

Benefits for Whom? Comparison of Various Community Benefits Agreements

In reaction to past failures to involve residents in the development process, Community Benefits Agreements (CBAs)¹ and Community Benefits Ordinances (CBOs)² were developed as mechanisms to guarantee community inclusion and negotiation of incremental benefits from proposed projects.³ To examine the success of CBAs in providing benefits to the community, I will compare the strengths and weaknesses of different CBAs from cities in several Midwestern cities and/or majority African American urban areas. In addition, I will evaluate the CBAs based on some being developed on a project-by-project basis and others designed as a model, Memorandum of Understanding (MOU)⁴ or local ordinance. This assessment will provide additional guidance for the potential creation of a CBO in the City of Cleveland.

Effective CBAs

According to the Partnership for Working Families,⁵ the four elements needed to have an effective CBA include:

- 1) *community interests are well-represented,*
- 2) *the CBA process is transparent, inclusive, and accessible,*
- 3) *concrete, meaningful benefits deliver what community needs, and*
- 4) *clearly defined enforcement mechanisms ensure developer accountability*

To investigate the effectiveness of CBAs in bringing inclusive and equitable development, I will break down each campaign by process and outcome.

A good negotiation and implementation **process** needs:

- strong community engagement,
- representation of all community members and their interests,
- trusting relationships between public and private sector stakeholders,
- a fair and open process where all stakeholders' views are considered equally,
- upfront and strong evaluation of projects before developer receives approval and funding,
- strong monitoring and enforcement procedures
- establishment of monitoring/enforcement committees
- transparent and frequent reporting of comprehensive metrics, and
- transparent process that is shared with the community, and
- clear objectives and goals of the process.⁶

A successful **outcome** includes:

- evaluation of project and CBA goals achieved (post-construction),
- examine accuracy and transparency of data,
- evaluate ability of monitoring and enforcement committees, and its procedures, to meet deliverables,
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- assessment that benefits were received and meet the needs of the community, including public and private interests, and
- all stakeholders are being held accountable.

Brief Description of CBAs

I will provide brief descriptions of each CBA/project and then compare their ability to achieve an effective and successful process and outcomes [Note: *While highlighting past urban planning decisions and community organizing are significant to understanding the history of CBA campaigns, in the following descriptions I only focus on current events.*].

Cleveland Memorandum of Understanding Community Benefits and Inclusion (MOU) – Cleveland, OH 2013 – Remains in effect (Model CBA)

The impetus for Cleveland’s Model CBA is a result of the success of the 2010 University Hospital’s Project Labor Agreement (PLA)⁷ that encouraged greater diversity in the workforce and MBE (Minority Business Enterprises) and Women Business Enterprises (WBE) participation; and the Fannie M. Lewis Cleveland Resident Employment Law enacted in 2004, which guaranteed 20% of workers on publicly subsidized projects over \$100,000 are “low-income” Cleveland residents. Key political leaders (e.g., Mayor Frank Jackson and Ohio Congressman Louis Stokes), prominent minority business owners, and other organizational/ business leaders within the construction industry advocated for a MOU to ensure developers make good faith efforts to hire low-income Cleveland residents and contract with MBEs on local city projects.⁸ Ultimately, the MOU goals comprise of a workforce demand study, local hire, MBE and WBE requirements, training programs, data reporting, mentor-protégé relationships, and a monitoring committee. The parties who were involved with the negotiation of the MOU include city government, business leaders, several institutional actors (e.g., Cleveland Clinic, Cuyahoga Community College (Tri-C), etc.), union contractor associations, and the building trades.⁹

Due to only industry leaders being responsible for negotiating the agreement, there was limited community involvement in the creation of Cleveland’s MOU. There was also little “teeth” to the agreement on account of the model CBA language lacking an enforcement mechanism and encouraging developers to make good faith efforts in reaching goals outlined in MOU. The monitoring committees were run by industry leaders and one organization, which primarily represented their members’ (institutional owners) interests, was responsible for leading the effort. No community members were involved in the monitoring and implementation of the MOU. The Construction Diversity & Inclusion Committee met for a few years to monitor the enactment of the CCIP. But the committee stopped meeting for various reasons, including inadequate reporting nor participation of key stakeholders.¹⁰ There seemed to be modest gains in pre-apprenticeship and apprenticeship training in the trades and manufacturing for high schoolers and adults.

