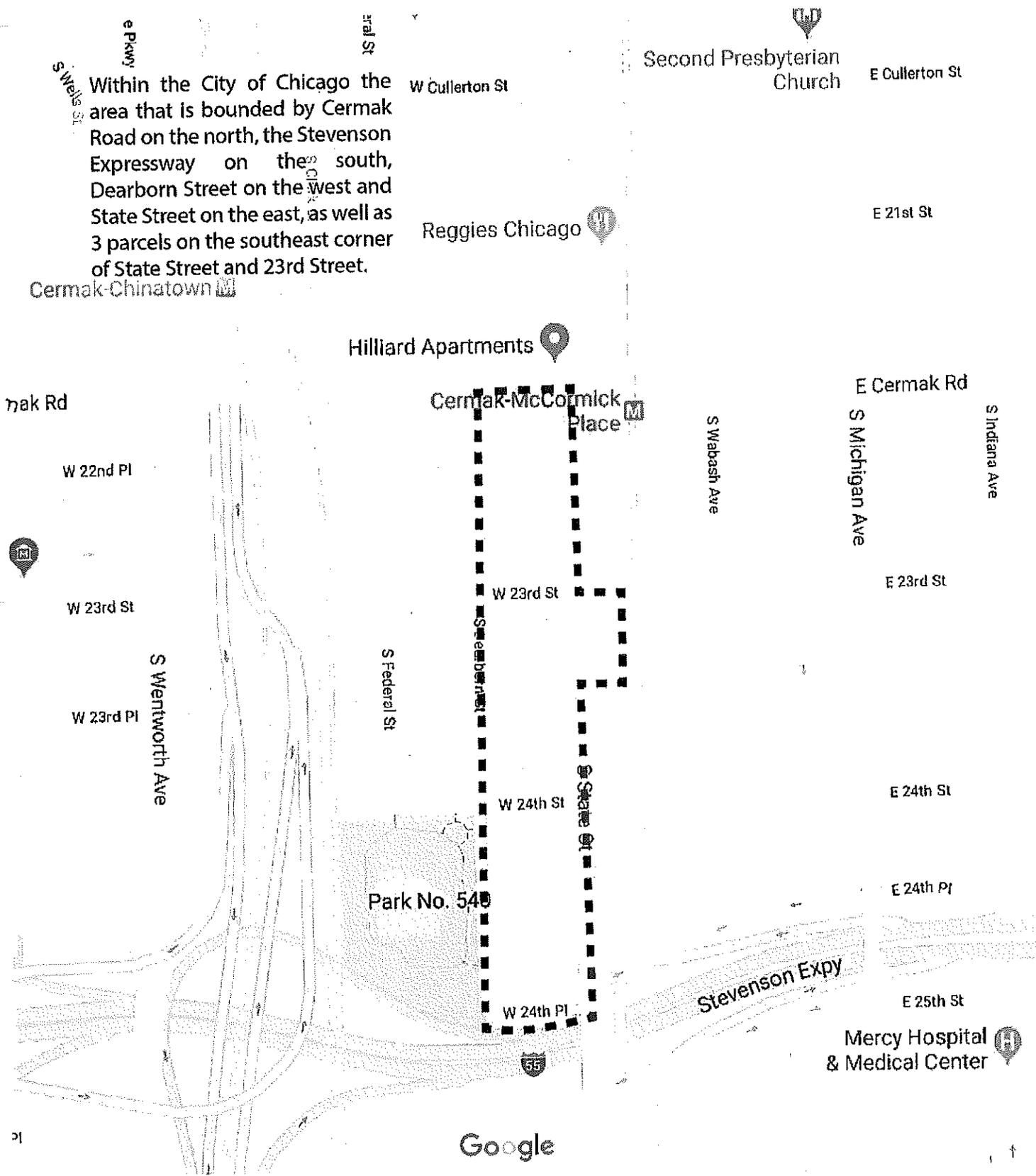
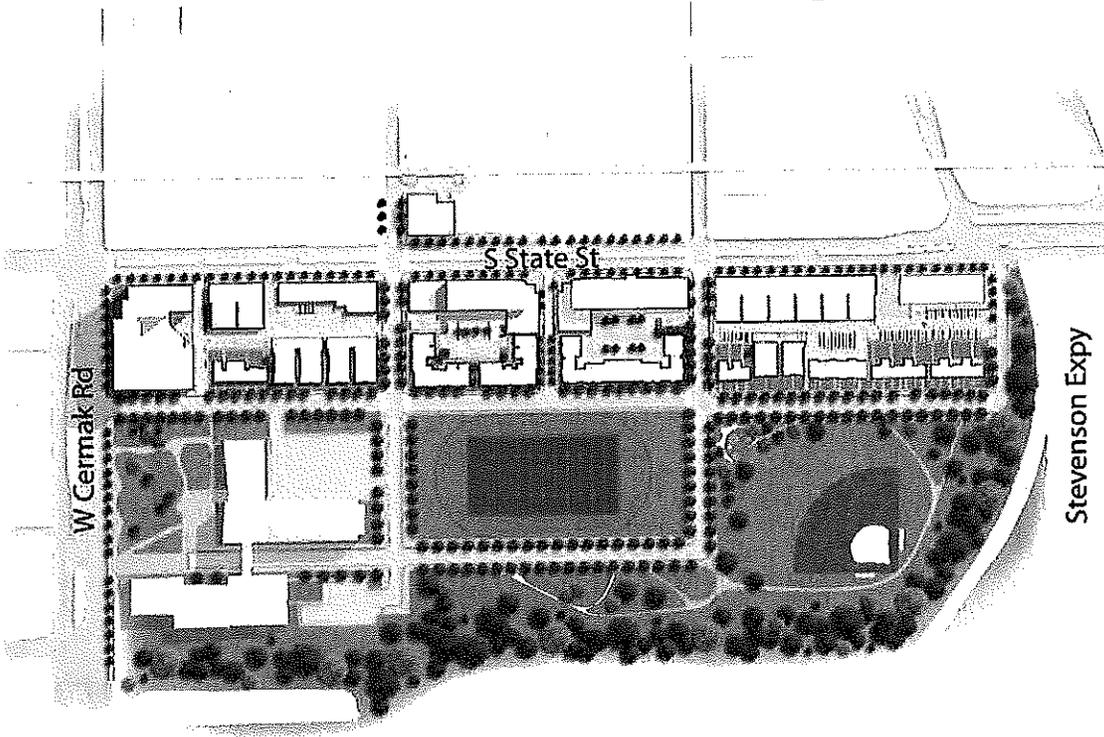


