

March 15, 2023

RE: Redline Extension Draft Transportation Supportive Development Plan

Good morning, Laura Flores, Chair and Andre Brumfield, Vice-Chair, fellow Commissioners and staff of the Chicago Plan Commission.

The Redline Extension TIF Coalition, a growing delegation of South Regional land use, zoning and sustainable development advocates, today supports the Draft Redline Extension Transportation Supportive Development Plan. We appreciate the zeal of the CTA staff, Planning Design and its consultant team for assembling this great document.

Today, we wish to add our public comments on the Draft Transportation Supportive Development Plan in order to further improve upon the potentiality to leverage substantial public and private investment along the Redline Extension TIF District and specifically the Greater Roseland Area.

First, we wish to again encourage the City to properly record and intentionally use the planning term, Transit Oriented Development (TOD). Since the Mid 80s, under the Harold Washington Administration, the Southside has used this term to communicate our hopes for public investments near Rail Stations. The term began in Englewood as part of an effort to build upon the Historic Racine Station at 63rd Street.

Currently, Chicago is embracing the TOD ordinance modeling at Lake and Damen and 115th and Michigan Ave.

The Draft Transportation Supportive Development must utilize the greatest investment model that only derives from the legislative use of TOD planning. We believe the Supportive Development model will reduce the capital investment potential for the Greater Roseland Area.

Second, we wish to encourage more language on public safety. The plan must elevate our collective hope for a safe and efficient transportation system and that the Vision Statement and Executive Summary must embrace that thrust.

That includes ways to better leverage the municipal role play of the Chicago Department of Transportation (CDOT). We need CDOT positioned more broadly in this plan and just don't see it in either the Traffic Safety, Pedestrian Friendly Design Concepts, funding and implementation platforms.

Thirdly, revisit the community partnering list in order to ensure local organizations and churches are properly recognized. Too many groups and church networks were not documented as stakeholders. That means, the Redline Extension Development Team must dedicate added community engagement hours to ensure equity is achieved.

Fourth, we recommend more housing density within the Four block radius of each station. We must increase the number of eyes on the street in order to ensure public safety and pedestrian friendly results.

To this end, Thank you so much for this work .

John Paul Jones
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Redline Extension TIF Coalition Board
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March 14, 2023

Chicago Plan Commission
121 North LaSalle Street
Chicago, Illinois 60602

RE: Red Line Extension Transit-Supportive Development Plan

Dear Plan Commissioners:

As the comprehensive regional planning organization for northeastern Illinois, the Chicago Metropolitan Agency for Planning (CMAP) is committed to building a more equitable and inclusive region. The principles of the ON TO 2050 regional plan — inclusive growth, prioritized investment, and resilience — guide our efforts to advance equity and opportunity across our 7 counties and 284 communities.

Our region's transportation system — and its transit system in particular — provides connections that are central to economic prosperity and quality of life for the residents of northeastern Illinois. The Chicago Transit Authority's (CTA) Red Line South Extension (RLE) project is an important investment in the regional transit system that will greatly improve mobility and other outcomes for residents of the South Side of Chicago and the south suburbs of Cook County. CMAP has been a long-time champion of the RLE and included it as a fiscally constrained project in both ON TO 2050 and its predecessor plan, GO TO 2040. However, as the project progresses, intentional and responsive planning is essential to ensure impacted communities can fully benefit from the communal and economic impacts of this significant investment. ON TO 2050 is clear that strategic, market-responsive, and sustainable development are key to leveraging large-scale infrastructure investments and supporting prosperity in historically disinvested and economically disconnected parts of the region.

Accordingly, CMAP was proud to participate on the Project Advisory Council for the RLE Transit-Supportive Development (TSD) Plan. The TSD Plan is a proactive effort by the CTA and the City of Chicago Department of Planning and Development (DPD) to create a guide for the implementation of future transit-oriented development in the communities located near the RLE project area. The TSD Plan reflects community and stakeholder feedback on the station concepts and proposed development in the station areas, and it prioritizes steps and frameworks that will rise to this unique opportunity for equitable and transformative development.

For these reasons, CMAP supports the adoption of the TSD Plan. We look forward to continuing to work with the CTA, DPD, and the Project Advisory Council to execute on the goals and vision of the TSD Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Erin Aleman".

Erin Aleman
Executive Director



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March 14, 2023

Laura Flores, Committee Chair
Chicago Plan Commission
121 N. LaSalle St.
Chicago, IL 60602

Dear Chairwoman Laura Flores:

As an advocate and supporter of the Red Line Extension (RLE) Project, we are writing to express our support for the RLE Transit-Supportive Development (TSD) Plan. We encourage the Plan Commission to adopt this Plan which will act as a guide for future community and economic development on the Far South Side.

Bounded by 95th Street on the north, the City limits on the south, the Bishop Ford Expressway on the east, and I-57 on the west. The Far South Quality-of-Life plan includes a focus on the following communities: Roseland, Altgeld Gardens, Calumet Heights, Cottage Grove Heights, Fernwood, Golden Gates, London Towne, Morgan Park, Pullman, Roseland Heights, Rosemoor, Washington Heights, and West Pullman. The Far South Chicago Coalition stewards a Quality-of-Life Plan to help leverage governmental initiatives, funding, corporate resources, and outside investments to strengthen our residents and communities. Our efforts have been focused around creating a comprehensive plan that outlines the support needed to make the Far South Side of Chicago safe, healthy, affordable, mixed-income, sustainable and livable communities.

The Red Line Extension Transit-Supportive Development Plan compliments our Far South Chicago Quality-of-Life Plan and represents the community's vision for future development along the RLE corridor in order to enhance economic vitality, improve quality of life, and increase mobility. It is imperative the city focus and prioritize resources in the RLE area, and this plan will help guide those investments.

Sincerely,

A handwritten signature in black ink, appearing to read "Joyce Chapman".

Joyce Chapman
President
Far South Chicago Coalition

Review of the CTA Red Line Extension
Transit Supportive Development Plan (February 2023)
Lou Turner (February 24 – March 2, 2023)

Overall, the CTA’s Red Line Extension (RLE) Transit Supportive Development (TSD) Plan represents a good start toward development of a plan that reflects a community-based vision of the actual needs and aspirations of the Greater Roseland (GR) communities on the Far South Side of Chicago. Several advantages of the RLE TSD plan are: 1) its intention to develop and implement TSD strategies through community engagement; 2) its explicit (if belated) recognition of gentrification and displacement as community risks associated with TSD strategies, and the collateral intention to mitigate gentrification by “development without displacement”; 3) the inclusion of community-based cooperative strategies for economic, business and housing development, rather than focusing solely on private business enterprise strategies; 4) creation of an inventory or clearinghouse of city, county, state and federal programs, as well as foundation funding, to aid community stakeholders in implementing various development strategies; 5) recognition of the complexity of government programs that pose barriers to stakeholders taking advantage of available program funding and capacity-building; and 6) recognition of the unique characteristics (though not the urban planning history) of Greater Roseland community areas.

