



RACIAL EQUITY IMPACT ASSESSMENT

CDOT - CHICAGO COMPLETE STREETS: NORTH MILWAUKEE AVENUE PROJECT

AUTHORED BY Chicago United for Equity
IN PARTNERSHIP WITH THE Logan Square Neighborhood Association
AND Latin United Community Housing Association

EXECUTIVE SUMMARY

Over the summer of 2018, the Logan Square Neighborhood Association (LSNA) and Latin United Community Housing Association (LUCHA) requested Chicago United for Equity (CUE) to conduct a Racial Equity Impact Assessment (REIA) of the Chicago Department of Transportation's (CDOT) proposed Complete Streets project for [North Milwaukee Avenue from Logan Square to Belmont](#). The currently proposed redesign includes safety spot fixes as well as the creation of significant public open space and catalytic changes to the streetscape.

As the Complete Streets initiative¹ comes to Logan Square and Avondale, its vision has inspired urgent questions from residents and advocates: Who, specifically, will reap the benefits of these transportation and open space improvements? Who comprises “the community”? What burdens or unintended consequences will accompany the development? Who will bear them? In the face of investment that will increase home values, what will prevent the community from experiencing another jolt like that delivered by the 606/Bloomington Trail, an investment that ultimately displaced low and moderate-income Latinx households through higher property taxes and increased rents?²

To answer these questions, community organizers at LSNA and LUCHA invited CUE to conduct an REIA on the project. The REIA is a nationally tested, community-driven process for assessing how a proposal may impact racial and ethnic communities differently. A REIA brings intentionality into decision-making around disparate impact. It identifies which groups are most likely to benefit from and which will be burdened by a project, then proposes strategies for ensuring equitable outcomes.³ As applied to the North Milwaukee Complete Streets project, it identifies possible impacts – positive and negative, direct and indirect – the project will have on specific populations within the Logan Square and Avondale communities. A series of REIA community meetings collectively drew interest from over 140 residents of Logan Square and Avondale whose information and observations are captured in this analysis.

Demographic Shifts. The urgency expressed by neighborhood residents arises from the dramatic shifts the community has experienced over the last two decades. Since 2000, over 20,000 Latinx residents have moved out of Logan Square, while more than 12,000 White residents have moved in.⁴ As of 2017, Logan Square's White population has surpassed its Latinx population. Median income jumped from \$48,773 in 2000 to \$63,597 in 2016.⁵ Family demographics have also shifted. From 2000 to 2014, Logan Square residents living with family dropped from 79.4% to 68.7%.⁶ Remaining families face the strain of adjusting to the changing demand for housing and family-oriented services like education.

¹ Complete Streets is an initiative built on improving active transportation for the people of Chicago. According to CDOT, “Complete Streets give Chicagoans of all ages and abilities safer, cheaper, and healthier travel options. They support economic development and can incorporate environmental services and placemaking, which helps to create sustainable infrastructure and communities.” Per the initiative website, CDOT is “working to bring these benefits to your community.”

² [A report produced by the Institute for Housing Studies at DePaul University](#) found that housing costs along the western half of the 606/Bloomington Trail increased by 48.2% in the four-year period after groundbreaking.

³ The Center for Racial Justice Innovation makes available [further resources and information](#) about the REIA.

⁴ [This Block Club Chicago](#) piece reports dramatic demographic shifts in Logan Square over the past decades.

⁵ CMAP. Community Data Snapshot. Accessed [online](#).

⁶ [A DNAInfo report](#) outlines demographic changes in the neighborhood as of 2016.

Public Investment and Rising Housing Prices. Alongside the demographic shifts and strains, a history of community investments leading to unintended harm has raised alarms for residents. Community members pointed to the rapid increase in home prices due to the 606 investment as an example of a negative consequence of public investment. DePaul University’s Institute for Housing Studies quantified this relationship between the 606 development and rapidly rising home values, finding that home values along the western portion of the trail increased by 48.2% after the project’s groundbreaking.⁷ This year alone, median housing prices have increased by 19% in Logan Square.⁸ With increased housing prices comes greater displacement and the associated negative outcomes of displacement: not only loss of home or business but also loss of community, social networks, and sense of belonging.

Key Community Concerns:

- **Residential displacement**, particularly of longtime, low-income, and/or Latinx and immigrant residents who could see housing costs rise to unaffordable levels as property values go up. Community trauma remains from the aforementioned heightened displacement of many local families, and many residents fear that they may be next. Commercial displacement is also a risk, especially for small, locally run businesses owned, operated by, and/or catering to local Latinx residents.
- **Weakened community institutions and social cohesion**, such as decreased enrollment in neighborhood public schools related to the displacement of families, similar impacts on local faith-based institutions, and the increased over-policing and harassment of youth, especially Black and Latinx youth, that often accompanies the beautification and increased usage of public spaces by higher income residents or visitors.
- **Project investments catering to higher income, White residents.** Participants expressed a persistent skepticism of city decisions and investments. Traffic and safety improvements to Logan Square have long been desired. This investment is only occurring now, after increased development in the neighborhood that has resulted in the displacement of longtime Latinx residents. Residents’ difficulty to connect their previous work with this new project, in combination with the delayed investment, has cultivated distrust among local community members.

Key Proposed Recommendations for N. Milwaukee Ave. Complete Streets Project:

- **Explicitly include racial equity as a goal of this Complete Streets project.** Alongside the existing transportation and safety goals, the REIA recommends that CDOT name racial equity as a project goal and thereby both begin rebuilding community trust and set up project design elements that support racial equity.
- **Develop an inter-agency neighborhood preservation plan.** The demographic changes of Logan Square continue to cause further gentrification. Mitigating displacement requires a comprehensive intentional strategy, many tactics of which fall outside of the direct purview of CDOT. We recommend that relevant departments collectively develop a neighborhood preservation plan with community groups participating and providing oversight. The plan should include the mitigation factor identified, city departments involved, and activities for each department.

⁷ The full study may be [accessed online](#).

⁸ [Crain’s Chicago Business](#) reports, “In a year when the real estate market in many Chicago neighborhoods has cooled, nobody has turned down the heat in Logan Square.”