EXHIBIT
A

SOUTHBRIDGE | Master Plan

- 877 residential units
- 770 Rental
- 107 Homeownership
- 3 Phases
- ~65,000 sf of retail
- ~3,000 sf of community flex space
- TOD Site along State St. Next to Two CTA Stations



THE COMMUNITY BUILDERS

McCAFFERY interests
THOUGHTFUL AND CREATIVE REAL ESTATE SOLUTIONS



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AFFIDAVIT OF ANN MCKENZIE

Chicago Housing Authority Chief Development Officer Ann McKenzie, being first duly sworn on oath, states:

- 1) I am the Chief Development Officer at the Chicago Housing Authority ("CHA"). In that role, I oversee all development activities by the Chicago Housing Authority. I have more than 20 years of experience developing affordable housing including public housing in Chicago and Detroit.

- 2) The CHA, the owner of the former Ickes site, the Gautreaux plaintiffs, Ickes Master Developer JV LLC, a Delaware limited liability company ("IMD") with its partners consisting of The Community Builders, Inc. ("TCB") and McCaffrey Interest, Inc. ("MI"), and Harold L. Ickes Homes former residents and others, in a collaborative approach, have developed plans to construct a new mixed income community on the 11-acre site of the former Harold L. Ickes Homes public housing development in the South Loop Area.

