



Working Toward a Healed City:

HOW CHICAGO CAN BUILD EQUITABLE COMMUNITIES
FROM THE GROUND UP

Shriver
Center on
Poverty
Law



Acknowledgments



The Chicago Area Fair Housing Alliance (CAFHA) is a 501 (c)(3) non-profit consortium of fair housing and advocacy organizations, government agencies, and municipalities. CAFHA works to combat housing discrimination and promote equitable place-based opportunity through education, advocacy, and collaborative action.

The Shriver Center on Poverty Law (Shriver Center) is a non-partisan, 501(c)(3) organization providing national leadership in advancing laws and policies that secure justice to improve the lives and opportunities of people living in poverty. The Shriver Center's Housing Justice Program works to protect housing rights and expand housing opportunities for individuals and families with low income.

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for a more inclusive and collaborative planning approach that incentivizes the market to prioritize the communities and residents adversely impacted by the city's long history of racially discriminatory housing policies. Using the knowledge he gained through his position as former Senior Vice President of Draper and Kramer and related senior positions in Chicago's commercial real estate and mortgage industries, Mr. Hanna has repeatedly litigated against the City of Chicago at his personal cost for what he characterizes as racially and economically discriminatory land use policies. Research support was provided by Albert C. Hanna and Lauren Bean Buitta, Principal of Stele Consulting and consultant to Albert C. Hanna. Research, design, and graphics assistance was provided by Okrent Kiesel Associates.

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Educating Communities on Environmental Justice

Introduction

A City Fragmented: How Race, Power, and Aldermanic Prerogative Shape Chicago's Neighborhoods exposed the racism and political dynamics polluting Chicago's community planning process and resulting in its failure to fulfill civil rights obligations.¹ Remedying the adverse effects of Chicago's deeply rooted aldermanic prerogative will take time, commitment, and leadership from the City's administration, elected officials, and neighborhood-level stakeholder groups. The creation of equitable channels for community input and the advancement of government transparency and accountability are key to this radical shift.

The unchecked and unwritten code of aldermanic prerogative has served as the sentry of Chicago's color lines and has detrimentally shaped the city's neighborhoods over time resulting in: a reduction of land area available for multifamily development, the consequential rising rents and loss of population, and vast disparities in community investment by race. With major shifts in city leadership and a population more vigilant, and yearning for change, we have collectively approached a new day in Chicago when unfettered political power wielded by unaccountable leadership will no longer be tolerated. In acknowledgment of this needed change, Chicago's incoming Mayor Lightfoot's transition plan notes, "Chicago struggles with a legacy

of redlining, exclusionary practices, and cycles of displacement in its communities. While some communities suffer from decades of disinvestment, others experience displacement as gentrification takes hold."² This report highlights key areas of overlap between the Mayor's Agenda and the findings of *A City Fragmented*. It outlines best practices for incorporating equity into a comprehensive planning process, presents ideas for correcting community input processes developed with housing advocates, and suggests next steps for the administration to ensure all Chicago's neighborhoods receive the resources necessary to thrive.

This report is composed of three sections:

Paving the Path: Citywide Planning for a More Equitable Chicago

Implementing a New Way: Shared Power and Civic Engagement in a Post-Aldermanic Prerogative Chicago

Next Steps for a New Administration

Paving the Path: Citywide Planning for a More Equitable Chicago

As highlighted in *A City Fragmented*, despite its many plans, Chicago is not a cohesively planned city. For example, there are currently 15 community plans,⁴ 173 TIF district plans,⁵ and a few citywide plans which individually address landscaping, transit-friendly development, and housing.⁶ The citywide plans are insufficient because they do not direct resource allocation with appropriate control and oversight to address the structural impediments that hamper equitable implementation. Additionally, the City lacks coordination among departments to link the goals and strategies of its existing, independent plans. For example, Mayor Emanuel's *Resilient Chicago* plan contains many of the elements advocated for here, yet it was never officially adopted by the City and therefore lacks enforceable goals and oversight.⁷