- **Support the creation and preservation of affordable, family-sized housing.** The REIA recommends that CDOT further partner with relevant city agencies, such as DPD or the forthcoming Department of Housing, to identify opportunities to promote affordable housing as part of this project. Elected officials and government agencies should commit to leveraging existing assets to provide affordable family-sized housing units. The city should follow through on its commitment to a 100% affordable housing development with family-sized units on the Emmett St. parking lot. The city should also help preserve naturally occurring affordable housing by helping mission-driven developers access capital to more competitively acquire and preserve affordable units.⁹

Key Proposed Recommendations for Future Projects:

- **Incorporate racial equity considerations into all CDOT decision-making.** Beyond this specific project, the REIA recommends that CDOT adopt a practice of conducting Racial Equity Impact Assessments for all Complete Streets projects and other capital investments. This move would position CDOT to increasingly orient all of its work toward racial equity.¹⁰ To go even further, CDOT could partner with the Government Alliance of Race and Equity (GARE) to embed racial equity throughout its operations and internal infrastructure as a proactive measure to address systemic injustice.¹¹

Next Steps

The intention of this report is not to oppose the needed safety improvements and health and environmental benefits proposed for the square and its surroundings; on the contrary, many community members support those project goals. Instead, this report seeks to highlight the need for more comprehensive and proactive planning around related unintended project consequences.

Indeed, this REIA illustrates how racial equity considerations need to be embedded into *all* city decision-making processes, including those of CDOT. As we have seen, well-intentioned investments can often have unintended negative consequences. Applying a racial equity lens at the start of project sets up all residents in the community, especially those who have historically been marginalized by public decisions, to benefit from the intended safety and transportation improvements of the project. By ignoring existing racial disparities and neglecting to holistically examine potential disparate impacts, public investments will only serve to grow inequities, exacerbate displacement, and reinforce patterns of segregation.

⁹ DePaul's Institute of Housing Studies recommends "creating financing vehicles that support mission-driven developers to acquire and maintain affordable units" as a key strategy for preserving affordability in high cost neighborhoods with rising prices like Logan Square. See "[Mapping Displacement Pressure in Chicago](#)" for more.

¹⁰ [Portland's Bureau of Transportation \(PBOT\) offers a precedent](#) for CDOT to learn from. PBOT's latest 5-year Racial Equity Action Plan includes usage of an REIA process in each bureau team as a core strategy, along with accompanying investments in training and staff capacity.

¹¹ Over 125 municipalities in the U.S. are intentionally embedding racial equity into their culture and operations within GARE's network. A full list of participating jurisdictions can be found [here](#).

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BACKGROUND

In early 2018, Logan Square Neighborhood Association (LSNA) and Latin United Community Housing Association (LUCHA) recruited Chicago United for Equity (CUE) to facilitate a community-led process to evaluate the Chicago Department of Transportation's (CDOT) Complete Streets project for North Milwaukee Avenue from West Belmont Avenue to Logan Square Boulevard. Five CUE fellows led facilitation of the REIA process:

- **Juan Sebastian Arias**, Logan Square resident, Program Officer - Enterprise Community Partners
- **Ellie Mejía**, Program Support Coordinator - City Bureau
- **Sara R. Shaw**, Avondale resident, Schurz High School LSC Community Representative, Senior Manager, Fiscal and Academic Solvency - Illinois State Board of Education
- **Adam Slade**, Associate - Metropolitan Planning Council
- **Sendy Soto**, Logan Square resident, Mozart Elementary School LSC Community Representative, Director of Community Benefit and Advocacy - Amita Health

As member organizations representing longtime residents, residents of color, low-income residents, and other Logan Square neighbors, LSNA, LUCHA and their community partners were concerned about the impact of the Complete Streets project on longtime residents, particularly Latinx families. They pointed to previous city initiatives that had not adequately protected these residents, such as the redevelopment of a former railroad line into the 606, an elevated park and trail. In that case, the investment and its expected community benefits were not paired with strategies to shield residents along the trail from a related increase in housing costs. As a result, the 48.2% increase in property values along the western portion of the 606 led to significant displacement of low- and moderate-income Latinx families.¹²

CDOT's Complete Streets project has similar features. It is a well-intentioned proposal that improves safety and transportation while creating additional public and open space – and also lacks any intentional consideration of who will benefit from and who will be burdened by the project, as identified by residents most impacted themselves. Moreover, as in previous instances, it has not been clear to residents whether the proposal links to previous work done in the neighborhood – for example, LSNA's comprehensive Quality of Life Plan¹³ – to articulate community-driven priorities and develop holistic plans for the community's development.

To explore the benefits and burdens of the Complete Streets project on people of color, CUE came on board. Since the organization's founding, teams of CUE Fellows have led REIAs throughout Chicago to focus specifically on racial equity, facilitating exploration of and advocating for equitable policies, practices, and decision-making. In this case, the REIA process consisted of two public town hall meetings on July 25 and August 12, 2018 to explore the impact of this proposal on residents, particularly longtime residents, residents of color, and low-income residents. Both sessions took place at Second Shift, 3432 W. Diversey Ave. Prior to these convenings, CUE also hosted a training on June 25th to give an overview of the REIA process and tool to residents and community stakeholders. We also held a preliminary small-

¹² The full report may be [accessed online](#).

¹³ The [2018 Quality of Life Plan](#) outlines community members' priorities for the future of their neighborhood, including mitigating further gentrification.

group REIA on January 27th. Both events took place at LSNA's office at 2840 N. Milwaukee Ave. The series collectively drew interest from over 140 residents of Logan Square and Avondale.

This report is a summary of the community input collected through the REIA process.¹⁴ It identifies likely unintended consequences of the Complete Streets project and proposes alternative strategies for mitigating disparate impact and advancing equitable outcomes. Ultimately, this report suggests measures for CDOT and the City of Chicago to consider in order to ensure that the project's benefits are accessible to all and that unintended consequences are minimized or removed.

RACIAL EQUITY IMPACT ASSESSMENT (REIA) OVERVIEW

A Racial Equity Impact Assessment (REIA) is a tool for evaluating a proposal's potential benefits and burdens before decision-making. An REIA aims to intentionally focus on advancing racial equity, which can only be done by actively bringing those most impacted to the table. In this practice, CUE and other organizations define racial equity as both a process and an outcome. As an outcome, racial equity is achieved when one's racial identity no longer determines one's life outcomes.