- 3) The Harold L. Ickes site has been renamed "Southbridge." It will create an opportunity for public housing families to live in a mixed-income housing development. Planned to be developed in three phases, the entire site is expected to include approximately 877 residential units including apartments, townhomes and condominiums along with 65,000 square feet of retail and 3,000 community flex space. The entire Southbridge Development is outlined in the Southbridge Master Plan. The plan calls for construction of 877 residential units in total, outlined as follows:

EXHIBIT
B

Master Plan	877 total residential units
	770 rental units
	107 for sale units
	65,000 square feet of retail
	3,000 community flex space

- 4) The following is the proposed distribution of rental units in the Southbridge project:

	0 BR	1 BR	2 BR	3 BR	4 BR	Total
PHA units	0	165	60	11	8	244
LIHTC units (60% of AMI)	0	47	23	2	0	72
Moderate units (80% of AMI)	4	49	19	7	0	79
Market-rate units	85	186	104	0	0	375
Total	89	447	206	20	8	770

- 5) During a compliance period of 15 years and an extended use period, approximately 316 of the 770 units must be leased as low-income rental units within the meaning of the Low-Income Housing Tax Credit ("LIHTC") program administered by the Illinois Housing Development Authority ("IHDA") and or the City of Chicago Department of Planning and Development ("DPD") pursuant to 26 U.S.C. Section 42.
- 6) The development is contained within an area bounded by Cermak Road on the north, the Stevenson Expressway on the south, Dearborn Street on the west and State Street on the east, with three additional parcels on the southeast corner of Cermak Road and State Street.
- 7) Exhibit A is the proposed site plan for the first phase (1A and 1B). The phase will consist of two six-story apartment buildings with a combined 206 units including 68 public housing units, 26 affordable units and 112 market rate units. Also included are 18 town homes that are to be offered for sale to private owners. The developer plans to break ground on

Southbridge in the first quarter of 2019 with resident occupancy anticipated in the first half of 2021. Funding for the first phase of CHA units will be covered by HUD's Rental Assistance Demonstration Program ("RAD") and may also include LIHTC from state or local sources.

- 8) Retail space for Phase 1A and 1B will be located in mid-rise buildings along State Street with an open space at the corner of State and 23rd Place to host community events, farmer's markets and street-side dining.
- 9) **Public Housing Units Above Third Floor.** There are eight total residential apartment buildings planned for the development, all are at least 6-story buildings and will require public housing above the third story. Two buildings will be taller, with one building of up to 30 stories and the other up to 15 stories.
- 10) **Management.** Southbridge is to be privately owned and developed by Ickes Master Developer JV LLC, a Delaware limited liability company ("IMD") with its partners consisting of The Community Builders, Inc, ("TCB") and MI Ickes LLC, a Delaware limited liability company("MII"). The property management company will be a private company to be selected.
- 11) **Neighborhood Improvements.** The South Loop area or the broader community known as the Near South Side that includes Southbridge has shown signs of significant improvement in recent years. The area is worthy of being considered a revitalizing area as there is a great deal of development activity that has occurred, is planned and underway so that economic integration is likely in the short run and racial integration in the long run. The factors listed below that have led IMD to believe that higher-income renters and owners will be attracted to the area and that approximately 244 public housing units at Southbridge should be developed include the following:
 - a. **Location Advantages.** Southbridge is in a prime location in the City of Chicago. It is less than two miles from downtown Chicago and less than a mile from the lakefront. The site is near the Dan Ryan expressway, Lake Shore Drive and several major streets, including State Street and Cermak Road. The location is surrounded by development and is highly desirable for excellent public transit options, access to employment centers, high-quality schools, recreation and medical facilities.

- i. **Public Transportation.** The area is served by the Chicago Transit Authority's (CTA) red and green lines, with a green line station adjacent to the site and a red line station a short walk away. In 2015, the Chicago Transit Authority (CTA) completed the reconstruction of the Green Line station at Cermak (adjacent to the site) at a cost of \$50 million. The project is the CTA's effort to bring more reliable and efficient rapid transit service to the south side of the city via the transit line that runs directly east of the proposed redevelopment site. The project included upgraded access to Cermak, new platform canopies and flooring, enhanced lighting, elevators for access, improved lighting, call buttons for security and improved connections to buses along Cermak. Previously, the red line station, located only two blocks away, was rehabilitated.

