



# Implementation Memorandum

## Building on Chicago's Strengths: The Partnership for Building Reuse

September 2018

In Partnership with



National Trust for Historic Preservation

**Preservation Green Lab**



## Urban Land Institute Chicago

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The mission of the Urban Land Institute (ULI) is to provide leadership in the responsible use of land and in creating and sustaining thriving communities worldwide.

ULI Chicago, a District Council of the Urban Land Institute, has nearly 1,400 members in the Chicago region spanning the land use industry including developers, builders, engineers, attorneys, planners, investors, financial advisors, academics, architects and public officials.

## Technical Assistance Services Program

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ULI Chicago's Technical Assistance Services (TAS) program allows local communities or government agencies an opportunity to access strategic advice from development experts that they could not obtain through any other process. Through its TAS program, ULI Chicago convenes a multidisciplinary team of ULI-member experts to address complex land use challenges and help sponsors find creative, practical and implementable solutions.

## Sustaining Support

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ULI Chicago gratefully acknowledges its sponsors, whose support is critical to local ULI initiatives:

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## National Trust for Historic Preservation

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The National Trust for Historic Preservation is a privately-funded nonprofit organization that works to save America's historic places for the next generation.

The **Preservation Green Lab** strengthens the fabric of communities by leveraging the value of existing buildings to reduce resource waste, create jobs, and bolster a strong sense of community. The Preservation Green Lab integrates sustainability with historic preservation by developing research, demonstration projects, and policies that decrease demolition and promote building reuse. Guided by a belief that historic preservation is essential to sustainable development, the Preservation Green Lab works with partners to create new pathways to shared prosperity and to bring people together around a common vision for their neighborhoods, towns, and cities.

### **CONTRIBUTOR**

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***“We are talking about the bread and butter buildings that create Chicago’s neighborhoods... about reusing the bones and character of these buildings and enlivening them with new use. Its not about sweating the terracotta details.”***

– Alicia Berg, Assistant Vice President, The University of Chicago and Chair, ULI Chicago Building Reuse Advisory Committee.

## Introduction

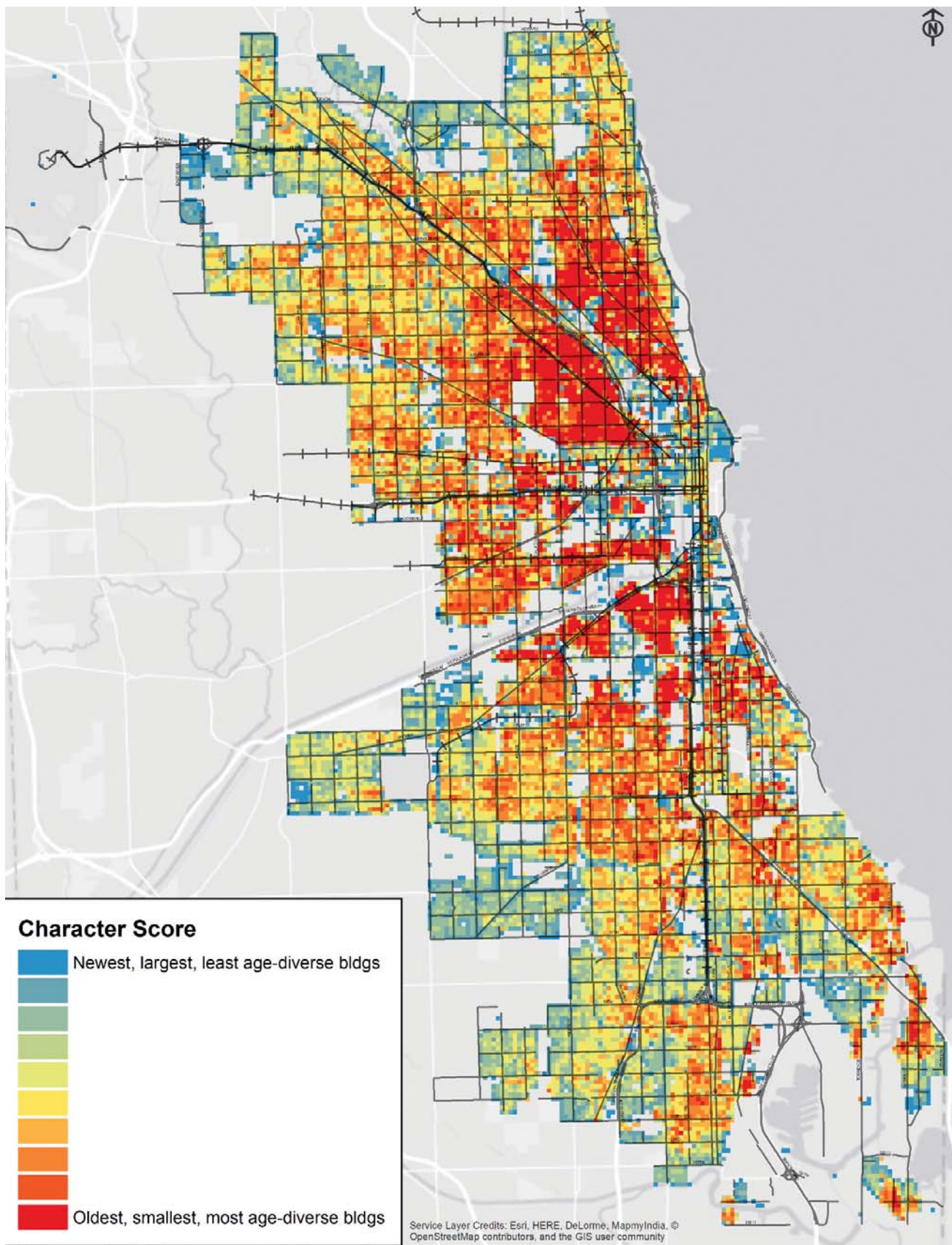
ULI Chicago has partnered with the National Trust’s Preservation Green Lab (The Partnership) to help strengthen Chicago’s neighborhoods by facilitating the reuse of older buildings that are vacant or underutilized.

