



# **The City of Chicago Equitable Transit-Oriented Development (eTOD) Policy Plan**

**August 2020**

**DRAFT – FOR PUBLIC COMMENT**

September 2020 – Chicago eTOD Policy Plan  
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# Executive Summary

**Context for the 2020 eTOD Policy Plan.** Since 2013, the City of Chicago has been encouraging compact, mixed-use transit-oriented development (TOD) near CTA and Metra rail stations. This development model can create additional community benefits such as increased transit ridership and more walkable communities, both of which reduce traffic congestion and greenhouse gas emissions, while also promoting public health and adding to the City's tax base. Through a series of TOD ordinances, first adopted by City Council in 2013 and then amended in 2015 and 2019, Chicago is evolving its approach to TOD. To date, this approach has been voluntary, allowing willing developers of sites near transit to reduce parking, increase height and density, and design projects to increase walkability and affordability. The January 2019 TOD ordinance amendment included an explicit equity focus and expanded TOD policy provisions to include property near several high-frequency bus corridors as well as extended the incentives to the densest residential zones, which had been previously excluded. Importantly, the 2019 Ordinance also requires the City to evaluate the performance of recent TOD projects and recommend revisions to the TOD provisions where appropriate. This 2020 eTOD Policy Plan fulfills that requirement. It captures findings from recent quantitative analysis and stakeholder engagement. The Plan also proposes a roadmap for City actions over the next three years to advance racial equity, community wealth building, climate resilience and public health goals through equitable Transit-Oriented Development (eTOD).

**Impacts of Recent TOD Projects.** Analysis of TOD development approved between 2016 and 2019 reveals disparities in growth patterns between neighborhoods, reinforcing existing racial inequities. During this time, almost 90% of new TOD projects took place in the North Side, Northwest Side, in Downtown and around the West Loop. In contrast, little TOD activity occurred near station areas in the South and West Sides. Where new TOD development is occurring, white population has increased, Black population has decreased, and Hispanic/Latinx population has increased in some areas and decreased in others. These demographic shifts point to displacement patterns. In contrast, areas near rail stations that are eligible for TOD benefits but that have *not* seen TOD project activity have 40% more residents of color, 23% more low-income residents and 16% more residents with a high school education or less than areas where TOD projects have occurred.<sup>1</sup>

The analysis also found that TOD projects had positive transportation and economic development impacts. Areas of the City with new TOD projects had lower household car ownership than areas without TOD activity. Developers are also taking advantage of optional parking reduction benefits in the TOD ordinances and have reduced off-street parking spaces by 74% in their TOD projects. Households in areas with new TOD projects<sup>2</sup> have, on average, access to 1.73 times more jobs than households in areas without TOD project activity (as defined by jobs within 30 minutes on transit). In addition, TOD projects approved between 2016 and 2019 are expected to create 75,533 new jobs in the City and produce over 3,000 new affordable housing units through the City's Affordable Requirements Ordinance.

**Defining Equitable Transit-Oriented Development.** Equitable TOD (eTOD) is development that enables all people regardless of income, race, ethnicity, age, gender, immigration status or ability to experience the benefits of dense, mixed-use, pedestrian-oriented development near transit hubs. eTOD elevates and prioritizes investments and policies that close the socioeconomic gaps between neighborhoods that are predominately people of color and those that are majority white. eTOD projects and processes elevate community voice in decision making processes and in realizing community-focused benefits such as affordable housing, public health, strong local businesses, and environmental sustainability, to name a few. When centered on racial inclusion and community wealth building, eTOD can be a driver of positive transformation for more vibrant, prosperous, and resilient neighborhoods connected to opportunities throughout the city and region.

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<sup>1</sup> U.S. Census Bureau, 2016 American Community Survey 5-year estimates & CNT's AllTransit™

<sup>2</sup> U.S. Census Bureau, 2015 Longitudinal Employer Households Dynamics and CNT's AllTransit™

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The Office of Mayor Lori E. Lightfoot envisions a Chicago that no longer concentrates poverty and racially segregates people from socio-economic opportunity; where structural racism no longer is manifested in city policies, programs or investments; and where a person’s race or zip code no longer determine their health outcomes, potential to build wealth, or access to opportunity. eTOD is both a process and a type of development that can help us realize this vision. eTOD can facilitate an equitable recovery from the simultaneous racial justice, public health, economic and climate crises our communities face. By contrast, TOD without an equity lens can have negative health and economic impacts on current residents through possible displacement as a result of gentrification if proactive steps are not taken. Without an equity lens on TOD, the benefits of transit — affordability, access to jobs, livable and walkable neighborhoods—end up accruing to those already with wealth and power.

**Committing to Action.** The 2020 eTOD Policy Plan outlines a comprehensive set of actions for the City to take over the next three years. Recommendations were informed through a cross-sector engagement process and analysis of City programs, and an evaluation framework focused on outcomes, equity, and implementation criteria. An eTOD work group with more than 70 members was created to engage stakeholders representing numerous City departments, community-based organizations, the private sector, philanthropies, and regional non-profit and governmental partners. The Policy Plan is a living document that will be refined as parallel City initiatives and planning efforts occur. These policy commitments set the direction for the City of Chicago’s equitable TOD policy agenda and implementation plan. Many of the specific commitments will require additional community and stakeholder engagement to refine details and ensure equitable impact.

Within the first year, City leadership wants to show quick wins from existing processes that leverage work underway to strengthen affordable housing commitments, standardize community engagement, and formalize cross-sector and interdepartmental coordination. Over the next year, the Mayor’s Office, Department of Planning and Development (DPD), Department of Housing (DOH), Department of Transportation (CDOT), Chicago Transit Authority (CTA) and other partners will identify specific opportunities to codify eTOD into zoning and other laws or efforts currently underway. The City will identify potential pilot areas and demonstration projects to begin testing and implementing aspects of the Policy Plan, including, but not limited to, opportunities within the Mayor’s INVEST South/West community improvement initiative.

**Three Strategic eTOD Priorities.** The Policy Plan is divided into three strategic priorities: 1) Building the internal capacity necessary to support eTOD; 2) Making eTOD required, easier, and more equitable; and 3) Embedding eTOD principles into Chicago’s Citywide Plan.<sup>3</sup>

## 1. Build the City’s Capacity to support eTOD

Significant cross-sector and inter-agency coordination is needed to support the many goals of equitable Transit-Oriented Development, as well as a commitment to evaluation, accountability, and transparency. Building the infrastructure to support comprehensive eTOD will be foundational to ensure the vision is met.

Implementation & Coordination	Continue convening eTOD Work Group and <b>formalize cross-sector, cross-agency coordination</b> , such as through the formal creation of an eTOD Task Force or other advisory body.
Implementation & Coordination	Dedicate <b>full time City staff</b> to serve as eTOD Manager in advancing policy recommendations and coordinating eTOD projects and programs.

<sup>3</sup> For additional detail on each see the complete 2020 eTOD Policy Plan, with a timeline for implementation available in Appendix F.

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Evaluation & Accountability	Create an <b>ETOD evaluation framework</b> and publish <b>annual performance report</b> , which can include setting targeted eTOD goals and tracking metrics such as Housing and Transit Affordability Index; production and preservation of affordable housing; accessibility; economic development, public health and environmental impacts; and transportation and demographic characteristics of TOD residents.
Evaluation & Accountability	Create an <b>eTOD Scorecard</b> that community and government partners can use to assess future projects and programs. <sup>4</sup>
Facilitating Equitable Development	Develop strategy to leverage <b>publicly owned land and vacant lots near transit</b> for public benefit, including publishing a directory of all public-owned land within designated TOD zones.
Facilitating Equitable Development	Develop a <b>comprehensive eTOD calculator mapping tool</b> combining existing resources from Center for Neighborhood Technology (CNT) and Metropolitan Planning Council (MPC). The calculator will help community members and developers identify qualifying eTOD sites and potential impacts.
Engagement & Communication	Standardize <b>community engagement requirements and practices</b> related to development and planning projects across City departments. Building on agreed-upon engagement principles and recommendations, such as those developed by Elevated Chicago, and utilize eTOD policies and projects as opportunities to test and pilot new engagement practices.
Engagement & Communication	Develop <b>public education and messaging tools</b> to communicate the vision and case for eTOD.

## 2. Make eTOD required, easier, and more equitable

In advance of the multi-year Citywide planning effort, the City and its partners can take many steps to ensure eTOD is required in target neighborhoods, easier to accomplish, and more equitable in its execution. All strategies will be tailored to local market context in alignment with City goals of facilitating development in neighborhoods historically disinvested, while avoiding displacement in neighborhoods already experiencing accelerated investment. This includes creating and preserving affordable housing near transit, promoting multimodal transportation usage, and committing to incorporating health and equity criteria in both policy and project development.

Policy	Apply <b>health and equity impact assessments</b> to the development of eTOD-related policy.
Zoning & Land Use	Create a flexible <b>eTOD overlay zone</b> to strengthen requirements for density, parking, and other equitable, climate resilient development near transit, tailored to neighborhood context (such as market strength).
Zoning & Land Use	Allow more <b>flexibility in permitted building uses</b> , such as by permitting residential on the ground floor in more business and commercial districts and right-sizing parking to reflect these additional uses.
Zoning & Land Use	Allow <b>small scale multi-family housing</b> in all TOD zones.
Parking-related	Strengthen <b>bike parking requirements</b> for TOD projects.

<sup>4</sup> See example from Minneapolis: <http://thealliancetc.org/our-work/equitable-development-scorecard/>

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Zoning	
Parking-related Zoning	Establish <b>maximum allowed parking</b> for new developments in all TOD zones identifying provisions, if needed, to minimize burden on low-income drivers.
Parking-related Zoning	Require parking to be paid or leased separately from housing in TOD projects (i.e., <b>unbundle parking and housing costs</b> ).
Parking-related Zoning	Include <b>sustainable transportation options and incentives in zoning code</b> , i.e., require developers to implement a certain number of options and incentives, such as transit passes, to manage traffic demand
Parking-related Zoning	Allow <b>shared parking arrangements</b> to meet parking requirements in TOD areas.
Jobs & Workforce	Strengthen <b>equity in procurement and supplier diversity policies</b> to ensure small and minority owned firms and Black, Brown, Indigenous and other people of color benefit from new development.
Jobs & Workforce	Create <b>quality jobs</b> through eTOD projects with a pipeline to residents and firms
Architecture Design/Review	Require <b>health, arts and culture, and equity</b> considerations in TOD-project level design.
Architecture Design/Review	Develop architectural design templates that can <b>streamline and simplify city approvals</b> for eTOD projects.
Transportation	Improve <b>pedestrian infrastructure</b> in TOD zones by prioritizing and targeting resources based on need, starting with an inventory of current sidewalk infrastructure.
Transportation	Improve <b>visibility and accessibility of transit signage and wayfinding</b> , especially for people with disabilities or for whom English is not their first language.
Transportation	Increase access to <b>shared micro-mobility options</b> , including bike-share, e-bikes, and e-scooters.
Transportation	Prioritize funding to make CTA and Metra <b>rail stations fully accessible</b> to people with disabilities, and to provide sufficient rail capacity for new riders.
Transportation	Ensure <b>high-performing bus service</b> , especially along TOD bus corridors. Prioritize <b>high-quality bicycle infrastructure</b> to, from, and within eTOD areas. Explore options for equitable enforcement of blocking bus and bike lanes that does not disproportionately harm low-income residents.
Housing	<b>Preserve unsubsidized affordable housing</b> within TOD zones, especially 2-4 flat buildings.
Housing	<b>Strengthen affordability and accessibility requirements</b> for city-supported housing development in TOD zones, including through updates to the Affordable Requirements Ordinance.
Housing	Modify the City's Qualified Allocation Plan (QAP) to include preference for <b>building affordable housing in TOD zones</b> , especially for very low-income residents.
Development Incentives	Develop <b>incentives and policies to preserve and retain</b> community organizations, small businesses, and other neighborhood assets in TOD Zones.
Development Incentives	Prioritize <b>eTOD in applications for city funding</b> that supports housing and economic development, including but not limited to the Neighborhood Opportunity Fund.
Development Incentives	Develop incentives for <b>public space</b> in eTOD projects.