The ad hoc partitioning of City planning produces erratic outcomes exacerbated by hyper-local and imbalanced control over community development. A lack of a citywide accountability makes it impossible to police abuses of power and to align efforts for ethical and responsible development for the entire city. The results are a meandering vision for the City of Chicago, inequitable resource allocation along racial lines, and the perpetuation of the city's residential segregation.⁸

To remedy this patchwork planning, the City must conduct and implement a comprehensive plan, a long-term plan to guide community development and land use decisions related to residential, commercial, transportation, parks and open space.⁹ The comprehensive plan must include a racial equity action plan

and action steps for land use with robust community engagement throughout the process.

So as not to squander limited resources, much of the foundational elements for a comprehensive plan can be built from existing plans such as *Resilient Chicago* and connect Chicago's many ancillary plans under a master, enforceable plan rooted in remedying neighborhood inequity.

“The new administration should convene a process to create a comprehensive plan for Chicago, with community and stakeholder input, that builds on existing community-level plans and establishes clear priorities for the city
- Lightfoot
Transition Plan”³

BEST PRACTICES FOR CHICAGO'S COMPREHENSIVE PLAN

Embarking on a comprehensive planning process for Chicago is an opportunity to tackle the multiple root causes of inequity and identify the interconnected systems that have perpetuated segregation and endanger the city's long-term viability.¹⁰ While housing is a central feature in a modern comprehensive plan, the plan must be *comprehensive*, meaning extends across the city's environmental and economic sustainability as well. Not only does this allow for equity to be addressed holistically, but also corrects for damages

Comprehensive Plan:

A long-term plan to guide community development and land-use decisions related to residential, commercial, transportation, and open space.

done by the City's past erratic planning and inequitable community investment patterns.

The following principles can serve as a basis for the comprehensive planning process.

1. THE COMPREHENSIVE PLAN IS ROOTED IN RACIAL EQUITY

Racial equity must guide future planning in Chicago.¹² As detailed in *A City Fragmented*, the city has a long history of racial segregation driven by discriminatory land use and housing policies. These policies have created a racial hierarchy that determines, based upon race, who is benefited and who is burdened.¹³

By implementing a Racial Equity Impact Assessment,¹⁴ the City of Chicago can identify and begin to repair the historic systems and structures that have long damaged Chicago. A Racial Equity Impact Assessment utilizes data and community-driven research on racial inequities within all systems and structures to inform and enact a Racial Equity Action Plan aimed at eliminating the gaps in opportunity.¹⁵

The research findings from the Racial Equity Impact Assessment and the community goals set in the Racial Equity Action Plan will then serve as the foundation for the City's comprehensive plan. All objectives crafted in the comprehensive plan must address the disparities uncovered in the assessment and goals created in the Racial Equity Action Plan to further racial equity.

2. THE COMPREHENSIVE PLAN DERIVES FROM A SHARED VISION AND SUPPORTING PRINCIPLES, NOT FROM THE EXISTING POLITICAL ACTORS

By prioritizing the creation of a shared vision, the plan draws on a consensus-based approach to decision making, as opposed to the localized concerns that have historically driven land use and development decisions. Through the direct involvement of an array of community stakeholders, no single neighborhood's decisions are exempt from supporting the comprehensive plan, and no single community is exempt from participating.

“To achieve real transformation, the city needs to undertake racial equity impact assessments (REIAs) before implementing any reform initiatives”¹¹
- Lightfoot
Transition Plan

Further, the plan must outlive administrations. The shared vision for the city is long-term and should not be subject to the short-term manipulation for political gain. The comprehensive plan must envision an equitable future at least 20 years out and identify the steps needed to get there, regardless of the political leadership now or then.

3. THE COMPREHENSIVE PLAN RESPECTS DIFFERING NEEDS ACROSS CHICAGO'S NEIGHBORHOODS AND IDENTIFIES APPROPRIATE APPROACHES

The planning process must meet each community at the intersection of their respective needs and opportunities unique to their individual history, geography, and development trajectory. The process must be transparent, data driven, and authentically confront issues identified by the community while also aligning with supporting principles and a shared vision for the city.

