



Request for Letters of Interest: Gathering Community Input on Equity- and Affordability-Focused Zoning in Evanston, Illinois

Prepared by Connections for the Homeless

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Table of Contents

Project Summary	1
Project Objectives	2
Outline of the Project Process	3
Role of Community Organizations	4
Grant Awards	5
Timeline	5
Format of Letter of Interest	5
Letter of Interest Assessment Criteria	6
Appendix A: Equity Zoning Diagnostic – Initial Observations, prepared by ZoneCo LLC	7

Connections for the Homeless (“Connections”) is seeking letters of interest for this project from organizations in Evanston, Illinois, that:

- Have a focus on racial equity;
- Are Black- or Latino/Hispanic-led;
- And/or are well connected with Black or Latino residents in Evanston

Connections has received funding from the Chicago Community Trust for this project which we will use to compensate participating organizations as described below.

Project Summary

This project is an exploration of zoning in Evanston from a perspective of racial equity and housing affordability. The project has three phases:

1. Diagnostic Review of the Zoning Code (Complete)

Connections engaged ZoneCo LLC to identify portions of the zoning code that could potentially be contributing to racial inequities and high housing costs.

2. Community Input (This Project)

Connections will engage local BIPOC-led and/or racial-equity-focused community groups to gather input from community members around the values and trade-offs involved in zoning decisions.

3. Analysis & Conclusions (This Project)

Participating groups will analyze input and recommend changes that promote equity and affordability. The end result will be provided as a tool to the City staff and elected officials.

The letter of intent requested in this document is for Phases 2 and 3.

Joining Forces for Affordable Housing (“Joining Forces”), the advocacy program of Connections for the Homeless, commissioned a diagnostic review of the City of Evanston’s (the “City’s”) zoning code from ZoneCo, LLC (“ZoneCo”). The intent of the review was to identify zoning provisions that create and perpetuate racial and other inequities and contribute to the high costs of housing. ZoneCo identified several problematic themes throughout the zoning code. ZoneCo recommends that the City and Joining Forces study the original intent of some regulations and their past and current real-world impact and consider whether and how related zoning code should be changed. **Appendix A provides a summary of ZoneCo’s initial findings.**

In Phase 2, the City and Joining Forces will engage community members in an evaluation of the findings presented in ZoneCo’s initial report. Specifically, the process will focus on evaluating the values and the trade-offs inherent in establishing zoning policy:

- What community values are the problematic zoning provisions reflecting?
- To which members of the community do those zoning provisions provide benefit and how?
- What detriment are the identified zoning provisions creating and which members of the community are affected?
- What would the impact be of changing the identified zoning provisions, and who would feel that impact and how?

Joining Forces and the City will work with the selected groups to analyze the ZoneCo findings and determine how to solicit and generate the most pertinent community feedback related to equity. Joining Forces will also engage an engagement consultant experienced in gathering community input on issues of community development, displacement, and racial equity to assist with the project design.

In Phase 3 of the project, the City, Joining Forces, and the organizations involved in Phase 2 will analyze results of the community input and develop conclusions and recommendations on the types of changes to make to the City's zoning code to increase racial equity and the amount of affordable housing available in the community.

The results of the community input process will be incorporated into a full report and will be used for the following purposes:

- Input into the City's Comprehensive Plan and Strategic Plan processes
- Input into an eventual overhaul of the City's zoning code
- Input into new guidance for the City to use as it deals with zoning issues in the meantime
- As a tool for Joining Forces to use in its work throughout north suburban Cook County

Project Objectives

Affordable housing, zoning, and racial equity have all received a lot of attention in the City in recent years. An increase in affordable housing is one of the City's goals; an affordable housing plan was started before the pandemic but not completed; zoning issues come before appointed committees and commissions almost weekly; and the City continues its efforts to incorporate equity in all processes and decisions. Public discussion has been extensive and heated among the limited number of residents and advocates who participate in it.

