

DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

CITY OF CHICAGO'S GOAL: *Take a whole-government approach to improve and protect the environment, health, and quality of life in environmental justice (EJ) communities through changes to internal policies, processes, practices and/or budgets.*

ENVIRONMENTAL JUSTICE ACTION PLAN

Department Name: Department of Housing

Department Scope and Authorities:

- Competitively select sites for multi-family affordable housing development and maintain design review and construction compliance authority over said sites. This is primarily done via the Department's Qualified Allocation Plan (QAP), with design standards enforced by the Department's Architectural Technical Standards (ATS) Manual.
 - The 2023 QAP, recently released, now states: "In accordance with this City-wide effort, and in recognition that the climate crisis places a disproportionate burden on low-income residents, communities of color, and other marginalized populations, this 2023 Qualified Allocation Plan (QAP) and DOH's 2023 Architectural Technical Standards include new language, preferences, and requirements related to energy efficiency, decarbonization, and climate resilience" (2023 QAP, p. 27).
 - The 2023 ATS manual now requires most buildings funded by DOH to be all-electric, and to avoid fuel combustion in residential units or common areas. The 2023 QAP allows the Department to further preference applications that exceed these standards.
 - The 2021 QAP supported equitable transit-oriented development by introducing a selection preference for multi-family projects in transit-served locations (TSLs). The 2023 QAP furthered this commitment by reinforcing the TSL preference and adding clarity about its implementation.
- Develop and publish RFPs for specific residential development sites (e.g., on city-owned land).
- Develop and implement ordinance-enabled programs and policies that influence residential development across the city; e.g., the Affordable Requirements Ordinance (SO2021-1226), the Woodlawn Housing Preservation Ordinance (O2020-3987), the Accessible Dwelling Units program (SO2020-2850), and the Connected Communities Ordinance (SO2022-2000).
- Lead distribution of rental and mortgage assistance programs, including court-based eviction proceeding rental assistance.
- Subsidize the development of affordable single-family homes.
- Fund critical home repairs for low-income homeowners (Home Repair Program, Emergency Heat Program).
- Fund the purchase and rehabilitation of various housing types to improve choice and quality and create better neighborhoods.
- Fund a network of delegate agencies that provide direct housing assistance to Chicago residents including Housing Counseling Centers (HCC), and housing technical assistance providers (TACIT and TACOM).
- Advocate for state and federal policy changes related to affordable housing, housing development and choice, and the elimination of residential segregation.

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Environmental Justice Strategy:

Based on the wide range of authorities reviewed above, DOH is committed to pursuing a variety of strategies to enhance our approach to environmental justice, and integrate that work with that of other departments:

- Implement enhanced process for evaluation of proposed sites for multi-family developments, including the evaluation of environmental justice risks, in coordination with related departments.
- Implement enhanced design review process for multi-family developments to better protect residents and local communities from environmental justice risks including pollution, flooding, extreme heat, shade access, green space access, and major freight routes.
- Deepen DOH's commitment to dismantling residential segregation by increasing housing choice for low-income Chicagoans. Continue to pursue a "both/and" strategy that promotes development of high-quality housing and amenities in disinvested areas, and affordable housing in amenity-rich areas.
- Fund organizations to provide city-wide capacity building related to climate resiliency, environmental justice, housing, and transit equity.
- Continue to pursue policy and public investment strategies that promote denser, transit-oriented residential development to reduce reliance on single-occupancy vehicle transportation and reduce greenhouse gas emissions.
- Deepen DOH's commitment to engaging community in housing issues, including involving communities in critical conversations about housing development, affordability, gentrification, and neighborhood investment. In parallel, continue to invest in expanding DOH's capacity for meaningful and timely community engagement.

Supporting Department(s):

- Department of Planning and Development
- Department of Transportation
- Department of Public Health
- Chicago Transit Authority

Impact Measures:

- Community partners engaged in planning and decision-making related to housing development.
- Number of housing units developed and/or rehabilitated, including the distribution of units across disinvested and amenity-rich communities, and number of units built in transit-served locations.
- Number of design interventions employed to address environmental justice concerns, including cooling rooms, resilient utility infrastructure, flood-resilient design, etc.

Related Department Investments & Prior Commitments:

- 2019 completion of first ever Racial Equity Impact Assessment (REIA) of a Qualified Allocation Plan (QAP).
- 2021 ATS requires developers to include air conditioning in all dwelling units and common areas in multifamily projects.
- 2021 QAP included multiple application "tracts" to encourage the selection of projects from diverse neighborhoods. This new approach led to an increase in development of affordable units in affluent and amenity-rich "opportunity area" communities.
- Of 24 affordable housing multi-family projects announced in the 2021 LIHTC funding round, 18 were in transit-served locations.

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- The Affordable Requirements Ordinance [Chicago’s inclusionary housing program] generated over 600 units in 2022, the majority in transit-served locations.
- 2022 passage of Connected Communities Ordinance (SO2022-2000) changed the Chicago Zoning Code to facilitate and incentivize the development of affordable, dense housing near transit.
- Ongoing investments in roof and porch repairs, emergency heating repairs, and Heat Receivership Program.

Action Steps	Timeline	Status
Implement an improved multi-family financing application and internal application review processes to better evaluate proposals based through an Environmental Justice lens for site concerns and the inclusion of mitigating design measures. DOH has implemented some improvements for the 2023 Qualified Allocation Plan, and will make further improvements in partnership with the Department of Planning and Development and Department of Public Health prior to the 2025 application round.	Q2 2025	Currently underway
Develop and implement a five-year housing plan that explicitly incorporates goals related to environmental justice and the specific needs of environmental justice communities. Engage and consult with community groups and stakeholders—especially those representing environmental justice communities—during plan development, and establish reporting structures through the planning process to hold DOH accountable to environmental justice goals.	Q4 2023	Planning process currently being initiated
Establish an energy efficiency and decarbonization grant program for low-income homeowners and tenants to decrease energy use, utility bills, and indoor fuel combustion and to improve indoor air quality and the City’s overall carbon footprint.	Q4 2023	Program in procurement
Fund delegate agencies to provide capacity building and technical assistance related to climate resiliency, environmental justice, housing, and transit equity through the Technical Assistance – Citywide (TACIT) program via the 2024 CDGA RFP.	Q2 2024	Planning in process
Work with Mayor’s Office, departments, Council, and external stakeholders to continue to push for ETOD zoning reforms and other changes to programs and policies that will promote equitable transit-oriented development.	TBD	Planning in process with partners
Community Input & Response		
<p>Community Input: No DOH-specific input received. General community input applicable to DOH included calls for meaningful community engagement; transparency; reinvestment in Environmental Justice communities; funding and staffing dedicated to achieving environmental justice goals; and interdepartmental coordination.</p>		
<p>Response to Community Input: Added an explicit commitment to continuing to develop staff capacity for engagement. Added an update related to DOH’s multifamily financing application review process, including committing to collaborating with sister departments on further improvements prior to next funding round.</p>		

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