These important scoping advantages of the RLE TSD at the same time make its limitations all the more glaring. While the following review will concentrate on the limitations of the RLE TSD Plan, it will also 1) point out advantages and benefits of the Plan; 2) point to missed opportunities to make important connections to other parts of the Plan, or to other strategies that could bolster or improve the Plan; 3) highlight multiple occasions where Greater Roseland’s urban and planning history could (and must) be taken into account as an indispensable historical reckoning with Chicago’s egregious racial apartheid planning history which created the “transportation desert” on the Far South Side of the city that the RLE is now tasked to remediate. (Despite its limitations, evident to me while working as a member of the “Transportation & Infrastructure” research pillar team for Chicago’s new comprehensive plan, *We Will Chicago* (February 2023), even Chicago’s new “comp plan” begins with a section, “Acknowledging Chicago’s Systemic Inequities.”)¹

In short, the RLE represents the “cost of segregation” of Chicago’s urban apartheid past and present. The transit inequities on the Far South Side did not just magically happen (although the system of *de facto* urban racism makes it appear as though it sprang full-blown from the heads of Chicago’s planners and decisionmakers.) The RLE TSD is silent on this most incontrovertible truth of Chicago’s urban geography and social history, begging the question, transit-supportive development for what purpose?

Transit Equity Matters

As against the CTA Red Line Extension Transit Supportive Development Plan, earlier iterations of transit equity models posed issues of transit inequity within *regional* transportation contexts, wherein transit equity measured socioeconomic indices of similarly situated transit projects in the Chicago metropolitan area, allowing the true inequalities in community development to surface, disclosing the “cost of segregation” that has historically defined Chicago’s Black communities. (See “Transit Equity Matters: An

¹ See *We Will Chicago: A Framework Plan for the City’s Future*, February 2023, pp. 8-16.
https://www.chicago.gov/content/dam/city/depts/dcd/we_will/we_will_documents/cpc/WWC_Final_CPC.pdf.)

Equity Index and Regional Analysis of the Red Line and Two Other Proposed CTA Transit Extensions,” December 2009. <https://voorheescenter.uic.edu/.../sites/122/2017/10/2009-transit-equity-matters.pdf>.)

Housing Development

- The TSD references a number of sustainable housing programs (126-129) but should include “locational efficient mortgages” as a financial program to lower refinanced mortgages for residential and rental housing located near the public transportation (RLE). See Center for Neighborhood Technology. [Rethinking Mortgages | Center for Neighborhood Technology \(cnt.org\)](http://www.cnt.org). The RLE TSD plan should promote LEMs as financial instruments to leverage the concerted participation of banks and other mortgage lending institutions as part of an anti-displacement economic development strategy for incumbent residents of Greater Roseland. This is key because so much of the TSD plan is focused on attracting new higher income residents, businesses, developers, and investors (e.g., Opportunity Zones) to Greater Roseland with the cumulative, inevitable effect of raising taxes, rents, cost of living with the risk of displacing incumbent residents.
- The “43 Green” model by The Habitat Company (11) as a model of affordable housing development is problematic from a comparability perspective. A presentation of 43 Green “affordable housing” development revealed that monthly market rate rents were estimated to be \$1800, whereas “affordable rents” were estimated at \$1400! As a baseline, Apartments.com lists the following rental ranges for market rate rents like Lowden Homes CHA public housing units near the 95th Street station area:²

Beds	Average Size	Lowest	Typical
3 Beds	1000 Sq Ft	\$1,300	\$1,433

- The RLE TSD should list *current* residential rent levels and *future* estimated rent levels projected within the TSD areas. Greater Roseland residents deserve to be apprised of impending estimated rental increases associated with the RLE TSD.

Assess current affordable rent levels in GR and in the RLE TSD areas.

Assess current commercial rent levels in GR and in the RLE TSD areas.

Problem: Contracting consulting and development firms with portfolios of moderate to high end developments, despite their self-branding as “affordable housing” developers, is mismatched for the RLE TSD for Greater Roseland, which has some of the poorest community areas containing the most affordable housing stock in Chicago. The threat of gentrification is palpable and inescapable.

What does the following statement mean?

² ([Frank Lowden Homes - 9400 S Wentworth Ave Chicago, IL | Apartments.com](http://www.apartments.com)).

CREATING A PLAN Identifying action steps to achieve the vision; refining financial and development recommendations and strategies. (12)

TSD needs to spell out the steps, processes, entities and persons involved in “refining financial and development recommendations and strategies.” A “review committee” is mentioned later in the TSD (100), but it is not clear either here (12) or later what these “action steps” entail, or that this “community review committee” would or has the capacity to “[refine] financial and development recommendations and strategies.”

The material gathered to frame the topics of the RLE TSD were not derived from stakeholders or from community engagement but instead represent the imposition of a ready-made TSD template or frame on marginalized poor to moderate-income community areas of Greater Roseland (GR).

Assess RLE TSD community engagement strategies and processes, e.g., digital outreach versus traditional modes such as community newspapers, churches, libraries, community organizations, block clubs, schools, realtors, businesses, contractors, etc. (14).

Assess Far South Side CTA/Pace ridership estimates at 95th Street station hub, the busiest station in the CTA system (18), i.e., research the estimated ridership coming from Far South Side RLE TSD areas.

103rd Street Station

- The “Vision Statement” of the TSD (18) proposes single residential housing, but the plan envisions multilevel rental housing at the 103rd Street station area (24-25). What the CTA TSD team heard from residents at the PAC (Project Advisory Council) was virtually unanimous opposition to multilevel housing options at the 103rd Street station. However, the TSD envisions the very multilevel housing that residents objected to.

Assess TSD plan goals. What does “establish anti-displacement strategies” (20) mean? Evaluate status of Invest South/West in Greater Roseland. According to the TSD plan, Invest South/West funding is concentrated at the Michigan Avenue RLE TSD. [See Voorhees/DCP studies on TOD in GR (2005) and Transit Equity Matters (2009) to compare to CTA RLE TSD.]