### 3. Embed eTOD into Chicago's Citywide Plan

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Chicago is in the beginning stages of its first citywide plan in decades. Recommendations to advance eTOD can and should be incorporated early in the Citywide Planning Process, from incorporating health and equity assessments to prioritizing transit investment and recognizing the specific opportunities near transit hubs.

Land use & zoning	Develop a process for the City and partners to conduct <b>racial and health equity assessments</b> on land use plans and zoning decisions.
Land use & zoning	Establish a framework for <b>neighborhood land use plans</b> that adheres to the goals of equity, resiliency and diversity and recognizes the <b>specific opportunities within TOD geographies</b> .
Transportation	Prioritize investments in <b>transit, biking, and walking</b> in the Citywide Plan.
Health and Safety	<b>Incorporate health and safety</b> into City's citywide plan

**A time for bold action on equity.** Much has happened over the last eighteen months since the eTOD Work Group first convened that has influenced the development of this Policy Plan. Among the major events was Mayor Lori E. Lightfoot’s election and inauguration and departmental leadership transitions. The City has also felt the devastating effects of a global pandemic profoundly influencing the health and economic security of thousands of Chicagoans, particularly people of color. Residents from across the City are sustaining racial justice protests demanding reform in policing and across a range of government programs where the continued legacy of systemic racism creates deep socio-economic disparities for Black and Brown communities.

Now is the time for bold thinking and action. Perhaps never before has the City been better prepared to commit to a new course that is founded on the power of community, that commits to desegregating our city, that provides community wealth building pathways for all regardless of the color of their skin or their transit line, and that promotes healthy communities to close the racial life expectancy gap. Through thoughtful policy decisions, investments and program placement that incorporate these values, development occurring in transit-served locations can and should more effectively benefit all Chicagoans, regardless of whether they reside near transit.

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# The Opportunity Before Us

*In 2013 the Chicago City Council approved a new policy to incentivize transit-oriented development (TOD) near CTA and Metra rail stations. In 2015, the Ordinance was amended to extend the catchment area around stations and to encourage the inclusion of affordable housing units. In January 2019, the City's TOD Ordinance was again updated to include an explicit equity focus and to also apply to several high-frequency bus corridors and dense residential areas (Zones B, C and D districts).<sup>5</sup>The 2019 Equitable TOD (eTOD) Ordinance increased the number of eligible TOD parcels by 64 percent and broadens its impact across the city. To date, the City's TOD approach has been a largely voluntary one for developers choosing to take advantage of the zoning flexibility the ordinance provides. This eTOD Policy Plan responds to the directive in the 2019 Ordinance to establish performance indicators, assess the performance of TOD provisions since their inception, and recommend revisions where appropriate to advance equity, transit, climate, and community goals.*

The City of Chicago has been shaped by transportation throughout its long history - from water travel by the Pottawatomie Native Americans to the first non-indigenous settler Jean-Baptist-Point Du Sable, to its later years of European settlement as the railroad made Chicago the center of midwestern trade and commerce, to the introduction of elevated tracks connecting neighborhoods and then expanding streetcars, buses and commuter rail lines into larger numbers of neighborhoods and surrounding suburbs. For the last century, transit has served both to liberate and isolate Chicago's Black and Brown communities. Our city and region rely on the workers and families who reside in transit-oriented communities. They fuel our economy, enrich our culture, and create the backbone of resilient communities. Yet since the 1950s, public policies and investments have largely prioritized the automobile and auto-oriented development even within the City of Chicago. We see this in the large amount of public space allocated for parking, in the widening of streets and the absence of sidewalks, in the lack of housing choices for different household types or incomes, in the long distances people must travel to reach jobs, schools, and other important needs, and in the reduction of transit service that occurred in many low-income communities who rely on it to reach regional economic and social opportunities.

Where Chicagoans live also deeply impacts their health. Neighborhood conditions - and the policies that shape them – influence chronic disease, mental health, community safety and several other health outcomes. Research shows neighborhood elements such as walkability, availability of transportation, housing quality and affordability, presence of open spaces, access to nutritious food, availability of health-promoting goods and services or presence of unhealthy industry and businesses shape our opportunity for health and well-being. eTOD can help improve health by reducing congestion (which improves air quality and reduces respiratory disease), increasing affordable housing (which improves food security and access to healthcare services), and promoting walking and biking to public transit (which increases physical activity and improves cardiovascular disease), among other health benefits. eTOD can also support walkable, livable communities by increasing neighborhood access to retail, job opportunities, and affordable housing. However, when TOD does not proactively prioritize equity it can have negative health impacts on current residents through displacement as a result of both gentrification in some areas and continued disinvestment in others.

<sup>5</sup> See eTOD ordinance for specific designations including CTA bus routes, bus line corridor roadway segments and zoning districts. <https://chicago.legistar.com/LegislationDetail.aspx?ID=3778726&GUID=69BCB445-7B90-4B95-BCD9-8713CA9E83E1&Options=Advanced&Search=>

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Racial inequities are seen across Chicago in the uneven patterns of development, public investment, economic activity, and in transit access and service levels. Black, indigenous, and other people of color have been steadfast in demanding better development, more economic opportunity, and safer neighborhoods for existing residents, business owners, and employees living and working in Chicago’s numerous transit-rich communities. The COVID-19 pandemic has illuminated and exacerbated longstanding racial inequities in how we work, how we get to work, and how we access goods and services. The pandemic has also created new challenges and pressures for transit and for City budgets and services, while exacerbating hardship for communities of color and for low-income residents. The Lightfoot administration promotes eTOD as a desegregation, community wealth building, public health, and climate resilience strategy with the potential to generate much-needed public revenues while reducing future public expenditures.

## What is Equitable TOD?

We envision a Chicago that no longer concentrates poverty and racially segregates people from socio-economic opportunity; where racism no longer is manifested in city policies, programs or investments, and where a person’s race or zip code no longer determine their health or their wealth. eTOD is both a process and a development form that can help us realize this vision. eTOD facilitates the equitable recovery from the simultaneous racial justice, public health and climate crises our communities face.

According to the Federal Transit Administration,<sup>6</sup> “*Transit-oriented development, or TOD, is a type of community development that includes a mixture of housing, office, retail and/or other commercial development and amenities integrated into a walkable neighborhood and located within a 1/2-mile of quality public transportation.*” TOD’s mix of residential, retail, office, open space, and public land uses in a walkable environment makes it convenient for people to safely travel by transit, bicycle, or by foot. Within TOD neighborhoods people are prioritized over roads or parking thereby reducing household transportation costs.

Across the country, communities with substantial transit systems are working to implement TOD policies. The market is responding, especially in places where good transit connects neighborhoods that offer a high quality of life to downtown urban amenities and jobs. Yet the implementation of TOD without an explicit equity lens can and often does lead to adverse and disparate outcomes. In Chicago, TOD has exacerbated the displacement of low-income residents, small businesses and people of color in places such as Logan Square, Pilsen, and the West Loop as the market for TOD and walkable urban living has accelerated rapid change and increased land values, housing prices, and rents. Yet in areas of our city that have been structurally disinvested, transit-rich neighborhoods with TOD potential (including several prioritized by the Mayor’s INVEST South/West initiative) see a continued lack of investment which also fuels displacement of businesses and households.

<sup>6</sup> <https://www.transit.dot.gov/TOD>

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In contrast, **equitable TOD (or eTOD)**, is development that enables all people regardless of income, race, ethnicity, age, gender, immigration status or ability to experience the benefits of dense, mixed-use, pedestrian-oriented development near transit hubs. eTOD elevates and prioritizes investments and policies that close the socioeconomic gaps between those neighborhoods that are predominately people of color and those that are majority white. eTOD projects and processes elevate community voice in decision making processes and in realizing community-focused benefits such as affordable housing, public health, and sustainability. It is a tool to drive place-based investment in Black and Brown communities that have suffered disinvestment for years due to structural racism formalized in policies like redlining, urban renewal, city zoning, and even transit service. eTOD shapes development in areas where market pressures would otherwise squeeze out affordable residential, commercial, and community-serving needs. When centered on racial inclusion and community wealth building, eTOD is a driver of positive transformation for more vibrant, prosperous, and resilient neighborhoods connected to opportunities throughout the city and region.



“TOD has a negative connotation for a lot of North Siders given all the gentrification happening in Logan Square, particularly along Milwaukee Avenue. There it was very much centered on big towers that are TOD, but they are not equitable. Most of them are market-rate apartments that are very inaccessible to low-income people.”

– **Lynda Lopez, Active Transportation Alliance**

eTOD involves parallel investments and policies, planned with residents and community stakeholders, for affordable housing, active transportation, and equitable land use providing pedestrian-oriented access to local retail, jobs, education and health care opportunities. Research shows that those who live in transit-oriented communities walk and use transit more which contributes to better health outcomes and reduced greenhouse gas emissions.<sup>7</sup> Moreover, eTOD contributes to the local and regional economy through increased land values, more efficient cost to provide services, and through reducing the amount that individuals spend on transportation. One Chicago study estimated that “Every 1 percent reduction in the private cost of transportation would free \$1 billion annually to meet family needs and improve the job-creating health of businesses.”<sup>8</sup>



“We need to reset the value of transit in our community and demand it comes with that suite of services that are available in other communities. We’ve never had those amenities. Different communities need different things. What works in one neighborhood may not work in another neighborhood.”

– **Melvin Thompson, Endealeo Institute Trinity United Church of Christ**

As the City looks for opportunities to end racial segregation, to improve the quality of life in Black and Brown communities, to realize our climate change commitments, and to address critical budget challenges, eTOD is a development strategy that supports all of these goals. Yet achieving them requires additional tools and prioritization in how public resources are spent and how zoning and building codes support more walkable, transit-oriented, compact development that includes housing and commercial spaces available to people at a range of incomes. The 2020 eTOD Policy Plan (Policy Plan) provides a set of recommendations for City

<sup>7</sup> <https://www.sciencedirect.com/science/article/abs/pii/S0749379710002977>

<sup>8</sup> <http://ctod.org/pdfs/tod204.pdf>

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departments to undertake with other regional partners and local community-based organizations in the coming years.

