

EQUITABLE TRANSIT-ORIENTED DEVELOPMENT (ETOD) HEALTH & RACIAL EQUITY IMPACT ASSESSMENT

Equitable Transit Oriented Development (ETOD) policies and investments that center equity and community participation will increase community vibrancy and housing opportunity, improve sidewalk and pedestrian safety for all sidewalk users, promote the use of active transportation modes, increase climate resilience, and foster social cohesion. This assessment finds that the Connected Communities ordinance, along with community-centered implementation and investment focused in communities that have traditionally been excluded from decision-making in planning, development, and investment, will likely make progress toward addressing persistent health and racial inequities.



The City of Chicago first passed a Transit Oriented Development (TOD) ordinance in 2013, with updated ordinances in 2015 and 2019. Between 2016 and 2019, 90% of new TOD projects were located either on the North/Northwest Side or Loop/West Loop. Analysis of demographic shifts point to displacement associated with Chicago's TOD projects, with white population increasing and Black population decreasing near station areas, and Hispanic/LatinX population increasing in some areas and decreasing in others.

Equitable Transit Oriented Development (ETOD) works proactively to redress inequitable development and focus policy and investment so that all Chicagoans can experience the benefits of mixed-use, sidewalk and transit user friendly development near train and bus stops. Achieving ETOD means **focusing policies and investments to advance developments in Black, LatinX, and Asian communities**

on the South and West sides of the city and taking **proactive measures to prevent displacement** so that residents currently residing in ETOD areas are able to stay and enjoy the benefits.

Over the past five years, Elevated Chicago and the ETOD Working Group¹ have forged partnerships between communities and government to evaluate existing TOD projects and develop the **2020 ETOD Policy Plan** as a roadmap to advance racial equity, community wealth building, climate resilience and public health goals.

From October 2021 to March 2022, the Chicago Department of Public Health (CDPH) partnered with Elevated Chicago and the Illinois Public Health Institute (IPHI) to engage members of the ETOD Working Group, ETOD pilot sites, youth leaders, and the City's Disability Advisory Committee to identify the ways that ETOD policies can impact health and racial equity across the city. This **Health & Racial Equity Impact Assessment (HREIA)** looked at three ETOD policy components and a critical companion strategy:

- Allow for more homes and businesses near transit, including both train and bus stops.
- Increase housing choice and opportunity, affordability, and accessibility near transit.
- Improve and prioritize street safety and encourage rolling, walking, biking, and transit use.
- Increase ETOD investment in disinvested neighborhoods.

How can ETOD policy impact health and racial equity in Chicago?

Community leaders identified the following pathways:



Community vibrancy and housing



Transportation



Wealth building opportunities



Safety



Climate resilience



Civic engagement and social connection



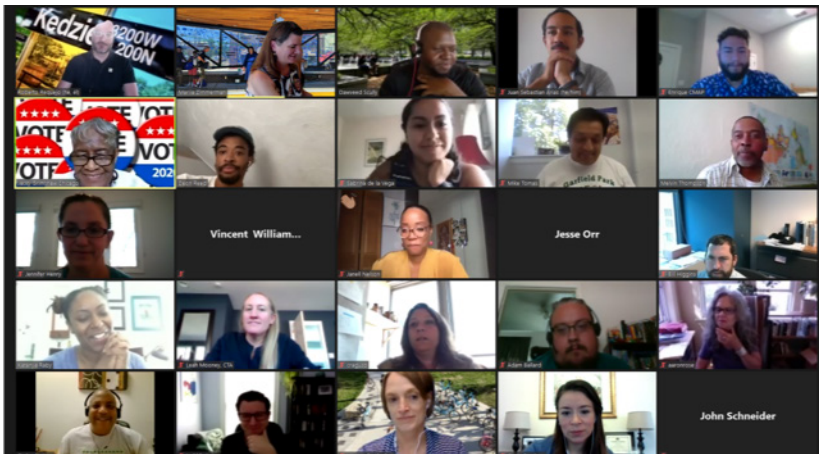
In Logan Square, we've seen that some of the amenities that promote walkability can also fuel gentrification. I think that if we can promote these amenities in a more widespread way through the zoning code, and not make it so that these things are rare, but rather throughout the City, that would make a City that we all want to live in."