4. THE COMPREHENSIVE PLAN IS A LIVING DOCUMENT

Neighborhoods change. When that change is unmanaged and unplanned, the City's ability to protect communities against destabilization and displacement is permanently lost.¹⁶ The City can better manage this change through an annual assessment and reporting of investments and progress on goals. The opportunity for substantial updates should be provided at 5-year intervals, identifying salient trends in neighborhoods and realigning resource allocation to match the changing community needs. As disinvested communities stabilize, the needs and appropriate interventions change. Resources are freed to move elsewhere and to other programs. The comprehensive plan must be agile enough to keep pace with changes, and to acknowledge and analyze where and why goals are not being met. Finally, through the process of assessing the goals of the comprehensive plan and setting benchmarks, an accountability structure can be created.

5. THE COMPREHENSIVE PLAN DIRECTS RESOURCE ALLOCATION

The comprehensive plan will overhaul how City resources, including federal dollars such as Low-Income Housing Tax Credits, federal housing and community development dollars, Department of Transportation, and the City's own resources, are directed by rooting them in a transparent and accountable evaluation of the needs and opportunities within each community and across the city. This, along with the Lightfoot administration's already-in-motion plans to curtail local aldermanic vetoes on affordable housing, will better align affordable housing development with need. Future development and affordable housing funding decisions will be responsive to the comprehensive

plan and the underlying Racial Equity Impact Assessment. Importantly, the comprehensive plan must create a pathway to shift the zero-sum game approach to planning that pits neighborhood against neighborhood, by identifying and directing resources based on community need for the good of all Chicago. In this way, strategic resource investment must be tied to actual on-the-ground need and not political placation.

Resources for housing and community development do not meet the scale of the need in Chicago. Future reports will tackle specific steps to mitigate municipal administrative and development costs associated with affordable housing.

6. THE COMPREHENSIVE PLAN DIRECTS COMMUNITY DEVELOPMENT DECISIONS

Too often, the City makes community development decisions behind closed doors. This is fundamentally different than most municipalities, where development projects are vetted at the required public hearings intended for that purpose. While City ordinances require public hearings for zoning matters,¹⁷ development projects seldom go to the public hearing stage unless they have been informally approved by the alderman of the ward in which the project will be located, severely limiting the capacity of the Plan Commission and City Council Zoning Committee to fulfill their obligation. With a comprehensive plan, development decisions will be responsive to community and citywide needs and rooted in a transparent and strategic pathway for resource allocation.

Implementing a New Way: Shared Power and Civic Engagement in a Post-Aldermanic Prerogative Chicago

Whereas the comprehensive plan is the how of getting the City to the change it seeks, who the actors are ensuring successful implementation is of equal importance. As outlined in *A City Fragmented*, the main vehicle for civic participation in the current community development process is through zoning advisory councils (ZACs). ZACs, whether formal or informal, exist almost exclusively within predominantly white and low-poverty wards and exercise their power to limit the development of affordable housing.¹⁹ There are no regulations regarding how ZACs are formed, who is eligible to participate, and how these groups function once formed.²⁰ Moving forward, it is critical that greater uniformity, transparency, and oversight is woven into the community input process.

Community Development

Action Councils: Elected bodies, reflective of the demographic diversity of Chicago, tasked with engaging in citywide and local planning processes, and zoning and land-use decisions.

MOVING TOWARD COMMUNITY DEVELOPMENT ACTION COUNCILS (CDACS)

In order to ensure equitable development across the city and adherence to

“Working with neighborhoods will unleash the innovative and resilient leadership that exists across the entire city, creating self-sustained, self-determined communities. It will create thoughtful investment plans in the city and in each neighborhood, which pave the way for economic vitality with shared decision-making power in that process”¹⁸

-Lightfoot
Transition Plan

the comprehensive plan, certain levers of aldermanic influence will need to be replaced with transparent and formalized processes for community input. To create a more robust foundation for civic engagement that provides equal weight to all communities in Chicago, Community Development Action Councils (CDACs) should replace ZACs where they currently exist and create new channels for civic engagement where ZACs are non-existent.