- TSD plan (24) renders multilevel housing at 103rd Street, whereas “Housing Density & Scale” (17) reported resident feedback expressed firm interest in “lower scale more aggregate to adjacent residential neighborhoods” (17). This represents a major contradiction in the RLE TSD and probable conflict with GR residential stakeholders in the 103rd Street station area.
- The land-use description for the 103rd Street TSD is deceptive by including “commercially-zoned parcels along the major corridors of 103rd Street, Halsted Street, and State Street” (24), when the area around the 103rd Street station is specifically single residential housing, not commercial. The TSD also inserts a statement about “increasing the housing inventory” (24), which signals transforming the housing character of the neighborhood that residents clearly insisted on maintaining. Also, the inset rendering of “Potential” (25) transformation at the 103rd Street station area features the very multilevel housing development residents’ feedback protested. **Furthermore, the Final Environmental Impact Statement plans for a 175-car surface parking lot at the 103rd Street station area. (See the Final Environmental Impact Statement, 2-10.**

http://www.transitchicago.com/assets/1/6/CTA_RLE_FEIS_20220805_CombinedFinalEIS-ROD_1of1.pdf)

111th Street Station

Roseland Community Hospital (RCH) and the Roseland Medical District (RMD) form an anchor institution that rationalizes the housing development, especially the multilevel housing development plan of the TSD in the 111th Street station area, whereas the very opposite neighborhood character exists at 103rd Street. The RLE TSD purports to operate on “balanced development” assumptions. Proposing similar, if not identical development plans, for each of four very different RLE station areas is at sharp variance with “balanced development.” Despite the RLE TSD plan branding each of the four RLE station areas with different development characteristics, the actual plan imposes the same template on each of the very distinct station areas. **Furthermore, the Final Environmental Impact Statement plans for a 225-car surface parking lot at the 111th Street station area. (See the Final Environmental Impact Statement, 2-10. http://www.transitchicago.com/assets/1/6/CTA_RLE_FEIS_20220805_CombinedFinalEIS-ROD_1of1.pdf)**

Michigan Avenue Station

Assess “Roseland Michigan TIF” not mentioned in the RLE TSD. (See *Crain’s Business* 2/22/2023 article on Rev. James Meeks *proposed affordable housing residential homes project (118th Street and Indiana Avenue area) designated to be built in walking distance of the Michigan Avenue CTA Red Line Extension Project Station.* [https://www.chicagobusiness.com/residential-real-estate/james-meeks-vacant-lots-affordable-homes-roseland.](https://www.chicagobusiness.com/residential-real-estate/james-meeks-vacant-lots-affordable-homes-roseland))

Housing Units (+ Commercial) Infill)			
103 rd	800	Michigan	2100
111 th	880	130 th	55 (Retail infill 22,000 sq. ft.; \$37M dev. Investment)

130th Street Station

RLE TSD proposes the RLE will provide transit access **to** retail, services, and jobs but **not** investment **in** those services **at** the 130th Street/Altgeld Gardens station area.

Assess “Key Strategies” (31); they make no sense. The 130th Street TSD is the only area in the plan that has “Opportunity Areas” (2); whatever that means (31).

TSD plan mentions “Asset Development” (14) in the beginning, but there is nothing about it in the rest of the plan, indicating a plan constructed on buzzwords and rhetoric about equity, community asset development, and engagement.

Assess “Action Plan Matrix” in the TSD appendix, especially “development without displacement” (32).

[What our RLE/TSD Assessment is *not* doing: 1) taking cheap shots or making criticisms for the sake of criticism, but instead constructively pointing out internal inconsistencies in the TSD plan and illuminating the need for critical oversight, e.g., the TSD plan for 130th Street/Altgeld Gardens. (BTW: Are there any other CTA station stops at a CHA public housing project in the system? Such a unique transit stop would seem to require special TSD planning inputs.)]

Assess potential and expected rent increases (residential and commercial) due to the RLE TSD as a result of the low level of residential rental housing in GR. Commercial rents will rise, driving existing businesses out of business. What mitigation does the RLE TSD envision for commercial rent increases for small businesses?

Assessment: Need urban rents analysis.

- RLE TSD has nothing on asset development, nor recognition of Gwendolyn Brooks College Prep (111th Street) as an “anchor institution.”

RLE TSD lists “Recent, Current & Relevant Plans, Studies & Reports” (38), but does not include:

- Two Voorhees Center/DCP studies (2005; 2009).
- MPC/DCP/CNT/CMAP visioning study (2010).
- CMAP/DCP livability study (2012).

(See the CTA Draft Environmental Impact Statement, 2016 (4-3), which lists these studies.)

The *We Will Chicago* comprehensive plan does not mention the RLE (38) although it had ample opportunity to do so.

The underlying assumptions and subtext of the RLE TSD “Market Analysis” (40) is: 1) stem the “shrinking city” effects of Chicago’s persistent racial marginalization of Black communities and residents; 2) increase the population (and local political power) in the largest affordable housing area in the Chicago metro area (i.e., where habitual disinvestment has reduced property values to such all-time lows that developers can appropriate landed property at wholesale prices with financial support from city, county, state and federal subsidies afforded by the RLE TSD). [NB: Only 11 percent of the GR population works in the RLE TSD market area.]

Housing Market

Vacancies did not contribute to “a cycle of disinvestment and safety concerns in the project area” (42); it is the cycle of disinvestment that contributed to vacancies and safety concerns in the project area.

The explanatory description of “the problem” and “the solution” appears quite different when we do not begin from the current *effects* of the presumed problem base, but instead from the sociohistorical forces that *caused* the problem.

The TSD contains no urban sociological analysis of the social forces that marginalized GR and its residents historically. Thus, the transit-supportive development guidelines needed to rebuild the community capacity to remediate the conditions that continue to disadvantage residents are insufficient.

Assess Habitat for Humanity Chicago’s Affordable Homeownership Program and other down payment assistance programs (42), as well as the projected support from the Cook County Land Bank (42), with respect to

- 1000 vacant parcels in the project area. Thus, an assessment must consider
- 31 percent of housing in the GR project area was built *prior* to 1940,
- 55 percent between 1940 and 1969,

- 61 percent are single family detached + 12 percent single family attached = 73 percent single family homes.
- There is an estimated 61,300 housing units.
- 16 percent vacancy rate (43).

Assess the RLE TSD claim that Invest South/West will target the Michigan Avenue station area.

Industrial Market

Assess the “competitive edge of the ghetto” assumptions in the RLE TSD “Industrial Market” claims. Historically, the RLE TSD narrative, “Demand for logistics and distribution on the Far South Side remains, as recent developments have proven the area to be a viable market for business and investment” (46), has never meant employment opportunities for residents. On the contrary, industrial and manufacturing development in or near Black communities has had little or no impact on employment opportunities for residents.³

Urban Design: Land Use & Zoning

103rd & 111th Street – single family + commercial; little mixed-use

Michigan Avenue – commercial, multifamily; more urban mixed-use

130th Street – multifamily (CHA) + single family (Altgeld Gardens is misrepresented as having no urban mixed-use, although the RLE TSD states, “has many services, educational and recreation land uses” (48).