**Atlanta Beltline Ordinance [Beltline Tax Allocation District (TAD) and BeltLine Redevelopment Plan] – Atlanta, GA
2005 – In progress (city CBO)**

The Atlanta BeltLine is a *sustainable redevelopment project*, which follows an old 22-mile, Atlanta railroad line and will lead to further economic development along the route.^{11, 12} The project will connect 45 neighborhoods, take approximately 25 years to complete and is expected to cost \$2.8 billion.¹³ The project will result in “28,000 new and 5,600 affordable housing units, 30,000 permanent and 48,000 one-year construction jobs and up to \$20 billion in total projected economic development.”¹⁴ Georgia Strategic Alliance for New Directions and Unified Policies (Georgia STAND-UP) pressed the City of Atlanta to enact the Atlanta Beltline Ordinance, which offers guiding principles of community benefits.¹⁵ The coalition spent months negotiating the CBO with the city, which successfully passed in 2005. The community benefits ordinance includes funding for affordable housing and other economic development needs funded by TAD bonds.¹⁶ The ordinance certifies that all projects receiving public subsidies will attach community benefits, such as prevailing wage, a first source hiring center, and training and apprenticeship programs.¹⁷

Overall, the community participated in the negotiations. But some residents found the process unfinished because certain requirements were vague and the process rushed.¹⁸ One of the limitations of the ordinance is that the goals were aspirational and not enforceable.¹⁹ Developers were encouraged to make good faith efforts, but there were no requirements or penalties for failing to meet the goals. The city council enacted a *community engagement framework* that includes quarterly briefings, study groups, design workshops, and advisory committees. A third-party non-profit agency was enacted to monitor and report data to regularly track the progress towards meeting inclusion and equity metrics. The metrics track the number and percentages of affordable housing built and rehabilitated, jobs created, businesses expanded, citizens accessing transit and trails, community events and community engagement, and green space opened and cleaned-up.²⁰ The third-party monitoring agency claimed that short-term goals are regularly being met, and there is still opportunity to achieve long-term goals. While most of the rail line is complete, the majority of multi-use trails and mixed-use development surrounding the rail line is still under construction.

**Obama CBA Residential Area Affordable Housing Pilot Ordinance - Chicago, IL
2020 – In progress (city CBO)**

The Obama Foundation is building a Presidential Center, on a 19.3-acre site, in Jackson Park for \$830 million.²¹ The projected expectations include the generation of 1,400 jobs and \$86M in income for South Side residents (during construction), 2,175 South Side jobs and \$81 million (annually after construction). South Side businesses are expected to gain \$339 million (during construction) and \$177 million (annually after construction).²² The South Shore and Woodlawn neighborhoods, who are concerned over displacement and ensuring residents secure economic opportunities and other community benefits from the project, created the Obama CBA Coalition. The Obama CBA Coalition, involves 50 organizations, urged the City of Chicago, University of Chicago, and Obama Foundation to sign a CBA to ensure the community benefited from the construction of the Presidential Center. Both the Obama

Foundation²³ and University declined negotiations. Over a 5-year period, there were several town hall meetings, which resulted in the city passing the Obama CBA Ordinance in September 2020. The Ordinance includes affordable housing, a community trust fund, property tax relief, local hiring requirements, and a pilot program for renters. The original legislation proposed by the community had stronger requirements, which were approved by city council members. Unfortunately, Mayor Lori Lightfoot approved a weaker version, lessening affordable housing requirements and the area the CBO applied to.²⁴

While the community is involved with the implementation of the CBO, it still must organize to ensure community needs are being met and parties are abiding by legislation. For example, over a two-year period, the city had yet to select which vacant lots would be deemed affordable. In August 2022, the Obama CBA Coalition successfully organized and pressured the city to put aside 20 (less than half of the total) vacant lots for housing near the Obama Center.²⁵ The Obama Foundation reports regularly on construction-related goals and has, thus far, met both the MBEs and local workforce utilization goals. But it is too early to make a judgement on whether the city or other relevant agencies are monitoring the housing piece. There have been roughly ten community meetings related to housing for Woodlawn residents, but South Shore residents are not included in similar discussions on housing and displacement.

