



October 29, 2020

To: City of Chicago Office of the Mayor and Department of Planning & Development

From: The Metropolitan Planning Council

Subject: MPC Comments and Recommendations on the ETOD Policy Plan

The Metropolitan Planning Council (MPC) is pleased to be a partner in strengthening the City's TOD ordinance to advance equitable development in Chicago. Encouraging development near bus routes and formalizing an equity-grounded implementation plan are steps in the right direction to ensure the benefits of living and working near transit hubs are available to a broader range of people. Denser urban development patterns and reduced need for driving can also further Chicago's resilience in the face of climate change. As a member of the planning team and working group we are proud that the development of these recommendations included over 70 voices from across the city raising important concerns and creative ideas and targeting common outcomes to reduce displacement, invest in communities of color, reduce segregation and promote economic development.

In Chicago, place matters. Residential segregation has a lasting impact on local housing and commercial markets and evidence shows that transit-centric development, while the smartest way to grow, can exacerbate the economic divides across our deeply segregated city. Transit-oriented development is a tool that needs different support across different markets. The ETOD policy has the potential to spearhead an integrated approach to development – one that accounts for local market conditions and leverages resources to stabilize neighborhoods in need of economic investment. Next steps taken by the city to evaluate recommendations and codify ETOD policy and practice should include the following:

1. Develop a clear process for equity and measuring equity outcomes
2. Clarify the roles of city departments in ETOD implementation with clear measures of accountability
3. Provide support for community-based developers
4. Encourage joint development with transit agencies
5. Demonstration projects should be guided by sound criteria and address a range of typologies
6. Ongoing and proactive engagement with community stakeholders

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Develop a clear process for equity and measuring equity outcomes: The plan provides a thoughtful definition of equitable TOD that defines who benefits, prioritizes closing economic gaps, and racial inclusion. While equity is referred to throughout the document, more specificity is needed on how equity will be achieved through the process. Development of an ETOD scorecard with performance metrics and equity indicators should be a first-year action to evaluate current and new projects in the pipeline as well as demonstration projects.

Clarify the roles of City departments and other policies in ETOD implementation with clear measures of accountability: The interdepartmental strategy employed to develop the plan should be followed by a clear articulation of those agencies roles in implementing recommendations during the demonstration period and how changes to policy and practice will be codified. -Related polices such as the ARO, Neighborhood Design Guidelines, Neighborhood Opportunity Fund, Stormwater Ordinance, Building Code, etc., could positively or negatively impact the desired outcomes of the plan and should be reviewed and revised to aligned with citywide goals for equitable development. The ETOD implementation should also consider how it can support site selection and identifying and coordinating resources for specific parcels and build on the strength of DPD's updated RFP model. In the absence of dedicated TOD staff, ownership and enforcement of the proposed recommendations are unclear. If DPD is leading the implementation, clear lines of participation and responsibility of other key departments must be articulated. The scorecard can serve as a tool for cross-agency accountability.

Provide support for community-based developers: The City should be more explicit on how it will support small business and community-based developers in a reimaged ETOD process. The current system is structurally biased to favor firms and projects that can quickly secure necessary resources. The City should consider how a parallel path can be created for BIPOC and community-based developers who have historically faced barriers to accessing and securing capital. Equity measures need to address who benefits from and who develops projects.

Encourage joint development with transit agencies: Building on cross-agency collaboration, the policy should include developing structures within transit agencies to pursue joint development at transit stations. This should include not only CTA but also Metra, which has many parking lots that could be developed as TOD, and potentially Pace at key stations and transfer locations. When publicly owned transit adjacent properties are developed as ETOD, they can create ongoing revenue streams that can help fund public transit. Examples of other regions that have established programs which can inform this strategy include: [Los Angeles Metro](#); [Bay Area Rapid Transit TOD](#); [BART Framework for determining financial return from affordable housing](#); and [Atlanta's MARTA Office of TOD and Real Estate](#)

Demonstration projects should be guided by sound criteria and address a range of typologies: Projects selected to test and evaluate recommendations should be determined using clear criteria aligned with program goals. Chosen sites should deliberately test varied policies/recommendations that are tailored to that geography and market. Overall, projects should produce a broad range of feedback from different challenges faced in different markets. Every community is different. Pilot project results should not be communicated as the replicable model but documented to capture lessons learned providing case studies that can be refined to fit specific community context. Pilots should also target ‘easy wins’ and balance the scale and size of projects targeted along both bus routes and rapid transit hubs.

Ongoing and proactive engagement with community stakeholders: ETOD demonstration projects and ongoing implementation should employ a proactive approach to community engagement. Projects should leverage existing resources such as MPC’s [Corridor Development Initiative](#), CMAP’s [Local Technical Assistance Program](#) and Elevated Chicago’s [Community Engagement Principles and Recommendations](#). It is important for ongoing engagement with community stakeholders to occur throughout the pilot process and implementation of the steps laid out above in order to continually evaluate and strengthen the ETOD policies moving forward. Special attention should be paid to engaging with residents, community members, and businesses that may be directly affected by potential development.

As the draft ETOD Policy Plan concludes:

“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.”

MPC and our partners agree that Chicago has a great opportunity in moving the ETOD Policy Plan forward. The feedback and next steps laid out above are integral in maximizing the City’s ability to take advantage of that great opportunity, and will lead to a more transparent, complete, and equitable engagement, development, and review process.

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