## Responding to the 2019 eTOD Ordinance

The 2019 eTOD Ordinance required the City to accomplish several important things. It required developing an eTOD Policy Plan informed by on-going community engagement. This 2019 Ordinance directed the Plan to include performance measures and emerging best practices that meet the stated goals of eliminating the displacement of residents and small businesses, supporting transit investment, and fostering investment in communities of color and low-income communities. The plan should also include recommendations to ensure appropriate density levels and parking requirements to the neighborhood context.<sup>9</sup>

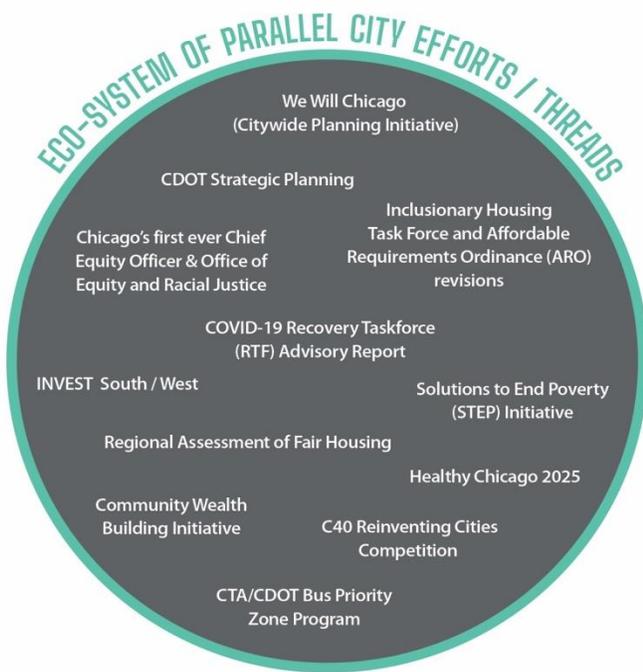


Figure 1. Snapshot of key City initiatives that are happening in parallel to eTOD Policy Plan implementation

Much has happened positively and negatively in the City since the passage of the 2019 Ordinance, including a Mayoral transition with new leadership across City departments; the COVID19 pandemic and economic crisis; and renewed calls for racial justice. This time period also saw the formation of a cross-sector and inter-agency eTOD Work Group and the launch of several new city initiatives (shown in Figure 1). These parallel City-led initiatives provide significant opportunities to advance and formalize policy recommendations that support the eTOD ordinance.

<sup>9</sup> <https://chicago.legistar.com/LegislationDetail.aspx?ID=3778726&GUID=69BCB445-7B90-4B95-BCD9-8713CA9E83E1&Options=Advanced&Search=>

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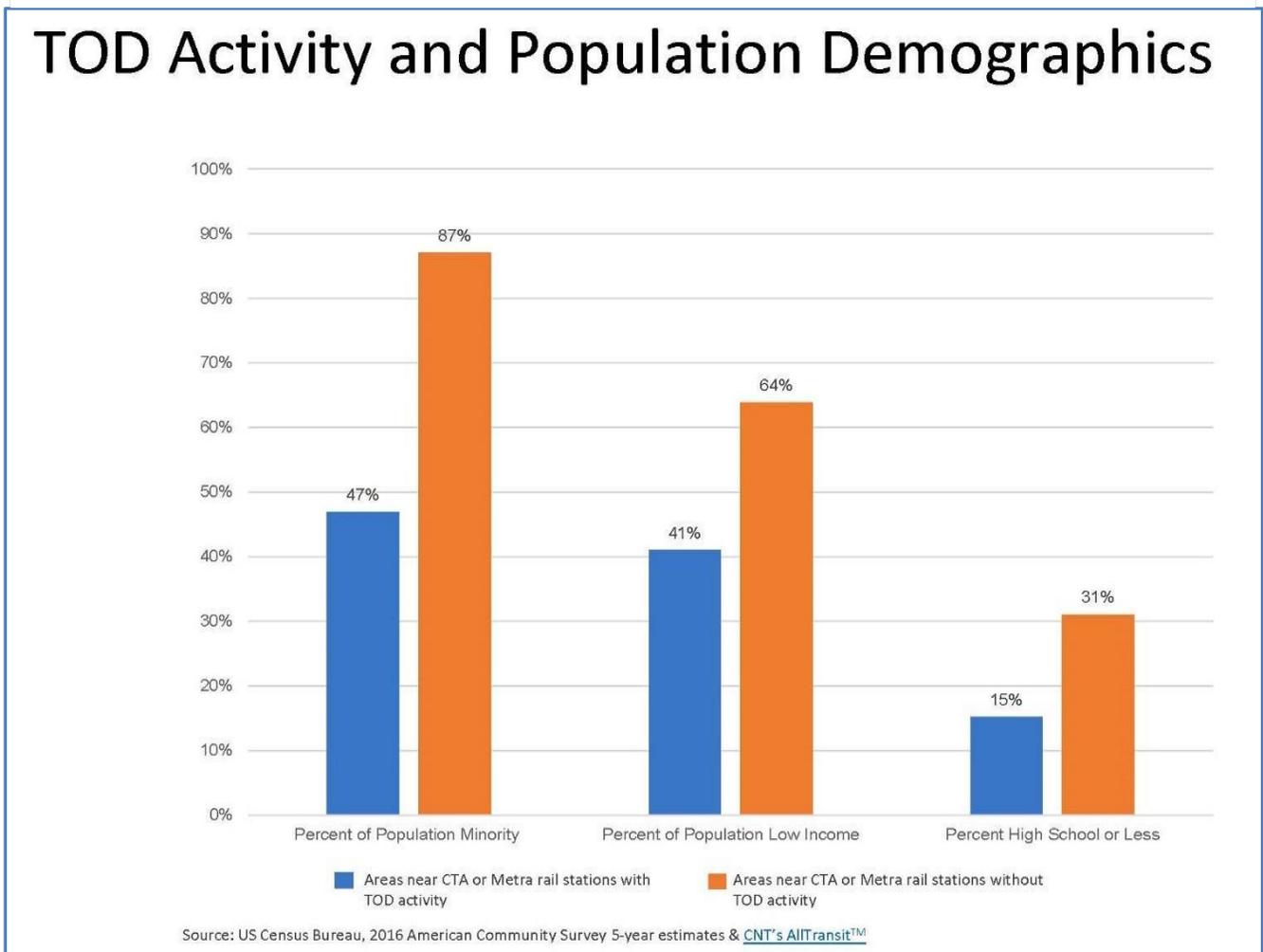
External events have altered the timing and process to develop the eTOD Policy Plan. Community engagement moved online, shifting City priorities responding to public health and racial justice crises influenced staffing, and parallel work began that provides significant near-term implementation opportunities. As such, this Policy Plan provides an initial action plan for City departments and cross-sector partners to support elevating equity within the City’s approach to TOD and prioritize transit-orientation across existing programs. This Policy Plan is intended to be a living document with continued refinement in the coming years as the City updates its citywide plan and adopts other changes to transportation, housing, public health and community engagement programs.

The 2020 eTOD Policy Plan summarizes key findings from the City’s analysis of the impacts of TOD projects approved since the 2015 ordinance, reports on work completed to date by the eTOD Working Group, and commits City departments and the Mayor’s Office to continued cross-agency collaboration and partnership with civic partners as we collectively work to implement eTOD across the many diverse neighborhoods connected by our transit systems. Limited collaboration between government agencies, across City departments and with communities and the private sector have impeded past progress on eTOD. Going forward, the City commits to expanding community engagement to include more and additional voices, especially from the neighborhoods most affected or bypassed by TOD, the disability community, employers, business owners, and developers, to refine TOD policies.

# Evaluating TOD's Impact

In early 2019, the City reached out to Elevated Chicago<sup>10</sup> and other stakeholders to collaboratively form a work group with a diverse set of members including regional agency partners at CTA, MPC, and CMAP and numerous City departments to inform eTOD policy recommendations.<sup>11</sup> The Mayor's Office, together with the Departments of Housing and of Planning and Development, co-convened the eTOD Work Group over the past eighteen months to identify issues and opportunities that could be advanced through policy changes informed by community dynamics in gentrifying and disinvested TOD areas of the City.

Figure 2. Demographic characteristics of the population in Chicago TOD areas.



<sup>10</sup> Elevated Chicago is a collaborative focused on driving transit-oriented development without displacing residents through a focus on racial equity, arts and culture, climate change resiliency, and public health in Chicago's neighborhoods around seven Chicago transit stations. <http://www.elevatedchicago.org/>

<sup>11</sup> See Appendix A for a list of members.

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In November 2019, the eTOD work group reviewed the performance of 150 TOD projects approved since the first TOD ordinance was passed in 2013.<sup>12</sup> The analysis revealed that during this five year period Chicago TOD projects have added thousands of new jobs and new housing units. They also supported increased transit and multi-modal transportation use. Yet this same period also saw related demographic shifts as the white population increased in areas with TOD activity while people of color were pushed out.

Meanwhile TOD areas in the South and West Sides, did not see significant new development (i.e., little TOD activity) but rather increased racial segregation and fewer new jobs created near transit. These trends underscore the value that TOD can bring to neighborhoods but even more so the critical need to center TOD policies on advancing racial and economic equity, especially in Chicago's West Side and South Side neighborhoods.

### Among the key findings:

**DEVELOPMENT & DEMOGRAPHIC SHIFTS** The distribution of development reveals disparities in the growth patterns between neighborhoods on the North and Northwest Side and neighborhoods on the South and West Side, reinforcing existing racial inequities.

- Nearly 90% of new development benefiting from TOD incentives occurred on the North and Near Northwest Sides, including communities like Logan Square and Lincoln Park, and in and around the West Loop. In recent years, Pilsen/the Lower West Side has also seen increased TOD activity. In contrast little new TOD development occurred in the West, South, Southwest or even Far Northwest Sides. See Appendix B for a detailed map of citywide TOD activity.
- Areas near rail stations that are eligible for TOD benefits but that have *not* seen TOD project activity have 40% more residents of color, 23% more low-income residents and 16% more residents with a high school education or less than areas with TOD project activity (see Figure 2).<sup>13</sup>
- From 2012 to 2017, the Black population decreased in almost all areas where TOD activity occurred near a CTA rail station while the white population increased. During the same time, the Black population increased in areas near CTA rail stations that were eligible for TOD benefits but did not see TOD activity, whereas the white population decreased in these areas. The exception to this trend is in areas near Orange Line rail stations without TOD activity, which lost black population and gained white population.
- There has been a loss of Hispanic/Latinx population in areas near the CTA Red/Brown Line stations and near Metra stations on the North/West sides and a gain in areas near some CTA Blue Line stations and Green & Orange Line stations, and near Metra stations on the Northwest/West/Southwest sides.

**HOUSING IMPACTS** Reflecting the disparities in development activity and population shifts, housing impacts were also noted.

- Rent prices increased at a higher percentage in areas near CTA and Metra rail stations with TOD activity (18% for both) than in areas near rail stations without TOD activity (5-6%) and the city overall (11%).
- Over 3,000 new affordable housing units were approved within TOD areas through the City's Affordable Requirements Ordinance (ARO), which requires that new development receiving city support set aside a percentage of units as affordable. However, many expected ARO units consist of

<sup>12</sup> A map of the projects analyzed is shown in Appendix B. A summary of findings is provided in Appendix C, and the [detailed data presentation slides can be downloaded at this link](#).

<sup>13</sup> U.S. Census Bureau, 2016 American Community Survey 5-year estimates & CNT's AllTransit™

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studios and 1-bedrooms, which are too small for the average household of color.

**TRANSPORTATION SHIFTS** Residents within TOD areas use transit and other modes of transportation at greater rates than in more auto-oriented neighborhoods of the city.