The objectives of Phases 2 and 3 of this project are to obtain substantive input from the community on the trade-off questions above and synthesize that input into recommendations by doing the following:

1. **Reaching More People:** The project seeks to reach a group of residents that is larger and more diverse than the group that has weighed in on housing and equity issues in the past and that reflects the range of experiences throughout the community. In particular, we wish to reach people who are among the nearly 50% of Evanston residents who struggle with housing cost burden (paying more than 30% of their incomes on housing), particularly those with lower incomes. This group of residents disproportionately includes people of color and people with disabilities and has not had substantive representation in such efforts in the past.
2. **Engaging More of the People Reached:** Engaging that diverse group of residents to participate in the input process by designing communications and input vehicles that will attract them and incite them to share their opinions.
3. **Gathering Substantive Input:** Working with community development consultants to frame the problem areas around zoning so that the participating residents understand the trade-offs in zoning decisions and can provide substantive feedback without having to go through a cumbersome learning curve.

4. **Synthesizing the Input:** Interpreting the feedback received and incorporating it in a final product that accurately reflects the community's input.
5. **Creating a Feedback Loop:** Contributing to a report and sharing it with participants in the input process so that they can see how their input was incorporated.
6. **Sustaining Transparency:** Communicating to the public throughout the process to achieve significant public awareness of the project and transparency regarding the project's purpose, processes, opportunities for engagement, and desired outcomes.

A successful proposal will describe how the applicant organization can contribute toward achievement of each of the above objectives by using the organization's knowledge of and networks within the community.

Outline of the Project Process

The steps involved in the process will evolve and will vary depending on how many and which community organizations participate. However, we believe that the following activities will be included. Community organizations will be involved in the planning, decision-making, and review of all steps and deliverables. Joining Forces, City of Evanston, and consulting staff will handle much of the implementation, particularly of technical and administrative functions. We have included time estimates for participation by community organizations below where they are possible to predict:

Phase 1: Diagnostic Review of the Zoning Code -- Completed already

Phase 2: Community Input

1. **Project Kick-Off**
 - Pre-work for each community organization (2 – 4 hours)
 - Initial kick-off meeting (2 hours)
 - Review of tasks and timelines (2 hours)
 - Selection of a community development consultant (community organizations will help with selection) (4 hours)
2. **Reaching More People**
 - Network mapping to identify who each community organization can reach out to (2 – 4 hours)
 - Selection and design of outreach methods (e.g., mailings, email blasts, canvassing, presentations at churches, etc.) (2 hours)
 - Recruitment of outreach workers (trusted messengers to invite people to participate) (8 – 16 hours)
 - Implementation of outreach plan (TBD depending on outreach methods selected)
3. **Engaging More People:**
 - Design of outreach materials (community organizations will work with a consultant) (4 hours)
 - Training of outreach workers (TBD depending on outreach methods)
 - Scheduling and tracking outreach activities and results (TBD)

4. Gathering Substantive Input:

- Review of ZoneCo analysis of zoning and analysis (8 hours)
- Design & review of an input process* (8 hours)
- Scheduling and rolling out of the input process(es) (TBD)

*Note: The consultant will lead the process of designing an input process that will:

- Provide a clear definition of each issue (e.g., preserving character of the community versus increasing affordability)
- Identify the trade-offs inherent in related zoning decisions
- Give participants the opportunity to provide input on who is impacted in different ways by each of the trade offs
- Give participants the opportunity to identify gaps in the issues we have identified and provide new information and ideas

Community organizations will provide input to the consultant, make suggestions to improve proposals for the input process, and ultimately select the input process(es) they feel will be most effective.

Phase 3: Analysis & Conclusions

1. Synthesizing the Input:

- Compilation of all input received (2 hours)
- Review of input to identify themes, areas of dissent, and other patterns (4 hours)
- Review of ZoneCo report in light of the input (2 hours)
- Definition of conclusions and recommendations to be drawn from the input (8 hours)

2. Communicating the Results

- Drafting & review of a final report
- Defining next steps
- Communication to relevant City committees, commissions, and council
- Communication to people who participated in the input

Role of Community Organizations

To ensure that community organizations have capacity to fully engage and use their knowledge of community experience to shape the project, we will ask each organization to do the following:

1. Participate in the planning process by:

- Reviewing materials, input, and reports, and sharing opinions and suggestions.
- Attending meetings to share ideas, evaluate options, and gain consensus.