The Government Alliance on Race and Equity's (GARE)¹⁵ methodology for a Racial Equity Impact Assessment includes the following core questions for consideration:

1. What is the proposal and its intention?
2. What does data tell us about the most impacted groups and program quality?
3. What have we learned in the community engagement process about who this plan benefits and burdens?
4. What alternative opportunities exist to promote racial equity within this plan?
5. How can we best support implementation and accountability?

For this process, the REIA team adapted the above GARE framework to specifically address the Complete Streets project. The rest of this report summarizes resident responses to the GARE questions and concludes with recommendations for strategies to minimize burdens and maximize benefits of the proposed project.

RACIAL EQUITY IMPACT ASSESSMENT (REIA) SUMMARY RESULTS

1. WHAT IS THE PROPOSAL, AND WHAT PROBLEM IS IT TRYING TO SOLVE?

CDOT has proposed traffic and safety improvements to the portion of N. Milwaukee Ave from Logan Square Blvd to Belmont Ave. CDOT initially proposed four potential designs for the project, ranging in their degree of development and change to Logan Square and N. Milwaukee Ave as they currently exist.

CDOT's stated goals for the project include:

- Work with community members to identify traffic and safety improvements

¹⁴ To access raw notes from the public sessions, please reach out to information@chicagounitedforequity.org.

¹⁵ GARE provides further information and tools [online](#).

- Make Milwaukee Avenue from West Logan Boulevard to Belmont Avenue more user-friendly
- Update Logan Square in a way that maintains its historic integrity and meets the needs of the area’s diverse residents, businesses, and commuters
- Create public space and improve walkability
- Achieve “Vision Zero”¹⁶ by enhancing traffic safety and access to the area
- Harmonize the various modes of transportation

2. WHAT CAN THIS PROPOSAL IMPACT?

Community discussion

While the CDOT proposal is mostly focused on traffic, safety, and open space improvements, the short and long-term impacts of the proposed redesign extend beyond transportation. Residents identified many additional potential impacts of the redesign on issues ranging from housing to economic development.

Participants discussed what impacts different degrees of development could potentially have on the neighborhood. All four proposals included the following features: reduced pedestrian crossing distances, new traffic signal and crosswalk at Wrightwood, and a redesigned intersection at Kedzie Blvd¹⁷. Each of the proposals had varying degrees of public space creation, traffic configuration and bike lanes. Generally, the four CDOT proposals range from least to greatest development changes with some variation regarding the impact of the reconfiguration of Kedzie Blvd service drive.

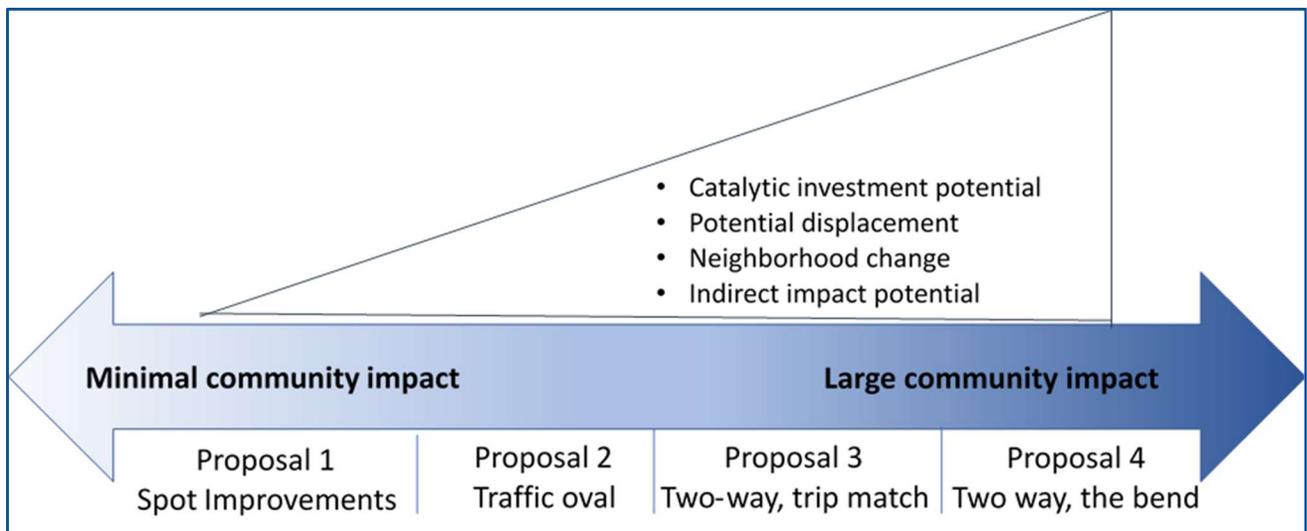


Figure 1

¹⁶ The City of Chicago defines Vision Zero [here](#).

¹⁷ See appendix A for comparative analysis.

CDOT proposal recommendation

As the results of the REIA were being compiled, CDOT staffers announced Proposal 4 - “Two Way, The Bend” scenario as the recommended path forward.¹⁸ They cite the ability to improve pedestrian access and flexible use of public streets for festivals and special events as part of the selection rationale. The recommended proposal goes beyond safety improvements around the square and substantively transforms the neighborhood space.

Based on the concerns of the community, the selection of Proposal 4 presents the greatest amount of potential change, amounting to a neighborhood-transforming catalytic investment. REIA participants were clear that they wanted increased amenities in their neighborhood but prioritized retaining affordability for current residents.

Community-Identified Impacts

The REIA process seeks to assess potential impacts of any given project in a holistic and comprehensive manner. For this Complete Streets project, residents identified the following likely impacts, without judgment of positive or negative, given current trends and past lived experiences.