What the RLE TSD accurately asserts (48) is particularly true of the 130th/Altgeld Gardens RLE station area:

Zoning in the RLE project area reflects the low density, auto-oriented type of development that occurs when residents and businesses are physically isolated, with limited opportunities to walk to daily destinations, and do not have access to frequent high-capacity transit. As a result, the current zoning within the station areas is often inconsistent with current development trends and the future vision for Far South Side communities. The TSD Plan identifies potential modifications to existing zoning that would be beneficial to support the desired transit-supportive development.

Nonetheless, the description of zoning (48) misrepresents the transportation conditions in the area. You would have no idea that the RLE TSD project area is a “transportation desert,” one which the structural racism of Chicago’s planning history intentionally designed and with which the RLE represents a long overdue reckoning. (See figure 2-18 for data graph (48) and figure 2-19 for land use map (49) of RLE Greater Roseland urban design.)

Station Area Development: Catalyst Sites

³ See Lou Turner, “The Impact of the Temporary Work Economy on African Americans: The Role of the ILBC as a Policy Leader in Protecting Workers’ Rights in Illinois’ New Economy,” paper presented at Illinois Legislative Black Caucus Annual Retreat, March 23, 2016, Chicago, Illinois (available from author).

The RLE TSD designation of “Catalyst Sites” is problematic in some cases, e.g., the 103rd Street station area (52), given the negative resident feedback against such “Catalyst Sites” of multilevel construction (3-5 stories) in the station area. The TSD rendering of proposed development around the 103rd Street station is at odds with its claim of fostering development that is “carefully integrated into the existing context” (52). Comparison of the RLE TSD map of 103rd Street and 111th Street shows greater use of “Catalyst Sites” in the latter than the former, consistent with their distinct neighborhood character. However, the pushback by 103rd Street area residents against the type of “Catalyst Sites” presented in the RLE TSD represents a major problematic in the proposed RLE TSD (54).

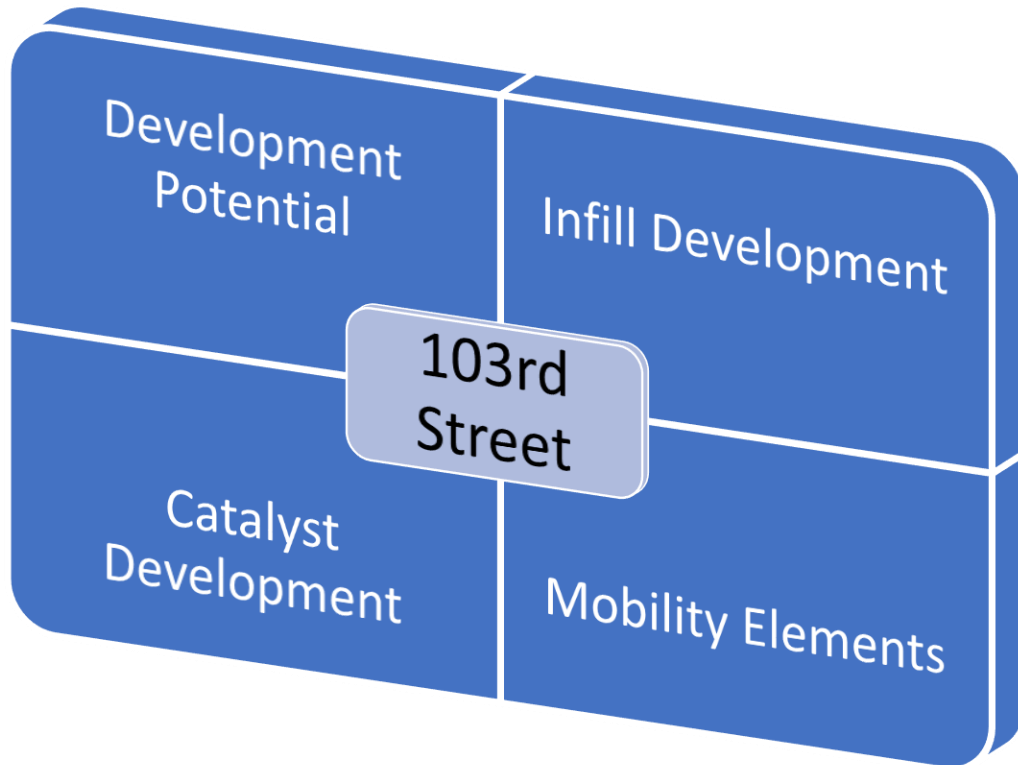
Development Strategy Framework

The RLE TSD identifies several development strategies based on a somewhat superficial analysis of the urban design and neighborhood characteristics of Greater Roseland (56-57). These are 1) rehab potential; 2) catalyst sites; and 3) opportunity areas. (For residents’ vision of land use around the four RLE station areas, see “What Will Your Station Look Like” A Summary Report of the Developing Communities Project Community Visioning Session for the Proposed Red Line Extension,” 2010; pp. 7-14.) In the Developing Communities Project 2010 visioning session, residents envisioned a “local activity center” in the 103rd Street station area, not the urban design rendered in the RLE TSD, despite branding it an “Active Community Hub” (58-59).

103rd Street Station Area

Assess risks and benefits of “mixed community hub” at 103rd Street station area. Given the conflicting feedback on the 103rd Street station area, an assessment by an outside organization is required to reconcile feedback with the RLE TSD plan. Need to assess multilevel “catalyst” development on both sides of the 103rd Street station. [*Note: The RLE TSD plan does not consider the daily 26 UPRR freight rail traffic passing through the area.*] Need to assess pedestrian environment and walkability around the 103rd Street station vis-à-vis heavy freight rail traffic. Assess bike, Divvy, and e-scooter access vis-à-vis crime and public safety in the 103rd Street station area. (See Chicago Police Department CLEARMap GIS data.) Assess other residential mobility issues at 103rd Street station.

Assess intersectional assessment of Development Potential; Infill Development; Catalyst Development; Mobility Elements.



Assess setbacks for infill development vis-à-vis available land area.

Assess 103rd Street Catalyst Site and proposed four-story mixed-use development with 32 residential units (rent assessment).

Assess CPD CLEARMap GIS crime data around all the RLE station areas.

Assess 2 station houses at 103rd Street: no parking structure; instead, surface parking lots. Assess scale of surface parking and climate effects of extensive asphalt surfaces (70).