2. Participate in the community outreach process by:

- Sharing information about their current networks so that the combined team can identify areas of overlap across the organizations, as well as gaps in community coverage and identify ways to fill those gaps.
- Using their existing infrastructure to communicate about the project with constituents.
- Doing additional outreach to constituents to increase engagement in the project, through new ways of communicating, one-on-one phone calls and conversations, and other methods devised by the combined group.

3. Participate in gathering community input, once community members are engaged, by:
 - Helping to run focus groups, surveys, interviews, etc.
 - Helping to measure responses to requests for input and doing more outreach if needed
4. Participate in analyzing community input once it has been gathered and in developing recommendations, by:
 - Reading compiled input and providing responses
 - Attending working sessions to identify trends and conflicts in the input, and to generate ideas for recommendations
 - Helping to devise a process for creating and communicating recommendations
5. Help to communicate the final results of the project by:
 - Using the organization's communications infrastructure to share the results and get feedback from the people who gave input

Grant Awards

We anticipate awarding 6 to 8 grants of \$5,000 each to community organizations using the grant Connections received from the Chicago Community Trust. We expect each of the community organizations to use at least some of the grant to pay constituents to “staff” this project by serving as liaisons between the community organization and community members and engaging community members to provide their feedback.

Organizations may also use the funding to cover their communications and infrastructure costs that support their relationships with their constituents.

Timeline

Request for Proposals Issued	March 22
Proposal Due Date	April 15
Grant Decisions	April 29
Project Kick-Off	May 9

As the project progresses, a timeline suited to the outreach and input methods developed will be created. The intention is to complete the outreach and input processes and have a final communications plan in place by the end of September 2022, if not sooner.

Format for Letter of Interest

Please submit a letter of interest that includes answers to the following questions:

1. What are your organization’s mission and goals?
2. How is your organization involved with and committed to action related to racial equity, social justice, and/or affordable housing?
3. How is your organization structured? For instance, is it a volunteer organization, a non-profit, an informal coalition or association, etc.? What is your leadership structure like?

4. How big is your organization? For example, how many members, employees, volunteers, and other stakeholders do you have?
5. Does your organization have a budget and, if so, how is it funded?
6. How do you communicate with your constituents?
7. Do you have email addresses, phone numbers, and/or mailing addresses for most of your constituents?
8. Do you have staff, leadership, and/or volunteer resources that could help with this project? Please describe.
9. How would you approach this project so as to engage the greatest number of people in a meaningful way?
10. What staff, volunteers, or “Project Staff” as described above would you assign to this project and why?
11. What other information relevant to the project would you like to share?

Proposal Questions and Submission

Any questions related to this Letter of Interest should be submitted prior to April 7.

Please submit Letters of Inquiry by April 15 at 4:00pm to the following email address:
SLoellbach@connect2home.org .

Letter of Interest Assessment Criteria

Letters of Interest will be evaluated based on the following point system:

Scoring Segment	Points
Understanding of Project	20
Communications Infrastructure in the Community	20
Potential to Reach a Large Number of Community Members	20
Availability of Resources to Staff the Project	20
Potential Effectiveness of Approach	20

Appendix A

Equity Zoning Diagnostic – Initial Observations

Prepared by ZoneCo, LLC

November 2021

The zoning code of Evanston, Illinois, contains roughly 800 provisions. For the purposes of this assessment, we have categorized each provision into one of three categories:

Categorization of Provisions	
Policy	<p>There are instances where overarching policy goals are listed within the zoning code.</p> <p>For example, “Purpose Statements” found throughout the code contain prescriptive language about what a particular provision or provisions are trying to accomplish, like the following: <i>“The R3 two-family residential district is intended to provide for infill development of single-and two-family residences in moderate density neighborhoods and to preserve the present physical character of such neighborhoods.”</i>¹</p>
Procedures	<p>All zoning codes contain procedures which are essentially action steps that must be taken to receive planning approvals or permits.</p> <p>For example, <i>“an application for a special use permit may be filed with the Zoning Administrator by the owner or lessee of the subject property or other person having a legal or equitable interest in the subject property.”</i>¹</p>
Development Standards	<p>The development standards communicate which uses are permitted and how the building and site must be constructed or arranged.</p> <p>For example, <i>“the maximum floor area ratio in the D2 district is 2.75,”</i> or <i>“the maximum building height in the MU district is forty-one (41) feet or three (3) stories, whichever is less.”</i>¹</p>