Through Community Development Action Councils, local communities are given the responsibility of holding the City and aldermen accountable to correctly implementing the comprehensive plan. No longer caught between conflicting local politics and federal civil rights law,

the City's Department of Planning and Development (DPD) and/or the newly formed Department of Housing (DOH) would work in partnership with local CDACs, thereby becoming a community-led tool responsible for implementing the comprehensive plan's zoning, planning, and City housing finance decisions. DPD or DOH would be charged with providing technical assistance to CDACs and creating uniform development review processes and protocols to ensure that the goals of the Comprehensive Plan are upheld at the community level and CDACs would then make recommendations to City Council regarding community development within the parameters of the Comprehensive Plan.

Additionally, there is opportunity to streamline communication between local communities and the City's administration and City Council through CDACs by removing the Chicago Plan Commission and replacing the Chicago Development Commission with CDAC representation. In this way, the Chicago Development Commission, made up of CDAC representation, would serve as the unifying citywide CDAC body, bringing the voice of distinct communities together to function collectively for the city. The Department of Planning and Development has the power to create such a platform for streamlining and shared decision-making. This would give CDACs the power to advise City Council directly on the comprehensive, Local Area Plans, and review of individual developments including TIF districts and planned developments.

INCORPORATING BEST PRACTICES FOR CIVIC ENGAGEMENT

THE CDACs MUST REFLECT THE DIVERSITY OF THE CITY OVERALL and

The 35th ward has established Community Driven Zoning and Development, with the goals of "fully and accurately representing the interests of the residents of the ward in a manner that respects and fosters diversity across all demographics; fully informing the community about requests made for zoning changes and their potential impact; engaging community groups that can provide insight and expertise that accurately reflects the community as a whole." This group is led by community organizations and neighborhood associations active in the ward and they organize community events to provide information and a venue to gather community input regarding community development. This body then makes recommendations to the 35th Ward Office based on community input and the alderman then makes decisions regarding community development based on the expertise of the community groups and input from the community.²¹

be composed of a mix of community stakeholders including renters, low-income subsidized renters, homeowners,

and local non-profit leaders and small business owners, with clear ineligibility mandates for those with potential financial conflicts.

The closest existing example of this type of entity is the 35th ward's Community Driven Zoning and Development (see sidebar on the previous page).

**THE CDACs MUST ENHANCE
TRANSPARENCY, ACCOUNTABILITY,
AND UNIFORMITY ACROSS CHICAGO:**

Initially, CDACs would be established at the ward level, and residents of each ward would vote on CDAC members. In recognition of the history of racial gerrymandering resulting in the current ward boundaries, the comprehensive plan and underlying racial equity impact assessment should review this structure for possible impediments to fair housing and fair racial representation. CDAC members should be trained on the role and responsibility of the position, the history of segregation in Chicago, and the ways in which community development decisions impact segregation.

CDACs should be legislatively required to abide by the Illinois Open Meetings Act, with meetings open to the public, diligent note taking and recording accessible to the public, and opportunities for public input and testimony.²²

**CDACs WILL BECOME A PART OF
PROACTIVE PLANNING:**

CDACs will provide a level of uniformity in the community development process that is currently lacking. The Depts. of Planning and Housing will provide technical assistance and tools to ensure the CDACs ongoing work aligns with the goals of the Comprehensive Plan as well as working with the CDACs to generate local portions of that plan. In turn, the CDACs will proactively collaborate with both the development community and residents to encourage investment that is locally sensitive and respects the comprehensive plan. As part of this obligation, the CDACs will work with the Depts. of Planning and Housing to shape programs guiding investment.

Next Steps for a New Administration

Advancing these changes, while achievable, will be a complex set of tasks. Multiple systems must change, and investments must be made to move Chicago towards an equitable future. Immediate next steps to create the momentum for true change are outlined below.