- Across the City, transit ridership declined during this period, yet ridership increased in many stations located in the North, Northwest, South Side and Downtown areas.
- Areas with TOD activity have higher bicycling accessibility and more households with fewer cars than in areas with little TOD-activity.
- Developers are taking advantage of optional parking reduction benefits, reducing off-street parking spaces by 74% in areas near CTA and Metra rail stations.
- Households in areas with TOD project activity have, on average, transit access to 1.73 times more jobs than households in areas without TOD project activity (as defined by jobs within 30 minutes on transit).<sup>14</sup>

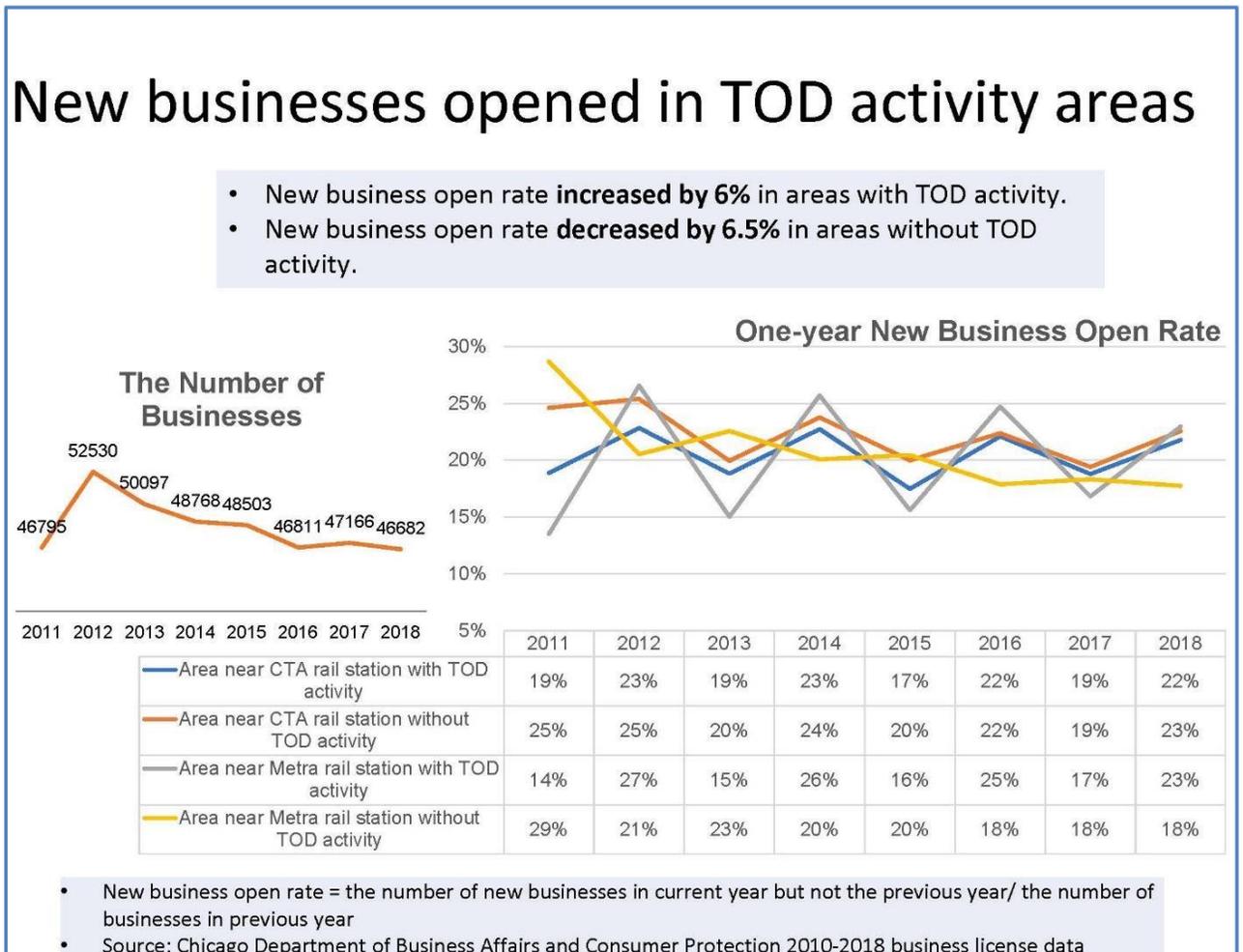


Figure 3. Business activity in Chicago TOD areas (2011 - 2018).

<sup>14</sup> U.S. Census Bureau, 2015 Longitudinal Employer Households Dynamics and CNT's AllTransitTM

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**JOB IMPACTS** The majority of new jobs created in TOD areas occurred in Logan Square and the West Loop, furthering economic disparities between neighborhoods on the North and Northwest Side and neighborhoods on the South and West Side.

- TOD projects are expected to create 75,533 new jobs in the City between 2016-2019, with these concentrated in areas where TOD activity occurred. In contrast the number of new businesses opened declined for areas without TOD activity (see Figure 3).
- The highest percentage of new jobs were in construction, retail, and services; however, the West Loop and Logan Square gained significant new professional, scientific and technical jobs (roughly 1/8<sup>th</sup> of the city's overall employment gain in this job category occurred in these two neighborhoods between 2012-2018).

Going forward, the City will publish an annual TOD performance report that continues to track those performance metrics identified in the 2019 study and add additional metrics as they become available. The ongoing evaluation of TOD activity and performance is a key commitment in the eTOD Policy Plan for ensuring accountability and transparency. City staff can formalize tracking methods to monitor shifts by race and demographics across Chicago TOD areas, multimodal transportation access, parking, housing, crime and safety, and business development and employment.

The eTOD work group identified additional potential metrics that other City departments and non-governmental partners are tracking that can provide a more comprehensive eTOD analysis.<sup>15</sup> These include green space, healthy, affordable food access, crime and safety, air quality and environmental contamination, displacement, accessibility, and economic and cultural opportunity.

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<sup>15</sup> See Appendix D for more detail on potential metrics.

# A Chicago Vision for eTOD: More than Housing and Density

Building on the work of the eTOD Work Group over 2019, two policy-focused workshops took place in May 2020 to inform the components of this Policy Plan. Over 75 individuals from across City departments, regional planning and transit agencies, civic stakeholders, developers, architects, artists, and community advocates were engaged.

## Workshop 1

The first workshop (May 1, 2020) focused on creating consensus around Equitable Transit-Oriented Development priorities, including how success can be measured.

Workgroup members reaffirmed the importance of centering the needs and dignity of low-income people and Black, Latinx and other communities of color in eTOD policies. Also important is meeting the unique housing, mobility, and accessibility needs of other important demographic groups. (See Figure 5.) Going forward, future analysis of eTOD performance needs to include disaggregation of various metrics to illustrate impacts by race, income, disability, gender and other key equity factors to ensure that benefits and burdens are not being unduly felt by one particular segment of the population.

Across the set of TOD components shown in Figure 5, the Work Group felt the City is not currently adequately meeting the different housing, mobility, and wealth building needs of residents.

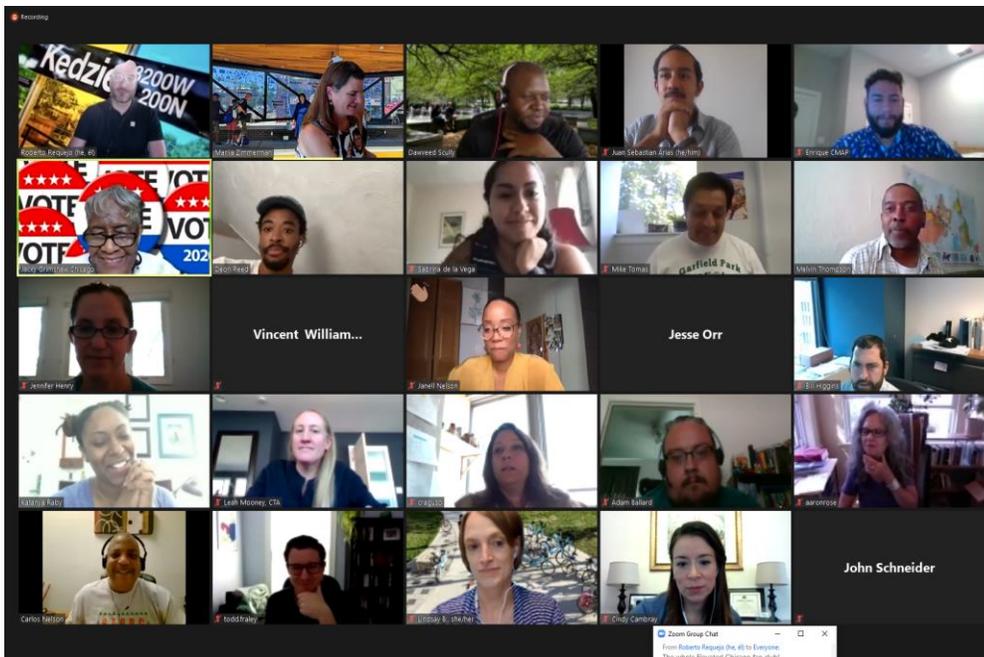


Figure 4. Members of the eTOD work group meet virtually to discuss shared values and priorities to inform the City's eTOD Policy Plan.

Centering equity outcomes across community engagement practices, investment priorities and land use policies is necessary to ensure that TOD benefits all Chicagoans regardless of their race, income, disability, immigration status, family size or type, or age. Our city – and indeed the country – has a deep legacy of racial segregation that is reinforced through zoning, enforcement and investment practices and policies. Changing this will take bold leadership and commitment to action, with policy changes across a range of areas from housing to transportation, from zoning and building standards to programming for public health and approaches to public

and personal safety.