Also, nearby is the Metra Electric District line to University Park (outbound) and downtown (inbound). The station is located at McCormick Place on 23rd Street between King Drive and Lake Shore Drive, less than one mile from the site. Nearby north and south CTA bus lines include the No. 29 State Street bus, Nos. 3 or 4 Michigan Avenue buses, and the No. 24 Wentworth bus. Buses running east and west include the No. 21 Cermak bus.

- ii. **Employment Opportunities.** The following is a list of some of the public institutions and investments in the area:
 - a) Wintrust Arena, 200 East Cermak Road, is a 10,000 seat sports arena that opened in 2017. Not only do the DePaul Blue Demons play home games there but also the Chicago Sky WNBA franchise.
 - b) McCormick Place, 2301 S. King Drive, consists of four buildings, the West, South, North Buildings and Lakeside Center with a combined total space of 2.6 million square feet, making it the nation's largest convention center. It includes four ballrooms, 173 meeting rooms and the 4,249-seat Arie Crown theater. The West Building was completed in 2007.

- c) Hyatt Regency McCormick Place, an upscale hotel offering an indoor pool, gym and restaurant has been added at 2233 S. Martin Luther King Dr.
 - d) Marriott Marquis Chicago, a four star contemporary hotel with 1,200 rooms, 24 hour fitness center, and a popular restaurant. The hotel has over 93,000 square feet of venues and event facilities. This building was completed in 2017 and is located at 2121 S. Prairie Avenue.
 - e) Home2 Suites by Hilton Chicago McCormick Place, a modern hotel offering an indoor pool, unique Spin2 Cycle fitness/laundry area and restaurant and lounge will be completed in late 2018 at 123 East Cermak Road.
- iii. **Educational Opportunities.** National Teacher's Academy, 55 W. Cermak Road, a Chicago Public School ("CPS") Neighborhood School, is adjacent to the site. The land south of the school is a CPS track and athletic field.

There are also other educational facilities in the surrounding area. Detour 2 Discovery Day School is an independent school that provides infant and toddler nursery, preschool and school-age summer camp in the south loop, located at 2001 S. Wabash. Other nearby public schools include Phillips Academy High School and Dunbar Vocational High School. The Illinois Institute of Technology is less than a half mile south of the site. Nearby is the Mark Sheridan Math & Science Academy, 533 W. 27th Street, a CPS magnet school focusing on math, science and overall academic excellence.

- iv. **Medical Community.** Mercy Hospital and Medical Center, an award-winning hospital and the first chartered hospital in Chicago, is located at 2525 South Michigan Avenue, less than a mile away. The hospital was first established in 1852. It is a 292-bed general medical and surgical, Catholic teaching hospital. It is a Level 2 Trauma Center. The University of Illinois Medical Center and Rush Medical Center are located approximately three and four miles away.