The Partnership has identified the most significant barriers for building reuse in the City of Chicago and developed recommendations to help overcome them. The recommendations report, released on May 2016, can be accessed on the ULI Chicago website.

The Partnership’s recommendations are based on an analysis of the building stock and the socio-economic fabric of Chicago’s neighborhoods, and are informed by “on-the-ground” experiences of over a hundred industry experts, community representatives, and City officials and staff. The report focuses on older, smaller buildings that might not have a historic or landmark designation but are still an integral part of Chicago’s neighborhoods (Figure 1). Rehabilitating these buildings can bring new jobs and residents and help stabilize and revitalize struggling neighborhoods.



Industry experts and community members gathered for the building reuse recommendations report release at 1871, a center for technology innovators and entrepreneurs, located inside the Merchandise Mart, an iconic Chicago building that has successfully reinvented itself.

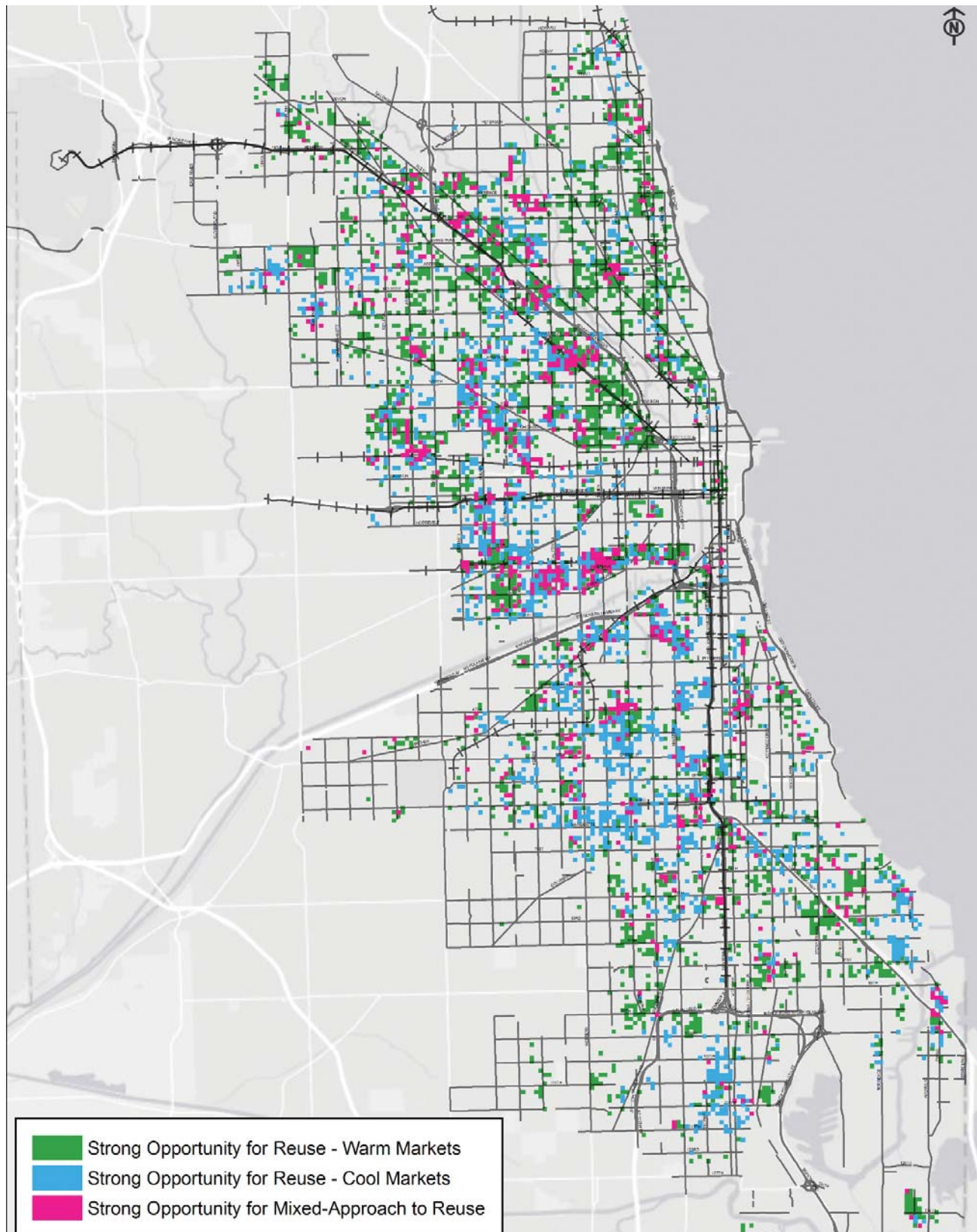


**Figure 1: Character Score**

Red squares represent areas of the city where buildings are older and smaller and where the diversity of building age is greatest.

Source: *Building on Chicago's Strengths: The Partnership for Building Reuse*





**Figure 2: Reuse Opportunity Areas: Present Throughout the City**

The colored squares shown on this map are areas of high opportunity for successful building reuse, according to a new methodology developed as a part of the Partnership for Building Reuse. Blue squares indicate strong opportunity for building reuse in cooler markets. Green squares indicate strong opportunities in hotter real estate markets. Pink squares indicate areas where a mix of for-profit and non-profit development could be most effective.