Detroit's Community Benefits Ordinance [Proposal B] – Detroit, MI 2016 – Remains in effect (Model CBA)

During the 2016 elections, Detroit residents had the opportunity to vote for two types of Community Benefits Ordinance. It was the first city CBO in the nation. After several years, the “Rise Together Detroit” coalition successfully petitioned city council to put Proposal A on the ballot. Proposal A, being stronger, required developers to enter CBA negotiations directly with community members for any publicly funded or incentivized development projects over \$15 million or when developers received \$300,000 in public dollars. In Proposal A, the CBA was legally enforceable, the agreements required local hire and MBE goals, and both the city and community members could legally enforce and monitor each CBA.²⁶ In response to this ordinance, some business and city leaders proposed a *weaker* Community Benefits Ordinance for Detroit residents to vote on.²⁷ Proposal B raised the amount to when a CBA would be prompted and reduced the authority the community had in the decision-making process. Proposal B received over 50% of the votes compared to Proposal A, which received approximately 40% of the votes.²⁸ Proposal B requires developers to enter CBA negotiations directly with community members for any Tier 1 projects over \$75 million or when developers receive \$1 million in public dollars. For Tier 2 projects, which are publicly funded and cost a minimum of \$3 million, developers must work with the city and other relevant agencies to prioritize hiring low-income residents and address issues raised by the community impacted by the project.

The community was involved with creating Proposal A, but were not included in designing Proposal B. Proposal B limits the community's power to be at the table by making it more difficult to have equal control over urban planning decisions; and little transparency due to several projects being unable to meet requirements that trigger a CBA.²⁹ There is a lack of inclusion of city

residents due to the city having control over the process, such as choosing which community residents are represented.³⁰ In Proposal B, only the city has authority to legally enforce agreements, and developers are not required to enter negotiations with the community. The CBO established (1) an advisory committee to create a Community Benefits package and collect community input on projects that affect their neighborhood, and (2) an enforcement committee which monitors whether developers are meeting incentives outlined in the Community Benefits Provision. Over 10 projects met the CBO threshold, which led to thousands of residents participating in the planning process, and sharing their ideas with various advisory committees and at community meetings.³¹

Park East Redevelopment Compact (PERC) – Milwaukee, WI 2004 – In progress (county CBO)

With the demolition of the Park East freeway, 64 acres, in total, were available for redevelopment in downtown Milwaukee.³² The development was built over three phases, and includes the construction of parking structures, apartments, retail or office space, and entertainment venues. In the first phase the Bucks arena was built, during the second phase a hotel was erected, and the third phase included the construction of an outdoor plaza.³³ The Good Jobs and Livable Neighborhoods Coalition – made up of several organizations, including the painters union, Sierra Club, Milwaukee Innercity Congregations Allied for Hope, and Milwaukee County Labor Council - held a number of community meetings.³⁴ They rallied for the City of Milwaukee to create a community benefit ordinance for the Park East Corridor, but the Common Council rejected it.^{35, 36} Although there was opposition from developers and the County Executive, who at the time was Scott Walker, the coalition successfully pressured the county to pass the ordinance. PERC mandated that developers meet requirements in agreement for each county-owned parcel (16 acres, in total).³⁷ The PERC created a fund to achieve sustainable and equitable development of the Park East corridor, such as capital for minority and small businesses. The PERC guaranteed MBE/WBE and local hire goals, affordable housing, prevailing wage for construction work, and environmental justice. It encouraged employers to make good faith efforts to hire workers of color from the county, formed an advisory committee for monitoring, and created a mechanism to report employment data.^{38, 39, 40}

The community was involved in the process, but when the city would not implement the ordinance, they went to the county where their advocacy work was successful. While developers were not in favor of PERC, part of the county ordinance required developers to meet ordinance requirements and provide annual reports for monitoring. The advisory committee met for the first 5-6 years after implementation of the ordinance, but due to the 2008 recession little development was completed during those years. While the committee oversaw limited monitoring of the overall development projects, developers did follow through with ordinance requirements.⁴¹ Developers were required to provide yearly reports, but there were no consequences for failing to meet goals. The majority of construction projects were completed around 2018, but several vacant lots remain undeveloped. More local job seekers are going through pre-apprenticeship and apprenticeship programs for construction-related trades than before.⁴²

Community Collaboration and Implementation Plan (CCIP) – Pittsburgh, PA

2018 – In progress (project-by-project basis)