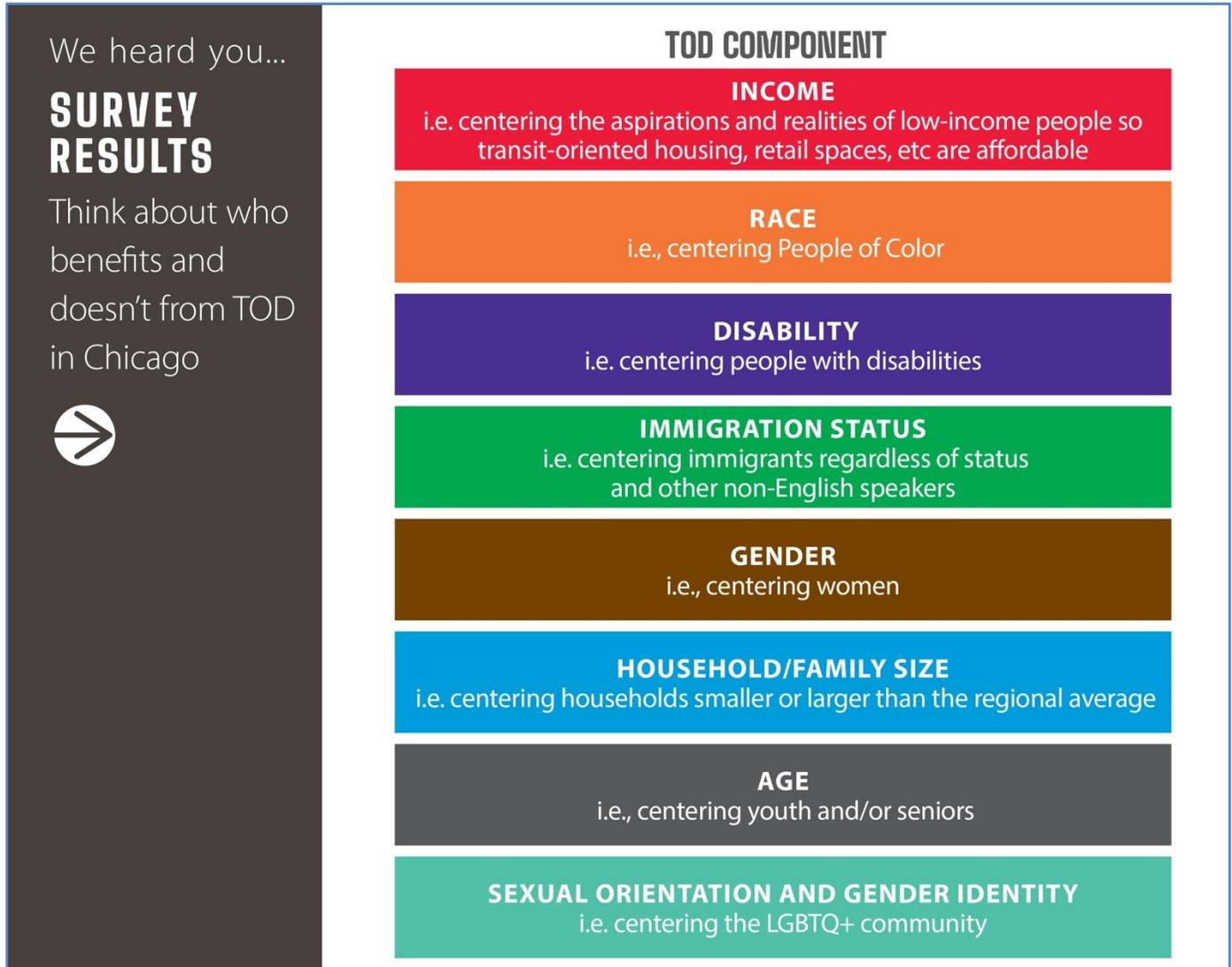


Figure 5. Equitable TOD has many dimensions, several of which are shown here. (eTOD work group members were asked to provide input via a survey to prioritize different equity components. This chart shows how each was ranked by those who responded.)

## Workshop 2

The second workshop (May 22, 2020) focused on creating a set of specific policy recommendations to advance eTOD in the City’s zoning and building codes, sister agencies’ policies, and the citywide comprehensive plan, which is intended to look at transit-oriented development in a multi-pronged approach through each of the applicable plan elements. Much of the City’s current approach to TOD has focused on increasing the density of housing around transit stations, yet equitable TOD is more comprehensive than just density.

Of course, density is key to many TOD-related outcomes. Research supports increasing residential density around transit corridors to increase ridership. Increased density also generates the market necessary to support local retail and restaurants that are an essential part of thriving neighborhood economies and mixed-use TOD. Density can also help make projects more financially feasible as land costs increase. However, density is not all that defines TOD nor is it usually what is most important to transit-served communities. Figure 6 highlights other important community goals that TOD can serve, in addition to equity that the eTOD work group identified to be addressed through the Policy Plan.

# City of Chicago eTOD Policy Recommendations (2020 – 2023)

## SUMMARY

Over the last eighteen months, members of the City-led eTOD Work Group created an initial list of almost 50 policy suggestions. These were vetted by workgroup members, the CTA, and City departments using an evaluation framework focused on outcomes, equity impacts, and implementation feasibility criteria (Figure 7).

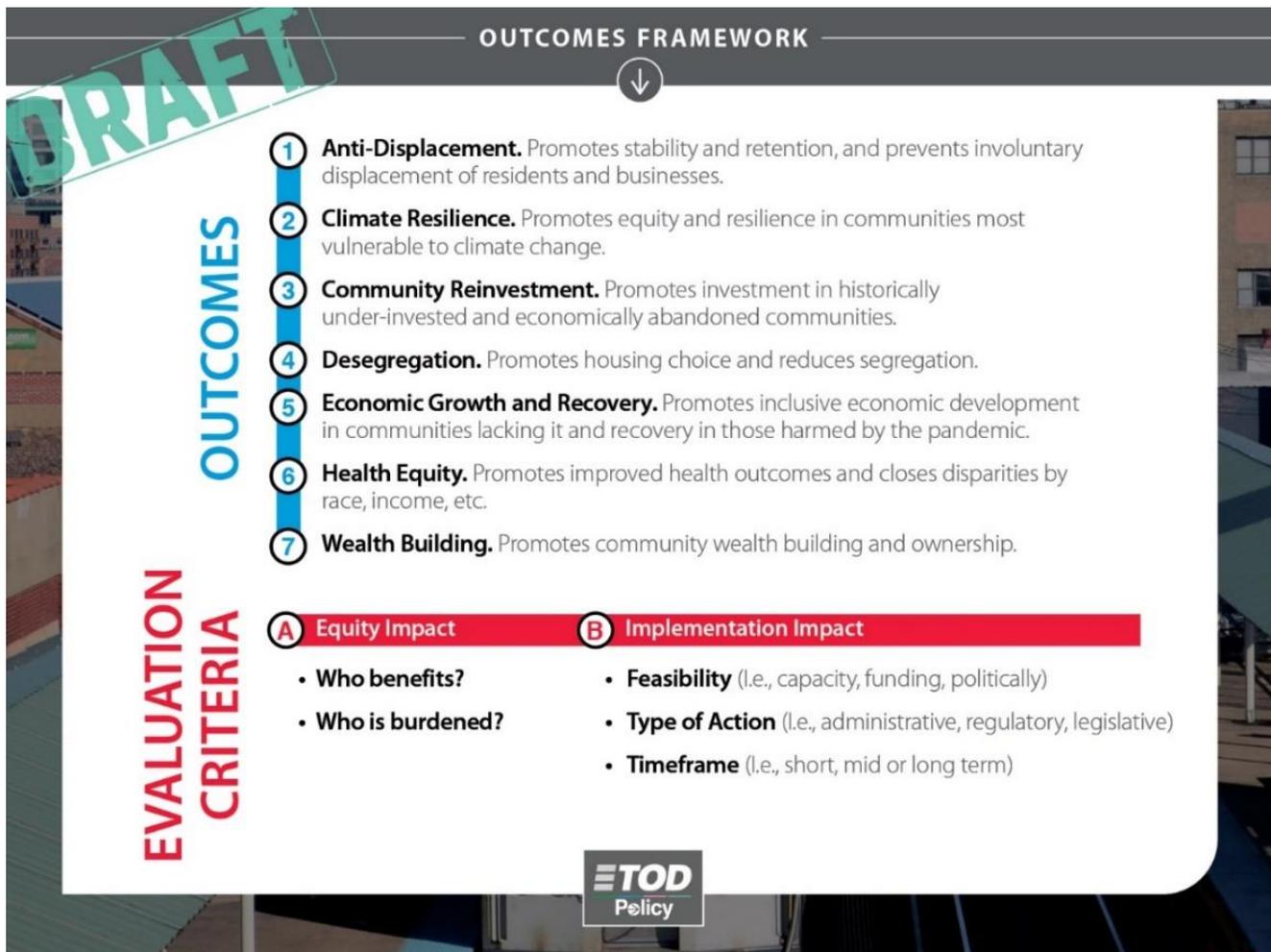
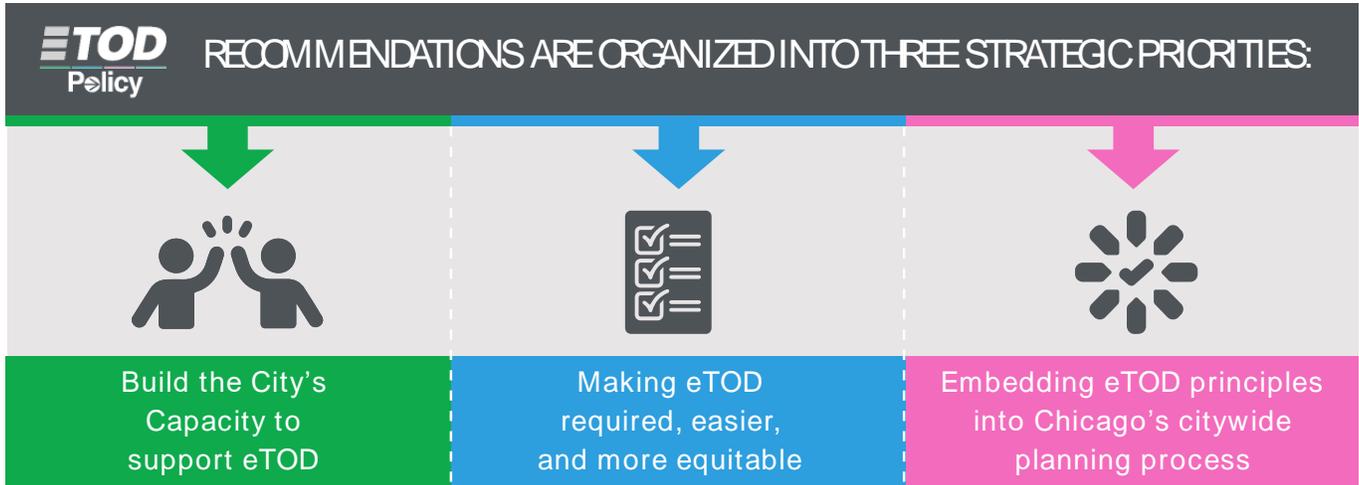


Figure 6. Evaluation Framework utilized by the eTOD work group to evaluate policy recommendations.

A revised set of recommendations based on the collected feedback is included in the 2020 eTOD Policy Plan. These policy commitments set the direction for the City of Chicago’s equitable TOD policy agenda and implementation plan for the next three years. Many of the specific commitments will require additional community and stakeholder engagement to refine details and ensure equitable impact and coordinated implementation, especially given external factors such as the continued uncertain impact of COVID-19 to our City’s economy, public health, transit service, and housing needs.



Several recommendations involve multiple departments and external stakeholders to be implemented. As noted in Figure 1, numerous parallel efforts are underway across the City that provide pathways to elevate and coordinate eTOD strategies with public health, transportation, housing, community safety, and economic development goals. It is the intention of the City to continue engaging with the eTOD Work Group and broader public stakeholders as implementation work continues including in the update of the Citywide comprehensive plan. Recommendations are summarized in the following pages, with more detailed discussion of each priority provided. For additional details, Appendix E provides a summary spreadsheet of all recommendations including a proposed timeline for implementation.

## 1. Build the City's Capacity to support eTOD

Significant cross-sector, inter-agency coordination and a commitment to evaluation, accountability, and transparency are needed to support the many goals of equitable Transit-Oriented Development. Building the infrastructure to support comprehensive eTOD will be foundational to ensure the vision is met. To do this, we propose taking the following actions in partnership with our community and civic partners:

Implementation & Coordination	Continue convening eTOD Work Group and <b>formalize cross-sector, cross-agency coordination</b> , such as through the formal creation of an eTOD Task Force or other advisory body.
Implementation & Coordination	Dedicate <b>full time City staff</b> to serve as an eTOD Manager in advancing this policy plan and coordinating eTOD projects and programs
Evaluation & Accountability	Create an <b>ETOD evaluation framework</b> and publish an annual performance report, which can include setting targeted eTOD goals and tracking metrics such as Housing and Transit Affordability Index, production and preservation of affordable housing; economic development, public health and environmental impacts; and transportation and demographic characteristics of TOD residents.
Evaluation & Accountability	Create an <b>ETOD Scorecard</b> that community and government partners can use to assess future projects and programs. See example from Minneapolis: <a href="http://thealliancetc.org/our-work/equitable-development-scorecard/">http://thealliancetc.org/our-work/equitable-development-scorecard/</a>

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Facilitating Equitable Development	Develop strategy to <b>leverage publicly owned land and vacant lots</b> near transit for public benefit, including publishing a directory of all public-owned land within designated TOD zones.
Facilitating Equitable Development	Develop a <b>comprehensive eTOD calculator mapping tool</b> combining existing resources from Center for Neighborhood Technology (CNT) and Metropolitan Planning Council (MPC). The calculator will help community members and developers identify qualifying eTOD sites and potential impacts.
Engagement & Communication	Standardize <b>community engagement requirements and practices</b> related to development and planning projects across City departments. Build on agreed-upon engagement principles and recommendations, such as those developed by Elevated Chicago, and utilize eTOD policies and projects as opportunities to pilot new engagement practices.
Engagement & Communication	Develop <b>public education and messaging tools</b> to communicate the vision and case for eTOD.