COMMUNITY ENGAGEMENT PROCESS

CDPH and Elevated Chicago engaged key stakeholders to collect feedback on the HREIA questions through:

- Two **community engagement sessions** with community members from ETOD pilot sites; transportation, housing, and development community-based organizations; and City department representatives and civic institutions (including the Department of Housing, the Department of Transportation, the Mayor's Office for People with Disabilities, the Department of Planning and Development, and Chicago Transit Authority);
- **Listening session** with advocates for people with disabilities, as well as two follow-up interviews; and
- **Listening session** with youth.

Content experts also compiled data from existing plans and assessments of TOD in Chicago and conducted a literature review to supplement recommendations from community members. The HREIA participant quotes included throughout this report are drawn directly from these engagement sessions.



Members of the ETOD work group met virtually to discuss shared values and priorities to inform the City's ETOD Policy Plan.



I was born and raised here, and I spent a considerable amount of time in a vehicle growing up on the South Side. My mom and grandparents never really used buses and trains much because the access was always limited. There were also concerns about safety or the perception of safety on the South Side...I saw disparities across the City [while on the train]. You start at 95th and ride the train up to Howard and see a completely different space...you can see the change in communities."

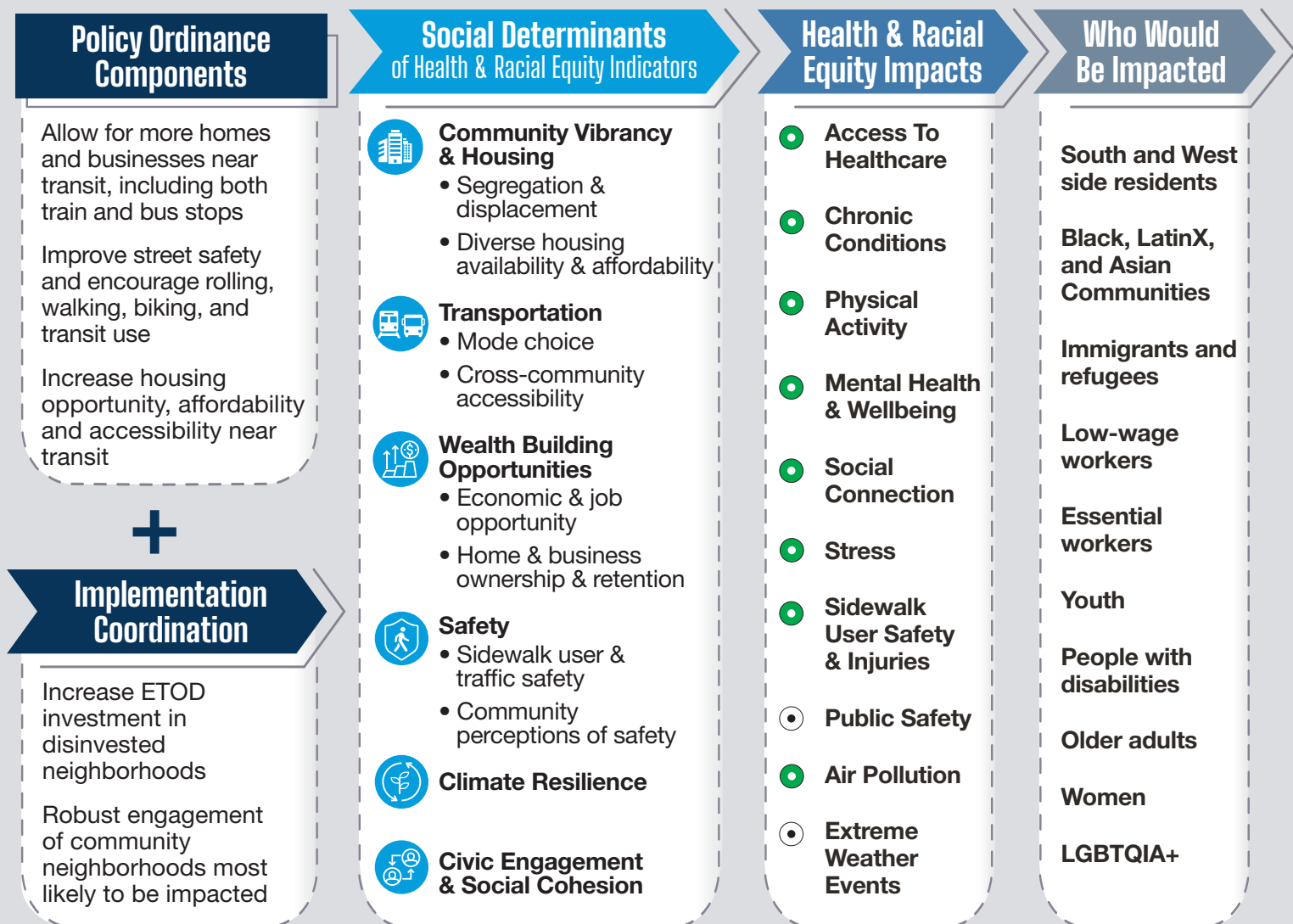
Components of a Health & Racial Equity Impact Assessment

