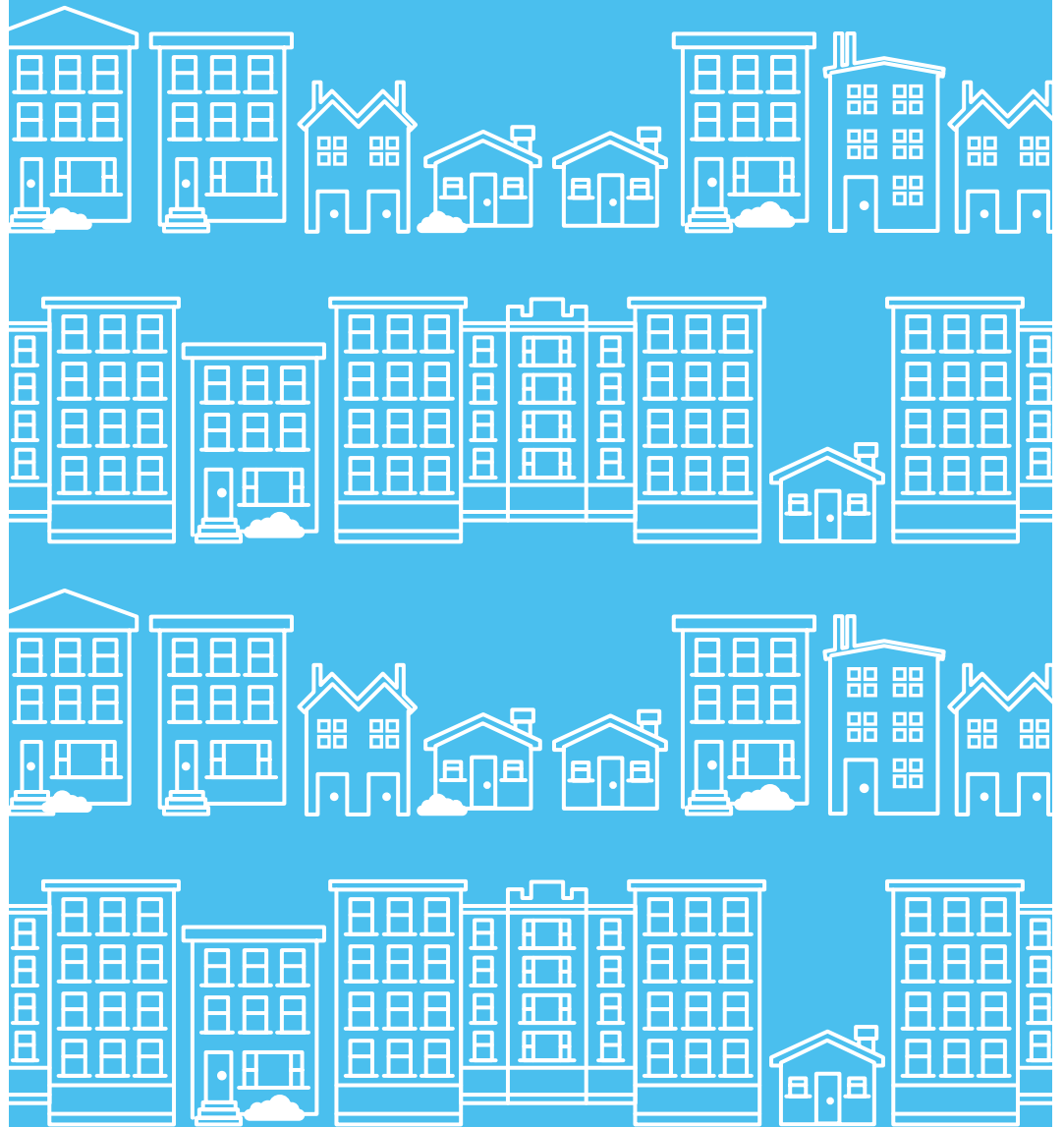


# Expanding Housing Choice



# Table of Contents

Introduction ..... 1

Policy framework..... 2

Barriers to housing choice..... 4

Recommended strategies ..... 13

Geography of analysis..... 22

Next steps..... 24

# Introduction

The Chicago Metropolitan Agency for Planning (CMAP) focuses its housing work on the intersection of housing affordability and housing stock diversity. GO TO 2040, the region's current long-range comprehensive plan, identifies the need for a range of housing options throughout the region to provide numerous benefits, including homes affordable at a range of price points.<sup>1</sup> The plan also recommends increased housing density near the region's transit station areas, particularly more affordable housing.

This policy framework manifests itself throughout agency's work. CMAP research has explored the state of the region's housing market, trends in housing development, and changing housing and transportation cost affordability.<sup>2,3</sup> Local Technical Assistance (LTA) recommendations have encouraged communities to permit more multifamily and townhome developments.<sup>4</sup> *Homes for a Changing Region* projects have encouraged balanced housing while exploring the relationship between balance and affordability.<sup>5</sup> The *Fair Housing and Equity Assessment* has recommended strategies to improve access to housing for different groups across the region.<sup>6,7</sup>

Acting on the CMAP Board's guidance for ON TO 2050 -- to refine existing policies, explore limited new policy areas, and develop more specific implementation strategies -- this strategy paper refocuses the policy framework on housing choice, or the intersection of housing supply and demand.<sup>8</sup> What types of housing do residents of the region demand, and what barriers prevent those demands from being met?

While this new framework includes a number of existing and planned CMAP activities, advancing some strategies will require an entity other than CMAP to take the lead. For instance, community and political challenges to housing choice and to research best practices regarding building codes will need champions.

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<sup>1</sup> Chicago Metropolitan Agency for Planning, [GO TO 2040 update](#), October 2014.

<sup>2</sup> Chicago Metropolitan Agency for Planning, [GO TO 2040 update appendix: indicator methodology](#), January 2015.

<sup>3</sup> Chicago Metropolitan Agency for Planning, [Policy Updates](#).

<sup>4</sup> Chicago Metropolitan Agency for Planning, [Local Technical Assistance](#).

<sup>5</sup> Chicago Metropolitan Agency for Planning, [Homes for a Changing Region](#).

<sup>6</sup> Chicago Metropolitan Agency for Planning, [Fair Housing and Equity Assessment: Metropolitan Chicago](#), November 2013.

<sup>7</sup> Chicago Metropolitan Agency for Planning, [Evaluating housing and transportation costs in the CMAP region](#), June 26, 2014.

<sup>8</sup> Chicago Metropolitan Agency for Planning, [ON TO 2050](#).



# Policy framework

GO TO 2040 highlights the importance of increasing the supply of low-cost housing options particularly in transit- and job-rich areas. CMAP work since GO TO 2040 was adopted, including research for ON TO 2050, has highlighted that it is equally important to consider additional factors when planning for housing with access to transportation, employment, and services. These factors include nearby school quality, inclusion and opportunity considerations, and market strength, along with the region's overall housing stock diversity.

To address these considerations, CMAP is reframing its housing work to focus on expanding housing choice. This shift refocuses the discussion around the intersection of supply and demand, with two driving questions: What types of housing do residents of the region demand? What barriers prevent demand from being met?