Children and Youth	Safer access to the square and an overall increase in open space can provide local children with more recreational play space.
Education	As increases in property taxes and rents lead to displacement of longtime, lower-income families, local public schools will likely be impacted by decreased student enrollment, ¹⁹ which leads to lower funding levels, often lower performance, and potentially eventual school closure.
Environment	Safety improvements to encourage walking, biking, and public transit can reduce automobile usage and positively benefit the environment. The addition of green space can also mitigate the effects of carbon emissions and improve stormwater management to minimize flooding.
Health	Safety improvements to encourage walking and biking can have positive health outcomes. In the short term, construction debris could negatively impact health, such as through increased asthma.
Housing	Additional traffic improvements and amenities, such as significant additional open space, will likely make the local housing market even more competitive, with even higher rents and home values. ²⁰ Especially in the context of the recent property tax increase ²¹ and the former Cook County Assessor’s Office’s systemic overburdening

¹⁸ This recommendation was announced at a public meeting held by CDOT on December 4th, 2018. The slides are [available online](#).

¹⁹ [Only 51% of White families in Chicago send their children to public schools](#), favoring private schools. An influx of White, upwardly-mobile families in Logan Square has the potential to leave neighborhood schools under-enrolled. In addition, representation of families in the neighborhood has dropped overall, as cited elsewhere in the paper, from 79.4% in 2000 to 68.7% in 2014. [In the past 5 years, the city has seen significant closures of schools deemed “under-enrolled.”](#) These shutterings have [disproportionately burdened low-income students and students of color](#).

²⁰ [A 2005 study](#) that reviewed national data from the 1970s onward showed that “parks and open space contribute to increasing proximate property values,” and that “a positive impact of 20% on property values abutting or fronting a passive park is a reasonable starting point guideline for estimating such a park’s impact.”

²¹ This [Chicago Tribune](#) piece details Mayor Rahm Emanuel’s property tax hike.

	of low- income homeowners, ²² rising housing costs associated with the proposed improvements will disproportionately burden low-income residents. ²³ Given existing income disparities by race in Chicago, Latinx and Black families will be most impacted by these rising costs.
Jobs and Contracting Equity	The project’s construction will create jobs and impact nearby businesses. Improved transportation and safety will also impact access to jobs for commuters who pass through the intersection and for those accessing the Blue Line Logan Square Station.
Law Enforcement	Residents shared that Black and Latinx youth are already disproportionately watched, stopped, and searched by police as compared to their White peers. ²⁴ As this project makes the square a more attractive destination to upper-income visitors, residents are concerned that youth of color will be deterred or criminalized by the police and not enjoy the same access to the space as their White counterparts. ²⁵
Parks and Recreation	The addition of new plazas and green space, especially if designed inclusively and reflecting the community’s historic Latin American and Polish heritage, can positively impact access to parks and culturally relevant recreational space.
Planning and Development	Businesses around the project are already changing. ²⁶ In recent years, small shops have made way for cafés and boutique stores catering to middle- and upper-income shoppers. This project will further impact local business composition by attracting more visitors and also by increasing commercial rents.
Transportation	Improvements may likely attract more public transit users. Residents expressed some concern that Logan Square Blue Line stop and area buses may not have the capacity to handle increased ridership. Safety improvements will also encourage alternate modes of transportation, such as walking or biking.

²² This [Chicago Tribune piece](#) details the lawsuit against former Cook County Assessor Joseph Berrios.

²³ A [National Recreation and Parks Association \(NRPA\) article](#) points out that “residents of low-income and minority communities have less access than their more affluent neighbors to parks and other forms of green infrastructure.” But simply creating or expanding upon green space in low-income or minority neighborhoods does not address this issue, as these residents are most vulnerable to displacement from “substantially increased property values and housing prices” that park investment can catalyze. The author notes that gentrification tends to occur with large investments in green space, like New York’s High Line and Chicago’s 606, but not as steeply with small-scale park improvements.

²⁴ Several participants shared their personal experience witnessing disproportionate harassment of youth of color by police, or being subject to this harassment themselves. There is also broader data to support their claims. In 2015, [the ACLU of Illinois found that in Chicago, “Black and Latino people are subject to stops and searches at a higher rate than whites.”](#) In 2017, a [federal investigation of the Chicago Police Department revealed that the CPD had “failed to adequately address racially discriminatory conduct by officers.”](#)

²⁵ From research at [NYU’s Furman Center](#): “Sometimes, when minorities are perceived to be out of place in predominantly white neighborhoods, police can be especially harsh, sometimes even using the threat of arrest to expel black and brown people from predominantly white areas. The combination of race and class marginality (thought to be identifiable in clothing, hair style, cadence, posture, or even the look in a person’s eye) puts particular black and brown people under a special form of threat in a range of middle-class neighborhoods, even in predominantly minority middle-class neighborhoods.”

²⁶ Logan Square’s transformation has been documented by local media outlets over the years. [A Chicago Tribune article](#) from this year describes Logan Square’s business mix as “frenetic and gentrifying,” and “hipster for certain.” In 2016, [DNAInfo reported](#) on the closing of Latinx-patronized businesses, like the Megamall and El Charro (a 30-year-old Mexican restaurant) to make way for a Target and a ramen restaurant, respectively.

3. AT FIRST LOOK, WHO BENEFITS UNDER THIS PROPOSAL AND HOW?

After identifying the various impacts of the proposal, REIA participants evaluated who is most likely to benefit from them and who is most likely to be burdened by them.

Benefit	Who receives benefits?
<p>Improved traffic safety. Improved traffic flow and clearly designated bike lanes and pedestrian crossings will lead to safer usage of local streets by all modes of transit.</p>	<ul style="list-style-type: none"> ● Motorists, cyclists, pedestrians who pass through Logan Square ● Households who can continue to afford to reside in, or move to, the neighborhood. Given racial income disparities in Chicago, these will mostly be White households.²⁷ ● Eventually, businesses along thoroughfares who benefit from increased exposure by higher foot, cyclist, and motor traffic
<p>Expanded green, open, and public space. Increased open and green space can have positive impacts on mental, physical, and community health.</p>	<ul style="list-style-type: none"> ● Pedestrians, community members, and visitors to Logan Square ● “People who feel ownership of” and “people who feel safe in” the area
<p>Added pedestrian plaza. The addition of pedestrian plaza made possible by redirecting Kedzie Ave. will create new public space that can provide benefits to many local residents, businesses, and institutions.</p>	<ul style="list-style-type: none"> ● Pedestrians, visitors, and residents using the space ● Businesses with storefronts facing plaza ● If allowed, street vendors or public street performers
<p>Increase in residential property values.</p>	<ul style="list-style-type: none"> ● Higher-income residents able to afford the cost increase, including both homeowners who build wealth off of the value increase and tenants from other parts of the city who are attracted to Logan Square and are willing and able to pay higher prices (as compared to other prospective or current residents who may not be able to). As White Chicagoans have a median income almost twice as large as Latinx, they will be disproportionately more likely to be able to afford higher rents and property taxes.²⁸ ● Real estate developers looking to invest in the area

²⁷ For more on income and other disparities in Chicago, see [“A Tale of Three Cities: The State of Racial Justice in Chicago Report”](#) by UIC’s Institute for Research on Race and Public Policy.