111th Street Station Area

Figure 3-21 for the 111th Street TSD does not show Gwendolyn Brooks College Prep, a major anchor institution in the 111th Street station area; RLE will provide transit-dependent students with a convenient transportation option.

111th Street station area is more supportive of multilevel development.

Assess health and wellness capacity of Roseland Community Hospital (RCH) and the Roseland Medical District (RMD) at 111th Street and TCA Health at 130th Street. COVID-19 exposed healthcare delivery inequities at 111th Street, including “pharmacy desert.”

Assess CCLBA (Cook County Land Bank Association) on its procedures (and theory of change) as it is a major player in the RLE TSD plan.

Assess ADA accommodation in the 111th Street area (assess ADA accommodations around all RLE station areas). There is only one mention of ADA accommodations in the RLE TSD (82). [See Voorhees/DCP TOD 2005 study for demographics on the high number of residents with disabilities in GR.]

It is puzzling why the TSD plan for the 111th Street station area does not mention Gwendolyn Brooks College Prep, a major anchor institution in the area. Oddly, there is mention of a bike bridge over Lake Calumet in the TSD plan for the 111th Street station area: “there are also plans to create a multi-use trail over Lake Calumet near the Port District” (82).

Assess bike access, mobility, and infrastructure vis-à-vis public safety for Gwendolyn Brooks College Prep students and other transit-dependent students in the area.

Assess scale of commercial development envisioned at 111th Street (84) vis-à-vis scale of commercial development envisioned at 115th & Michigan Ave.

Michigan Avenue

The Michigan Avenue “Station Area History” (89) is deceptive: “The collapse of the Far South Side’s industrial economy and the influx of auto-oriented shopping centers contributed to the rapid decline of the commercial district and surrounding neighborhoods through the 1970s and 1980s” (89). The TSD statement ignores the fact that 25 percent of the households do not have access to automobiles; again, erroneously positing the *effects* of Chicago’s urban structural racism as its *cause*.

Assess the role of East Lake Management as the newly named property manager for the RLE.

A *Reader* analysis of Cook County eviction court data from 2007 through 2018—which includes 250,000 cases filed against Chicago tenants—shows that since its founding Pangea has taken as many people to court as the next four landlords combined. The company owns and operates 7,500 units in Chicago. In 2018 it filed 1,137 eviction cases. The second most prolific evictor last year, with 247 cases, was East Lake Management, a property management company with 6,000 units in neighborhoods similar to Pangea’s. (Full disclosure: In October 2018, the *Reader* was purchased by a new investment group headed by Elzie Higginbottom, the founder of East Lake, and two of East Lake’s executives are involved with the company’s board. This investigation predates these relationships.) (*Chicago Reader*, May 16, 2019)

Assess connectivity between the Michigan Avenue station and the Kensington/115th Street Metra station.

Assess the Michigan Avenue TSD projects, which will foster the largest scaling up of housing and commercial development in the RLE TSD plan; and in turn runs the greatest risk of gentrification or becoming the prime generator of gentrification in the combined 103rd, 111th and 115th & Michigan Avenue RLE station areas. The anticipated scale of development at the Michigan Avenue TSD alone will drive unprecedented increases in property values throughout the RLE project area. Along with the RLE project being an historic CTA infrastructure project (\$3.4 billion), the scale of the RLE TSD is likewise historic for African American community economic development in Chicago. (See Michigan Avenue TSD “Infill Development” (94).)

Assess Michigan Avenue station area as a multimodal site given that it is branded as a “Commercial & Transit Hub” (96). Assess Michigan Avenue station as a multimodal hub for rerouting bus routes feeding

into the station. Assess problems of pedestrian access and mobility for such a large station with CTA and Pace bus bays.

Assess a campaign to get Gwendolyn Brooks students to use multimodal (train, bus, bike) mobility rather than cars. Assess public safety measures, if any proposed. Assess placemaking at Michigan Avenue station area. Michigan Avenue Catalyst #1, Concept #1 envisions a 7-story building. (See RLE projects from Janet Smith's UIC plan-making class.)

Assess landscape architecture of Michigan Avenue station area TSD plan. Instead of being pedestrian inviting, it is a high-walled fortress in appearance. While the vacant space is extensive in scale, it is adjacent to single-family housing neighborhoods to the south. The Michigan Avenue TSD would create a physical barrier sharply demarcating the Michigan Avenue station from immediate residential areas, an urban design that is pre-World War II, e.g., see urban design of Detroit's Grosse Pointe on Jefferson Avenue immediately adjacent to a large multilevel industrial plant (Uniroyal) and surrounding "ghetto."

Michigan Avenue Catalyst #1, Concept #2 TSD establishes a "street wall" (98). It is likely that large commercial storage facilities will occupy this catalyst space with no aesthetic appeal. Logistics facilities or distribution centers are also likely candidates for the TSD structures envisioned in Concepts 1 & 2. TSD rhetoric about "generous pedestrian promenades" is misleading (98). All Michigan Avenue catalyst sites dramatically change the blended residential character of the area.

Assess what investment and development on the scale envisioned by the Michigan Avenue TSD looks like in historically divested areas.

Assess the RLE TSD RFQ (Request for Qualifications). Request a copy of the RFQ from the CTA.

"From Planning to Implementation" embeds the DPD (Dept. of Planning & Development) "Invest South/West" program in the Michigan Avenue TSD (100).

Assess Review Committee to review RFQ for Michigan Avenue TSD plan:

A review committee comprised of community, DPD, and City representatives will evaluate proposals based on their potential to realize the community's vision, capacity to build community wealth, design excellence, and financial feasibility. Thereafter DPD will choose a developer to implement their proposal for the selected Michigan Avenue site(s) with City financial support and collaboration with CTA. (100)

Request position on review committee.

Assess Invest South/West consulting partners, e.g., SB Friedman, which wrote the Roseland-Michigan TIF plan for Greater Roseland.

130th Street/Altgeld Gardens

The "Station Area History" for the 130th Street station area ignores history of segregation by stating Altgeld Gardens was constructed for "affordable workforce housing and returning veterans" (104), conveniently leaving racial segregation out of the history, i.e., AG was built for Black working-class families whose members worked in the World War II and Korean War industries, as well as for returning GIs from the wars.

Assess AG’s state historic preservation status. Assess the AG “Memorial Wall” and the threat of its destruction. (See Linda Paula, WBEZ, “Altgeld Garden’s Memorial Wall’s place in Chicago’s history is clear, its future less so,” Chicago Sun-Times, January 31, 2022.