Source: *Building on Chicago's Strengths: The Partnership for Building Reuse*



# Advancing Building Reuse Recommendations

## Engaging the City of Chicago

Recognizing the untapped potential of underutilized/vacant buildings in driving neighborhood revitalization, the Departments of Planning & Development and Buildings at the City of Chicago are keenly interested in exploring policy and regulatory improvements that can make it easier to rehabilitate and reuse older buildings.

Representatives from both departments actively participated in the Partnership's work to develop reuse recommendations. During the recommendations report launch in May 2016, the City of Chicago's leadership team reiterated their commitment to supporting reuse of older buildings. They welcomed technical

*"ULI is a convener of experts...but ULI is also an implementer. Our hope is that best policies from projects like these will be implemented by government, the market, consultants and by residents. We intend to work in partnership with the City to assess and implement some of the mechanisms we have proposed for promoting building reuse."*

— Paul Shadle, Partner, DLA Piper and ULI Chicago Advisory Board Member, Building Reuse Advisory Committee Member.

assistance from ULI Chicago and other professional and community organizations in identifying potential solutions, including regulatory improvements, for making it easier to reuse older buildings.

## Implementation Task Forces

To help implement the Partnership's recommendations, ULI Chicago formed two task forces—the Building Code Task Force and the Zoning, Parking and Streetscape Task Force. The task forces focused on strategies for implementing two key recommendations in the report related to overcoming regulatory barriers:

- 1. Apply Chicago Building Code (CBC) in a more flexible manner for rehabilitation/reuse of older buildings.**
- 2. Strengthen adaptive reuse policies within the Chicago Zoning Code and reduce off-street parking requirements for building reuse projects.**

Both task forces, made up of industry experts and City of Chicago representatives, met regularly to identify key building and zoning code challenges, analyze potential solutions, and to seek stakeholder input. Their key findings and strategic recommendations are summarized in the following sections.



City of Chicago Commissioners, David Reifman and Judy Frydland, of the Department of Planning & Development and the Department of Buildings respectively, expressed their enthusiasm for working with ULI Chicago and community partners to promote building reuse.

# Building Code Recommendations

## The Process

The building code task force, charged with recommending improvements to the Chicago Building Code (CBC), focused on small, neighborhood buildings that are not designated historic but are nevertheless an integral part of Chicago's urban fabric. These buildings do not often qualify for regulatory relief or financial assistance but rehabilitating them and returning them to productive uses is key to strengthening and revitalizing neighborhoods.

While recognizing that each building reuse project faces unique challenges in meeting code requirements, the task force identified CBC requirements that are encountered frequently in a variety of building types and tend to be costly and difficult to implement. These include:

- Low thresholds for triggering compliance with new construction standards when making repairs, alterations or additions to an existing building.
- Change in use/occupancy triggering compliance with new construction standards.
- Different levels of regulatory relief for buildings on the National Historic Register compared to buildings with Chicago Landmarks designation.
- Accessibility requirements with limited allowances for common-sense solutions and variations due to construction tolerances.
- Archaic materials and assemblies – lack of compliance pathways for reusing many commonly found archaic materials in older Chicago buildings.

The task force discussed different solutions that have been successfully used by developers/owners for meeting these code challenges. To recommend amendments that can eliminate/minimize challenging code requirements without compromising life-safety,

the task force did a comparative analysis of CBC and International Existing Building Code (IEBC) standards for Light & Vent and, Staircase, Exiting & Fire Resistance Ratings. The task force findings are presented below.

## Recommendations

### 1. Knowledge-Sharing

To make it easier for smaller-scale and newer owners/developers to rehabilitate older buildings by utilizing well-established solutions and work-arounds for common challenges, the task force recommends organizing informational workshops in neighborhoods throughout the City. These workshops could be organized through aldermanic offices and bring together industry professionals, including ULI members and City staff, to provide valuable technical assistance to community members.

### 2. Aligning Chicago Building Code (CBC) with International Existing Building Code (IEBC)

Based on its comparative analysis, the task force found that modifying CBC to align it more closely with IEBC could help remove many barriers that currently make it hard to rehabilitate and reuse older buildings in Chicago. More detailed recommendations for CBC requirements identified as particularly challenging by the task force are as follows:

#### 2A. Thresholds for triggering new construction compliance requirements related to repairs, alteration or addition to an existing building.

CBC thresholds for triggering new construction requirements are not consistent across code sections and in many instances, minor alterations, such as moving an internal wall without increasing the overall floor area, can require an entire older structure to meet new construction requirements. This can make

it cost prohibitive to rehab many older buildings for reuse, especially smaller buildings in neighborhoods with weaker real estate markets. A simplified process and revised thresholds for triggering new construction requirements for the entire existing structure can help expedite the review process and reduce project costs, both pre-development and development, for owners/developers. This in turn can enhance the financial feasibility of rehabbing and reusing older buildings.

### Proposed Improvements

Modify CBC trigger thresholds for new construction requirements to align more closely with IEBC,

especially:

- Provide a multi-tiered compliance pathway so that minor alterations do not trigger the same requirements as more comprehensive remodeling.
- Eliminate cost basis for calculating trigger thresholds.
- Make new construction compliance triggers uniform across code sections to the extent possible.