CMAP has developed a working definition of housing choice based on feedback from resource group members, CMAP experience, and extensive literature review:

*Housing choice is the ability for all households in the region to find a quality affordable home that fits each household's preferences, including proximity to jobs, transportation, and other amenities, throughout all stages of life.*

The components of housing choice are characterized below.

- Household size. Households of all sizes, from single resident households to large families, have housing choice.
- Household income. Households across the income spectrum have housing choice, including options that are affordable in terms of both housing and transportation costs (i.e. combined housing and transportation costs are 45 percent of the household income or less).
- Characteristics of members of household. Households, regardless of members' characteristics, including age, race and ethnicity, housing status (including homelessness), special needs, etc., have housing choice.
- Tenure/type of home. A home meets the form and tenure desires of the household, including rental and ownership as well as single-family, townhome, or multifamily needs.
- Amenities. Households can find housing that meets amenity preferences, whether through quality parks, good schools, proximity to jobs, or good transportation access.



CMAP is already working to expand housing choice in northeastern Illinois through a number of initiatives. *Homes for a Changing Region* and other LTA projects have emphasized the importance of housing diversity.<sup>9</sup> <sup>10</sup> Policy updates have highlighted how regional demographic trends may affect local housing needs.<sup>11</sup> The *Fair Housing and Equity Assessment* introduced the importance of addressing regional equity concerns by deliberately locating new housing in certain areas.<sup>12</sup> Continuing much of this work is important to advancing housing choice in the region.

However, municipalities, developers, and other organizations also influence housing choice. These partners may be more appropriate to lead some housing choice strategies, while CMAP provides support. For example, Access Living is a trailblazer in advocating for housing for people with disabilities, and the Livable Communities Collaborative (LCC) can take a leading role in housing needs for the senior population.

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<sup>9</sup> Chicago Metropolitan Agency for Planning, [Local Technical Assistance](#).

<sup>10</sup> Chicago Metropolitan Agency for Planning, [Homes for a Changing Region](#).

<sup>11</sup> Chicago Metropolitan Agency for Planning, [Policy Updates](#).

<sup>12</sup> Chicago Metropolitan Agency for Planning, [Fair Housing and Equity Assessment: Metropolitan Chicago](#), November 2013.



# Barriers to housing choice

To determine what strategies CMAP and others should pursue to improve housing choice, CMAP staff catalogued barriers to housing choice in the region. The CMAP Housing Committee, experience from LTA projects, guidance from the Reinvestment and Infill Resource Group, and feedback during the creation of GO TO 2040 also informed this process.<sup>13 14</sup>

Barriers fall into five categories, which are explained in the following section: market feasibility; regulatory environment; community and political constraints; finance and resources; and interjurisdictional collaboration.

## Market feasibility

Market conditions influence housing choice through development and redevelopment decisions. Strong markets can struggle to provide or maintain housing affordable to low- and moderate-income individuals due to higher prices and strong demand. Stable housing markets also require unique strategies to preserve the existing housing stock. In markets lacking demand, the cost of building or rehabilitating homes may exceed what sales prices or rents can support.

The confluence of these trends region-wide undermines housing choice. With fewer low-cost housing options in strong or stable markets, low- and moderate-income households find their options limited, often to weak markets.

Several factors limit the potential to create or preserve existing housing units. Some communities may lack the physical assets necessary to support population growth, such as utility infrastructure, transportation systems, or revenue to provide basic services. Strong housing markets may lack land for new development or the residents of the area may lack willingness to add density, especially in locations with access to transit, jobs, and other desirable amenities. In these areas, local regulations and policies can strongly shape market outcomes, including limiting the overall supply of housing, such as by zoning areas at densities lower than what the market (or potential residents) would support. This also often increases the cost of remaining housing.

Market conditions can also strain the existing stock of housing or reduce housing options for existing residents. In markets with rising prices, residents may struggle to pay rents, and tenants may be poorly educated about their rights as renters under local, state, and federal law. In areas with declining housing markets, property owners, especially of investment properties, may hold properties vacant in anticipation of an improved housing market, when they may be

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<sup>13</sup> Chicago Metropolitan Agency for Planning, [Housing Committee](#).

<sup>14</sup> Chicago Metropolitan Agency for Planning, [Reinvestment and Infill](#).



able to recoup their investment. Dilapidation caused by negligent property owners, poor asset management practices, or insufficient rental revenues can lead to a cycle of decline.

Shifting demographics and related changes in housing demand present challenges when planning for housing in the future, especially for municipalities and organizations that lack staff capacity for analysis and planning. People's housing decisions can differ sharply from surveyed preferences due to affordability, changing opinions, and other factors. Previous *Homes for a Changing Region* work cited national research about the growing interest in smaller homes, greater density, and more walkable transit-accessible locations.<sup>15</sup> Yet, other research indicates that such demand may be temporary, and that as younger households age, they may seek out single-family homes in the suburbs.<sup>16</sup> The degree to which these forecasts are correct will significantly change demand.

All the while, many baby boomers are reconsidering their housing choices as they age. Research has highlighted potential complications around the impending intergenerational housing transfer between baby boomers and millennials. While some boomers may be looking to sell suburban single-family homes, it is not clear whether millennials will want to buy those units due to many factors, including preferences for type, tenure, and location.<sup>17</sup>

## Regulatory environment

Communities adopt regulations for many reasons. Building codes and their enforcement help ensure that people live in safe, decent, and sanitary homes. Zoning and design codes help ensure development aligns with a community's vision or goals. Some local regulations seek to spur new development desired by the community, or to preserve existing buildings. Codes can implement sustainability goals, for example zoning code changes that require new developments to manage stormwater on site, rather than funneling it to the municipality's sewer system. GO TO 2040 research and recommendations on this topic have led numerous LTA participants to improve their local zoning ordinances and development processes.<sup>18</sup>

Yet, meeting regulatory requirements is often a sequential process, with added costs driving up home prices with each step. Development regulations can limit potential housing options that the market might otherwise provide. For example, building and zoning codes may require specific, costly materials or construction processes beyond what is necessary for minimum health and safety requirements.

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<sup>15</sup> Urban Land Institute, [America in 2015](#), June 2015.

<sup>16</sup> Kris Hudson, "[Generation Y Prefers Suburban Home Over City Condo](#)," *The Wall Street Journal*, January 21, 2015.

<sup>17</sup> Laurie Goodman, Rolf Pendall, and Jun Zhu, "[Headship and Homeownership: what does the future hold](#)," Urban Institute, June 2015.

<sup>18</sup> Chicago Metropolitan Agency for Planning, [Regulatory Barriers and Housing Affordability](#), January 2009.



Rehabilitation projects sometimes must meet the same standards as new construction, thus requiring very expensive upgrades or even demolition. Such development regulations can arise from an overabundance of caution; lobbying from special interest groups; delays in updates to codes due to staff, budgetary, or political constraints; aesthetic benefits; or exclusionary goals (i.e. NIMBYism, or “not in my back yard” sentiments).<sup>19</sup>

Developers transfer additional regulatory costs to property owners or renters. When the cost of meeting requirements is higher than what the market can bear, residential development may not proceed at all. This problem particularly harms low- and moderate-income housing developments, which often have limited financial margins. Regulations also affect decisions regarding the location, size, design, and quantity of units. Removing unnecessary regulations or expediting the regulatory process can potentially encourage more developers to build or preserve housing.