<https://chicago.suntimes.com/politics/2023/1/31/23577106/altgeld-gardens-memorial-wall-public-housing>.) Assess historic preservation plan to receive federal and state historic tax credits:

With a National Register Historic District designation, Altgeld Gardens and Philip Murray Homes are in a good position to receive federal and state historic tax credits that could help fund ongoing rehab and restoration work at the development. (105)

Assess 130th Street station area ecological and green development potential (106).

Given the scope of the TSD “Open Space” description of the 130th Street station area wetlands habitat, it is puzzling why there is no mention of the Ford Calumet Environmental Center originally proposed for the Hegewisch Marsh:

Hegewisch Marsh and Ford Calumet Environmental Center

The Chicago Department of Environment (DOE) and the State of Illinois partnered to develop a new Ford Calumet Environmental Center (FCEC) near 130th Street and Torrence Avenue. The center will be a regional hub for research, programming and stewardship. The proposed building will have many functions, including but not limited to being an educational resource on the industrial, cultural and ecological heritage of the area and serving as an operational base for research activities, environmental remediation and ecological rehabilitation, as well as a base for volunteer stewardship throughout the area. Prior City of Chicago studies stated that the center could generate over 100,000 visitors per year.

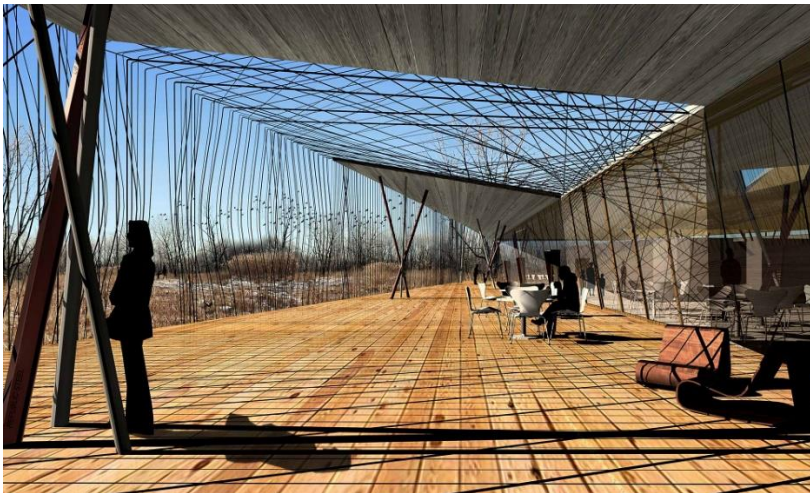


Figure 2.9. Ford Calumet Environmental Center. Copyright by Studio Gang Architects

The center site is zoned PD and located within the Hegewisch Marsh (zoned POS), which is bounded to the north by 130th Street and the Ford Motor Company manufacturing plant, to the east by Torrence Avenue and Ford’s parking lot, to the south by 134th Street, and to the west by the Calumet River and WM CID landfill, which is located west of the river (see Figure 1.4). The 130.1-acre site includes three main parcels: (1) a 100.3-acre parcel owned by the City of

Chicago, (2) a 17.8-acre parcel owned by Norfolk Southern Railroad, and (3) a 10.2-acre parcel owned by the MWRD. The U.S. Army Corps of Engineers (USACE) also owns 1.8 acres along the southern edge of the site and has an access road leading to the Thomas S. O'Brien Lock and Dam on the Calumet River. The center entrance is proposed to be just north of 134th Street on the west side of Torrence Avenue.

In 2006, the Chicago Department of Environment (CDOE) prepared a comprehensive site plan for the ecological rehabilitation and management of the Hegewisch Marsh. The plan serves as the basis for preparing final design plans and specifications for site rehabilitation and management of the site. Presently, the project is still in the final design and funding stages. (See "130th Street Station Market/Access Study. Final Report." Prepared by the City of Chicago Department of Transportation, December 2010.)

Assess 130th Street station area TSD proposal:

...in 2023 the City of Chicago granted the Black-owned grocery store group Yellow Banana \$4.9 million in Community Development Grant funds to bring a full-service grocery store to the far south neighborhood. Yellow Banana will construct a new, 10,000 square foot grocery store on City-owned property at 130th Street and Eberhart Avenue. (107)

Also assess By the Hand urban farming project (107).

Assess zoning at 130th Street station area. Assess The Hatchery as a model for 130th Street.

Assess the TSD's "uses" (i.e., community-services uses) versus invest in existing services, e.g., TCA Health, daycares, etc. Assess what added inputs could be made. (For assessment of TOD potential at 130th Street, see Voorhees/DCP, "Transit-Equity Matters" study, 2009.) Assess "satellite university center...job training" plan (108). Assess Beaubien Woods recreational development plan. Assess pedestrian mobility issues in development areas adjacent to the 130th Street station. See CDOT Market/Access Study regarding pedestrian risk assessment.

Assess housing investment options for Golden Gate and Eden Green:

Up to 55 infill housing units can be added west of the station area in Golden Gate & Eden Green. (110).

Assess 20,000 sq. ft. retail envisioned by TSD for 130th Street station area (110), plus 55 infill housing units in Golden Gate and Eden Green (112).

[RLE TSD uses "Development Potential" (110) from Voorhees/DCP "Transit-Equity Matters" study, i.e., "TOD Potential," but does not credit the latter study.]

Assess "Mobility Elements (112), which are key pedestrian factors for Altgeld Gardens residents vis-à-vis TSD mobility elements for non-AG transit riders who will use park-and-ride option at the 130th Street station area. Assess pedestrian mobility from different sites in AG, Golden Gate and Eden Green to 130th Street station given the distance of most residents from the 130th Street station.

[Fix caption (112): "Figure 3-71" should be "Figure 3-73."]

Assess Catalyst Site/Opportunity Areas (1 & 2) at 130th Street station area. This is a major problem area of the TSD, i.e., a total of 12-13 unplanned land areas. Assess “Strategic Zoning” for 130th Street station area (116).

Assess 103rd Street station area rezoning (118).

Reckoning with Chicago’s Racial Past to Leverage Greater Roseland’s Sustainable Future

Assessment: RLE TSD articulates the planning rationale to justify the substantial historic investment in the RLE transportation infrastructure project. This rationale suffers from the problem of misplaced concreteness, however. The primacy of the RLE as Chicago’s major transportation infrastructure project should instead have as its rationale to reckon with the historical forces of structural racism of Chicago’s urban design and disinvestment in Chicago’s Black communities on the Far South Side, which created the “transportation desert” the RLE aims to rectify. The related secondary rationale is to “leverage the substantial RLE investment to stimulate further public and private sector investment in the project area” (122). There is no leveraging of investment for the RLE TSD without historic reckoning with the structural racism of Chicago’s planning history that created the need for “substantial RLE investment.”