²⁸ The 2015 median hourly wages in Chicago for White workers are \$28 (or over \$58,000 annually) but \$15 for Latinx workers (\$31,200 annual) and \$19 for Black workers (\$39,520 annual). [Source](#).

<u>Increase in commercial property values.</u>	<ul style="list-style-type: none"> ● Businesses that are able to afford the cost increase can benefit from more customer traffic ● Real estate developers looking to invest in the area
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4. WHO IS BURDENED BY THIS PROPOSAL AND HOW?

Burden	Who is at risk?
<p><u>Residential displacement.</u> As has been experienced by similar investments, this project will likely cause further residential displacement. Logan Square and Avondale are already experiencing rapid gentrification. Lifelong residents and working-class families have been forced to sell or rent in unfamiliar places due to increased demand and market speculation. New real estate developers typically build smaller units not designed to accommodate larger families.²⁹ Property taxes are likely to increase.</p>	<ul style="list-style-type: none"> ● Limited income households who own or rent ● Latinx, Black, and immigrant households ● Longtime residents ● Families needing 2+ bedrooms
<p><u>Commercial displacement.</u> Similarly, rises in property values will lead to higher commercial rents that displace smaller businesses. New development may also prioritize larger businesses and businesses catering to higher income residents and visitors to the area. Ongoing displacement of Latinx residents may lead to the closure of businesses catering to Latinx customers.</p>	<ul style="list-style-type: none"> ● Small “mom and pop” businesses on tight profit margins, which tend to be owned by or catering to immigrants or Latinx residents
<p><u>Construction-related setbacks for business.</u> Construction-related reconfiguration of traffic patterns may lead to temporary business losses for local stores.</p>	<ul style="list-style-type: none"> ● Businesses reliant on existing traffic patterns or on foot traffic ● Businesses reliant on parking for customers ● Small “mom and pop” businesses on tight profit margins, which tend to be owned by or catering to immigrants or Latinx residents

²⁹ As one example, the [Luxury Living Chicago realty blog from July 13, 2016](#) lists the latest apartments available for rent in Logan Square, all of them touted for their luxury and amenities directed more at higher-income incoming residents than working-class families.

<p><u>Construction-related barriers to pedestrian mobility or access.</u> Closing of sidewalks, rerouted roads, and delays in public transportation can disrupt the commutes and mobility needs of residents with distinct mobility needs, such as residents with disabilities or aging residents.</p>	<ul style="list-style-type: none"> ● Aging population ● People with disabilities ● Infants, children, and their caregivers ● Other residents or visitors with distinct mobility needs
<p><u>Potential closures of neighborhood schools.</u> Increased displacement and gentrification will impact enrollment in local neighborhood schools. Lower enrollment in the neighborhood schools will not only reduce financial resources, but also heighten the risk of school closures and, consequently, the proximity of schools and the ability to have the school as the center of community.</p>	<ul style="list-style-type: none"> ● Children ● Public schools ● Working parents/guardians ● Families that send their children to the local schools ● Local businesses dependent on foot traffic from the schools
<p><u>Transportation delays.</u> Construction work can cause serious traffic delays. Any increased ridership in public transportation during and after construction can increase commute times due to over-crowdedness.</p>	<ul style="list-style-type: none"> ● Commuters accessing public transit at the Logan Square Blue Line Station ● Residents dependent on public transportation, often low-income residents of color
<p><u>Heightened policing.</u> The Illinois Bicentennial Monument (“the Eagle”) has long been a gathering place for community members. As the neighborhood has gentrified, youth and other people of color have reported police harassment and profiling while occupying the space. Hostile interactions with police can lead to stress, anxiety, and a general feeling of exclusion or not belonging to the space.</p>	<ul style="list-style-type: none"> ● Youth, especially youth of color ● Other people of color ● Homeless residents targeted by police
<p><u>Weakened community institutions and social cohesion.</u> Changes in neighborhood demographics caused by displacement can disrupt networks and impact the traditions and customs of lifelong residents, such as their places of worship. If places of worship no longer serve a congregation that can help sustain their cost, they may shutter, along with many of the social service programs they provide (e.g., food pantries, soup kitchens, clothing distribution, benefits referrals, etc.).</p>	<ul style="list-style-type: none"> ● Existing faith-based communities, other community organizations, and any vulnerable community members relying on their social services ● Longtime residents who have established local support networks ● Nonprofits or community-based organizations serving residents being displaced

RECOMMENDED STRATEGIES

After identifying likely impacts of the Complete Streets project, residents proposed measures to protect low-income and longtime community members, specifically those of color, from unintended negative consequences. Additional stakeholders, including community organizers and policy analysts, further contributed recommendations.

Together, these various impacts and proposed strategies encompass items directly within CDOT's authority, items that address indirect impacts of the proposed redesign, and items that speak to larger CDOT and local government practice. Community members also identified additional information that should be considered as CDOT advances planning and implementation of the Complete Streets project.

The below sections both synthesize the recommendations recorded through the REIA process and identify the core strategies in each category recommended for CDOT's action. These categories are:

- Direct Impacts (i.e., suggestions within CDOT's current scope)
- Indirect Impacts (i.e., those requiring interagency partnership or coordination)
- CDOT policy and practice (i.e. recommendations for all CDOT work, beyond this Complete Streets project)

DIRECT PROJECT IMPACTS

This section outlines the observations and recommendations collected that would directly impact CDOT's planning and implementation of the Complete Streets project within its current scope.