Varying building code requirements and enforcement practices also can increase costs significantly. CMAP research on regulatory barriers cited the variation among municipalities as potentially the “most significant obstacle posed by building codes.”<sup>20</sup> International and national model building codes can provide uniformity, transparency, and predictability for developers. Illinois does not have a statewide building code, but does have model codes for plumbing, fire and safety, and accessibility.

However, municipalities frequently customize model codes to incorporate local conditions and community needs. Even when codes are substantially similar, interpretations may differ considerably between communities. Separate special districts, such as stormwater and fire, often have distinct regulations and/or interpretations that add to this challenge. Developers working in many communities must familiarize themselves with these nuances, which takes time and financial resources, sometimes discouraging developers from entering certain markets.

## Community and political constraints

Addressing barriers to housing choice requires support from municipal leaders, community-based organizations, and residents -- and such buy-in can be hard to get. Many factors underlie community resistance. First, local stakeholders do not always agree that providing housing choice is a desirable goal. NIMBYism can be another significant challenge, as residents and stakeholders can have misperceptions about the impact of density, tenure, and other characteristics of developments on their communities. Local opposition to a development can stem from fear of change, reflecting concerns about property values, service levels, fiscal impacts, community character, the environment, or public health and safety.

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<sup>19</sup> Christopher Swope, “[The Code War](#),” *Governing*, January 2006.

<sup>20</sup> Chicago Metropolitan Agency for Planning, [Regulatory Barriers and Housing Affordability](#), January 2009.





Disadvantaged or underrepresented population groups often lack representation in the development and political process. Finally, a lack of local champions for or expertise on the benefits of housing choice may also lead to minimal vocal support.

Opposition to affordable housing, denser housing, or new housing can lead to costly delays and sometimes even forces developers and communities to abandon projects. Developers may avoid communities with reputations as difficult places to develop, effectively limiting housing choice for many of the region's residents.

## Finance and resources

Funding markets are the most critical piece of the resource puzzle and important arbiters of housing choice. Actors in the funding space include private lenders, as well as federal, state, and local governments. While decisions on individual loan applications most obviously influence what gets built or rehabilitated, many factors underlie those decisions, including federal funding and regulatory determinations, along with the risk perceptions of public and private funders. The following subsections identify key barriers to housing choice in the finance system, including the effect of federal policies.

### Federal role

Nearly every home in America relies either directly or indirectly on some aspect of federal funding or regulation, including direct subsidies, tax deductions, and mortgage guarantees. Much of this funding comes through the federal home mortgage interest deduction, which provides a significant tax deduction to many homeowners. Federal financing guidelines have an enormous impact on where development occurs and what is built. These policies and programs shape the housing market.

Despite some efforts by federal agencies to encourage regulatory flexibility to meet changing market demand, the gap between the traditional objectives of most housing programs and the market realities of preferred housing types remains wide.<sup>21</sup> Americans increasingly prefer to live in walkable neighborhoods that mix commercial amenities with single-family, townhome, and multi-family homes (i.e. mixed-use neighborhoods). Yet, federal housing rules favor homeowners over renters and single-family homes over multifamily homes, and create policy barriers to market changes.<sup>22</sup>

It is important to take a fresh look at these federal programs and rules to ensure that they meet the needs of the region today and in the future, by providing for a range of housing densities

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<sup>21</sup> Regional Plan Association, [Mixed Use Development and Federal Housing Regulations](#), January 2013.

<sup>22</sup> Julia Koschinsky and Emily Talen, "[Affordable Housing and Walkable Neighborhoods: A National Urban Analysis](#)," *Cityscape: A Journal of Policy Development and Research*, 2015.



and dwelling types, and by directing investment to disinvested areas. While it has a sizable impact, the home mortgage interest deduction is outside the scope of ON TO 2050 and should not be addressed in the plan.

### ***Unmet demand for housing in walkable, mixed-use communities***

Despite the growing demand for walkable communities with stores, services, and other amenities, federal housing rules, in part, prevent the private market from meeting this demand.<sup>23</sup> Walkable communities often mix residential and non-residential uses, typically in low-rise buildings with retail on the ground floor and apartments above.<sup>24</sup> These types of infill and transit-oriented developments are especially important for existing communities in disinvested areas, which see infill as a way to upgrade housing and add convenient amenities.

However, projects like this frequently struggle to qualify for federal financing and loan guarantees.<sup>25</sup> The U.S. Department of Housing and Urban Development (HUD), Federal Housing Administration (FHA), and Fannie Mae and Freddie Mac programs all limit the amount of non-residential space allowed within developments as a condition for receiving federal financing or loan guarantees.<sup>26</sup> To qualify for federal financing, developers need to keep the amount of non-residential space, or the amount of revenue from that space, below a certain percentage -- typically between 10 to 25 percent, depending on the lender.

By capping the amount of non-residential space in federally supported housing projects, federal housing rules make it difficult to finance construction and renovation of low-rise, mixed-use buildings. For example, a mixed-use project seeking financing from Freddie Mac can have a maximum of only 20 percent non-residential use, meaning (generally) that the building must be at least five stories to accommodate ground-floor retail.<sup>27</sup> In the CMAP region, this building height may be out of scale with existing communities or noncompliant with existing zoning regulations. Moreover, the criteria used by many private lenders to assess risk is based on the federal regulations, meaning mixed-use projects not seeking federal financing or loan guarantees can still be affected.<sup>28</sup>

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<sup>23</sup> Regional Plan Association, [The Unintended Consequences of Housing Finance](#), February 2016.

<sup>24</sup> Low-rise communities are characterized by low-rise buildings, typically three to four stories, with ground-floor retail and apartments on the upper floors.

<sup>25</sup> Christopher B. Leinberger and Mariela Alfonzo, "[Walk This Way: The Economic Promise of Walkable Places in Metropolitan Washington, D.C.](#)," Brookings Institution, May 2012.

<sup>26</sup> Congress for New Urbanism, [Live/Work/Walk: Removing Obstacles to Investment](#), 2015.

<sup>27</sup> Regional Plan Association, [Mixed Use Development and Federal Housing Regulations](#), January 2013.

<sup>28</sup> John Norquist, "[Roadblock on Main Street](#)," *The American Conservative*, Nov. 18, 2014.



### **Fewer low-cost rental units**

Mirroring national trends, households in the CMAP region are increasingly renters. During the recent recession, investors and lenders converted many formerly owner-occupied single-family homes into rental units.<sup>29</sup> Private developers have added new rental stock through the construction of larger multifamily buildings. In spite of these additions, rental demand continues to increase, with vacancy rates falling from 8.2 percent in 2009 to 6.2 percent in 2015. Rents have increased as well, and while additional units in the pipeline might help relieve this market pressure, most new units are priced for higher-income renters.<sup>30</sup>

From 2000 to 2015, the region gained rental units in single-family homes, townhomes, and multifamily buildings with 50 or more units.<sup>31</sup> Meanwhile, it lost rental units in smaller multifamily building types, partially attributable to the growth of rental units in other types of buildings and the increasing popularity of “de-converting” 2-4 unit rental properties into single-family homes in communities with strong markets. High foreclosure levels also left many 2-4 unit buildings vacant. A 2010 analysis of multifamily foreclosures in the City of Chicago found that in 2009 alone, newly foreclosed multifamily properties contained nearly 20,000 rental units, with an average of three units per building.<sup>32</sup> These small buildings play a key role in providing low-cost, family-sized rental units. In Chicago, where over half of the region’s renter-occupied units are located,<sup>33</sup> the lowest rents are in smaller multifamily buildings, while the highest rents are in single-family buildings or townhomes, and multifamily buildings with 50 or more units. As some rental buildings get older, rents in those buildings stagnate or decline, leaving them affordable to income groups that previously could not live in them, a process called filtering. While it improves housing affordability, filtering does not fully address the growing gap between the supply of and demand for lower-cost rental units.