 **2. Make eTOD Required, Easier, and More Equitable**

The citywide plan is a multi-year effort. While it is underway, the City and our partners can take additional steps to ensure eTOD is required in more neighborhoods, easier and more affordable to accomplish, and more equitable in its execution. This includes reducing or eliminating zoning, building code, parking and street design standards or requirements that prioritize car-oriented development. These commitments also include creating and preserving affordable housing near transit, promoting multimodal transportation usage, and incorporating health and equity criteria in both policy and project development.

Policy	Apply <b>health and equity impact assessments</b> to the development of eTOD-related policy.
Zoning & Land Use	Create a flexible <b>eTOD overlay zone</b> to strengthen requirements for density, parking, and other equitable, climate resilient development near transit, tailored to neighborhood context (such as market strength).
Zoning & Land Use	Allow more <b>flexibility in permitted building uses</b> , such as by permitting residential on the ground floor in more business and commercial districts and right-sizing parking to reflect these additional uses.
Zoning & Land Use	Allow <b>small scale multi-family housing</b> in all TOD zones.
Parking-related Zoning	Strengthen <b>bike parking requirements</b> for TOD projects.
Parking-related Zoning	Establish <b>maximum allowed parking</b> for new developments in all TOD zones identifying provisions, if needed, to minimize burden on low-income drivers.
Parking-related Zoning	Require <b>parking to be paid or leased separately</b> from housing in TOD projects (i.e., unbundle parking and housing costs).
Parking-related Zoning	Include <b>sustainable transportation options and incentives</b> in zoning code, i.e., require developers to implement a certain number of options and incentives, such as transit passes, to manage traffic demand

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Parking-related Zoning	Allow <b>shared parking</b> arrangements to meet parking requirements in TOD areas.
Jobs & Workforce	Strengthen <b>equity in procurement and supplier diversity policies</b> to ensure small and minority owned firms and Black, Brown, Indigenous and other people of color benefit from new development.
Jobs & Workforce	Create <b>quality jobs</b> through eTOD projects with a pipeline to residents and firms
Architecture Design/Review	Require <b>health, arts and culture, and equity</b> considerations in TOD-project level design.
Architecture Design/Review	Develop architectural design templates that can <b>streamline and simplify city approvals</b> for eTOD projects.
Transportation	Improve <b>pedestrian infrastructure</b> in TOD zones by prioritizing and targeting resources based on need, starting with an inventory of current sidewalk infrastructure.
Transportation	Improve <b>visibility and accessibility of transit signage and wayfinding</b> , especially for people with disabilities or for whom English is not their first language.
Transportation	Increase access to <b>shared micro-mobility options</b> , including bike-share, e-bikes, and e-scooters.
Transportation	Prioritize funding to make CTA and Metra <b>rail stations fully accessible</b> to people with disabilities, and to provide sufficient rail capacity for new riders.
Transportation	Ensure <b>high-performing bus service</b> , especially along TOD bus corridors. Prioritize <b>high-quality bicycle infrastructure</b> to, from, and within eTOD areas. Explore options for equitable enforcement of blocking bus and bike lanes that does not disproportionately harm low-income residents.
Housing	<b>Preserve unsubsidized affordable housing</b> within TOD zones, especially 2-4 flat buildings.
Housing	<b>Strengthen affordability and accessibility requirements</b> for city-supported housing development in TOD zones, including through updates to the Affordable Requirements Ordinance.
Housing	Modify the City's Qualified Allocation Plan (QAP) to include preference for building <b>affordable housing in TOD zones</b> , especially for very low-income residents.
Development Incentives	Develop <b>incentives and policies to preserve and retain</b> community organizations, small businesses, and other neighborhood assets in TOD Zones.
Development Incentives	<b>Prioritize eTOD in applications for city funding</b> that supports housing and economic development, including but not limited to the Neighborhood Opportunity Fund.
Development Incentives	Develop <b>incentives for public space</b> in eTOD projects.



### 3. Embed eTOD into Chicago's Citywide Plan

Chicago is in the beginning stages of the first citywide plan since 1966, which will be launching in fall 2020. Many actions to advance eTOD can and should be incorporated early on into the Citywide Planning Process, from building in health and equity assessments to making improvements to the zoning code. Specific steps to ensure the citywide plan advances equitable TOD goals include:

Land use and zoning	Develop a process for the City and partners to conduct <b>racial and health equity assessments</b> on land use plans and zoning decisions.
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Land use and zoning	Establish a framework for <b>neighborhood land use plans</b> that adheres to the goals of equity, resiliency and diversity and recognizes the <b>specific opportunities within TOD geographies</b> .
Transportation	Prioritize investments in <b>transit, biking, and walking</b> in the Citywide Plan.
Health and Safety	<b>Incorporate health and safety</b> into City's citywide plan

## Priority 1: Build the internal capacity necessary to support eTOD

### Discussion

By its very nature, eTOD involves coordination across different issues, different city agencies and departments, and between the public, private and community sectors. Without help to navigate this complexity, additional project costs or delays can result making it too expensive or difficult for developers. Failure to coordinate across agencies may create cost inefficiencies or missed opportunities to leverage investments and community goals all of which can contribute to community opposition or unaffordable development. Significant cross-sector and inter-agency coordination is needed to support the many goals of equitable Transit-Oriented Development, as well as to ensure accountability and transparency through evaluation. This requires building the necessary City capacity to support comprehensive eTOD.

Eight specific eTOD-focused actions are recommended to support this work. Creating and formalizing new structures and staff to manage this coordination are critical first steps which also support the development and continued evaluation of programs, policies and proposed projects to ensure that outcomes align with City goals.

Progress on goals can be measured based on project-specific characteristics, like housing costs or affordable housing units provided. Impact can also be measured through changes to a neighborhood's population, businesses, or demographics such as race and income. Work group members recommended additional metrics to evaluate comprehensive eTOD, including health outcomes, combined housing and transportation cost index, and public safety centered on the treatment and perceptions of Black and Brown populations. An annual report should be published with suggestions for potential refinements of City policies or programs to improve performance. This annual report can also be a tool to report on performance of eTOD demonstration projects.

Other U.S. cities, such as Seattle, Saint Paul, and Los Angeles, have also created equitable development scorecards that provide community-based organizations and residents an opportunity to evaluate and help shape proposed projects and policies. Creating a similar scorecard for Chicago eTOD can facilitate alignment between government and community outcomes to help provide more clarity for developers.

Creating a strategic plan for the reuse of vacant and underutilized land near transit stations is another area that requires internal action to map, analyze and engage community residents and different city departments to create redevelopment policies and incentives. The reuse of public lands should focus on equity outcomes such as affordable housing and local business retention and be standardized across city departments. More can be done to bring transparency on vacant property ownership and redevelopment options (especially if public owned). Potential interventions can include incentives for supporting community-serving uses like daycares, job training centers, business start-ups, and affordable housing, to name a few.

Another critical need for comprehensive eTOD is improved community engagement. While community engagement impacts all development, given the breadth of TOD corridors across the city and their community impact, they provide important opportunities to pilot new City engagement approaches and principles.

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Community stakeholders, such as Elevated Chicago,<sup>16</sup> shared several concerns with current approaches to public engagement ranging from repeated planning efforts without resources for implementation (which contributes to planning fatigue and community frustration), to one sided and reactive engagement rather than proactive engagement that involves community members in decision making.

Future implementation of the eTOD Policy Plan provides opportunities to address these concerns and pilot new approaches while standardizing an improved approach to engagement. Among the suggestions identified by the eTOD work group: incentivize, train and prequalify community leaders and residents, community-based non-profits, and artists as community engagement contractors creating a pool of prequalified organizations; and allocate target funding percentages of the project cost for community engagement in TOD projects specifically to engage under-represented community members, such as people with disabilities, by ensuring that community engagement is accessible.

**Priority 1 Recommendations**

<b>Goal Being Addressed</b>	<b>City Policy Area</b>	<b>Recommendation</b>	<b>Notes</b>
Enable comprehensive eTOD	Implementation & Coordination	<b>Formalize cross-sector, cross-agency coordination</b> to advance eTOD.	Continue convening eTOD work group and formalize a structure for cross-sector, cross-agency coordination, such as the creation of standing advisory group. Existing models to adapt include the City's past River Ecology and Governance Task Force.
Enable comprehensive eTOD	Implementation & Coordination	Dedicate <b>full time City staff</b> to serve as an eTOD Manager in advancing this policy plan and coordinating eTOD projects and programs	Explore options for hiring a dedicated full-time staff given City budget constraints.  In the long-term, seek to establish a City of Chicago eTOD Office with a senior staff person to lead interdepartmental coordination. eTOD Office would connect incentives programs, planning and design review, and leverage benefits in transit-served locations.
Enable comprehensive eTOD	Evaluation & Accountability	Create an <b>eTOD evaluation framework</b> and publish annual performance report	Create an eTOD evaluation framework to operationalize an annual eTOD performance report published by the Mayor's Office. Publish first annual report in Q4 2020.  The framework should incorporate a comprehensive view of eTOD that includes public health, educational access, and safety metrics with information disaggregated by race,

<sup>16</sup> Elevated Chicago. "Community Engagement Principles and Recommendations." <http://www.elevatedchicago.org/cep/>

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			income, age and ability where feasible. Examples include tracking the creation and preservation of both subsidized and market-rate affordable homes in TOD zones. Support tools and capacity needed to streamline evaluation and performance tracking. Explore reporting requirements on new development.
Elevate community voice	Evaluation & Accountability	Create an <b>eTOD Scorecard</b> that community and government partners can use to assess future projects and programs	Work with community and regional partners to create and utilize an eTOD scorecard that can be used to assess future TOD projects, programs and policies with explicit focus on who benefits and who is burdened and that clearly articulates the definition and elements of eTOD.
Equitable Land Use Practices	Facilitating Equitable Development	Develop strategy to <b>leverage public and vacant lands near transit for public benefit</b>	Pursue the development of a vacant and underutilized land strategy for TOD zones, that include a priority on using surplus public lands to support affordable housing and economic development. Local artists can be tapped to assist in vacant land activation and engagement efforts to inform residents about land ownership of vacant or underutilized properties and to collaboratively create ideas for their re-use to support community benefits
Enable comprehensive eTOD	Facilitating Equitable Development	Develop a <b>comprehensive eTOD calculator</b> combining existing tools from CNT and MPC.	Complete work to combine 2 separate tools into a comprehensive eTOD calculator mapping tool, which facilitates eTOD through identifying eligible parcels as well as estimating expected benefits and impacts.
Enable comprehensive eTOD	Engagement & Communication	Standardize <b>community engagement requirements and practices</b> across City departments and projects, utilizing TOD policies and projects as opportunities to pilot and test new agreed upon engagement principles and practices such as those in Elevated Chicago Community Engagement Principles and Recommendations.	Standardize community engagement requirements across City departments related to eTOD, such as DPD, CDOT, DOH, CTA, etc. Can include allocating funding for community engagement to ensure it is accessible for all regardless of language or disability, as well as creating opportunities to engage community leaders, artists and community-based non-profits as community engagement partners. Publish a public statement articulating the city's commitment and approach to community engagement, similar to Vancouver, BC and Seattle, WA.