Core strategy: *Explicitly include racial equity as a goal of the Complete Streets project alongside existing transportation and safety goals.*

First and foremost, the explicit inclusion of a racial equity goal sends a powerful message to the community. Residents, especially residents of color, articulated deep skepticism that the Complete Streets improvements are meant for their benefit. This skepticism is grounded in decades of perceived treatment by the city and data indicating that the neighborhood's changes are resulting in displacement. Acknowledgment that public investment has not always benefited those who are historically most burdened - and that this particular public investment is perceived as long overdue by longtime residents - goes a long way toward beginning to rebuild trust, especially when accompanied by explicit commitment to those burdened populations. Stating racial equity as a goal resets the public discourse.

Secondly and also significantly, the inclusion of a racial equity goal will shape the decisions made through the public discourse. CDOT has already demonstrated a thoughtful approach toward achieving its existing goals, framing each proposed design in light of the stated goals and corresponding criteria for success. Taking advantage of this backwards mapping skill and applying that same approach to a newly added racial equity goal will yield proposal selections and supporting plans that ensure success for more residents.

The recommendations below, compiled through the REIA process, are further expansions of the above core strategy. For example, once CDOT adopts racial equity as an explicit project goal, protecting local businesses owned, operated, and/or serving predominantly Latinx residents follows naturally as a supporting tactic. When implementing any or all of these recommendations, a community benefits

agreement may prove useful as a form of publicizing the agency’s commitment and rebuilding community trust.

Impact Area	Expanded Recommendations
Children and Youth	<ol style="list-style-type: none"> 1. <i>Create safe youth space.</i> Include child- and teen-friendly spaces in the design as a benefit to all populations and especially to longtime residents with families. Explore the use of seed grants for community organizations to make kid-friendly and culturally relevant spaces in the area.
Economic Development	<ol style="list-style-type: none"> 2. <i>Improve economic opportunities for neighborhood residents of color.</i> For example, create a designated, welcoming space on the square for Latinx food carts whose regular customer base has been increasingly displaced.
Housing	<ol style="list-style-type: none"> 3. <i>Directly name housing equity issues that could result from the redevelopment.</i> As part of rewriting the proposal to make racial equity explicit as a consideration and desired outcome, identify the connection between housing and development issues and address residential displacement risks.
Law Enforcement	<ol style="list-style-type: none"> 4. <i>Create inclusive space to increase feelings of safety for the diverse residents and users of the space.</i> Design the new open space in partnership with the community to ensure a balance between aesthetics and safety for <i>all</i> residents, including those disproportionately targeted by law enforcement. Specific potential tactics include deliberate use of public benches and lighting, art projects celebrating the community’s history and cultures, and specific signage outlining that the park is open to specific behaviors. CDOT would not get to this level of detail during project design at this stage, but setting early expectations for who should benefit from the space and who should be included in its design will shape all subsequent expectations and actions.
Planning and Development	<ol style="list-style-type: none"> 5. <i>Engage community stakeholders, housing representatives, and economic development representatives to pair the transportation development with plans for plaza development.</i> The development of Logan Square should focus on the whole community, with broad community representation (emphasizing representation of low-income neighbors and neighbors of color) at the decision-making table alongside housing and economic development experts and representatives like Bickerdike, LUCHA, and other affordable housing agencies/corporations. The degree to which the plaza is developed should flow from that intentional engagement. 6. <i>Build on existing community plans in proposal delivery and acknowledge them in proposal delivery.</i> At least two past efforts have already engaged local residents in building community visions for the Logan Square neighborhood and for development in the Emmett St.

	<p>Parking Lot and Blue Line station plaza.³⁰ CDOT’s Complete Streets project should incorporate these existing neighborhood visions or even take the opportunity to engage the community in expanding them. Incorporation of these visions may require some refinement, as conditions in the neighborhood have continued changing since the previous plans’ publications, but these steps can play a significant role in rebuilding trust with community stakeholders.</p>
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INDIRECT PROJECT IMPACTS

This section outlines observations and recommendations that indirectly impact the planning and implementation of the CDOT project within its current scope.

In many cases, residents anticipated indirect impact based on a community understanding that investment in the neighborhood not only increases quality of life for current residents but also makes it a more desirable place to visit and live for current non-residents, which is a more complicated consequence. From housing to businesses to schools, community members are interested in exploring the intended and unintended consequences that reach beyond any single project.

This REIA and community residents recognize that CDOT alone is not responsible for all of these listed impacts and recommendations. Rather, the REIA should serve as a call to action for the city and community to work together holistically, addressing both hopes and fears about this development in partnership.

Core strategy: *Take concrete and coordinated action to protect housing for residents of color, longtime residents, and low-income residents in Logan Square and Avondale.*

Quantitative and qualitative data both point to a housing crisis in Logan Square, particularly for Latinx families. The example of the 606 stands as a stark reminder of the exacerbating role that public amenity investments can play in their displacement. Beyond simply naming the housing equity issues that could result from this redevelopment, as the Direct Impact recommendations advise, CDOT has the opportunity to convene and collaborate with other agencies and actors to put in explicit measures to stabilize housing, develop more affordable options, and prevent displacement. An example measure already under discussion and enjoying significant community commitment is the proposal to convert the city-owned Emmett St. parking lot next to the Logan Square Blue Line station into 100% affordable housing with predominantly family-sized units.

The recommendations below, compiled through the REIA process, may be viewed as supplements and further expansions of the above core strategy. For example, once racially equitable housing is secured, local schools and local businesses will also stabilize. When implementing any or all of these recommendations, a community benefits agreement may prove useful as a form of publicizing the agency’s commitment and rebuilding community trust.

³⁰ In 2014 Logan Square executed a corridor development initiative (CDI) process to get feedback on what is desired for the CTA station/Emmett Street parking lot. The project has since stalled. Feedback from that process should be incorporated into or redone to include the CDOT development plan for the square.