Without a strong response from federal housing agencies, some state and local governments have attempted to improve rental affordability through strategies such as inclusionary zoning, which mandates that a share of new units in housing developments have below-market rate rents. Chicago implemented inclusionary zoning through the Affordable Requirement Ordinance that requires developers who build market-rate properties to either pay a fee to support City efforts to build units for low- and moderate-income households or build units affordable to low- and moderate-income households somewhere else to offset the market-rate

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<sup>29</sup> Chicago Metropolitan Agency for Planning, [Single-family housing tenure changes in the CMAP region](#), February 22, 2013.

<sup>30</sup> Joint Center for Housing Studies of Harvard University, [The State of the Nation’s Housing](#), 2016.

<sup>31</sup> CMAP analysis of U.S. Census data found that between 2000 and 2015, the number of renter-occupied housing units increased in single-family homes (80 percent), townhomes (61 percent), and multifamily buildings, 50-plus units (9 percent). The number of renter-occupied housing units decreased in multifamily buildings, 2-9 units (-2 percent) and multifamily buildings, 10-49 units (-15 percent).

<sup>32</sup> Lawyers’ Committee for Better Housing, [2009 Foreclosure Report](#), April 2010.

<sup>33</sup> CMAP analysis of U.S. Census data found that 52 percent of renter-occupied housing units in the CMAP region were located in the city of Chicago (2011-15).



units they built. Chicago recently modified its Affordable Requirements Ordinance to provide incentives for developers to build affordable units in the same neighborhood as their properties, without threatening the value of their developments.<sup>34</sup> Strong federal support is still essential to meet the need for affordable units, as inclusionary housing programs have produced just 129,000-150,000 affordable units nationwide from the 1970s through 2010.<sup>35</sup> *Homes for a Changing Region* projects regularly identify gaps between future demand and potential supply given current zoning. Such communities often wrestle with the need to make local zoning changes to encourage the development of more townhomes or multifamily units. Even when a community decides to make such a change, federal regulations sometimes undercut such efforts.

### ***Uneven access to credit***

FHA heavily favors single-family housing over multifamily housing. Between 2007 and 2011, FHA provided approximately \$1.1 trillion in loan guarantees for single-family housing and made only one-tenth of that investment (\$112 billion) for multifamily housing.<sup>36</sup> Providing significantly more low-cost loans for single-family homes skews the market for that type of housing. That said, FHA multifamily housing commitments grew substantially since the housing crisis, more than quadrupling between 2009 and 2011. In discussions with market specialists, few consider the FHA multifamily loan guarantee an issue because the cap has not been reached.

Private market lending decisions also effect the flow of credit to some parts of the market. For example, preserving units in small rental buildings requires smaller-sized loans than in larger rental buildings. These small loans have become increasingly difficult to access, and lenders providing credit to these buildings have either left the market or shifted to larger loans.<sup>37,38</sup> Lower-income communities, where properties often have lower values and charge lower rents, need more small loan options.

Given the key role that small multifamily buildings play in the region's lower-income communities, the decline of lending to these types of properties has been challenging. Local responses include the Small Balance Loan origination, which provides additional liquidity to smaller apartment properties, and HUD's Small Building Risk Sharing Initiative, which

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<sup>34</sup> City of Chicago, [Affordable Requirements Ordinance](#).

<sup>35</sup> This estimate includes units produced "in whole or part with [in-lieu] fees," paid by developers in place of building the below-market rate units in their developments. Alan Mallach and Nico Calavita, "United States: From Radical Innovation to Mainstream Housing Policy," *Inclusionary Housing in International Perspective: Affordable Housing, Social Inclusion, and Land Value Recapture*: 15–77, 2010.

<sup>36</sup> Smart Growth America, [Federal Involvement in Real Estate](#), January 2013.

<sup>37</sup> Fannie Mae, [Fannie Mae's role in the small multifamily loan market](#), 2011.

<sup>38</sup> Institute for Housing Studies at DePaul University, [Understanding neighborhood multifamily lending trends in the wake of the housing crisis](#), November 2014.



facilitates the financing of small multifamily properties.<sup>39 40</sup> Community Investment Corporation (CIC), the region’s leading lender for the acquisition, rehabilitation, and preservation of affordable rental housing, offers a variety of loan products that help preserve affordable rental housing that otherwise might be lost.

### **Perception of increased financial risk**

Despite recent research on loan performance indicating that loans in walkable, mixed-use communities are less risky than those in residential-only communities, the perceived risk associated with mixed-use development is a major barrier to meeting housing demand and providing housing choice.<sup>41</sup> Mixed-use projects are inherently more complicated and costly than single-use projects, and that has contributed to the widespread belief that they pose a higher risk to investment. As a result, lenders tend to prefer standard real estate products that support single-use over mixed-use development. This signals a need to increase understanding of the risks involved with various types of projects by developers, finance professionals, and policy-makers.

### **Other resources**

While smaller in comparison with the private lending market, federal, state, and local subsidy programs (CDBG, Illinois Housing Trust Fund, Low Income Housing Tax Credits etc.) also play a critical role in housing financing. Unfortunately, a number of factors have challenged the success of these programs: overly burdensome regulations; inefficient or ineffective local decision-making about their use; and funding cuts.

Non-financial resources also effect housing choice. Some communities lack the staff capacity to identify local housing needs and enact policies to meet those needs. A limited number of developers in the region have the expertise to develop complicated projects in difficult markets. With no shortage of communities hoping for innovative investment, such developers can be highly selective about their projects.

## **Interjurisdictional collaboration**

Providing housing choice for all residents in the region requires coordination and collaboration across jurisdictions and sectors. Greater teamwork is needed both horizontally (i.e. between organizations of the same type, such as municipalities) and vertically (i.e. between organizations of different types and sizes, such as federal-state-local partnerships).

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<sup>39</sup> FreddieMac, [Small Balance Loans](#).

<sup>40</sup> U.S. Department of Housing and Urban Development, [Small Building Risk Sharing Initiative](#).

<sup>41</sup> Joseph Gyourko and Witold Rybczynski. [Financing New Urbanism Projects: Obstacles and Solutions](#), March 2000.



Because so many different actors play critical roles in ensuring housing choice, coordinated actions are needed at various scales to address regulatory, political, and financial barriers.

Improved coordination can take on many forms: identifying shared goals; coordinating financial, informational, and staff resources; and working across traditional geographic, political, and administrative boundaries on projects. Coordination does not necessarily entail changes to existing governance or administrative structures, nor does it require formal agreements. With scarcer public funding, efficiencies achieved from coordination are even more necessary. The lack of interjurisdictional coordination can present logistical, regulatory, and financial challenges in the preservation or creation of new housing units.