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Elevate community voice	Engagement & Communication	Develop <b>public education and messaging tools</b> to communicate the vision and case for eTOD.	The Partners for Places grant provides a near-term opportunity to develop and test outreach materials with diverse community stakeholders. Outreach can also include briefings to City staff to educate and raise awareness of eTOD benefits.
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## Priority 2: Make eTOD required, easier, and more equitable

### Discussion

The largest set of eTOD recommendations fall within this second category. Many of them can be implemented or advanced over the next year in parallel with the recommendations included in the other two categories.

A key recommendation to enable comprehensive eTOD is to create eTOD overlay zones that set stronger requirements for density, affordability, and climate resilient development as appropriate for the multimodal transportation context and surrounding land use and tailored to local market strength. Increasing residential, commercial, and mixed-use development in transit-served areas will help reduce congestion, improve air quality, and provide Chicagoans with more opportunities for everyday physical activity. Given the different context of neighborhoods across the city, eTOD overlay zones will be tailored to existing neighborhood and market dynamics. Any new requirements will be adjusted by neighborhood to ensure investment is facilitated in areas that the private market tends to skip over, like parts of the South and West Sides. Calibrating eTOD overlay zoning to reflect the diversity of different needs and characteristics of different neighborhoods is required over a one size fits all approach. Numerous cities have created and adopted eTOD overlay zones in tandem with updating citywide comprehensive plans, including recently in Minneapolis, MN and Richmond, VA.

Through this process, the City can re-examine its TOD-defined geography. Currently, the TOD Ordinance applies to a mix of one-half or one-quarter mile radius around rail stations (depending on ‘pedestrian street’ designation). In the case of train stations, a one-quarter mile radius may be limiting the impact of the TOD Ordinance. A review of the literature about access distances to transit and the development near transit suggests that universally extending the radius around rail stations to half-mile would be justified and is consistent with best practices from other transit regions across the country.

Several important transportation and parking recommendations are also offered to tame the automobile and improve multimodal accessibility. These are in direct response to the goals outlined in the 2019 eTOD ordinance. Many neighborhoods within TOD areas, especially in the South Side and West Side, lack adequate sidewalk infrastructure to support safe and easy walking to and from transit stations. Rightsizing parking is also important to managing automobile traffic in TOD areas and reducing the cost of building or renovating existing housing.

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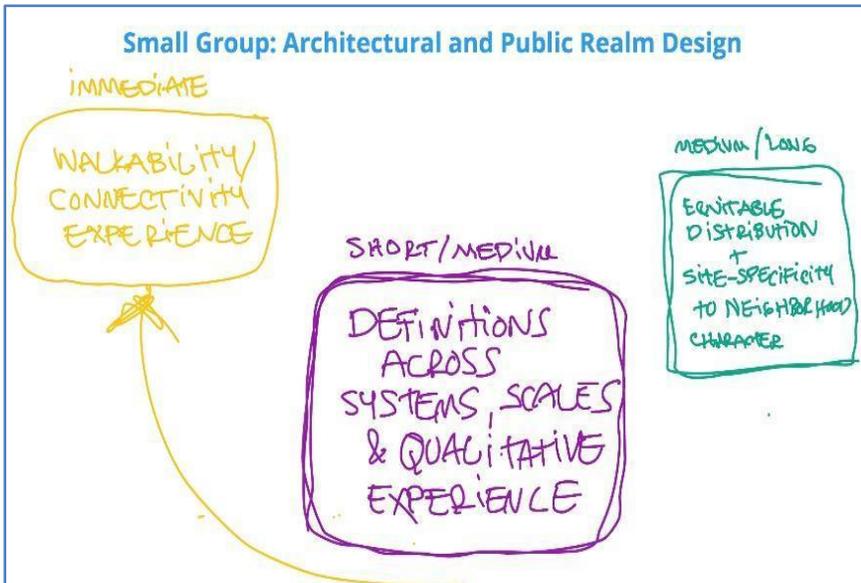


Figure 6. Notes from eTOD Work Group Architectural and Public Realm Design team are available to view at the [eTOD work group Miro workspace](#)

Residential displacement is a growing concern in TOD areas where rising land values are pricing out longtime homeowners and renters both. Displacement is also a challenge in TOD areas where continued disinvestment contributes to housing blight and lack of opportunity. More needs to be done to preserve, modernize and weatherize the small multi-family housing stock that contributes to community character and creates affordable housing options. TOD zones offer opportunities to increase density and height of buildings adjacent to stations but within the ½ mile radius of transit many neighborhood streets are lined with two- to four-unit housing stock that also contributes to TOD goals. Preservation of this housing, along with making it easier to build higher density housing, must both be part of how Chicago advances eTOD that works for all.

Other important recommendations are to strengthen requirements and incentives to support the preservation and creation of affordable housing; and to support local business retention and economic development. For both, there are actions the City can take to prioritize TOD areas in allocating funding for existing programs and policies such as in the Qualified Allocation Plan and the Neighborhood Opportunity Fund. Efforts are also currently underway by the Department of Housing to amend the Affordability Requirement Ordinance which can also be designed to align with TOD, help stem displacement, and create more affordable, accessible homes.

Several recommendations are provided to improve the architectural design and review process overseen by the City’s Department of Planning and Development (DPD) and modify existing parking and multimodal transportation requirements. Applying health and equity impact assessments, rightsizing parking and requiring design considerations and providing architectural templates or design guidance can assist developers in supporting these goals along with placemaking elements contributing to larger community-oriented goals with facilitating approval processes.

Time is money for developers, and if the City’s process for accessing the TOD incentives takes more time than it is worth, this limits the potential of the program especially in parts of the City where market rents do not support newer unsubsidized housing. Making more elements of the TOD incentive program occur “by right” when the requirements are met would reduce uncertainty and lower the barrier for developers considering TOD. This could also help affordable housing supply keep pace with demand in “hot” real estate markets, which helps avoid displacement. Procedural streamlining might be similar to Chicago’s existing Green Permit Program, which offers expedited permitting for projects that meet green building criteria, or also supported through the TOD Overlay Zones.

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TOD has the potential to support individual and community wealth creation. There is more the City can do to support small, locally- and minority-owned businesses that are threatened by displacement and support living wages jobs in the procurement process and in allowing greater flexibility for first-floor uses of within TOD zones. Avoiding displacement is not only important for residents and small, locally owned businesses, but also cultural and community organizations. While community organizations serve their residents, cultural institutions work to foster and retain cultural identity, activity, and participation.

**Priority 2 Recommendations**

<b>Goal Being Addressed</b>	<b>City Policy Area</b>	<b>Recommendation</b>	<b>Notes</b>
Enable comprehensive eTOD	Policy	Apply <b>health and equity impact assessments</b> to the development of eTOD-related policy.	Use health and equity impact assessments in the design and implementation of various elements of the ETOD Policy Plan, including but not limited to the creation of a TOD Overlay Zone.
Enable comprehensive eTOD	Zoning & Land Use	Create a flexible <b>eTOD overlay zone</b> to strengthen requirements for density, parking, and other equitable, climate resilient development near transit, tailored to neighborhood context (such as market strength).	Create <b>TOD overlay zone</b> that broadens the definition from a ¼ mile to a ½ mile from a transit station as identified in the eTOD ordinance, and that requires appropriate density, reduced parking, mixed-use, and other transit-oriented zoning and architectural design. Requirements will be tailored to levels of development in neighborhood, such as targeted incentives or waivers for station areas with weaker markets.
Equitable Land Use Practices; Tame the Automobile	Zoning & Land Use	Allow more <b>flexibility in permitted building uses</b> , such as by permitting residential on the ground floor in more business and commercial districts and right-sizing parking to reflect these additional uses.	Expand currently allowable first floor zoning uses beyond retail in TOD areas, i.e. community health centers, daycare facilities, libraries, co-workspaces; and provide sample architectural design specifications, floorplans, or other guidance that facilitates broader types of uses.  Study and propose reductions to allow more flexibility in parking requirements and curbside loading/parking for first floor uses within TOD. For example, reduce the zoning code requirement for loading areas associated with daycare facilities located in TOD areas. New use categories, like PDR (production/distribution/repair) as well as co-working, and mixed production and retail have been codified in some places in recent years.
Increase housing affordability and accessibility	Zoning & Land Use	Allow <b>small scale multi-family housing</b> in all TOD zones.	Allow small multi-family housing in all TOD zones, prioritize the preservation and modernization of existing 2-4-unit housing stock located in TOD areas to improve accessibility, energy efficiency and climate resiliency.

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Improve multimodal accessibility	Parking-related Zoning	Strengthen <b>bike parking requirements</b> for TOD projects.	Amend bike parking zoning requirements for TOD projects to require at least one bike parking space per unit rather than having bike parking linked to car parking reductions.
Tame the automobile	Parking-related Zoning	Establish <b>maximum allowed parking</b> for new developments in all TOD zones identifying provisions, if needed, to minimize burden on low-income drivers.	Explore expanding parking maximums (which already exist in downtown districts) to all TOD areas, including considerations for community benefits, management, and equity impacts, and tailored to neighborhood context. Ensure that low-income households are not unduly burdened.
Increase housing affordability and accessibility; Tame the Automobile	Parking-related Zoning	Require <b>parking to be paid or leased separately</b> from housing in TOD projects (i.e., unbundle parking and housing costs).	Require developers of TOD projects to unbundle parking and housing costs, charging for each separately, and lowering cost burden on households without cars.
Improve multimodal accessibility; Tame the Automobile	Parking-related Zoning	Include <b>sustainable transportation options and incentives</b> in zoning code, i.e., require developers to implement a certain number of options and incentives, such as transit passes, to manage traffic demand	Establish a point-based system and require developers to implement a certain number of options and incentives associated with each development, ranging from bike membership and infrastructure to free or discounted transit passes. Consider variations or fewer points required in areas with lower development activity so as not to turn off developers in areas that need investment. Provide guidelines for where to provide parking within the site design and to implement shared parking.
Tame the Automobile	Parking-related Zoning	Allow <b>shared parking</b> arrangements to meet parking requirements in TOD areas.	Enable formal shared parking arrangements in TOD areas. Allow new development to fulfill parking requirements by counting shared parking facilities in the calculation. Ensure any new arrangement maintains accessible parking for people with disabilities.
Encourage investment and wealth building in BIPOC communities, businesses and people	Jobs & Workforce	Strengthen <b>equity in procurement and supplier diversity policies</b> to ensure small and minority owned firms and Black, Brown, Indigenous and other people of color benefit from new development.	Prioritize local WBE/MBE/BEPD firms and BIPOC residents and other people who may have barriers to employment for jobs related to TOD, including project design, development, or construction.
Encourage investment and wealth building in BIPOC communities, businesses and people	Jobs & Workforce	Create <b>quality jobs</b> through eTOD projects with a pipeline to residents and firms	Set measured targets for quality job creation through eTOD projects. May include providing additional training and workforce development opportunities specific to eTOD projects. Connect to City’s coordinated workforce programs.
Enable comprehensive eTOD	Architecture Design/Review	Require <b>health, arts and culture, and equity</b> considerations in TOD-project level design.	