Impact Area	Expanded Recommendations
Economic Development	<ol style="list-style-type: none"> 1. <i>Prevent displacement of existing businesses and organizations.</i> Develop a neighborhood business preservation plan to protect businesses in the area, especially those owned, operated, and/or serving predominantly Latinx residents, given the projected increase in commercial rents following project completion. 2. <i>Create a neighborhood incubator space for small businesses.</i> Incentivize the creation of an incubator space for mom-and-pop businesses owned and/or operated by long-term residents. This kind of a small business incubator would begin to fill the void left by the MegaMall closure and any other local business closures caused by the development. 3. <i>Hold a job fair for community residents to fill new jobs.</i> New retail or other commercial development should attempt to hire locally through a process defined with the community for new businesses that develop as a result of this project. 4. <i>Create a job creation forecast.</i> The number and types of jobs created from the project should be forecasted during the planning phase for community input.
Education	<ol style="list-style-type: none"> 1. <i>Protect public schooling options by creating an enrollment mitigation plan for struggling schools.</i> Recent school closings due to low enrollment make residents nervous, especially for schools like Monroe Elementary School and Darwin Elementary School. Fears of under-enrollment have propagated due to Latinx families' migration out and young professionals' migration in. Mitigation of low enrollment should occur before closure, conversion to charter schools, and/or redesign to serve different demographics. These efforts can start with a forecast of the impacts of the development on local school enrollment, especially given enrollment trends. This more transparent enrollment trend analysis to determine the risk of student displacement can dispel fear of the unknown and allow for data-driven community planning and advocacy. 2. <i>Fully fund the surrounding neighborhood public schools.</i> Demonstrate the city's investment in the area by acknowledging the correlational relationship between healthy schools and healthy communities and therefore fully funding the schools to fully protect the community. 3. <i>Showcase local public neighborhood school options.</i> School fairs can illustrate the accomplishments and pride of neighborhood schools and draw in more families and greater investment. The annual Avondale School Forum is one example of neighborhood school promotion that could draw further support and inspire further examples.
Housing	<ol style="list-style-type: none"> 1. <i>Mitigate the continued displacement of families of color.</i> Example strategies include:

	<ol style="list-style-type: none"> a. Complete the proposed 100% affordable housing development for family-size units at the Emmett St. parking lot location adjacent to the project b. Support the establishment of a community-led land trust to preserve naturally-occurring affordable ownership and rental housing options c. Explore property tax assistance for long-term residents <ol style="list-style-type: none"> 2. <i>Ensure affordability in new housing developments.</i> Create an affordable housing task force spanning multiple wards to give feedback on any new development proposals. 3. <i>Prioritize the inclusion of family units in new housing developments.</i> Mandating the inclusion of larger unit types (2 bedrooms or more) will better preserve affordable family housing options.
Law Enforcement	<ol style="list-style-type: none"> 1. <i>Promote community action to ensure equitable treatment of all residents, specifically teens of color.</i> Younger participants specifically described negative experiences with the police, including being stopped and searched in the neighborhood around the square. A restorative justice framework or neighborhood police training is recommended to combat the inequities of how laws are enforced or how individuals are policed according to the skin color of the purported offender.
Social Cohesion	<ol style="list-style-type: none"> 1. <i>Maintain business and service diversity.</i> Encourage mixed use of the corridor such that new businesses entering do not cater solely to young or higher-income residents or visitors. Protect existing social services and institutions like churches serving longtime residents. 2. <i>Explore opportunities for the built environment</i> to reflect the neighborhood’s history of working-class and Latinx families and to be welcoming to families and children. Encourage and engage in placemaking activities that reflect the history of the neighborhood. Puerto Rican flag arches in Humboldt Park, rainbow pylons in Boystown, and columns in Greektown celebrate the communities that reside within those neighborhoods, and reinforce their belonging. CDOT should partner with local community groups to similarly incorporate and encourage elements of traditional Latin American and Polish aesthetics into the design of the square. One nearby example is the mural near the Spaulding Exit of the Logan Square Blue Line Station.

CDOT POLICY AND PRACTICE

Through the process of commenting upon the Complete Streets project, stakeholders and advocates identified recommended changes for CDOT policy and practice that would help promote racial equity not only for the current project in focus but also when planning *any* capital project. These propositions can be inferred from the recommendations above but are collected in this section for easy reference and application.

1. *Adopt racial equity as a core outcome and value in CDOT's mission and implement organizational plans to operationalize accordingly.* CDOT should follow the lead of over 125 municipalities across the US, including the Chicago Department of Public Health and Cook County, to partner with the GARE and embed racial equity throughout its operations and internal infrastructure.
2. *Incorporate consideration of racial equity impacts at the onset of a project planning process.* Racial equity needs to be an explicit goal at the beginning of any decision-making process to fully and meaningfully address potential disparate impacts of a public project. Once a project or process is already well underway, adding a racial equity lens is challenging.
3. *Directly address existing community feelings of distrust.* In the case of Logan Square, the community has been told that this redevelopment would be happening for more than a decade. It is only recently as the neighborhood demographics have shifted and more White residents have moved into the neighborhood that development plans have moved forward. Rebuilding trust is a long and fragile process. CDOT should begin similar projects by acknowledging relevant history, honoring community visions already in existence, and meaningfully engaging and empowering community voices and leaders to guide and shape the implementation of incoming projects. Trust is rebuilt as power is shared. One measure of success is the willingness of community members to explain and be excited about the process and its products to their neighbors.
4. *Conduct an REIA on all future capital projects.* The REIA process serves the dual purpose of (A) meaningfully informing community members of proposals impacting their neighborhood, and (B) ensuring that they have a voice and can have their concerns addressed. The activity allows for trust to form and for the community to embrace the project.
5. *Build interagency partnerships to holistically address project impacts.* CDOT should collaborate with other city agencies to ensure a holistic approach to understanding the many impacts related to street and plaza redevelopment. For example, the Chicago Transit Authority (CTA) should be involved to understand and plan for impact to public transit usage, while the Department of Planning and Development (DPD) and Chicago Housing Authority (CHA) can be engaged to identify housing solutions. Collectively, city agencies need to work together to ensure communities are equipped and ready to handle all impacts of proposed projects.