The Chicago Department of Public Health, Mayor's Office of Equity and Racial Justice, and a Community Accountability Committee worked together to develop focus areas that guided this community-engaged process.

- Define the opportunity or problem
- Acknowledge history
- Look at numbers and narratives
- Shift power
- Measure the benefits and burdens
- Embrace accountability and commit to action

IMPACT PATHWAYS

Community members identified categories or “pathways” of impact through the HREIA engagement sessions, and the HREIA team organized findings from the community engagement process and literature review according to those pathways. For each pathway, the HREIA team identified indicators to understand how ETOD policies and implementation could impact health and racial equity. Each potential impact was evaluated and classified as likely to improve (**green**), likely to deteriorate (**red**), or unclear/unknown (**black**). This HREIA focused on understanding impacts for communities most impacted and that have traditionally been excluded from decision-making in planning, development, and investment, as detailed in the diagram.



- Likely improvement
- Likely deterioration
- Unclear/unknown impact

How is equity achieved?

The City of Chicago defines **equity as both an outcome and a process** that results in fair and just access to opportunity and resources that provide everyone the ability to thrive.

In the case of ETOD, public, private, and civic actors must work together with community members to deconstruct racist policies and systems that have led to an inequitable distribution of TOD, pedestrian streets, and other mixed-use amenities across the City. Policy changes can facilitate development in historically disinvested areas, increase housing options in amenity-rich areas, and ensure community members are able to stay in place and enjoy the benefits of ETOD. This requires collaboration on zoning policy, investment and implementation; interdepartmental and interagency collaboration; and ongoing partnership between the City and Black, LatinX, and Asian communities, especially on the South and West sides.



I would really love it if we had a CTA system where all stations are accessible for people using wheelchairs, people who have trouble walking, parents with strollers...”



Anytime we talk about new development taking place, we talk about the haves and the have nots. We need to think about intersectionality—how do we tie policies to new homes for working families? To the CHA voucher program? Otherwise we’re going to start seeing gentrification. We have to learn from others who’ve already experienced this.”



We not only need to have people with disabilities at the table. Are you looking at architects with disabilities, architectural firms and planning and design processes that include people with disabilities across the board? Again, people with disabilities are end users in the most profound way. So how does this get across to communities in terms of understanding of planning and development?”

ASSESSMENT FINDINGS

INCREASING ETOD INVESTMENT AND IMPLEMENTATION

Community members emphasized that policy changes must be made with an equity lens; otherwise, people living in the West and South Sides of Chicago, especially in Black, LatinX, and Asian communities, will continue to experience exacerbated racial and health inequities while those already in power will continue to accumulate wealth and undue influence.



I live on the South Side and the condition of our streets is inequitable. I commute by bicycle and was leaving my mom's house and had a terrible bike crash because of some of the potholes on our street. Thinking about those conditions and the vacant lots that kids have to walk past on the way to school—those are examples of inequitable development.”

Strategies to increase ETOD investment must 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 – and increasing diversity of housing options in high-cost, exclusionary neighborhoods.

This includes strong engagement and partnership between community-driven ETOD pilot sites, City departments, and local elected officials; creating and preserving affordable housing

options near transit; setting predictable standards for equitable development near transit; promoting multimodal transportation usage; including proximity to transit as a factor for place-based investments; and incorporating health and equity criteria in both policy and project development.