¹Excerpts taken from the City of Evanston Zoning Code

INITIAL FINDINGS

Policy

There are passages throughout this code that communicate the overarching policy goals guiding zoning regulations. These passages identify community goals and objectives underlying and shaping adopted zoning standards, which are usually drawn from long-range planning documents. In the initial review, we made the following observations:

- There are inclusionary housing bonuses within the code, which demonstrate a commitment to attainable and affordable housing for residents (though not for very-low-

and extremely-low-income residents). Each inclusionary zoning section references section 5-7-3 of the City Code which states an objective to “promote the public health, safety, and welfare of the residents of Evanston by requiring residential developments or developments which contain a residential component to include a certain percentage of dwelling units in a proposed development to be priced affordably for low-income, moderate-income, and middle-income households or to make a payment in accordance with the terms of this Chapter.”

- Equity and equitable outcomes are not mentioned within the purpose statements, public benefit statements, or anywhere in the code despite the presence other general prescriptive statements related to preserving natural, historic, architectural, and environmental features.
- The planned development code lists “provision of a variety of housing types in accordance with the City's housing goals,” as a desirable public benefit, which displays a commitment to achieving the community’s housing goals.
- Within the R zoning districts, which is where the majority of the city’s residents reside, there is no reference to the City’s housing goals.
- There were several policy goals related to lessening congestion. Populated areas, especially cities, inherently have congestion due to a more concentrated population than rural areas. Where any city has a high level of accessibility/activity, which is positive, it will also have congestion. The goal of lessening congestion can be used selectively and in discriminatory ways to prevent the construction of smaller, more concentrated units that tend to be more affordable.
- Small businesses frequently do not have the space needs of larger businesses and retailers, and in most cases do not have the resources or the desire to pursue large lot development. It is positive that several business districts aim to accommodate “small neighborhood business districts”, “small storefronts”, and “unique, small scale, pedestrian oriented retail shops, services, and restaurants”, which makes business ownership more accessible generally.
- There are multiple instances where maintenance of “character” is a stated policy goal. The term “character” could be used to reinforce or enforce exclusionary dynamics in the built environment if they already exist in a given zoning district.

Procedures

Construction or alteration activity that requires any kind of permit or planning approval is required to follow a set of procedures. It can be challenging to fully understand how procedural steps in any zoning ordinance are experienced by residents, and public engagement will help to understand resident experiences. In the initial review of procedures, we made the following observations:

- Amendments to the zoning code require a public process to determine whether the amendment is in the best interest of the community. Segments of a community might be in favor of an amendment, or they may be in opposition. In Evanston, in instances where there is opposition to an amendment by 30% of adjacent property owners, then support for the amendment is required from $\frac{3}{4}$ of the City's Council Members to approve the amendment. Given that this provision allows a minority of adjacent property owners to trigger an additional obstacle to an amendment, the city should study instances where this provision has been triggered and ensure that it is not being used in a way that is discriminatory to housing types that are generally more affordable (smaller, attached dwelling types).
- The review purview of the Design and Project Review (DAPR) Board is overly broad, specifically for the review of the “construction of a new building or structure, or modifications to the exterior of an existing structure (including additions) for any land use requiring a building permit”. As written, the DAPR reviews all building/construction activity or alterations occurring within the city no matter how large, small, impactful, or insignificant so long as it requires a permit. It is reasonable to have additional design review where there is a district or collection of properties with distinct architectural features, however, this review purview is excessively broad (especially given the broad nature of the Board’s review criteria).
 - The City should study the projects rejected by the DAPR to ensure that specific uses or building types are not being discriminated against at a greater rate.
- In addition to a review of the DAPR purview and process, undertake an assessment to ascertain whether the regulatory environment contributes additional costs to housing.
- Where low-income residents are in violation of the zoning ordinance due to lack of funds, the code should direct property owners to the Owner-Occupied Housing Rehabilitation Program; this program is positive and demonstrates commitment to treating homeowners equitably.
- It is positive that the Housing and Community Development Committee is mandated to have housing advocate and professional appointments; however, neither the Planning Commission nor the Zoning Board of appeals must have a housing or equity professional on either Board, which should be examined given the high proportion of residentially zoned land in Evanston.