Multiple entities are involved in the housing development and preservation processes, including developers, local agencies (i.e. planning department, building department), special districts that enforce codes and regulations (i.e. fire districts), and funders (i.e. banks, Illinois Housing Development Authority). Each stakeholder may have varying requirements and timelines. Having many different stakeholder groups involved in a project can increase the risk and unpredictability of the development process. The CMAP Housing Committee and others cited how a lack of coordination between fire districts and municipal governments on code content and interpretation can be costly for developers.

Another facet of interjurisdictional collaboration is cross-sector planning, as concepts such as the jobs and housing mismatch or transit-accessible housing are being considered more often than in previous decades. Innovative, complex housing projects (i.e. mixed-use or supportive housing) often require the coordination of agencies and complex funding mechanisms. Housing, transportation, land use, economic development, and community development agencies may have differing priorities, as well as varying constraints. Differences can manifest in funding programs, policies, and strategies.

When adjacent municipalities and other stakeholder groups share challenges and priorities, they may still undertake separate efforts to address these issues or goals. Interjurisdictional coordination requires many factors to succeed: an organized forum or strong impetus to convene; commitment and upfront resources, including staff capacity; and clear benefits. Interjurisdictional coordination challenges arise when one or more stakeholder group lacks capacity, and when the benefits of coordination outweigh the amount of effort to coordinate. Results of coordination may also be unclear, intangible, and inconsistent, reducing motivation for stakeholder groups -- both with stronger and weaker capacity -- to make the effort to coordinate with other groups.



# Recommended strategies

The definition of housing choice touches on many factors that influence the ability of a household to afford a home that meets that household's preferences: income, characteristics of members, form, tenure, etc. The barriers to achieving that goal are similarly broad, requiring actions from private sector developers, financiers, multiple levels of government, individuals, and many others. The following section outlines strategies that CMAP and its partners can undertake to address these barriers to housing choice. Actions focus heavily on using research, education, collaboration, planning, outreach, and funding decisions to help an array of actors understand how alternatives to the status quo can make housing choice a reality. The strategies are organized into three areas: activities CMAP should continue or refocus through the LTA program, other activities that CMAP should continue or expand, and activities that organizations other than CMAP should lead.

Complementary strategy papers and ON TO 2050 projects address topics related to housing choice, including infill development, inclusive growth, tax policy, stormwater, development at the edge of the region, and placed based approaches. The Reinvestment and Infill strategy paper offers a policy framework to promote reinvestment -- including residential development - in the region.<sup>42</sup> The Tax Policies and Land Use Trends strategy paper analyzes the ability of different development types to generate the revenue necessary to support associated development.<sup>43</sup> The Lands in Transition strategy paper considers ways to better protect existing agricultural and natural areas and coordinate new development.<sup>44</sup> Additionally, through both ongoing and future work, CMAP will tackle regional economic growth from multiple perspectives through the agency's existing regional economic work and recommendations, as well as establishing a link between economic stratification and regional economic conditions in the Inclusive Growth strategy paper.<sup>45</sup> <sup>46</sup> The Inclusive Growth strategy paper will also offer policies and strategies across each of CMAP's topic areas, including housing choice and disinvestment.

## Local Technical Assistance (LTA) program

CMAP primarily assists localities through the LTA program. Municipalities, counties, and community groups have benefited, including through the housing-specific *Homes for a Changing Region* effort, developed in partnership with the Metropolitan Mayors Caucus (MMC) and the Metropolitan Planning Council (MPC). Through *Homes for a Changing Region*, municipalities plan for future housing demand and create long-term housing plans.

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<sup>42</sup> Chicago Metropolitan Agency for Planning, [Reinvestment and Infill](#).

<sup>43</sup> Chicago Metropolitan Agency for Planning, [Tax Policies and Land Use Trends](#).

<sup>44</sup> Chicago Metropolitan Agency for Planning, [Lands in Transition](#).

<sup>45</sup> Chicago Metropolitan Agency for Planning, [Regional Economy and Clusters: Building our Strengths](#).

<sup>46</sup> Chicago Metropolitan Agency for Planning, [Inclusive Growth](#).



CMAP should continue to use the LTA program generally, and *Homes* specifically, to help communities address housing choice through visioning and broad-based stakeholder engagement, zoning updates, infrastructure planning, collaborative processes, and other technical assistance.

Data collection and analysis accomplished by CMAP's housing work, including *Homes*, should deepen understanding of regional demand and subregional housing supply to help municipalities identify opportunities for collaboration with neighboring communities. The differing levels of analysis (regional and subregional) will involve internal collaboration by CMAP staff to assess supply and demand. CMAP should continue these and other efforts to help entities in the housing sphere share successful solutions and explore shared solutions for similar housing issues. As will be discussed in the Geography of Analysis section of this paper, CMAP is working with MMC and MPC on a project to both identify similar housing submarkets across the region and to develop a strategy document partners can use to address the housing issues unique to each submarket. In this respect, additional work will identify the issues most common to each submarket, or cluster, and typical strategies to address these issues. Once completed, the strategy document in conjunction with the clusters will serve as the lens for future LTA analysis of housing issues in local communities.

Expanded LTA trainings can help address barriers to housing choice by informing planners, plan commissioners, and local public officials of the processes, policies, and challenges related to housing preservation and development. Through trainings and education about regulatory processes related to housing, local decision-makers will be better equipped to develop or support efforts to remove regulatory barriers to housing development and preservation.

Similarly, regulations are integral to protect residents, the environment, and community character. Yet, overly restrictive or outdated regulations and inefficient processes impede housing choice by limiting the development of additional housing types or increasing the cost of new development beyond what the market may bear. CMAP should continue recommending updates to local zoning codes to permit more density and a wider range of dwelling types consistent with a community's vision. Such efforts include making strategic edits to bulk regulations to allow more compact development styles, allowing mixed-use development, and updating off-street parking requirements that prevent developers from building various housing types. LTA should also continue its focus on streamlining development review processes to reduce developer time and costs, and thus improve the market feasibility of residential projects.





## Other CMAP activities to continue and expand

CMAP disseminates critical data and analysis on housing issues to help municipalities and other stakeholders contextualize site-specific projects within the scale of the community, sub-region, or region. CMAP should continue to create, update, and disseminate products such as community data profiles, policy updates, and reports.<sup>47</sup> For example, the Demographics Snapshot provides a scan of various traits of residents and households in the region, including income, race/ethnicity, education, and immigration.<sup>48</sup> The agency is also exploring income, race, ethnicity, and age as part of its socio-economic forecast, which will provide better context for changing regional housing demand. This information can be used to inform local housing supply analyses, including forming the basis for a revised approach to planning for local housing needs through *Homes for a Changing Region* and other LTA projects. CMAP's Aging in Place white paper explores aging trends in the region and shares best practices for municipalities to support residents who wish to stay in the communities where they now live as they grow older.<sup>49</sup>

As discussed in the barriers section, silos continue to present financial and regulatory hurdles to housing choice. CMAP should continue to highlight connections between housing choices and other livability goals and related policies, including market demand, transportation, jobs; and parking requirements. This research will complement work led by partners such as MPC, DePaul Institute for Housing Studies, and Woodstock Institute.