### Analysis

IEBC vs. CBC: Comparing current thresholds for new construction requirements for Light & Vent (L&V) and Staircase, Exiting & Fire Resistance Ratings (SE&F)

IEBC Requirements (Current)	CBC Requirements (Current)
<b>Repairs</b> <ul style="list-style-type: none"> <li>• Reconstruction or renewal of any part of an existing building for maintenance or to correct damage does not trigger any L&amp;V requirements.</li> <li>• Like materials are permitted, as long as no unsafe conditions are created.</li> </ul>	<b>Repairs</b> <ul style="list-style-type: none"> <li>• Code exemptions on a case-by-case basis are allowed only to buildings/structures designated Chicago Landmarks.</li> </ul>
<b>Alterations</b> <ul style="list-style-type: none"> <li>• Provides three different levels based on the extent of alterations</li> <li>• A project's alteration level remains unchanged across L&amp;V and S,E&amp;F code sections.</li> <li>• Level of alteration is based on the type of work and work area, not the cost of work.</li> <li>• Compliance requirements increase as the level of alterations increase.</li> </ul>	<b>Alterations</b> <ul style="list-style-type: none"> <li>• There is no stepped method of compliance based on defined levels of alteration.</li> <li>• Alteration thresholds that trigger compliance requirements are not consistent across code sections: <ul style="list-style-type: none"> <li><b>L&amp;V.</b> ANY alteration in room size triggers compliance with new construction requirements (except existing courts and light wells do not need to be increased). This would include a rearrangement of partition walls without increasing overall floor area. Increase by one additional dwelling unit also triggers compliance requirements.</li> <li><b>S,E&amp;F.</b> Compliance requirements are triggered when the cost of remodeling is more than 50% of the cost of reproduction of that space/building.</li> </ul> </li> </ul>
<b>Additions</b> <ul style="list-style-type: none"> <li>• In case of an addition (increase in floor area, number of stories, building height), only the addition portion of the building is considered new construction and needs to comply with IBC.</li> <li>• If the addition impacts a portion of the existing structure, then that portion also needs to comply with IBC.</li> </ul>	<b>Additions</b> <ul style="list-style-type: none"> <li>• When the floor area of the addition is less than 25% of the original building, only the addition portion of the building needs to conform to CBC's L&amp;V requirements.</li> <li>• When the floor area of the addition is more than 25%, the ENTIRE building (addition and existing) has to meet CBC's L&amp;V requirements.</li> </ul>

## 2B. Change in use/occupancy resulting in compliance with new construction requirements.

When any change of use occurs for an existing building, a Certificate of Occupancy is required as per CBC and IEBC. Because a change in use impacts several metrics such as population density and travel distances that affect life safety, both CBC and IEBC require an investigation and analysis to determine any compliance requirements to meet code standards before an occupancy certificate can be issued.

CBC provides prescriptive directives, which while applicable to many change-in-use circumstances, are not easily tailored to unique situations that often arise in older buildings. Compliance with new construction standards is the default in such situations, which can make reuse technically infeasible and/or cost prohibitive.

### Proposed Improvements

- Instead of prescriptive requirements, allow greater integration of performance based

methods, similar to IEBC, to meet health & life safety requirements. For example:

- Consider alternative live load calculations for small, frame-construction residential buildings.
- Consider a ventilation solution that combines natural with mechanical when windows in historic facades are not adequately sized (IEBC allows all mechanical solutions).
- Allow existing water/sewer pipes (irrespective of size) if they meet performance adequacy standards.
- Recognize that certain IEBC requirements, such as the extensive provision of fire sprinkler systems, would need to be analyzed and likely modified to synchronize with other CBC requirements.
- Compile a list of alternatives to new construction standards for frequently encountered issues approved by Standards & Tests Committee.

### Analysis

IEBC vs. CBC: Comparing current compliance requirements for change of occupancy

IEBC Requirements (current)	CBC Requirements (current)
<ul style="list-style-type: none"> <li>• Lists certain new uses that would mandate compliance with new construction standards and provides Hazard Indexes for assessing egress, fire separation and fire exposure elements – any increase to the index mandates new construction compliance.</li> <li>• <b>Fire Sprinklers.</b> Broad requirement for sprinklers for all uses and building types.</li> <li>• <b>Plumbing.</b> New occupancy has to “comply with the intent” of the applicable new construction elements of the code, providing some flexibility in achieving compliance.</li> <li>• <b>Electrical.</b> New construction standards are mandated for the entire building when certain uses are provided. All unsafe conditions are to be corrected.</li> <li>• <b>Light &amp; Vent.</b> Change of Occupancy mandates new construction requirements for L&amp;V, either natural or mechanical ventilation is permissible for all uses including residential.</li> </ul>	<ul style="list-style-type: none"> <li>• Prescriptive requirement for change of occupancy to residential; for changes to other uses, a graduated Hazard Index methodology is used.</li> <li>• <b>Fire Sprinklers.</b> Limited requirement for fire sprinklers.</li> <li>• <b>Plumbing.</b> Alterations or other upgrades are subject to new construction standards. PVC pipes are allowed for residential uses not over 4 stories.</li> <li>• <b>Electrical.</b> Entire electrical system required to be new if more than 60% is altered.</li> <li>• <b>Light &amp; Vent.</b> Existing L&amp;V can remain if no existing room sizes are altered. Any change in room size results in new construction requirements, which are largely prescriptive. Natural L&amp;V are required for residential.</li> </ul>



## 2C. Different requirements for Chicago Landmarks vs. buildings on the National Historic Register.

IEBC offers relief from code compliance for buildings that are either individually listed, contributing buildings, or certified as eligible for listing on the National Register for Historic Places or designated historic under state or local law. In contrast, CBC only provides relief from code compliance for buildings that are designated Chicago Landmarks. Expanding this relief in Chicago for other historic buildings, similar to IEBC's approach, would make it easier for building owners to undertake difficult historic rehabilitation projects and would help when there is a conflict between meeting CBC and also meeting historic rehabilitation standards. Currently, relief from the Chicago code provisions has to be reviewed on a case-by-case basis for each project and with authorization from the DOB Commissioner. This makes it difficult for landmark building owners to know what kind of code

relief is possible and takes valuable DOB staff time for specific project reviews. A compilation of commonly available DOB Administrative Relief for historic properties would be beneficial such as identifying acceptable relief for historic railings, for existing stair configurations, and for light and ventilation requirements.