In the early 2000s, the Pittsburgh Penguins wanted to play in a new venue so the Civic Arena (a.k.a. the Igloo) was demolished and a new arena built in an adjacent lot. To assure the community benefited from the new Civic Arena, the One Hill Coalition – comprising roughly 100 community organizations - negotiated a CBA with the Penguins and the city. The agreement was signed in August 2008 and it was the first CBA in the City of Pittsburgh. One of the benefits in the agreement was a 10-year master development plan, which was later used to come up with demands for a new CBA. Stemming from this work, a new coalition formed to promote a Community Collaboration Implementation Plan (CCIP) or CBA for the redevelopment of the 28-acre site of the former Civic Arena. The CCIP was negotiated between city officials, the Hill Community Development Corporation (CDC), and the Penguins. The benefits of the CCIP include an advisory committee, MBE and WBE goals, local hire, affordable housing, and wealth building and cultural legacy initiatives.

The One Hill CBA used a democratic process to create a list of demands to be included in the agreement. On the other hand, the CCIP lacked community engagement because it was strictly negotiated between key negotiators who were government and business leaders.⁴³ With construction only beginning, the outcomes are mixed and incomplete. An advisory committee meets regularly to oversee implementation and monitoring of the CCIP. The Hill CDC filed a lawsuit against the City of Pittsburgh and the Pittsburgh Arena Real Estate Redevelopment team (PAR)⁴⁴ for not abiding by the CCIP. The city and PAR were found responsible for not complying with the CCIP and as a result the Hill CDC secured a Local Economic Revitalization Tax Assistance (LERTA) district, which is an investment fund for the Hill District. The Greater Hill District Neighborhood Reinvestment (GHDNRF) funds will be used towards meeting CCIP goals. There is an advisory committee to oversee the allocation of the LERTA funds. The CCIP requirements are voluntary so there is little accountability on behalf of the developers to follow through with the agreement. Buccini/Pollin (BPG), the developer, has been collecting data but it is not routinely reported or easily accessible.

Full Description - Process & Outcomes of CBAs & CBOs						
City (Year CBA began) <i>Project status</i>	Cleveland (2013) <i>Remains in effect</i>	Atlanta (2005) <i>In progress</i>	Chicago (2020) <i>In progress</i>	Detroit (2016) <i>Remains in effect</i>	Milwaukee (2004) <i>In progress</i>	Pittsburgh (2018) <i>In progress</i>
Project Scale	Large-scale development projects within the City of Cleveland	22-mile multi-use transit loop, including light rail and sidewalks. ⁴⁵	The Obama Presidential Center will be constructed on a 19.3-acre site	Large-scale development projects within the City of Detroit	64-acre mixed-use redevelopment site	28-acre mixed-use redevelopment site
Name - Type of CBA	Cleveland’s Memorandum of Understanding Regarding	Atlanta Beltline Ordinance [Beltline Tax Allocation District (TAD) and	Obama CBA Residential Area Affordable Housing Pilot Ordinance –	Detroit’s Community Benefits Ordinance [Proposal B] – city	Park East Redevelopment Compact (PERC) – county CBO	Community Collaboration and Implementation Plan (CCIP) –