CMAP should continue to look for opportunities to improve the efficiency, effectiveness, and coordination of entitlements, public housing authorities, state entities, and other housing funders. Sometimes, as with assistance to Cook County in 2014, this will occur through LTA projects.<sup>50</sup> Other times CMAP assistance will take place beyond the LTA program. For example, the Regional Housing Initiative (RHI) is a collaboration between CMAP and public housing authorities throughout the region to pool rental assistance vouchers to provide funding for rehabilitation and construction of subsidized multifamily affordable housing in amenity-rich locations.<sup>51</sup> The coordination allows the RHI partners to achieve targeted gains by supporting housing in desirable locations. Similarly, CMAP comments periodically on federal and state plans and rules, such as the IHDA qualified allocation plan and HUD rule making regarding fair housing.

That said, CMAP analysis, research, and outreach also offer additional avenues for new research into barriers identified in this strategy paper. The following subsections highlight topics for additional research.

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<sup>47</sup> Chicago Metropolitan Agency for Planning, [Community Data snapshots](#), June 2016.

<sup>48</sup> Chicago Metropolitan Agency for Planning, [Demographics Snapshot](#), February 2017.

<sup>49</sup> Chicago Metropolitan Agency for Planning, [Aging in Place white paper](#), June 2016.

<sup>50</sup> Chicago Metropolitan Agency for Planning and Cook County, [Planning for Progress](#), January 2015.

<sup>51</sup> Chicago Metropolitan Agency for Planning, [Regional Housing Initiative](#).



## Align goals across investments

GO TO 2040 calls for strategic investments to improve the efficiency and effectiveness of the region's transportation system and to achieve related quality of life goals, including expanding housing options. The Travel Trends Snapshot identifies that low-income earners and people of color have longer-than-average commutes, reemphasizing the interplay between housing, job, and transportation access.<sup>52</sup>

CMAP can affect the transportation (inclusive of public transit) portion of this relationship in some ways. The agency conducts policy research, programming, and planning activities related to transportation, including the administration of the Congestion Mitigation and Air Quality Improvement (CMAQ) program, Surface Transportation Program (STP) (in conjunction with the City of Chicago and Councils of Mayors), Transportation Alternatives Program (TAP), and prioritization of major capital projects.<sup>53 54 55</sup> CMAP should research best practices on funding and project selection criteria so that transportation investment decisions take into consideration housing choice. Those practices could be used both in CMAP's programming and in project selection by other transportation agencies. Other housing funders, such as IHDA, counties, municipalities, non-profits, and philanthropic organizations, should be involved in creating such criteria, as they too could use them to direct funding programs. Research should consider the value of methods that reward jurisdictions that have accomplished numerical benchmarks (i.e. share of housing stock affordable to low- and moderate-income households), adopted preferred housing policies, or conducted housing planning. A potential model may be the Metropolitan Council in the Twin Cities, which uses a Housing Performance Score in its regional project solicitation (a blend of CMAQ, STP, and TAP funds).<sup>56</sup>

Moreover, some projects, including major capital projects, benefit from comprehensive land use planning in advance of the investment, as was done with Illinois Route 53/120.<sup>57</sup> Continuing to do such analysis offers an opportunity to understand current and likely future housing needs in areas targeted for substantial investment.

## Examine use of tools, regulations, and funding mechanisms

Whether financial, land use, or regulatory, all levels of government use tools to support some types of development over others. Local governments regularly use tools such as zoning codes, building codes, and impact fees to preserve or create different types of housing. Counties and municipalities make decisions about how best to use federal and state housing funds.

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<sup>52</sup> Chicago Metropolitan Agency for Planning, [Travel Trends Snapshot](#), September 2016.

<sup>53</sup> Chicago Metropolitan Agency for Planning, [Congestion Mitigation and Air Quality Improvement program](#).

<sup>54</sup> Chicago Metropolitan Agency for Planning, [Surface Transportation Program](#).

<sup>55</sup> Chicago Metropolitan Agency for Planning, [Transportation Alternatives Program](#).

<sup>56</sup> Metropolitan Council, [Housing Performance Scores](#).

<sup>57</sup> [Illinois Route 53/120 Corridor Land Use Strategy](#), November 2015.



As discussed previously, federal regulations also influence the types of units constructed and purchased in the region through the private finance system.

CMAP work should build off models from the Regional Plan Association to research how federal regulation affects market functions, and then expand from there to consider the specific ways it affects the region broadly and, if possible, sub-geographies such as the housing submarkets discussed in the Geography of Analysis section of this paper. CMAP could publish results of this research through policy updates and reports.

No comprehensive database exists on the use of federal and state housing assistance programs in the region at the parcel level. Stakeholders, both in the strategy paper process and other previous agency housing work, frequently discuss the need for such a database, all with slightly different focuses. Many obstacles prevent its creation, most importantly consistency of need, data quality, and funding. CMAP should continue to monitor the need for such a database. If CMAP did choose to create such a database, a partnership with DePaul University Institute for Housing Studies would be critical.

### **Increase municipal capacity**

Whether communities lack staff, technical knowledge or expertise, time, or finances, insufficient municipal capacity makes it increasingly difficult to overcome barriers to housing choice.

Empowering communities with additional resources and expertise can help preserve and create housing. CMAP, in partnership with MPC, is working on a municipal capacity strategy paper that will identify approaches to increasing capacity within or providing different resources to communities.

## **Activities that organizations other than CMAP should lead**

Many other partners already work independently of CMAP's involvement to address the barriers highlighted in this paper. For example, both the Cook County Land Bank and South Suburban Land Bank and Development Authority serve as model programs for much of the region. Partners including MPC, MMC, South Suburban Mayors and Managers Association (SSMMA), and others develop and lead programs, as well as host platforms for municipalities and agencies coordinate on shared challenges and solutions. While this work should continue, the following section identifies specific areas of work in need of leadership by entities other than CMAP.



## Community acceptance

Community and political barriers continue to undermine the chances of achieving housing choice. Previous efforts have tried to tackle this issue. In 2002, the MMC adopted the Housing Endorsement Criteria, principles to help effectively attract, identify, and promote proposals for quality housing development.<sup>58</sup> The general principles include:

- Location in the community, particularly the development's access to job centers and transit options;
- Design of the site and how it fits within the community;
- Attainability and mix of incomes;
- Experience of the management team and, if applicable, the support services team; and
- Feasibility, including soundness of the financial plans, relocation strategy, zoning, and others.

In 2001, more than 40 housing organizations in the region collaborated on the Housing Illinois initiative.<sup>59</sup> With the tag line "We need the people who need affordable housing," the project was designed to bolster support for and minimize opposition to affordable housing in northeastern Illinois. Activities included an advertising campaign, policy research, and trainings. The momentum behind each of these previous efforts has waned, particularly after the recessions and a refocusing of regional attention around the effects of the foreclosure crisis.

Few organizations in the region have the unique intersection of capacity, breadth, and organizing expertise needed to cultivate champions and lead new efforts to address community and political challenges to housing choice. CMAP does not. Ideally, a wide range of stakeholders would participate in a strong regional effort to address community acceptance: civic organizations, non-profit developers, for-profit developers, service providers, employers, elected officials, etc. With so many potential individuals or groups involved, an effort can quickly stall due to lack of ownership.