### Proposed Improvements

- Consistent with IEBC, expand CBC relief to include buildings that are either individually listed, contributing buildings, or certified as eligible for listing on the National Register for Historic Places or designated historic under state or local law.
- A compilation of commonly available DOB Administrative Relief for historic properties would be beneficial such as identifying acceptable relief for historic conditions such as railings, exit stairs, and light and ventilation requirements.

## Analysis

IEBC vs. CBC: Comparing current exemptions for historic buildings

IEBC Requirements (current)	CBC Requirements (current)
<ul style="list-style-type: none"> <li>• Relief from code compliance is provided for a wider category of historic buildings:               <ul style="list-style-type: none"> <li>- Listed/ certified as eligible for listing on the National Register for Historic Places</li> <li>- Designated historic under state or local law</li> <li>- Contributing resource within a National Register or state or locally designated historic district</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Relief from code compliance may be provided on a case-by-case basis only to buildings/structures designated Chicago Landmarks by the Chicago City Council</li> <li>• Buildings on the National Register of Historic Places are not eligible</li> <li>• (13-200-100). Building Commissioner may authorize repair, alterations and additions necessary for preservation/ rehab/ continued use of a (Chicago Landmark) building if:               <ul style="list-style-type: none"> <li>- Unsafe conditions are corrected in accordance with approved plans</li> <li>- The restored building will be no more hazardous than the existing building</li> </ul> </li> </ul>

**2D. Meeting Accessibility Requirements.**

CBC is currently being updated to align more closely with 2010 Americans with Disabilities Act (ADA) standards for accessibility in buildings. Aligning CBC with 2010 ADA will allow owners/developers to follow one set of requirements, streamlining the compliance process. The task force recommends exploring opportunities for making it easier and cheaper to provide accessibility related improvements and to allow greater flexibility in rehabilitating uses/ buildings that are not governed by 2010 ADA standards.

**Proposed Improvements**

- For uses not governed by 2010 ADA standards, such as private multi-family residential buildings, explore opportunities for greater flexibility in CBC requirements to make reuse easier while still meeting accessibility goals.
- Consider a “Standards & Tests” type approach for buildings that are especially challenging.
- Make it easier and cheaper to provide ramps (fixed or portable) in the public right-of-way to provide access to buildings with raised entrance levels.
- Limit liability for design professionals to design-related accessibility errors/ omissions (not operations-related), making it easier for small businesses/ individuals to provide design services to small scale reuse projects.

**2E. Archaic materials and assemblies – lack of compliance pathways for several commonly found archaic materials in older Chicago buildings.**

IEBC and CBC are very similar in their treatment of archaic materials as they rely on the same governing document, National Institute for Building Sciences “Guideline on Fire Rating of Archaic Materials and Assemblies.” The task force recognizes that there is a need to incorporate compliance pathways for archaic materials not currently covered by CBC but frequently encountered in older Chicago buildings. However, for the purposes of this analysis, the task force focused on aspects of CBC where adopting/aligning with IEBC can make a difference.

**Proposed Improvements**

- Develop compliance pathways for archaic materials not currently covered by CBC but commonly found in older Chicago buildings. This effort should be separate from the City’s work to align CBC more closely with IEBC.

# Zoning, Parking & Streetscape Recommendations

## The Process

The zoning, parking and streetscape task force, charged with helping overcome zoning code related barriers, focused on the following key strategies:

- Encourage and ease reuse of older buildings by giving the Zoning Administrator the authority to make past building use, dwelling unit, and parking/loading determinations in the absence of City records.
- Provide an incentive for rehabilitation of older buildings by increasing parking relief and allowable floor area ratio (FAR) for older buildings.
- Expand the applicability of the 2015 transit-served location (TSL) ordinance provisions to provide partial benefits to locations within a ¼ mile of high-boarding bus stops (particularly at intersections of high ridership lines) and stops within a ¼ mile of bus rapid transit (BRT) stations and provide greater benefits for reuse projects<sup>1</sup>.
- Provide the P street designation to additional streets with concentrations of older, smaller buildings to extend the benefits of the 2015 TSL ordinance provisions (including parking relief, building, and site design standards) to these streets.

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<sup>1</sup> On June 22, 2018 Mayor Emanuel announced a plan to expand Transit Oriented Development (TOD) policy to high ridership bus lines in the City. Many of the bus lines proposed for this benefit align with those recommended by the ULI Chicago task force (page 15).

Once implemented, these changes to the zoning code will further incentivize building reuse, especially for owners/developers of smaller, neighborhood-scale buildings by:

- Simplifying the permit approval process and making it easier to navigate for smaller owners/developers.
- Reducing costs, in terms of time and money, by creating a simplified and streamlined process.
- Limiting code relief to projects that preserve/reuse older buildings, not allowing relief in combination with demolition.
- Maintaining community input through neighbor comment and City Council process.