HOUSING AND LAND USE

Community members identified that living near clean, safe, and dependable transit has many benefits for households and families: **saving money, saving time, and providing greater access to employment and education opportunities.** Participants also shared that these economic and lifestyle benefits relate to overall well-being and physical and mental health for individuals and families.



There's a new model where they are building public libraries below senior housing. My father had the opportunity to move in there. It's really a great model. The senior citizens are always downstairs in the library interacting with one another. It's really helped to give them a community space and get them out of the house.”



Further, community members shared how combining transit with a walkable, mixed-use neighborhood will amplify benefits for those living in proximity to train stations and bus stops. Vibrant mixed-use neighborhoods near transit would provide expanded retail and housing options in Black and Brown communities on the West and South sides of Chicago, if policies **support retention of small businesses, provide space for social services and**

social enterprises, encourage lingering, disincentivize development like strip malls and drive thru facilities that disrupts mobility and vibrancy near transit, address the needs of specific community members such as people with disabilities, youth, and older adults, and ensure affordable housing within new development and preserve naturally occurring affordable housing.

Community members recognized that **affordable housing is a central element to achieving Equitable TOD**. The HREIA team intentionally engaged community members representing areas of the city with a range of different housing markets. Those participants were clear that ETOD needs to have policy components to assure affordable housing options in both communities that are facing displacement pressures and communities that are currently underinvested. This would include stronger incentives for affordable and accessible homes in new developments, protections for preserving affordable housing (such as 2- or 3-flats), and other policies that make it easier to build diverse housing options near transit. Community members also emphasized the importance of shifting to parking maximums for affordable housing and repurposing surplus parking space for additional affordable units.



To advance health equity, include the community to identify the development that will be useful for all.”

Community members saw **opportunities with ETOD to affect climate resilience in a few ways**. In addition to broader emissions reductions through transportation mode shifts, a number of participants pointed to innovative ways to impact climate resilience on a local level through land use and development in ETOD areas by promoting use of renewable energy sources, greening, and stormwater runoff management.

MOBILITY

Community members highlighted the importance of limiting curb cuts, driveways, car-oriented developments, and parking near transit; and prioritized sidewalk user safety and bike parking, neighborhood greening, establishing and maintaining bike lanes, creating safer transit stops, and improving rapid transit networks. In addition to improving mental health and wellbeing, the literature also pointed to improvements in local pollution levels and chronic illnesses like asthma as a result of increasing sidewalk and transit access, expanding neighborhood green space, and reducing cars on the street.

Community safety was a prominent topic of discussion among stakeholders and community members. **People acknowledged that safety and perceptions of safety will have a great impact** on the extent to which broader community members utilize transit and visit street and



Walkability in effect means accessibility. It means a welcoming neighborhood. It is an opportunity for [all sidewalk users], whether we are walking or rolling...”

sidewalk-oriented retail districts. As community members and the literature pointed to, positive perceptions of safety are created by elements like well-lit transit stops, the presence of diverse sidewalk users throughout the day (such as youth, the elderly, people with disabilities), access to green space, and reduced police presence.

Parking near transit and around local businesses within ETOD areas was also discussed in detail. Community members named the importance of **prioritizing parking for people with disabilities and the elderly** and to preserve local businesses that might only be accessible by car. However in all other instances, they encouraged parking in ETOD areas to be limited to encourage the safety of sidewalk and transit users.

Community members (including youth, people with disabilities, and the elderly) should be consistently involved in the design and implementation of mobility interventions to make improvements in mode choice, local business activity and retention, household affordability and savings, safety, climate resilience, and community cohesion.



Making communities safer and increasing walkability... creates an incentive to walk and ride your bike more, get more physical activity, and go to different destinations... and reduces the reliance to use a car. New infrastructure like bike lanes also support this type of improvements."



RECOMMENDATIONS FOR ETOD POLICY AND IMPLEMENTATION

These are recommendations for the City to consider as it advances the Connected Communities Ordinance in order to maximize health and racial equity benefits.