Others in the region have also highlighted the need for champions and increased education. CMAP staff currently participates in ongoing discussions with organizations such as SSMMA, Transportation Management Association of Lake Cook, MPC, MMC, Illinois Housing Council, Chicago Area Fair Housing Alliance, and BRicK Partners about how best to address the ongoing challenge with community acceptance, the respective roles each organization could play in potential activities, and the potential to identify additional partners. The current LTA project with Impact DuPage also touches on this topic.<sup>60</sup> CMAP staff should continue to participate in discussions about how best to address this ongoing challenge and help identify an organization, whether existing or new, that can take the lead.

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<sup>58</sup> Metropolitan Mayors Caucus, [Housing Endorsement Criteria](#), June 2015.

<sup>59</sup> Housing Illinois website, <http://www.housingillinois.org/>.

<sup>60</sup> Chicago Metropolitan Agency for Planning, "[An Affordable Housing Strategy for Impact DuPage.](#)"



## Building codes

As discussed previously, although building codes are essential to community health and safety, they can also present barriers to housing choice. Meeting building codes represents a significant portion of the time and cost of the development and preservation process. Building code variation among municipalities represents a sizable obstacle in reducing building costs. Inconsistency in application of a code in a community can be just as costly.

Additional research is needed on best practices regarding development, adoption, and implementation of municipal building codes. Efforts should specifically focus on the following.

- How should municipalities decide when and why to adopt a new base code (i.e. a new version of the International Building Code)?
- What local changes or additions to the base international codes are the most costly?
- What are municipal best practices in evaluating potential additions or changes to the base international code, including how municipalities differentiate between necessary, appropriate provisions versus excessive, redundant provisions?
- What types of flexible administrative approaches have communities used to achieve targeted safety, health, or design outcomes, like the City of Chicago's recent administrative relief on residential rehabilitation?<sup>61</sup>

Research should also explore best practices for building inspections, including analysis of case studies where a municipality has outsourced inspections and used local inspectors. Data from inspection companies may also be useful for analysis.

CMAAP does not have expertise in building codes. The work envisioned is similar to previous MMC work where the organization, along with contract partners, examined vacant property and rental regulation practices by different municipalities to identify best practices and improve regulatory efficiency and effectiveness. MMC is a potential partner for CMAAP and others in advancing building code work, though all work envisioned will require cultivating additional financial resources.

## Government funder action

As noted before, CMAAP and other civic actors have assisted government funders through various efforts, including LTA. These efforts often focus on identifying opportunities where funding formulas, project selection criteria, and grant requirements can be modified to explicitly reward coordinated efforts. Even with such assistance, the burden of implementation (i.e. changing application requirements or making project selections) remains with the funder.

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<sup>61</sup> City of Chicago, "[Department of Building Announces Code Relief to Encourage Redevelopment of Affordable Housing Across the City](#)," 2017.



One particular area for action by these funders is capacity building to create more high-capacity innovative developers. Some federal programs such as CDBG and HOME include special funding set-asides specifically designed to grow the capacity of local organizations.<sup>62</sup> Groups like the National Housing Trust and CIC currently support projects with innovative funding structures, specifically preservation projects that do not include low-income housing tax credits.<sup>63</sup> Non-profits like Preservation of Affordable Housing (POAH) cultivate small developers as part of larger projects to help build capacity.<sup>64</sup> Entitlement communities and IHDA have an opportunity to support an increasing number of high-capacity innovative developers who can work in challenging markets.

Many funders support local rehabilitation because new affordable housing construction can be significantly more expensive than preserving existing housing. The existing housing stock is also a key source of units that are affordable to a range of incomes. Civic organizations including CMAP should assist funders in developing strategies to rehabilitate and maintain existing housing of all types, including renter and owner housing. Some of these strategies specifically target affordable housing preservation. With CMAP's support, partners can research best practices to preserve and maintain affordable housing, such as:

- First rights of purchase of affordable housing to public agencies who want to preserve the stock of affordable land;
- Offering of public land and public buildings to developers at a lower cost in exchange for affordable housing;
- Community land trusts, which allow homeowners to build wealth while maintaining the affordability of the house on the community land trust land;
- Rental structures such as mutual housing associations, where tenants in multiple buildings can subsidize rents and pool utility and maintenance costs to save money;
- Renter protections;
- Expiring use restrictions; and
- Incentives such as rehabilitation grants/loans or tax abatements in exchange for affordability easements.

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<sup>62</sup> U.S. Department of Housing and Urban Development, [HOME Investment Partnership Program](#).

<sup>63</sup> National Housing Trust, [Affordable Homes Preserved through Real Estate Development](#).

<sup>64</sup> Preservation of Affordable Housing, [Woodlawn Park](#).



## Vacancy and abandonment

Strategies for vacant and abandoned properties have been extensively researched since the recession. This includes a 2010 publication by CMAP, MMC, and BPI on tools for dealing with vacant property, and a 2016 publication by MMC and BPI on vacant building/property ordinances.<sup>65</sup> <sup>66</sup> Yet, work remains. Little research has been done on re-classifying vacant and blighted buildings into higher property tax rates to encourage property owners to maintain and return the buildings to productive uses, a potential strategy in areas with stronger underlying demand. Previous efforts by CIC to expand the use of tools that are part of Chicago's Troubled Buildings Initiative outside the city have run into concerns about municipal capacity.<sup>67</sup> Similarly, MMC and Ancel Glink have worked with south suburban communities to explore abandonment and fast-track demolitions; in the process, they have learned that many municipalities do not exercise their full legal authority to address vacant property issues, mostly due to a lack of funding and capacity. Additional research is needed by partners like MMC and BPI on ways to address capacity concerns that stand in the way of effective strategies to confront vacancy.

## Research projects

While CMAP can take on some research projects, other research topics may be better suited to other research organizations with different roles.

- Entities with a strong working knowledge of regional sales trends, such as the DePaul Institute for Housing Studies, should consider researching effects of unique products -- such as micro-units and short-term rentals, like Airbnb -- on the supply and costs of housing.
- Organizations such as LCC and Access Living should consider researching the market's role in providing accessible homes, particularly given the region's aging population.

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<sup>65</sup> Business and Professional People for the Public Interest, Chicago Metropolitan Agency for Planning, Metropolitan Mayors Caucus, [How can municipalities confront the vacant property challenge?](#), March 2010.

<sup>66</sup> Business and Professional People for the Public Interest, Metropolitan Mayors Caucus, [Vacant Building Ordinances](#), June 2016.

<sup>67</sup> City of Chicago, [Troubled Building Initiative](#).



# Geography of analysis

The barriers identified earlier in this paper are broad, applying to many parts of the region, often without specifics on how those barriers play out at the local level. Recognizing that breadth, the strategies in this paper are meant to address these barriers by focusing heavily on process and structure, and by identifying programs CMAP or others should undertake in the region without respect to geography. As noted, a major focus of ON TO 2050 is the development of more specific guidance for implementers. As part of the development of ON TO 2050, CMAP is creating a series of “layers” to cater the content of the regional plan to local partners through mapping and more spatially specific recommendations.<sup>68</sup>

This section identifies how the programs emphasized in previous sections should take into account geographic variation. Housing work by CMAP and its partners over the past six years highlights the importance of understanding geographic variation in housing issues. That lesson has been particularly clear through *Homes for a Changing Region*, where CMAP and its partners have seen that communities with common market conditions (such as a shared transit corridor, high foreclosure rates, poor job access, or high demand for rental housing) are more likely to collaborate long-term and achieve sustainable results.