POLITICAL WILL:

First, the City must confront the policies and practices that created residential segregation and structural barriers to equity across a range of issues, including housing and land use policies, health, employment, public safety and policing, and education. For example, zoning, by definition, is an exercise of the police power granted to the legislative branch of government. Chicago City Council and its aldermen are charged with making the decisions regarding zoning. The current structure of City Council, along with certain components of State law, enable the system of aldermanic prerogative that has created segregation and inequities. Curbing aldermanic prerogative will require significant political commitment and dedication to change.

Until there is a comprehensive plan in place with the racial equity impact assessment and racial equity action planning as central components, community organizations are uniquely positioned to drive this narrative forward. Importantly, community groups must be vigilant and critical of solutions proffered by the City or other entities that do not address systemic and sustainable change.

CREATE MEANINGFUL AND EQUITABLE COMMUNITY INPUT ACROSS ALL COMMUNITIES AND WARDS:

The City should facilitate the development of Community Development Action Councils (CDACs) and establish a system that allows for balanced demographic representation and creates safeguards for transparency and accountability. Underrepresented groups and areas, and vulnerable populations should be targeted for additional engagement to correct underrepresentation and resources should be allocated to ensure accessibility by low-income individuals, people with disabilities, families with children, and those whose first language is not English.

ASSESSMENT & ACCOUNTABILITY:

The comprehensive plan requires regular evaluation and clear lines of accountability. No objective in the comprehensive plan should be without:

- A responsible party or agency designated for the administration and monitoring
- Partnerships identified with community and business groups
- Funding sources indicated and assessed for impact to the budget
- A key performance indicator for tracking progress

The most important accountability measure of the comprehensive plan is the inclusion of metrics which track and concisely indicate to stakeholders the city's progress on racial equity and other objectives.²³ Measures for citywide progress towards racial equity might include:

- **Change in the Black and Latinx population.** From 2000 to 2010, Chicago lost 180,000 black residents and certain Latinx neighborhoods also lost significant proportions of their population—more than 10,000 individuals in Pilsen alone. Housing insecurity, disinvestment, safety concerns, education inequity, and lack of opportunity in the city have all contributed to the significant losses. Seeing these trends reverse is a clear sign of progress being made.
- **Equitable Accessibility of the City for Low- and Moderate-Income Families.** Low- and moderate-income families, especially renters, face significant restrictions when finding larger unit housing that is affordable and connected to the opportunities needed to thrive.
- **Equitable Allocation of Resources.** The proportion of programs and departments that prioritize equity, and the changes implemented to bring more programs in line, tracks changes at the systemic level. Chicago should look to other jurisdictions, like Portland, Oregon’s Budget Equity Assessment Tool and adapt and apply these to Chicago’s departmental budgets and programs.

Whatever the metrics used to monitor equity progress and other objectives, they cannot exist solely in annual reports isolated from other actions. Progress is made every time a plan is finalized, a grant is made available, a redevelopment agreement is executed, or a permit is issued. The City must leverage their existing data portal infrastructure to support a consistent, readily available and up to date access point for all measures employed.

In response to such information in addition to qualitative measures, the plan should be reviewed and potentially

modified annually and at the 5- and 10-year anniversaries of the plan. This offers opportunities for communities to reengage with the plan, identifying the cumulative progress and shortfalls of the plan, and address major shifts locally which require significant re-imagining of the plan.

Portland’s Budget Equity Assessment Tool extends and supports the Citywide Racial Equity Goals and Strategies,

ensuring a racial equity framework is employed within departments and across their levels of responsibility, including internal activities and the external programs the department operates within communities. The tool provides guiding questions which makes departments explicitly reflect on the impact each program will have on communities of color, how these communities have been engaged in the design of the program, and how the program will improve community capacity in the future. By using the tool as part of program design, departments are better able to put appropriate focus and metrics in place and, by documenting their activities, track their own progress towards equity goals as well.

AMENDING LAW AND POLICIES

Equitable land use decisions require distinct, transparent roles of the City Council, the Department of Planning and Development, the Department of Housing, the Community Development Action Councils and all other departments and committees that interact with the decision-making process.