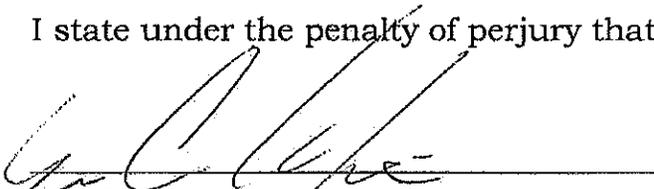
- b. **Community Institutions.** There are several major anchor community institutions within two miles of Southbridge – McCormick Place, Soldier Field, Wintrust Stadium, Guaranteed Rate Field, home of the Chicago White Sox . Other nearby community facilities include:
- i. Chinatown Branch, Chicago Public Library, 2100 S. Wentworth Ave, which opened in August, 2015 has a partially covered, “living” roof and Feng-shui influenced interior design.
 - ii. The 1st District Central Chicago Police Station, located at 1718 S. State Street.
 - iii. Ping Tom Memorial Park located at 1700 S. Wentworth Drive, is a 17-acre park along the on the south bank of the Chicago River less than one half mile northwest of Southbridge. The park features a pagoda-style pavilion, bamboo gardens, a playground and nature area. There is a field house, gymnasium, swimming pool, fitness center and public boat dock for non-motorized boats. There is also kayak rentals.
- c. **Nearby Retail.** Grocery shopping is located nearby with an upscale grocer, Marianos, located at 1615 S. Clark, and a Jewel-Osco located at 1224 S. Wabash. Also located nearby are a Walgreen’s Pharmacy, Chase Bank and many restaurants in the immediate area and in nearby Chinatown. Restaurants in the immediate area include Chef Luciano Kitchen + Chicken, Pizano’s Pizza & Pasta, Reggie’s Chicago, Asian Cajun, and Opart Thai House Restaurant. Southbridge will contain a large retail component with 65,000 square feet of retail space. It is anticipated that grocery stores, restaurants and coffee shops will use some of the space.
- d. **Residential Development.** New private sector residential development has blossomed in the area near Southbridge over the past several years. It has included both new construction and the rehabilitation of existing buildings. Recent new developments include The Lex, a luxury high-rise apartment building located at 2138 S. Indiana Street, Lakeside Lofts (of Prairie Station), 2025-35 S. Indiana, 1000M, a high-rise apartment building designed by world-renowned architect Helmut

Jahn located at 1000 S. Michigan Avenue, Vision on State, 1255 S. State Street, 1901 S. Calumet, Park Michigan, 1212 S. Michigan, South Loop Apartments, 2101 South Michigan, The Shelby, 2300 S. Michigan, and many more developments.

12) Economic conditions in the surrounding community have improved since initial planning of this development and are continuing to improve.

13) **The Proposed Revitalization Area.** The entire Harold Ickes Revitalization plan is based on creating an environment where public housing residents will live in a community with market rate, home-ownership and affordable homeowners in a mixed-income, mixed-use community. The master development plan will be implemented in several phases over the next several years. The new mixed income community will consist of housing units set aside for public housing residents, affordable rental and for sale townhome housing units, market rate for sale housing units, commercial/retail space, open park space and a community "flex" space. The redeveloped site will provide approximately 877 units of diverse housing opportunities for different lifestyles when fully complete.

I state under the penalty of perjury that the foregoing is true and correct.



Ann McKenzie
Chief Development Officer
Chicago Housing Authority

12/14/18
Date

Within the City of Chicago the area that is bounded by Cermak Road on the north, the Stevenson Expressway on the south, Dearborn Street on the west and State Street on the east, as well as 3 parcels on the southeast corner of State Street and 23rd Street.