## Recommendations

The task force identified key zoning improvements to incentivize reuse of older buildings. The proposed improvements, outlined in this section, are incremental in nature and intended to help shift the balance towards reuse from vacancy or demolition. The proposed increases in FAR and reduction in parking are not based on a quantitative analysis; instead, they reflect the sentiment that was frequently expressed during stakeholder convenings - even slight shifts in regulatory requirements have the potential of going a long way in making building reuse easier and financially viable.

## Recommendation 1: Streamline Past Building, Use, Dwelling Unit, and Parking and Loading Determinations

**1A.** Extend parking and loading exemptions for expansions in older buildings:

- Non-residential buildings need to comply with current parking/loading standards only when enlarged by 30% or more (instead of 25%).
- Residential buildings need to comply when 4 or more new dwelling units are added (instead of two or more new dwelling units).

**1B.** Grant Zoning Administrator discretion to make determinations of building age, duration of use, number of dwelling units, and number of parking and loading spaces where no or insufficient records exist.

### Chicago Zoning Ordinance Provisions to be Amended

- Revise Section 17-10-0101-B: Expansions and Increases in Intensity.
- Add new sub-section to allow Zoning Administrator to make determinations related to building age, duration of use, number of dwelling units and number of parking and loading spaces in response to request for Advisory Opinions.

### Criteria/sources for determining past use would include, but not be limited to:

- Sanborn Maps
- Building types from National Register and Chicago Landmark designation reports
- Comparable buildings
- Character of location/mix of nearby uses
- Existence of certificate(s) of occupancy

### Process for determining past use

1. File Freedom of Information Act (FOIA) request for City records and federal/local landmark reports (including reports for Chicago Landmark buildings and districts).
2. If no documents establishing building age or past use, dwelling units, or parking/loading can be produced within 20 business days, then owner may apply for a past use determination in the form of a zoning opinion letter.
3. Zoning Administrator authorized to render determinations of building age, use duration, number of dwelling units and parking and loading spaces, in response to a request for an Advisory Opinion filed by the subject property owner, lessee, or another party authorized by the owner or lessee.



## Recommendation 2: Extend Parking Relief and Increase Floor Area Ratio (FAR) to Support Reuse of Older Buildings

Grant new authority to Zoning Administrator to approve certain increased relief through administrative adjustments (for some relief measures that currently require Zoning Board of Appeals approval) and grant additional authority to the Zoning Board of Appeals (ZBA) with respect to granting of variations related to FAR and off-site parking.

### 2A. Residential Parking

Administrative adjustment to reduce off-street parking by not more than 5 spaces (instead of 2 spaces) in RT4, RM4.5 or RM5 Districts or by not more than 10 spaces or 25% (instead of 5 spaces or 20%), whichever is greater, in RM5.5, RM6 or RM6.5 Districts when the building has been in lawful existence for 50 years or more.

#### Chicago Zoning Ordinance Provisions to be Amended

- Delete sections 17-13-1101-C and 17-13-1101-G. These sections authorize variations that are now proposed to be allowed as administrative adjustments. Any administrative adjustment may also be approved as a variation per Section 17-13-1101(A).
- Revise Section 17-13-1003-DD: Parking Reduction for Older Buildings.

### 2B. Increased FAR

Administrative adjustment to allow enlargement of permitted residential or non-residential uses in RS3, RT3.5, RT4, RM4.5, or RM5 by 25% of the floor area (instead of 15%) in buildings in lawful existence for at least 50 years before the adjustment is requested.

#### Chicago Zoning Ordinance Provisions to be Amended

- Add New Section 17-13-1003-LL to allow for approval of proposed increased FAR through an administrative adjustment.

### 2C. Non-Residential Parking and Loading

Variations granted by the ZBA and administrative adjustments to reduce off-street parking and loading requirements by 2 spaces (instead of 1) or 25% (instead of 20%), whichever is greater. Parking relief via administrative adjustment is available only for buildings in lawful existence for 50 years or more.

#### Chicago Zoning Ordinance Provisions to be Amended

- Revise Section 17-13-1101-D to reduce applicable off-street parking or loading requirements.
- Add New Section 17-13-1003-MM to allow reduction in parking and loading requirements through administrative adjustment for buildings that have been in lawful existence for 50 years or more.

### 2D. Non-Residential FAR

Variations granted by the ZBA and administrative adjustments to increase maximum gross floor area by 15% (instead of 10%). FAR increase via administrative adjustment is available only for buildings in lawful existence for 50 years or more.

#### Chicago Zoning Ordinance Provisions to be Amended

- Revise Section 17-13-1101-H to allow increased FAR as a variation.
- Add New Section 17-13-1003-NN to allow increased FAR through administrative adjustment for buildings that have been in lawful existence for 50 years or more.

*continued..*

**2E. Floor Area Bonus for Older Buildings**

Additional proposed amendments to Chicago Zoning Ordinance regarding administrative adjustments to allow the addition of floor area through conversion of area excluded from floor area for purposes of calculating FAR in existing buildings (such as unused parking area, mechanical area and other altered space).

**Chicago Zoning Ordinance Provisions to be Amended**

- Revise Section 17-4-1003-E.1 to allow floor area bonus of less than 0.5 FAR in any “D” district to be approved as an administrative adjustment by the Zoning Administrator in existing developments; provided such floor area bonus shall result in an increase of no more than 5% or less of the floor area in existence as of the date of application for an administrative adjustment.
- Revise Sections 17-4-1008 and 17-13-1003-D: Add new sub-section to provide floor area bonus via administrative adjustment to increase the amount of floor area within the existing building envelope, provided the increase is no more than 5% of the existing floor area for existing developments located within approved planned developments.