Patterns & Practices

While there is no discernible narrative in the RLE TSD, the most compelling candidate is, the “RLE TSD Plan identifies ways to leverage the substantial RLE investment to stimulate further public and private sector investment in the project area” (122).

Assess TSD’s aim of “growth without displacement” (122). So-called “growth without displacement” cannot be achieved without a diagnosis of the history of the existing conditions and outcomes of social stagnation produced by Chicago’s “redevelopment machine”⁴ and the role that transportation planning played in the production of those conditions and outcomes. [NB: Preliminary assessment of these urban sociological conditions and issues, which are utterly absent from the RLE TSD, evinces the need for funding to engage in in-depth analysis and assessment of the actual conditions of existence in Greater Roseland that the RLE TSD proposes to change.]

Assess “Strategy & Action Plan Matrix” (146-169), which identifies 1) financial resources, support programs, timelines, potential partnerships (122). Also see the “Resources” section of the Appendix for “Tools” (170-175).

Assess Section 4 “Implementation & Economic Development” (122). Section 4 must be assessed because it scopes the CTA/DPD rationalization for the RLE TSD. While there may be general agreement with the need, purpose and objectives of a RLE TSD plan, the underlying assumptions, rationale and implications of the current draft RLE TSD is another question all together, given the damning reputation of Chicago’s planning history in African American communities, for which Greater Roseland is “ground zero.”

Section 4 employs “scenario planning” to change the “point of view” (POV) and mindsets about the external factors and causes responsible for the socioeconomic conditions of Greater Roseland prior to formulation and implementation of specific policies and strategies. The result privileges plausible

⁴ See David Wilson, *Chicago’s Redevelopment Machine and Blues Clubs*, 2018.

storylines and narratives dependent on causal relationships between factors that can be demonstrated or that appear self-evident. Such scenarios, however, conceal hidden causes that are less self-evident, or no longer historically evident, despite their continued impacts and effects. “Section 4” is a case of dynamic scenario planning. In other words, there is no predictive certainty to be derived from the arbitrary themes and forecasting scenarios presented in Section 4. Hence, TSD Section 4 constructs a plausible scenario for the RLE TSD transit-supportive development impacts on Greater Roseland.

Because RLE TSD predictors of positive community economic development impacts draw from the social context of Greater Roseland, which the TSD contends it predicts positive impacts and influences of societal change, the RLE TSD benignly neglects possible (probable) negative unintended consequences of RLE TSD plan scenarios, e.g., increasing business starts ups with new construction will undoubtedly increase commercial rents of existing businesses that have marginally survived the decimation of the surrounding commercial environment. The ahistoricism of the TSD plan, indicative of Chicago DPD’s drive to develop Greater Roseland out of its underserved marginalization, is fraught with a range of risky unintended redevelopment consequences for which Chicago planning is infamous. Ignoring the antecedent social forces that contributed to Greater Roseland’s underdevelopment, while planning its so-called “sustainable future,” not only requires so-called “balanced development” but a historical reckoning with the structural racism of Chicago’s planning past.

Planning Greater Roseland’s “sustainable future” must be *balanced* with a reckoning with its politically and racially driven urban past. Community development must be balanced by reckoning with the antecedent causes Greater Roseland’s underdevelopment and marginalization.

Counterfactual

A counterfactual exercise is illustrative of the need for historical “balance” in the RLE TSD. Consider the “No Build” option in the Alternatives Analysis planning phase of the RLE. The 2005 Voorhees/DCP transit-oriented development (TOD) report for Greater Roseland (the equivalent of the CTA’s TSD plan) found that Greater Roseland’s annual consumer revenues amounted to over \$1 billion but that due to its lack of commercial development, Greater Roseland had a yearly “consumer leakage” of \$824 million spent outside of Greater Roseland. Now, consider that the recently passed RLE Transit TIF (December 2022) is expected to generate \$950 million in TIF revenues for the RLE. (The CTA calculates this as part of the local match to leverage \$2 billion in federal funding.) Under the “No Build” option, i.e., the CTA and the City of Chicago opts not to build the RLE (as some transit advocates and politicians propose), the lack of commercial development that would otherwise have been generated with the construction of the RLE (and that the TSD anticipates) means that over the next 35 years Greater Roseland’s continued consumer revenue leakage would amount to a staggering \$29.6 billion! This counterfactual scenario is by no means imaginary but the actual historical past, present, and future of Greater Roseland. And any scenario for Great Roseland’s “sustainable future” cannot be rationally planned without engaging and reckoning with the history of the underlying social forces that threaten to make this counterfactual the overriding reality of Greater Roseland’s so-called “sustainable future.” In short, what this counterfactual illustrates is that Greater Roseland residents *live* their fraught past as well as their future in their deeply inequitable present every day.

In addition, the RLE TSD does not present to Chicago city government nor to the Chicago metro public the human rights stakes of the Greater Roseland Red Line Extension Project, stakes that are as serious as it gets when it comes to reckoning with the urban racial apartheid of Chicago redevelopment past.⁵

[Correct next to last sentence on p. 122 of the RLE TSD.]

Population Stabilization; Project Financing; Development Without Displacement

The section “Development without Displacement” is the only brief mention of “Segregation and disinvestment, limited access to capital and lack of adequate funding” (124); however, there is no explanation or accounting of the history by which these conditions came about.

Assess nature of “Intentional and ongoing partnerships between developers, business associations, community groups, block clubs, and residents” (124).

Assess 1) controls put in place to ensure access to affordable homeownership and affordable rents for residents and businesses (124). 2) “support measures...for existing residents/businesses to abate or offset elevated taxation related to property value increases” (125).

Assess Greater Roseland residents’ fears of displacement. [GR residents’ fears of displacement were fully evident during a Plan Commission hearing on the Roseland-Michigan TIF in the early 2000s.]

Assess NOAH (naturally occurring affordable housing):

(NOAH) happens when the existing market-rate housing in a neighborhood is affordable to households earning less than 60% of Area Median Income (AMI). Since the rents and pricing of these units are not legally restricted, over time they are at risk of losing affordability as markets evolve following major investments like the RLE. The large NOAH stock in the RLE project area is at risk for being lost if rents rise as the market demand increases. (126)

Assess trade-offs associated with high transaction costs now with high housing costs later with the RLE, and how the TSD rationalizes these trade-offs.