	Community Benefits and Inclusion (MOU) – Model CBA	BeltLine Redevelopment Plan] – city CBO	city CBO	CBO		project-by-project basis
CBA Benefits/ Requirements	MOU goals contained a workforce demand study, MBE and WBE requirements, pre-apprenticeship and full-apprenticeship programs, workforce reporting, mentor-protégé relationships, and a Construction Diversity and Inclusion Committee. ⁴⁶	The community benefits ordinance includes funding for affordable housing and other economic development needs funded by TAD bonds. The ordinance certifies that all projects receiving public subsidies will attach community benefits, such as prevailing wage, a first source hiring center, and training and apprenticeship programs. ⁴⁷	The Ordinance includes 30% affordable housing at 50% Area Median Income (AMI) on 25% of city-owned vacant land (52 vacant lots); community trust fund and property tax relief to assist with purchasing, refinancing, or rehabilitating homes and apartment buildings; local hiring requirements for developments that receive city-owned land; and a Tenant Right of First refusal pilot program for larger apartment buildings. ^{48,49}	Proposal B requires developers to enter CBA negotiations directly with community members for any Tier 1 projects, which are publicly funded or incentivized development projects over \$75 million or when developers receive \$1 million in public dollars. Tier 2 projects do not meet the criteria for Tier 1 and are seeking public support for a project costing at least \$3 million. For Tier 2 projects, developers must work with the city and other relevant agencies to prioritize hiring low-income residents and address issues raised by the community impacted by the project. In Proposal B only	PERC mandated that developers meet requirements in agreement for each county-owned parcel (16 acres, in total). ⁵¹ The PERC created a fund to achieve sustainable and equitable development of the Park East corridor, such as capital for minority and small businesses. The PERC guaranteed 25% Disadvantage Business Enterprises (DBE) and MBE goals, a 5% WBE goal, 20-25% local hire goal, affordable housing for 20% of the total new housing units, prevailing wage for construction work, and green space and design. It encouraged employers to make good faith efforts to hire workers of color from the county, formed an advisory committee	The demands in the CCIP, originated from ideas in the master plan. The master plan was one of the benefits included in the One Hill CBA, was developed by resident input at a series of community meetings. The benefits of the CCIP include an advisory committee; 30% MBE and 15% WBE goals; 20% local and minority hire; 20% inclusionary units on development site; and wealth building and cultural legacy initiatives. ⁵⁵

				the city has authority to legally enforce agreements, and developers are not required to enter negotiations with the community. ⁵⁰	for monitoring, and created a mechanism to report employment data. ^{52,53,54}	
Fairness & Effectiveness of Negotiation Process	Limited community involvement in the creation of Cleveland’s MOU due to industry leaders being responsible for negotiating agreement.	Overall, the community was involved in the negotiations. Some residents found that the process was unfinished because certain requirements were vague and the process too quick. ⁵⁶	The city and other related agencies invited the community to create the legislation. The original proposed legislation had stronger requirements, which were approved by several city council members, but Mayor Lori Lightfoot approved a diminished version. ⁵⁷ The approved version lessens the area for which the CBA applies to and reduced affordable housing requirements.	The community was involved with creating Proposal A, but was not included in designing Proposal B. Proposal B limits the community’s power to be at the table by making it more difficult to have equal control over urban planning decisions.	The community was involved in the process, and when the city would not implement the ordinance, they went to the county where their advocacy work was successful.	The negotiation of the CCIP restricted community engagement because the key negotiators were government and business leaders. ⁵⁸
Implementation Process – Community Engagement	There was little “teeth” to the agreement due to model CBA language that encouraged	One of the limitations of the ordinance is that the goals were aspirational and not enforceable. ⁵⁹	The community is involved with the implementation of the CBO, but still must organize to ensure community	Proposal B maintains business-as-usual. ⁶⁴ The CBO is not legally enforceable.	While developers were not in favor of PERC, part of the county ordinance required developers to meet ordinance	With construction only beginning, the outcomes are mixed and incomplete. The Hill CDC filed