**2F. Location of Off-Street Parking—Both Residential and Non-Residential Uses**

Variation to allow off-street parking up to 1,200 feet (approximately two City blocks) from project (instead of 600 feet) for buildings in lawful existence for 50 years.

**Chicago Zoning Ordinance Provisions to be Amended**

- Revise Section 17-13-1101-F to increase the distance for locating required parking spaces from a use that can be granted as a variation by the Zoning Board of Appeals.
- Also review possible changes to Section 17-13-1003-FF, or to increase the allowed distance to offsite parking through the administrative adjustment permitted by Section 17-10-0603-A.1 to increase allowed distance to offsite parking from 100 feet to 450 feet.

**2G. Authority for Administrative Adjustments**

Allow Zoning Administrator to grant 4 administrative adjustments (instead of 2) before going to Zoning Board of Appeals.

**Chicago Zoning Ordinance Provisions to be Amended**

- Revise Section 17-13-1002

**Recommendation 3: Amend 2015 Ordinance for Transit Served Locations (TSL)**

Expand the applicability of TSL provisions to areas served by bus lines and extend parking reductions.

**3A. Create a new TSL level for nodes with very high bus use with some benefits of TSL currently provided to areas with train stations.**

- Available to sites within ¼ mile of a bus stop with high CTA bus boardings, particularly at intersections of high-boarding bus lines, or within ¼ mile of high-boarding BRT stations. The following corridors with high-boarding bus stops at major intersections should be considered:

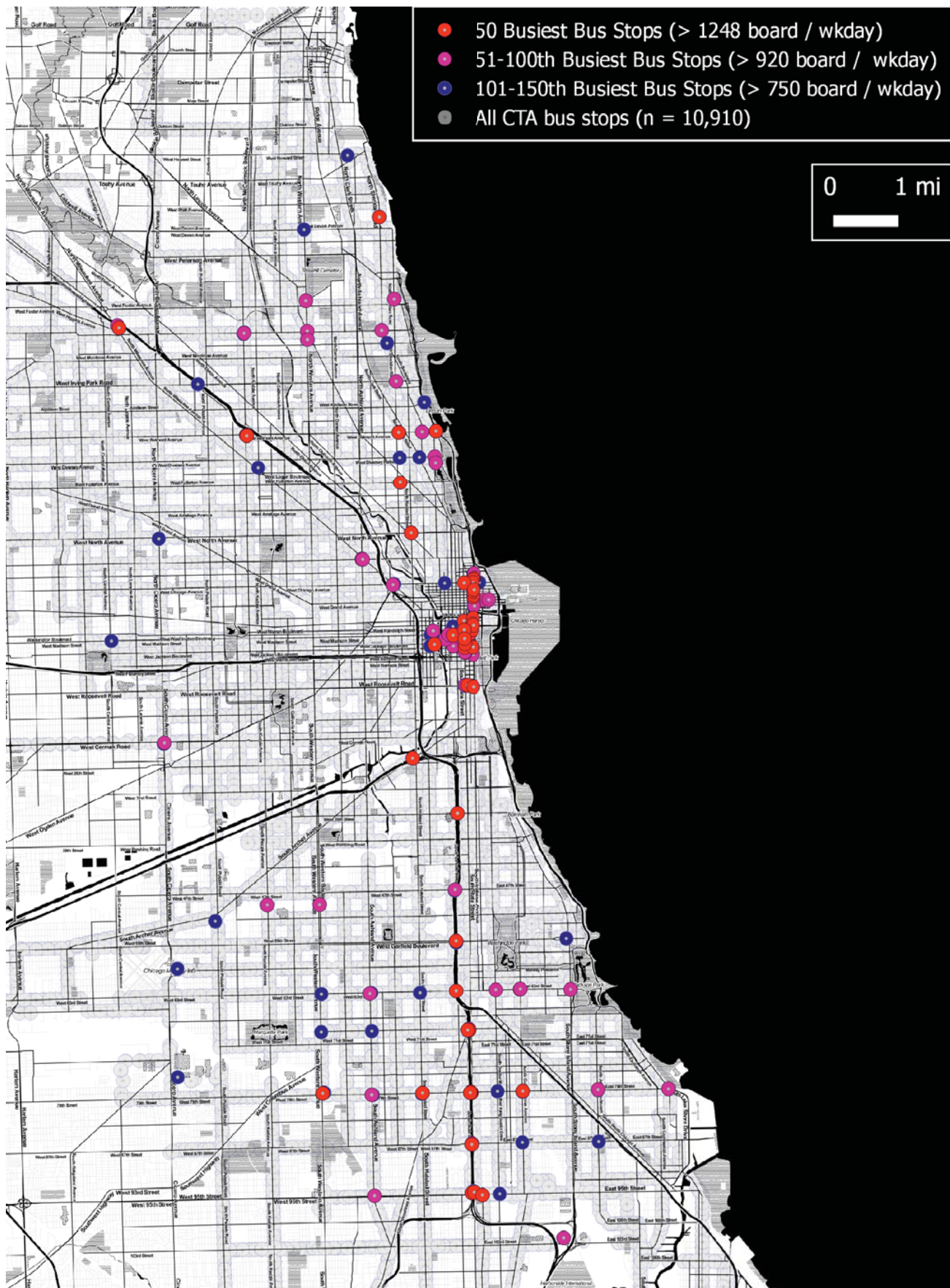
**North – South Streets:**

- Western Avenue between Foster Avenue and 95th Street
- Ashland Avenue between Bryn Mawr Avenue and 95th Street
- Halsted Street between 63rd and 95th Streets
- Cottage Grove between 63rd and 95th Streets
- Stony Island between 55th and 103rd Streets