Development Standards

Development standards are the provisions within a code that govern how uses, buildings, and site features are organized on a given property. In the initial review of development standards, we made the following observations:

Residential Zones and Residential Uses:

- Generally, zoning codes outline the purpose and intent of individual zoning districts. The City's housing goals are not represented within the policy goals for the R districts at the beginning of each district section. It is understood that land for development or redevelopment is limited within the R districts, however, there should be a reference to policy goals, and they should be reflected within zoning standards.
- Zoning codes sometimes mandate land utilization that is economically inefficient (i.e., excessive lot standards and setbacks) and where this occurs, those inefficiencies will be more easily borne by residents with higher incomes. This has an inherently exclusionary or segregationist effect on housing. The following standards are excessively restrictive in some instances in the R districts (and in some cases the standards are found outside of the R district, but apply directly to residential properties):
 - Lot coverage maximums;
 - Floor to area ratio maximums;
 - Height maximums;
 - Minimum lot size, especially where additional lot size is required per residential unit on-site; and
 - The limited range of housing types permitted in the R1, R2, R3, especially since regulations can mandate that their form and design be complementary to existing structures
- The term "family" throughout the code. The building code is a more effective tool to regulate overcrowding, health, and safety of residents. Additionally, households should have an inherent right to form based on whether the members are related or unrelated. It is reasonable for a municipality to implement regulations that guard against overcrowding or unsafe conditions, but mandating familial structures is an inherently flawed and discriminatory way to regulate these things.

Planned Developments (PD) in Residential Districts:

- There are some positive provisions in this section like mandatory pedestrian pathways and tree preservation, which promote livable design.
- A PD is intended to be a tool that provides flexibility in land use that complements the zoning code. Applicants go through a public process to ensure that their proposals are advantageous for the City of Evanston in meeting planning goals and objectives even if they do not conform to the existing zoning code. The following restrictions are antithetical to the goal of utilizing the PD flexibly to meeting planning objectives:
 - The provision that states that "maximum height increase over that otherwise permitted in the residential districts shall be no more than twelve (12) feet." is

counter to the flexibility that is generally intended for the PD, especially given that 12 feet will only accommodate one additional story.

- The maximum increase in dwelling units permitted within the PD, which is none in R1-R3, and 25% in R4-R6, is overly restrictive.
- The additional allowances for lot coverage are restrictive. The provision of open space, parks, or permeable surface area are concrete objectives. The lot coverage standards are mandating inefficiency without a tangible goal.

Other Zones:

- The following standards may be acting as a barrier within the B1, B1a, and B2 to creating dense, walkable, mixed-use development that provides a high level of accessibility to residents:
 - Maximum building heights;
 - Minimum lot sizes;
 - Lot coverage maximums; and
 - Floor to area ratios.
- It is positive that the first 3,000 square feet of building space for a non-residential property in any D district is exempt from providing a minimum number of parking spaces. However, the downtown does not appear to have an overall parking strategy that informs parking space minimums. Generally, downtown sites are historic, and the pattern of development reflects construction prior to large-scale adoption of the private automobile. Parking space minimums in the Downtown districts could be creating an additional barrier to development within an area that should prioritize walkability and accessibility.
 - Best practice is currently to recognize that Downtown is an area where a resident could feasibly live without a car (and many residents likely do). Accordingly, when parking is developed for new residential units, the cost of developing/utilizing parking is passed through exclusively to occupants that are utilizing the parking.
- The limitations that the development standards within the U1, T1, and T2 impose have the potential to severely restrict residential density. Because the City has been experiencing conflict related to where students live, the City should assess whether these limitations have facilitated additional student demand for housing within the R districts due to an undersupply of student housing in those districts.