The HREIA team analyzed findings from the community engagement process and literature review to develop recommendations for ETOD policy and implementation. Foundational to enacting these recommendations are the partnerships between community representatives from ETOD pilot sites in Black, LatinX, and Asian communities and City departments and elected officials. These partnerships must center the expertise of community members with knowledge of transit and development, including youth, people with disabilities, low-wage workers, and older adults, in order to advance equitable investment and implementation of ETOD. The HREIA affirms many of the strategies and recommendations in the 2020 ETOD Policy Plan, provides additional evidence about potential health and racial equity impacts related to the Connected Communities ordinance, and identifies crucial implementation and investment strategies to improve health and racial equity, such as including transit-orientation as a key criteria in economic development, affordable housing, and capital infrastructure investments.

Health & Racial Equity Recommendations for ETOD

- 1 Include bus routes with the highest ridership as ETOD areas, so areas around bus stations are eligible for TOD incentives. Standardize the geography of TOD incentives for CTA stations, Metra stations, and eligible bus stops.
- 2 Put in place pedestrian, bike, and ADA and wheelchair-friendly design guidelines within ETOD areas to promote safety for sidewalk and transit users.
- 3 Minimize barriers to mobility, such as curb cuts and driveways, near transit stations. Have a mechanism for requesting an exception.
- 4 Preserve existing market rate housing that is affordable to working class families within ETOD areas.
- 5 Incentivize and legalize multi-family development within ETOD areas, consistent with local context and priorities and in line with equitable values and implementation.
- 6 Require on-site affordability for developers to access TOD density bonuses and incentives.
- 7 Reduce on-site parking mandates for affordable housing within ETOD areas. Create opportunities for other types of parking such as bike parking.
- 8 Prioritize accessibility for people with disabilities within developments in ETOD areas. Ensure more ground-floor accessible units for people with disabilities.
- 9 Incentivize small and local businesses to locate within ETOD areas.
- 10 Incentivize small and local businesses to appeal to sidewalk and transit users with amenities like street-level access and walk- or roll-up windows.

ETOD Implementation Recommendations

- ① Build strong partnerships between community representatives in Black and Brown communities and City departments and elected officials to advance equitable investment and implementation of ETOD. Make sure to include community members with specific expertise on transit and development such as youth, people with disabilities, low-wage workers, and older adults.
- ② Improve interdepartmental and inter-agency coordination and investment in support of community driven ETOD projects.
- ③ Incentivize larger developers to partner with community-based contractors and developers to build investment in local businesses and ensure local context and priorities are preserved.
- ④ Incorporate community partnerships, street and building design, arts and culture, and different community activation elements to increase safety and perceptions of safety in areas around key transit stops.

NEXT STEPS

This HREIA is part of an ongoing process to ensure that the City's future transit-oriented development policies and projects are informed by community voice at all stages and affirmatively promote equity by maximizing benefits for Black, LatinX, and Asian communities who live near transit stations - particularly in communities facing disinvestment and displacement pressures. Many of the HREIA recommendations are already included in the Connected Communities ordinance; some speak to how this ordinance and related policies should be implemented.

The City commits to embed implementation of the recommendations within ongoing ETOD progress reporting, such as by monitoring and reporting on public investments near transit. Ongoing partnership with the ETOD Working Group in implementation and deeper equity analyses on issues surfaced through the HREIA will ensure ETOD policies and investments advance health and racial equity.

The City commits to working with a Community Accountability Committee to learn from this HREIA, refine tools, and advance inclusive, proactive, and creative community engagement across City departments to integrate health, racial equity, and climate impact tools and analysis into policymaking and planning.

This process marks another important milestone in the City of Chicago's efforts to be responsive and accountable to evolving, community-identified concerns and solutions and proactive in building trust with communities that have been historically excluded from many of the benefits of living in Chicago.

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The ETOD Health & Racial Equity Impact Assessment was conducted by the Chicago Department of Public Health and the Illinois Public Health Institute, with support from Elevated Chicago.

The Illinois Public Health Institute mobilizes stakeholders, catalyzes partnerships and leads action to improve public health systems to maximize health, health equity and quality of life for people and communities.

Elevated Chicago is a multi-sector collaborative that promotes more equitable development of public spaces, buildings and vacant land around Chicago's public transit infrastructure. Elevated focuses its work on people—especially Black, Brown and indigenous residents, on places affected by displacement and other forms of inequity in the built environment, and on processes that can repair harms, shift power, spark development, and engage communities.