**East – West Streets:**

- North Avenue between Harlem and Milwaukee Avenues
- Chicago Avenue between Austin Boulevard and Racine Avenue
- Madison Street between Austin Boulevard and Halsted Street
- 55th Street between Cicero and Stony Island Avenues
- 63rd Street between Kedzie and Stony Island Avenues
- 79th Street between Western and Brandon Avenues
- 95th Street between Western and Torrence Avenues

*continued..*



**Figure 3: Busiest Bus Stops**

Top 150 bus stops in the City of Chicago based on average weekday ridership data

Source: Preservation Green Lab analysis of Chicago Transportation Authority data

- Allow variation for up to 50% reduction of parking requirements (as opposed to up to 100% reduction for train stations).
- Provide an incentive for reuse of older buildings by providing a 20% decrease in MLA requirements, 15% increase in FAR, and 9 feet increase in maximum height for additions to older buildings or for projects that incorporate reuse of an older building as a part of the project.

**3B. Modify existing TSL benefits to allow reduction of parking requirements for change in use from commercial or industrial to residential for older buildings that are preserved, as an incentive to reuse the building rather than build a new building.**

**Policy Considerations**

- The proposed recommendations encourage reuse over new construction by providing buildings over 50 years old with parking relief and FAR bonuses that are not available to new construction projects. Additionally, streamlining the process of past-use determination will make it easier for reuse projects to avail of these relief measures.
- Allow additional height in B and C dash 5 districts in addition to dash 3 districts.
- The City's Neighborhood Opportunity Fund can be leveraged for promoting commercial development within these newly designated TSL zones with high bus usage.

**Chicago Zoning Ordinance Provisions to be Amended Include:**

- 17-3-0402-B Minimum lot area per dwelling unit in B and C districts
- 17-3-0403-B Maximum FAR in B and C districts
- 17-3-0408-B Maximum building height in B and C districts
- 17-4-0404-C Minimum lot area per dwelling unit in D downtown dash 3 districts
- 17-4-0405-C Maximum FAR in D downtown dash 3 districts
- 17-10-0101-B.2. Parking requirements applicable to changes of residential uses
- 17-10-0101-C.2. Parking requirements applicable to changes of non-residential uses
- 17-10-0102-B(1) Parking requirement reductions for residential uses of TSL sites in B, C and D districts
- 17-10-0102-B(2) Parking requirement reductions for non-residential uses of TSL sites in B, C, D and M districts



## Recommendation 4: Provide Additional P Street Designations

Expand the P Street designations to more locations and extend parking reductions.

### 4A. Modify restrictions on P Street designation to allow for designation of streets with strong architectural character and existing structures, but in need of reinvestment.

P Street criteria language should be adjusted to preserve and promote architectural character in neighborhoods in weaker markets. This could be done by removing the following requirements:

- “have a high concentration of stores and restaurants”
- “have very few vacant stores”

### B. Provide 50% reduction in required parking for new uses along a P Street for residential and non-residential uses on projects larger than 10,000 square feet, and up to 75% reduction for rehabilitation of buildings in lawful existence for 50 or more years.

### Policy Considerations

- Modified criteria – consider limiting curb cuts to one per block or 600 feet rather than eliminating curb cuts completely so as not to turn away needed businesses/ economic development opportunities. Example: Bank with drive-thru window.
- Utilize National Trust/ULI mapping to inform designation of additional P Streets, add criteria based on age and age-diversity of buildings.
- Consider tactical, targeted urban revitalization such as parklets, pop-ups etc. Example: Street(s) in Chatham.
- Incorporate current City programs such as Neighborhood Opportunity Bonus areas, SPARK and other corridor incentives to amplify benefits of recommended improvements.

### Chicago Zoning Ordinance Provisions to be Amended:

- 17-3-0500 et seq. Revise description and criteria for designation of Pedestrian streets in B and C districts.
- 17-4-0500 Revise description and criteria for designation of Pedestrian streets in D districts.
- 17-3-0504-E Add provisions to permit a 50% reduction in required parking for new uses with areas larger than 10,000 square feet on P streets, and 75% reduction in required parking for any use in a rehabilitation of a building in lawful existence for 50 or more years.

## Chicago's Older Buildings: By the Numbers

### SNAPSHOT:

# 502,362 BUILDINGS

WITH AGE DATA IN THE CITY OF CHICAGO

Half of the buildings standing in 2015 were built in 1926 or earlier.  
63% were built pre-war (1945).

### OLD BUILDINGS + THE ECONOMY

# NEARLY 2X

AS MANY JOBS IN NEW BUSINESS

In areas of the City characterized by older, smaller buildings, 7% of jobs are in businesses launched in the last year.

# 45% of JOBS

IN SMALL BUSINESS

More jobs are in businesses with fewer than 20 employees in areas with older, smaller buildings when compared to areas of newer, larger, buildings.

### OLD BUILDINGS SAVE ENERGY

# 12% LESS ENERGY

IS USED IN AREAS WITH OLDER, SMALLER BUILDINGS

### SPACE FOR ARTS, FOOD + CULTURE

# 60% of CHICAGO'S BEST RESTAURANTS

ARE ON BLOCKS WITH MAJORITY PRE-1920 BUILDINGS

# MORE THAN 70%

OF CHICAGO'S CREATIVE NON-PROFITS ARE IN OLD BUILDINGS

## Reuse Advisory Committee

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