- **Limiting Aldermanic Approval:** The City must ensure that no City department require a letter or other evidence of aldermanic support as a pre-condition or condition of receipt of public dollars, zoning change, permits, map amendments, special uses, or planned development, for deeply affordable housing proposals.
- **Clear and Transparent Timelines for Zoning Approval of Affordable Housing:** Remove the ability of aldermen to indefinitely defer zoning approval for affordable housing and put in place timelines for review and action. Upon the rejection of zoning approval for affordable housing, require referral to the Chicago Zoning Board of Appeals (ZBA). The ZBA will review the development application with fact-based criteria.
- **Zoning Ordinance and Map Align with Comprehensive Plan:** The Chicago Zoning Ordinance must be amended to mandate that among the criteria for approval of planned developments, zoning map amendments and special uses, applications must be consistent with the City's adopted comprehensive plan. The Zoning Map must be reviewed to create consistency between the uses allowed, the scale of those uses, and the current zoning of parcels.
- **Clear and Distinct Roles for Communities and the City:** The role of the CDACs, and Chicago City Council in zoning matters shifts

from being the Czar to an advocate and keeper of the comprehensive plan. CDACs make direct recommendations to Chicago City Council on development proposals in line with the comprehensive plan and with support from DPD/DOH and the City Council considers the recommendations of the CDACs along with citywide concerns.

OVERSIGHT, ACCOUNTABILITY, AND CAPACITY ENHANCEMENTS

- The capacity to develop, deploy, monitor and update a comprehensive plan and modern land use support system needs to be analyzed. Funding would need to be allocated for both creation, implementation, updating and monitoring of the comprehensive plan.
- The ability to share key performance indicators of the comprehensive plan between relevant departments, City Council, and CDACs, is necessary for success.
- The City should implement a fair housing training program for all City staff involved in affordable housing development, including planning, zoning, and finance, the City Council, and CDAC members. The training program should provide information on fair housing laws and the history of residential racial segregation in Chicago, including the exclusion of public and affordable housing and redlining and their attendant effect on people and communities of color, and highlight contemporary efforts to produce more equitable patterns of development.
- The City's Office of Inspector General should conduct an annual review of affordable housing development policies and practices.

Although the reforms outlined here will not entirely eradicate development

or investments that runs afoul of the comprehensive plan, nor the instances of institutional or community based discrimination, it has the potential to mitigate the bias and corruption within the current system while at the same time finally address the unjust disparities in life outcomes for Chicago residents simply based upon where they live. For these reasons, complete ward-level control over community development decision-making must come to an end. Communities must become active participants in citywide planning and must be equipped and engaged to hold decision-makers accountable. Chicago can become a city for all, and we look to Chicago's new leadership to take the difficult but necessary steps to get us there.

Endnotes

¹ Chicago Fair Housing Alliance & Shriver Center on Poverty Law, *A City Fragmented: How Race, Power, and Shape Chicago's Neighborhoods* (2018).

² Mayor-elect Lori E. Lightfoot's Transition Committees, *Report of the Transition Committees*, 74 (May 17, 2019), <https://bettertogetherchicago.com/transition-report/>.

³ *Id.*

⁴ Mayor Lori E. Lightfoot, *DPD promotes the comprehensive growth and sustainability of the City and its neighbors: Community Plans*, CITY OF CHICAGO PLANNING AND DEVELOPMENT (2019), https://www.chicago.gov/city/en/depts/dcd/provdrs/planning_and_policydivision/svcs/community-plans.html.

⁵ Mayor Lori E. Lightfoot, *DPD promotes the comprehensive growth and sustainability of the City and its neighbors: TIF District Redevelopment Plans*, CITY OF CHICAGO PLANNING AND DEVELOPMENT (2019), https://www.chicago.gov/city/en/depts/dcd/supp_info/redevelopment_plans.html.