CONCLUSION

Residents who participated in the REIA see the benefit of traffic and safety improvements that the Complete Streets project seeks to advance. Still, residents largely agree that project benefits will be enjoyed by all Logan Square residents and businesses *only* if paired with public commitment and related policies to preserve the diversity and vibrancy of the neighborhood. As a community, Logan Square has been undergoing significant changes in recent decades, and many families of color have not been adequately protected from the negative consequences associated with this increased development and investment. Since 2000, over 20,000 Latinx residents have moved out of Logan Square. This displacement is a primary concern of community residents, one that is based in the trauma and lived

experience of recent investments exacerbating existing market pressures on low- and moderate-income residents.

Through the REIA process, three themes emerged as suggested measures:

Explicitly recognize racial equity as a goal of the Complete Streets project and of future CDOT

projects. Although the community members engaged in the REIA process acknowledge the assets of the Complete Streets project, they are concerned that longtime residents, particularly those of color, will not be able to benefit from them. As stated elsewhere in this report, traffic improvements and additional green space will likely contribute to the trend of rising property values in the area, causing housing costs to become too high for low-income residents. This effect has a clear impact on the racial composition of the neighborhood in a city where the average hourly wage for a Latinx person (\$15) is nearly half that of a White person's (\$28). CDOT must consider racial equity a key goal in this project, as well as future projects, if racially inequitable outcomes are to be avoided. To do so, the report team suggests that:

- CDOT adopt a practice of conducting Racial Equity Impact Assessments for all Complete Streets projects and other capital investments
- CDOT actively include local residents, businesses, and other community representatives in decision-making for the design, programming, and usage of new public plazas or open space created such that the resultant space reflects the identity, needs, and desires of those who should most benefit from it

Support the creation and preservation of affordable family-sized housing. Within its current scope, the Complete Streets project will likely lead to increased residential displacement. As a part of the planning process, CDOT should engage with relevant city agencies to identify opportunities to mitigate this likely burden. For example, the city can commit to providing the desired Emmett St. parking lot for the development of family-sized affordable housing units. The city could also help preserve naturally occurring affordable housing by helping mission-driven developers access capital to more competitively acquire and preserve affordable units.³¹

Establish interagency partnerships for holistic planning and implementation. When agencies partner together, with each other and with communities, the system works for everyone. In this case, CDOT should identify the relevant agencies whose scope overlaps with the direct and indirect impacts listed in this report. The goal of these partnerships would be to ensure local systems are equipped to handle the impacts of the Complete Streets project holistically. For example, CPS would be involved to assess impacts on local public schools, and the DPD would be involved to mitigate residential and commercial displacement impacts. The holistic approach supports whole communities beyond a single traffic safety focus.

We recognize that CDOT alone is not responsible for all of these impacts and recommendations. Rather, this REIA is a call to action for the city and community to work together holistically in new ways. We invite CDOT and all city agencies to use this REIA as a guide to accompany the Complete Streets project implementation such that it mitigates the potential negative impacts as identified by community

³¹ DePaul's Institute of Housing Studies recommends "creating financing vehicles that support mission-driven developers to acquire and maintain affordable units" as a key strategy for preserving affordability in high cost neighborhoods with rising prices like Logan Square. See "[Mapping Displacement Pressure in Chicago](#)" for more.

members. True public investment in the neighborhood will be measured by whether *all* neighbors receive the benefits.

The REIA team thanks CDOT for allowing participation at scheduled public meetings and for making time intermittently for check-ins along the way. We also express appreciation for the community engagement built into the Complete Streets project from the beginning and hope that two-way feedback continues as the project moves forward. Finally, although neither CDOT nor the Mayor's Office were able to take advantage of invitations to actively join the REIA process, partners at LSNA, LUCHA, and CUE stand at the ready to educate and collaborate with CDOT and the city at large.

CUE invites CDOT and other local organizations to build upon these recommendations in such a way as to further the explicit CDOT project goals while also deepening the city's engagement with its communities and promoting racial equity.

APPENDICES

APPENDIX A: COMPARATIVE ANALYSIS OF PROPOSED COMPLETE STREETS DESIGN OPTIONS

Logan Square CDOT proposal analysis				
	Spot improve-ments	Traffic oval	Two- way, trip match	Two way, the bend
Existing roadway configuration				
Reduced number of travel lanes in some areas				
Reduced number of lanes per direction				
Reduced pedestrian crossing distances				
Raised sidewalks in some areas				
Additional bike facilities in some areas				
Separated bike lanes around the square				
Separated and/or on street bike lanes				
Retains most on-street parking				
Consolidation of some on-street parking				
New traffic signal and crosswalk at Wrightwood Ave.				
Redesign intersection at Kedzie Blvd.				
Reconfigured Kedzie Blvd. service drive				
Pedestrian refuge island near Comfort Station				
Pedestrian refuge island at Troy St.				
Public space added near eastbound right lane from Logan Blvd.				
Realignment of Kedzie Ave. for public plaza at bus terminal				

Removal of existing splitter island north of the square				
Milwaukee Ave. remains running through the square				
Two-way traffic on west and south sides of the square				
Milwaukee Ave. rerouted around the north and east of the square				
One larger public space within the square				
Two-way traffic on all roadways around the square				

APPENDIX B: COMMUNITY REQUESTS FOR FURTHER INFORMATION

Community residents raised several questions regarding the forecasted impacts of the different proposal options. The below inquiries demonstrate the breadth and depth of community interest in the impact of the Complete Streets project upon their neighborhood home. In some cases, the information may have already been provided, in which case the department may consider how effectively messages are reaching their intended audience.

ECONOMIC DEVELOPMENT

- **Impact of construction on the neighborhood.** What is the construction mitigation plan for each of the proposal plans?
- **Economic development impact analysis.** What is the anticipated benefit or loss to small business owners?

TRANSPORTATION

- **Demographics study.** Who uses the different modes of transit: bus, subway, walking, biking, and driving? For what purposes do they use them?
- **Data used in decision-making.** What metrics will CDOT use to measure success of the proposal? Clarity on this measurement will help residents understand the proposals completely.
- **Traffic study.** Specific questions raised included the following:
 - What are the forecasted traffic flows that would result from each of the proposals?
 - What is the impact of the project on CTA access during rush hour? (Community residents are particularly concerned about already overcrowded trains during the morning commute and overall capacity issues resulting from increased ridership.)
 - How will parking be impacted by the project?