Yet, it is difficult to foster such collaboration without a better understanding of the common submarkets and the strategies that are most effective in those areas. To address this issue, CMAP, MPC, and MMC used a grant from The Chicago Community Trust (CCT) to engage DePaul University’s Institute for Housing Studies to develop a market segmentation model that identified the geography and characteristics of subregional housing markets across the seven-county region. DePaul looked at more than 40 variables, including housing stock characteristics, the affordability of the stock, housing investment and market conditions, and demographic variables.

The analysis identifies eight different housing submarkets in the region, defined using data at the census tract scale.<sup>69</sup> Unit age, household income, population growth, and economic hardship indicators such as unemployment and foreclosure most strongly differentiate the submarkets. The work identifies two low- to moderate-income primarily suburban clusters differentiated by housing stock, an aging population, and certain economic indicators. The work also found two high-wealth clusters: one typified by middle-aged homeowners in communities with moderate sales activities, and a second cluster of young, highly educated, urban professionals. Two economically distressed clusters are differentiated by the varying degrees of unemployment, subsidized housing, and investment indicators. Finally, two largely suburban faster-growth clusters are located predominately at the edge of the region.

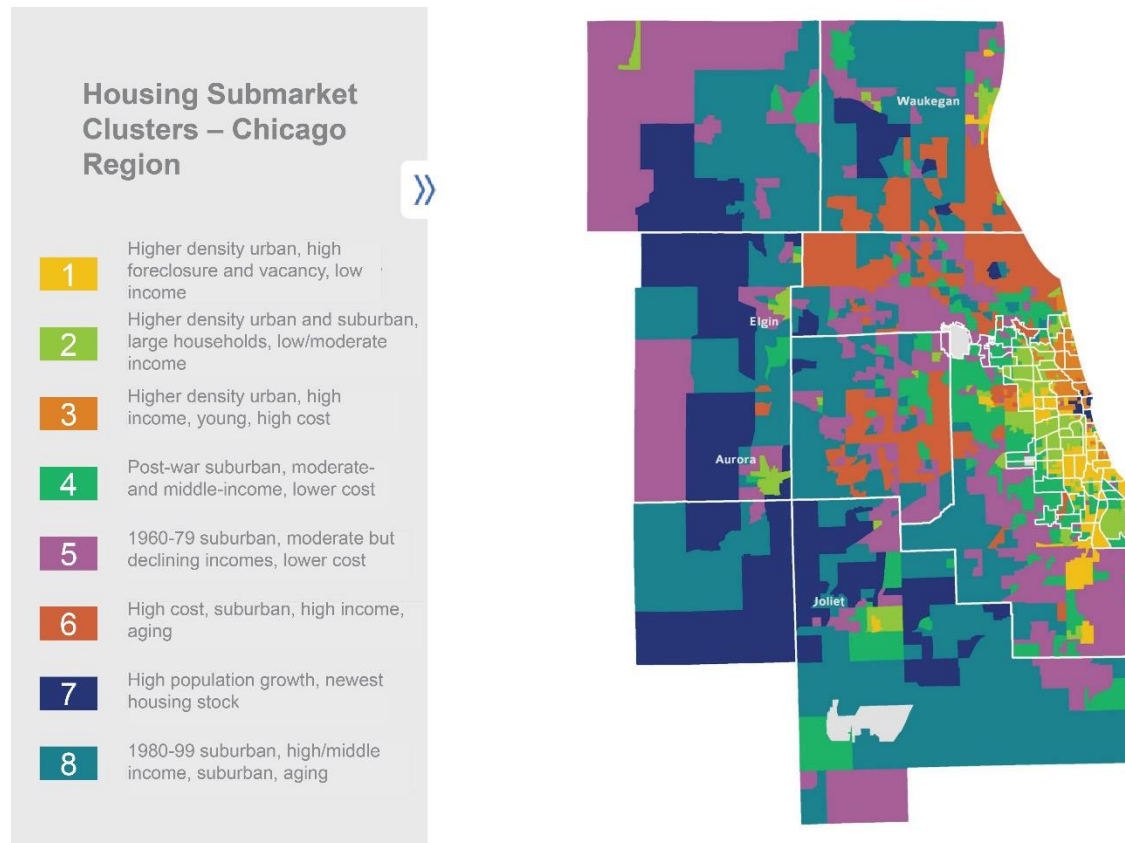
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<sup>68</sup> Chicago Metropolitan Agency for Planning staff memo, [Place-Based Layers Approach](#), May 11, 2016.

<sup>69</sup> Institute for Housing Studies at DePaul University, [“Regional Housing Market Segmentation Analysis,”](#) June 2016.







Source: Institute for Housing Studies at DePaul University and Chicago Metropolitan Agency for Planning.

CMAP should use the identified clusters as a lens for multiple agency activities. CMAP, MMC, and MPC, with financial assistance from CCT and the Harris Family Foundation, will develop in FY17 a strategy website partners can use to address the housing issues unique to each submarket. In this respect, additional work will identify the issues most common to each cluster and typical strategies to address these issues. Once completed, the strategy document in conjunction with the clusters will serve as the lens for future LTA analysis of housing issues in local communities.

The clusters might also be used in policy work analyzing regional housing trends, along with the previously identified specific research projects, where appropriate. The clusters may be useful in research on incentives, regulations, and funding mechanisms, such as the effect of federal and state policies on the private finance system, to understand how different effects play out in various geographies.

The result is that the clusters will serve as common framework in tracking regional trends, researching regional issues, and implementing effective approaches at the local level.



## Next steps

The framework in this document sets the direction for housing in ON TO 2050. The recommendations will help integrate the vision for housing choice into context with the approaches for other topic areas, such as reinvestment, infill, and inclusive growth. CMAP expects these recommendations to inform future strategy papers, snapshots, technical assistance projects, policy updates, research products, and data sharing.

CMAP cannot achieve housing choice alone. Regional partners are critical to successful implementation of many strategies. Further discussions on the most effective ways to advance regional collaboration will be essential as the agency develops and then implements ON TO 2050. The largest unanswered questions from this paper -- how to address those topics for which CMAP should not take the lead -- will require continued work by staff in partnership with other organizations to hone both the best regional approach and CMAP's role in that approach.



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The Chicago Metropolitan Agency for Planning (CMAP) is our region's comprehensive planning organization. The agency and its partners are developing ON TO 2050, a new comprehensive regional plan to help the seven counties and 284 communities of northeastern Illinois implement strategies that address transportation, housing, economic development, open space, the environment, and other quality-of-life issues. See [www.cmap.illinois.gov](http://www.cmap.illinois.gov) for more information.

ON TO 2050 strategy papers will explore potential new topics or refinements to existing GO TO 2040 recommendations. These documents and data-driven snapshot reports will define further research needs as the plan is being developed prior to adoption in October 2018.