Assess bank lending policies in the GR area, their history, and legal liabilities from cases of banking discrimination in Black communities.⁶

Assess housing and food cooperatives as alternative community development models. The history of Altgeld Gardens illustrates the use of cooperatives as models of sustainable development in AG’s first couple decades. [“Gentrification” finally mentioned on p. 126.] Assess LOHE and other anti-gentrification programs in the RLE TSD (127).

The most powerful potential exemption vehicle combatting displacement in the RLE project area is the Long-time Occupant Homestead Exemption (LOHE), which limits the growth in equalized assessed value according to household income. (127)

⁵ See African American Leadership & Policy Institute “theory of change,” [Theory of Change | theaalpi.org](http://theaalpi.org).

⁶ For an example of what a sociohistorical analysis of planning policies of underserved communities of color could look like, see *A People’s Atlas of Detroit*. Detroit: Wayne State University Press, 2020.

Assess need for senior housing (128). [See Voorhees/DCP 2005 TOD Greater Roseland report for senior citizen demographic data.]⁷

Assess affordable housing funding resources and procedures (128). Assess Roseland Rising plan by CNI (Chicago Neighborhood Initiatives) and Hope Center Foundation (129).

Assess tax, rent, and utility bill caps. [See Pulaski & Green Line TOD by Bethel New Life.]

Assess SSA (special service areas) proposal (130), BID (business improvement districts) (130), i.e., assess the spectrum of housing and business improvement districts and potential coordination problems. There is no analysis or assessment of housing and business underdevelopment, so proposed programs are not customized nor coordinated (130) to fit the needs of Greater Roseland.

Assess industrial and workforce development (131).

Assess waivers of permits and fees, which could expose Greater Roseland neighborhoods to unforeseen risks due to natural and man-made disasters.

Assess Invest South/West initiatives at 111th and Michigan station areas. Assess expansion of Enterprise Zones to TSD areas (132). Assess Opportunity Zone proposal in RLE TSD (133).

Assess Greater Roseland Chamber of Commerce and Far South CDC as matches for RLE TSD (133).

Assessment: RLE TSD does not include support for local contractors and workforce development opportunities for residents to work on construction of the RLE.

Assess proposal for Ford Calumet Environmental Center and Gateway Visitors Center in Hegewisch Marsh in the CDOT “130th Street Market/Access Study. Final Report” (2010), E-17-22; 29-30. TSD features the Big Marsh Ford Calumet Environmental Center (134). Investigate plans for original environmental center in Hegewisch Marsh.

Assess public safety issues in the RLE TSD project areas, which are major concerns for residents.

Assess TSD’s lack of any mention of the many service programs and agencies in Greater Roseland connected to its vast church network, i.e., community assets. Assess TSD lack of any mention of GR’s network of churches as GR’s primary social service provider and community asset for some of Chicago’s poorest community areas (140).

Assess placemaking (“Branding & Identity”) at each of the RLE station areas (134).

Assess workforce training (136) and the status of RLE PAC (Project Advisory Council) workforce development subcommittee. Given that the CTA has contracted consultants to focus on workforce development, it is unfathomable why there is no mention in the workforce training section of the RLE TSD that reflects the two years of that work.

The goal is to create and maintain a viable workforce supportive of current and future commercial business, healthcare services and industrial production in the RLE project area. In order to attract investment and existing business growth, it is recommended that workforce

⁷ See “741 Workforce Collaborative Worksheet,” available from author. Also, see DURP grad student report on LIHTC.

training programs, like TIFWorks and Neighborhood Business Development Centers, be maintained and funded for expansion to ensure skills training matches current market trends and employer demand. (136)

Assess equitable economic development (137). See Voorhees/DCP 2005 TOD study for assessment of GR small businesses, especially GR's numerous daycare centers.

Assess CRA (community reinvestment act) and GR banks (137). [NB: Elevated Chicago is mentioned as recommended by the CTA RLE TSD to receive continued city, county and state resources (137). This no doubt explains why the RLE was never seriously considered by Elevated Chicago. It also explains the CTA's adoption of Elevated Chicago's "ETOD" concept as the official CTA planning assumption, which originated with the Voorhees/DCP 2009 "Transit-Equity Matters" report.]

Assess CWB (community wealth building), i.e., cooperative business and housing development (138). [See history of Altgeld Gardens cooperative "garden city" model as potential RLE TSD model.] Assess CIV (community investment vehicles) (138). Assess use of CTA/DPD ETOD program in its CIV (community investment vehicles) program (138).

Assess CCT (Chicago Community Trust) Catalyzing Neighborhood Investment program (139) for possible grant submission to do assessment of RLE TSD. Assess Polk Bros. provider of workforce development, housing, community economic development and safe communities funding (139). See Chicago Workforce Funder Alliance (139).

Assess GR residents' access to wellness goals (140) vis-à-vis business development where healthy nutritional foods and mental health options were absent. [See UP 479 Community Engagement in Planning course project on urban gardening at 130th & Altgeld Gardens.] Why does the RLE TSD *not* include the Chicago High School for Agricultural Sciences (Ag School) at 3857 111th Street?

Assess why does the TSD not address GR's "pharmacy deserts" as a TSD wellness infrastructure issue. [See 2005 Voorhees/DCP TOD study for demographics on GR's aging seniors' population (140).]

The TSD states "The community within the RLE study area has been engaged in the planning process since its inception" (141). However, it does not mention Developing Communities Project (DCP) as the CBO (community-based organization) singularly responsible for the GR community's engagement in the planning process since its inception.

Assess the prospects of the GR community's "continued level of engagement...during the implementation phases for public and private projects" (141). [NB: This represents potential for our collaborative's assessment intervention as a value added to the TSD.]

Assess TSD proposal to create an "implementation task force, or community advisory committee to audit development projects over time" (141). What is the difference between the "review committee" (100) and the "implementation task force" (141)?

Assess TSD strategic partnerships with local organizations like Far South CDC and GR Chamber of Commerce (141).

Assess 10 Economic Development Goals + Recommendations (144). Given the already long planning process for the RLE, what assurances do GR residents have that the timeline of the implementation of

the TSD is in anyway valid or likely (144), i.e., the “Strategy & Action Plan Matrix” of 1-5, 5-10, and 10+ years timeline? Currently, we are in year-20 (!) of the Red Line Extension Project, which, according to the CTA, is not due to start construction until 2025 (sic) and completed in 2029 (sic). Greater Roseland residents can have little or no confidence in the TSD Matrix timeline.

There are no educational institutions, nor college programs named in the Matrix or Resources sections, e.g., Olive-Harvey Community College, Chicago State University, Chicago Ag School, Gwendolyn Brooks College Prep, G.W. Carver Military Academy as either “Example of Resources” or “Potential Partners” (144-175).

Assess Chicago SSA districts for RLE station areas (171).