⁶ Office of the Mayor, *One Chicago: Housing Strategies for a Thriving City, Five Year Housing Plan, 2019 – 2023*, DEPARTMENT OF PLANNING AND DEVELOPMENT (2019).

⁷ *Resilient Chicago's* steering committee pulled together officials and community leaders from across the city, but never was put before the Chicago Plan Commission or the City Council. The mayor's February 14, 2019 press release on *Resilient Chicago* stated that a resolution to adopt the plan would be put forth in March but never materialized; R2019-157, a "Resolution in support of renewable energy goals conversion to clean energy by setting time milestones for suppliers, CTA all-electric bus fleet and renewable electricity in all buildings, creating career path opportunities" makes overtures to the goals of the Resilient City plan, but does not call it by name or officially adopt it.

⁸ See Chicago Area Housing Alliance & Shriver Center on Poverty Law, *supra*, at 7-12.

⁹ See Trevor Dick, *Overview of Comprehensive Plans*, CHICAGO METROPOLITAN AGENCY FOR PLANNING (May 9, 2011).

¹⁰ See David R. Godschalk & David C. Rouse, *Sustaining Places: Best Practices for Comprehensive Plans*, AMERICAN PLANNING ASSOCIATION (Jan. 1, 2015) (laying out guidelines for developing a comprehensive plan, including six principles which function as normative statements of intent underlying the plan's overall strategy and should be included in the development of any plan for Chicago: Interwoven Equity; Livable Built Environment; Harmony with Nature; Resilient Economy; Healthy Community; Responsible Regionalism).

¹¹ Mayor-elect Lori E. Lightfoot's Transition Committees, *Report of the Transition Committees*, 101 (May 17, 2019), <https://bettertogetherchicago.com/transition-report/>.

¹² Ryan Curran, Julie Nelson, Dwayne S. Marsh, Simran Noor, & Nora Liu, *Racial Equity Action Plans: A How-to Manual*, HAAS INSTITUTE FOR A FAIR AND INCLUSIVE SOCIETY, UNIVERSITY OF CALIFORNIA, BERKELEY, 7 (2016).

¹³ *Id.*

¹⁴ Julie Nelson & Lisa Brooks, *Racial Equity Toolkit: An Opportunity to Operationalize Equity*, LOCAL AND REGIONAL GOVERNMENT ALLIANCE ON RACE & EQUITY (2015).

¹⁵ *Id.* at 9.

¹⁶ NYU Marron Institute of Urban Management & 100 Resilient Cities, *Planning for Resilient Urban Growth: Tools for Proactively Managing Rapid Urban Growth* (May 2018).

¹⁷ Chicago Department of Planning and Development, *Plan Commission Rules* (January 2014), <https://www.chicago.gov/content/dam/city/depts/dol/rulesandregs/DPDPlanCommissionRulesFINAL.pdf>.

¹⁸ Mayor-elect Lori E. Lightfoot's Transition Committees, *Report of the Transition Committees*, 39 (May 17, 2019), <https://bettertogetherchicago.com/transition-report/>.

¹⁹ See Chicago Area Housing Alliance & Shriver Center on Poverty Law, *supra*, at 75-82 (reporting that ten wards, eight of which are on the North or Northwest sides of Chicago, have established formal Zoning Advisory Councils (ZAC); nine wards, six of which are on the North or Northwest sides, have instead called on resident advisors or neighborhood associations within the respective wards to coalesce into a

type of ad hoc ZAC when needed).

²⁰ *Id.* at 24-28.

²¹ Alderman Carlos Ramirez-Rosa, *Procedures and Goals: Thirty-Fifth Ward*, CITY OF CHICAGO (June 2018), <http://www.aldermancarlosrosa.org/cdzd>.

²² *See* 5 ILCS 120.

²³ Many key indicators for monitoring the objectives have been set in the Resilient Chicago plan already. Drawing from the Albany 2030 Plan, system wide interrelated metrics focused at the goal level work best as they allow for a triple bottom line approach to impact assessment, where people, planet, and profits are all considered simultaneously without limiting the goal to a single outcome area.

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