Cermak-Chinatown

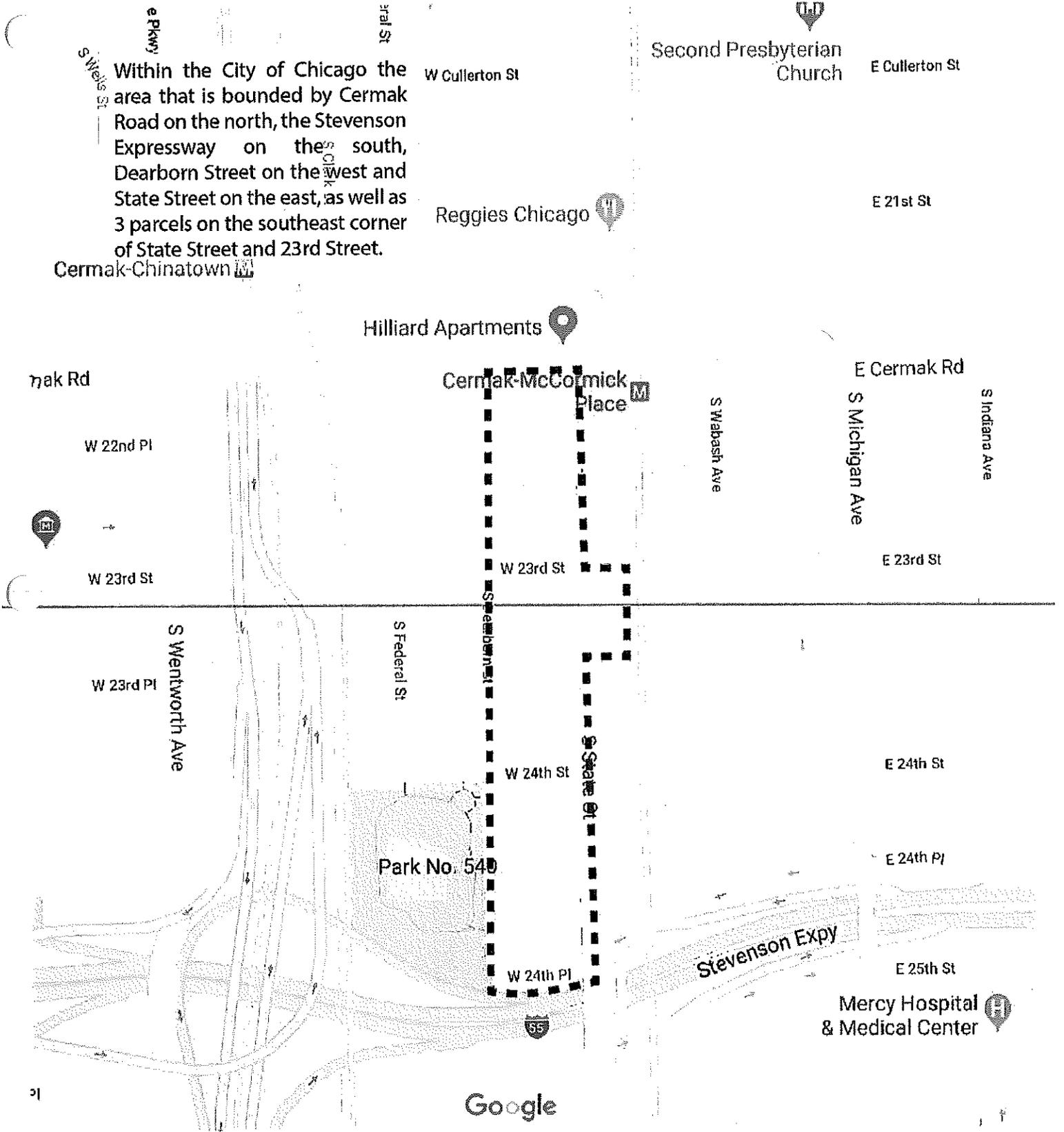


EXHIBIT
C

**UNITED STATES DISTRICT COURT
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CHICAGO HOUSING AUTHORITY,)	66 C 1459
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Defendants.)	Hon. Marvin E. Aspen
)	

TO: All Parties and Counsel of Record

NOTICE OF MOTION

PLEASE TAKE NOTICE that on the day of December 20, 2018, at 10:30 a.m. or as soon thereafter as counsel may be heard, Defendant, the Chicago Housing Authority, a Municipal Corporation, shall appear before the Honorable Judge Marvin E. Aspen of the United States District Court for the Northern District of Illinois in Room 2568 at 219 S. Dearborn Street, Chicago, IL, and shall then and there present the attached **Joint Motion of Plaintiffs and Defendant Chicago Housing Authority for an Order Designating the Ickes Revitalizing Area**, a copy of which is herewith served upon you.

CHICAGO HOUSING AUTHORITY

By: s/s Thomas N. Osran

Elizabeth M. Silas and Thomas N. Osran
James L. Bebley
Chicago Housing Authority
60 East Van Buren
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(312) 913-7090
(313) 913-7091 Fax

CERTIFICATE OF SERVICE

I, Thomas N. Osran, an attorney for Defendant Chicago Housing Authority certify that on December 14, 2018, I caused copies of the foregoing Notice of Motion and Joint Motion to be filed electronically with the Clerk of the Court for the United States District Court of the Northern District of Illinois by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system and that this Notice and the Motion referenced have been served electronically on the persons in the service list below and all others on the CM/ECF list.

s/Thomas N. Osran, December 14, 2018

s/s Thomas N. Osran
Thomas N. Osran

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