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Enable comprehensive eTOD	Architecture Design/Review	Develop architectural design templates that can <b>streamline and simplify city approvals</b> for eTOD projects.	Pursue the creation of architectural design templates to simplify and ease pre-approval for eTOD projects
Improve multimodal accessibility	Transportation	Improve <b>pedestrian infrastructure</b> in TOD zones by prioritizing and targeting resources based on need, starting with an inventory of current sidewalk infrastructure.	Improve safety, walkability, and accessibility for sidewalks and other pedestrian infrastructure within 1/2 mile of TOD stations. Develop a process to prioritize and target pedestrian infrastructure near transit based on need, as defined with an equity lens. Includes an inventory of sidewalk infrastructure in TOD zones.
Improve multimodal accessibility	Transportation	Improve <b>visibility and accessibility of transit signage and wayfinding</b> , especially for people with disabilities or for whom English is not their first language.	Improve visibility and accessibility of transit signage and wayfinding within TOD areas, esp. for people with disabilities or for whom English is not their first language. Incorporate community connections within wayfinding, i.e. access to parks, libraries, schools and health centers.
Improve multimodal accessibility	Transportation	Increase access to <b>shared micro-mobility options</b> , including bike-share, e-bikes, and e-scooters.	
Improve multimodal accessibility	Transportation	Prioritize funding to make CTA and Metra <b>rail stations fully accessible</b> to people with disabilities, and to provide sufficient rail capacity for new riders.	For example, support funding for CTA’s All Stations Accessibility Program (ASAP), to increase the number of CTA rail stations with elevators and to replace end-of-life elevators to improve availability
Improve multimodal accessibility	Transportation	Ensure <b>high-performing bus service</b> , especially along TOD bus corridors. Prioritize <b>high-quality bicycle infrastructure</b> to, from, and within eTOD areas.	Ensure that high-quality bus and rail transit service is provided to low-income, communities of color, which tend to have off-peak and dynamic work hours. Explore options for equitable enforcement of blocking the box and bus and bike lanes that does not disproportionately harm low-income residents.
Avoid displacement	Housing	<b>Preserve unsubsidized affordable housing</b> within TOD zones, especially 2-4 flat buildings.	Prioritize the preservation of 2-4 unit housing stock within TOD zones including through supporting community land trusts and housing cooperatives, piloting right of first refusal, and providing emergency relief to tenants and landlords affected by COVID19. Tracking the amount of existing affordable homes (both subsidized and unsubsidized) to be included in annual performance reporting.
Avoid displacement; Increase housing affordability and accessibility	Housing	<b>Strengthen affordability and accessibility requirements</b> for city-supported housing development in TOD zones, including through updates to the Affordable Requirements Ordinance.	Modify existing requirements (including in the Affordable Requirements Ordinance) and incentive programs to create deeper affordability requirements in TOD zones and to incentivize larger, family-sized units and accessible eTOD units.
Increase housing affordability and	Housing	Modify the City's Qualified Allocation Plan (QAP) to	The Department of Housing is currently conducting a Racial Equity Impact Assessment

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accessibility		include preference for building <b>affordable housing in TOD zones</b> , especially for very low-income residents.	of the City’s QAP. eTOD goals and benefits will be included in the assessment.
Encourage investment and wealth building in communities, businesses and people	Development Incentives	Develop <b>incentives and policies to preserve and retain</b> community organizations, small businesses, and other neighborhood assets in TOD Zones.	Pursue and identify specific development and retention incentives to support and preserve community assets within TOD zones like CBOs, small businesses, art and culture incentives, daycare and public health facilities. Include prioritization for BIPOC-owned community assets.
Encourage investment and wealth building in communities, businesses and people	Development Incentives	<b>Prioritize eTOD in applications for city funding</b> that supports housing and economic development, including but not limited to the Neighborhood Opportunity Fund.	Identify top 10 programs that fund development in the City and, as appropriate, award extra points for eTOD projects to each. For example: revise Neighborhood Opportunity Fund program to provide extra points to small business applicants located within TOD zones. Priority could be placed on supporting ground-floor retail in city-funded housing projects to bolster the financial health of the project. Additional points for BIPOC applicants.
Improve community health and safety	Development Incentives	Develop <b>incentives for public space</b> in eTOD projects.	Evaluate potential incentives (financial or administrative, including transfer of development rights) that could be provided for eTOD projects that design for public spaces to facilitate community gathering, neighborhood commerce, festivals, and sustainability.

## Priority 3: Elevate eTOD within Chicago’s Citywide Plan

### Discussion

In August 2020, the Department of Planning and Development (DPD) announced a new three-year, citywide planning initiative under Mayor Lori E. Lightfoot that will encourage neighborhood growth and vibrancy while addressing social and economic inequities that impair Chicago’s legacy as a global city.<sup>17</sup> This effort, dubbed “We Will Chicago” is the first citywide plan of its type since the City’s “1966 Comprehensive Plan.” We Will’s initial goals for future growth across Chicago are based on three core principles: equity, diversity, and resiliency for all residents in every neighborhood – all of which align well with the City’s eTOD goals.

The ‘We Will Chicago’ plan is a powerful opportunity to refine and formalize critical eTOD policy actions as the plan is developed to identify citywide priorities, spending, and policymaking to assist with economic recovery and guide development for years to come. Four recommended actions are offered to improve land use and zoning, transportation and parking, health and safety, and housing elements within ‘We Will Chicago’ to better support eTOD.

A top priority is to develop a process for utilizing racial and health equity assessments in evaluating and improving zoning policy. Many of Chicago’s current plans and regulatory requirements date back to earlier plans that prioritized the automobile over transit and walking; and that reinforced systemic racism both deliberately and inadvertently in the categorization, location, and prioritization of Black and Brown communities. Land use

<sup>17</sup> [https://www.chicago.gov/city/en/depts/dcd/provdrs/we\\_will\\_chicago.html](https://www.chicago.gov/city/en/depts/dcd/provdrs/we_will_chicago.html)

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and zoning decisions deepened health and economic disparities and racial segregation. Going forward, the City has a powerful opportunity to create a new approach that centers equity outcomes, builds community wealth, and improves health outcomes for BIPOC communities and people. In September 2020, the City will also launch its community health improvement plan, Healthy Chicago 2025, which recognizes that in order to close the racial life expectancy gap, a health and racial equity lens must be utilized to inform how resources and opportunities are distributed at the neighborhood level. The Department of Housing is currently also applying a racial equity screen to its allocation of low-income housing tax credits as part of updating the City’s Qualified Allocation Plan in 2021.

**Priority 3 Recommendations**

<b>Goal Being Addressed</b>	<b>City Policy Area</b>	<b>Recommendation</b>	<b>Notes</b>
Equitable Land Use Practices	<b>Land use and zoning</b>	Develop a process for the City and partners to conduct <b>racial and health equity assessments</b> on land use plans and zoning decisions.	Develop process and apply to inform the citywide planning process. DPH and DOH are both testing health and equity screens in fall 2020. The Office of Equity and Racial Justice (OERJ) can also support efforts.
Equitable Land Use Practices	<b>Land use and zoning</b>	Establish a framework for <b>neighborhood land use plans</b> that adheres to the goals of equity, resiliency and diversity and recognizes the <b>specific opportunities within TOD geographies</b> .	The Citywide plan is a multi-year effort that is launching in Fall 2020, including through a series of public forums. Ensure TOD geographies are considered throughout early engagement.
Improve multimodal accessibility	<b>Transportation</b>	Prioritize investments in <b>transit, biking, and walking</b> in the Citywide Plan.	
Improve health and safety for our most vulnerable community members	<b>Health and Safety</b>	<b>Incorporate health and safety</b> into City’s citywide plan	Incorporate health and safety into the Citywide plan: i.e. create health and race principles, commit to an equitable planning process, establish role for health dept, safer communities by better maintenance not by over-policing, inspections as health component

## Conclusion and Next Steps

Much has happened over the last eighteen months since the formation of the eTOD Work Group to inform this Policy Plan, yet the City’s commitment to writing a new chapter in its history to achieve equitable transit-oriented development remains. Now is a time for bold thinking and action. Perhaps never before has the City been better prepared to commit to a new course that is founded on the power of community; that commits to desegregating our city; and that provides community-wealth building pathways for all regardless of the color of their skin or their transit line.

The City is poised to take immediate action across several different fronts, each of which will require coordination across departments that the Mayor’s Office can shepherd. The City and Elevated Chicago recently received a \$150,000 Partners for Places grant<sup>18</sup> that will support the **deeper ETOD community engagement**, particularly as the Citywide planning process, “We Will Chicago” kicks off.

Formalizing the eTOD Work Group (or another advisory structure) will also provide continued partnership and outreach between community stakeholders, regional partners and government agencies to support comprehensive eTOD implementation. Members are particularly interested in opportunities to advance in the short term.<sup>19</sup>

Among the numerous short-term implementation opportunities are:

- Formalize a **structure for cross-sector, inter-departmental coordination** to advance the Policy Plan, including dedicating City staff and capacity;
- Finalize an eTOD evaluation framework for **annual performance reporting** and outcomes tracking;
- Design a **health and racial equity assessment of current land use and zoning codes** to inform the Citywide Plan;
- Expand **the TOD designation to 1/2mile radius** from all CTA and Metra stations while working to adopt **TOD Overlay Zones** that create greater certainty and consistent application of land use, zoning, parking and other design elements;
- Develop a **comprehensive strategy to leverage publicly owned land and vacant lots** near transit for public benefit;
- Strengthen **affordability and accessibility requirements** for city-supported development in TOD zones through revisions to the Affordable Requirements Ordinance;
- Combining existing tools into a **comprehensive eTOD Calculator** to identify equitable development opportunities; and,
- Identify and support the successful implementation of **eTOD demonstration projects** across the City, including opportunities in the INVEST South/West initiative and in other transit corridors.

Parallel city-led efforts such as, but not limited to, Healthy Chicago 2025, INVEST South/West, revisions to the Affordable Requirements Ordinance, and the City’s COVID19 Recovery Task Force report provide important opportunities to embed comprehensive eTOD.

As these planning efforts move forward, the City will also advance **eTOD demonstration projects** to test and deploy many of the proposed policy changes. The Mayor’s INVEST South/West initiative is one important

<sup>18</sup> <https://www.fundersnetwork.org/partners-for-places/>

<sup>19</sup> See Appendix E for proposed implementation timeline for the next three years.

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pathway to demonstrate the impact of revised eTOD policies. Additional demonstration or pilot projects can be created in other eTOD corridors as well and be opportunities to align and coordinate interventions by numerous City departments. For instance, transportation and sidewalk improvements, including improved way finding, that support people living in new affordable housing projects can also include stormwater management and energy efficiency design elements (e.g. potentially involving programs at DOT, CTA, DOH, and DPD).

Chicago has a great opportunity and much to do to create a new chapter for equitable development that is centered on existing transit and community assets. eTOD is an approach that requires much more intentional coordination between players, and a commitment to revise the policies and practices that prioritize auto-oriented, suburban-style, and extractive development practices over those that generate wealth and opportunity for the many Chicago households and businesses already located near transit.

## Appendices

- A. eTOD Work Group Members (as of May 2020)
- B. Map of Past Approved TOD projects
- C. Summary of eTOD Data Analysis (completed November 2019)
- D. Potential eTOD Performance Metrics
- E. Timeline and Summary of eTOD Recommendations
- F. Glossary of Common Terms