	<p>developers to make good faith efforts in reaching goals outlined in MOU.</p> <p>Limited community engagement because committees were run by industry leaders and one organization, which primarily represented their members' (institutional owners) interests, was responsible for leading the effort.</p> <p>Gains in pre-apprenticeship and apprenticeship training in the trades and manufacturing for high schoolers and adults.</p>	<p>Developers were encouraged to make good faith efforts, but there were no requirements or penalties for failing to meet the goals.</p> <p>The city council enacted a <i>community engagement framework</i> that includes quarterly briefings, study groups (representing five areas along the BeltLine), design workshops, and two advisory committees - the Affordable Housing Advisory Board and the TAD Advisory Committee.⁶⁰</p>	<p>needs are met.</p> <p>Over a two-year period, the city had yet to select which vacant lots would be deemed affordable. In August 2022, the Obama CBA Coalition successfully organized and pressured the city to put aside 20 vacant lots for housing near the Obama Center – under half of the total vacant lots.⁶¹</p> <p>As of October 2022, nine community engagement and planning sessions with Chicago's Department of Housing were held for Woodlawn residents to learn about and respond to urban planning decisions related to housing.⁶² South Shore residents were included in terms of workforce and business development but left out of</p>	<p>There is a lack of inclusion of city residents due to the city having control over the process, such as choosing which community residents are represented.⁶⁵</p> <p>The city council denied an amendment to lower the threshold for when CBAs are applied but approved an amendment to increase the number of public meetings for a project from one to five.⁶⁶</p>	<p>requirements and provide annual reports for monitoring.</p>	<p>a lawsuit against the City of Pittsburgh and the Pittsburgh Arena Real Estate Redevelopment team (PAR) for not abiding by the CCIP. The city and PAR were found responsible for not complying with the CCIP and as a result the Hill CDC secured a Local Economic Revitalization Tax Assistance (LERTA) district, which is an investment fund for the Hill District. The Greater Hill District Neighborhood Reinvestment (GHDNRF) funds will be used towards meeting CCIP goals.</p> <p>Developers also need to go through the DRP process⁶⁷ for each block in the Lower Hill redevelopment area, including any other development in the Hill that is seeking public subsidies or</p>
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			protections from displacement and inclusion of affordable housing. ⁶³			incentives. Consequently, this means the community and community-based organizations must advocate for benefits for each block.
Monitoring & Enforcement Mechanisms	The Construction Diversity & Inclusion Committee met for a few years to monitor the enactment of the CCIP. Committee members comprised of business leaders in the construction industry. The committee stopped meeting for various reasons, one of which was due to inadequate reporting.	As part of the ordinance, the Atlanta Beltline Partnership, a non-profit organization, was created to track meeting inclusion and equity metrics, such as affordable housing, economic development, transit access, inclusion, and quality of life.	The Obama Foundation seems to do well at monitoring their goals. It is too early to make a judgement on whether the city or other relevant agencies are monitoring the housing piece.	The Detroit CBO established a Neighborhood Advisory Council (NAC), which includes 9 members: 2 elected residents of the impacted area, 4 members selected by the City of Detroit Planning and Development Department, and 3 members appointed by council members. ⁶⁸ The NAC procedure includes developer presentations, working sessions, and community feedback and input to create a Community Benefits Package. The provisions are then submitted to city council to approve.	The Community Advisory Committee for PERC was adopted for the first 5-6 years after implementation of the ordinance. Due to the 2008 recession little development was completed during those years. While committee oversaw limited monitoring of the overall development projects, developers did follow through with ordinance requirements. ⁶⁹	The Executive Management Committee meets regularly, which was formed as an advisory committee to oversee implementation and monitoring of the CCIP. The GHDNRF Advisory Committee meets regularly to make suggestions on how to appropriately use funds and monitor the Lower Hill LERTA.
Transparency &	Due to a lack of	The third-party non-	Since construction	The CBO	The City of	There is limited

<p>Reporting Outcomes</p>	<p>enforcement, there were significant challenges to reporting. Since developers were not required to meet goals, many failed to report workforce participation data. While a few developers did report data, there were several inconsistencies or categories left out, which made it difficult to fully analyze data and compare results with data from other development projects.⁷⁰</p>	<p>profit monitors and reports goals regularly. Atlanta Beltline Partnership reported (as of November 2022): 88% of the 22 miles of rail transit were achieved and 40% of the 33 miles of multi-use transit trails; 48% of the 50,000 permanent jobs have been attained; 83% of the \$10 billion in economic development has been reached; 36% of the 1,100 acres in environmental devastation has been cleaned up; 56% of the 5,600 units of affordable housing has been attained; over 450 public art displays; and 31% of the 1,300 new green spaces have been reached.⁷¹</p>	<p>began in August 2021, the Obama Foundation reports regularly. As of August 24, 2022, the Obama Foundation reported 52% Minority Business Enterprises (MBE) vendors; 32% local hire from Chicago’s South and West Sides; and 158 city residents placed in skilled trade jobs across the city.⁷²</p>	<p>establishes an Enforcement Committee of a minimum of five government officials from various departments and one NAC member. The committee conducts biannual compliance reports and annual meetings to monitor whether developers are meeting incentives outlined in the Community Benefits Provision.</p> <p>While the reporting mechanisms are worthy, there is little transparency of the project due to many projects not meeting the requirements that trigger using the CBO.</p>	<p>Milwaukee describes the different projects completed as part of the PERC, but the specific data showcasing jobs, housing, etc. are not readily available.</p>	<p>transparency because each stakeholder accuses another stakeholder of spreading misinformation about the development process to the community.</p> <p>Buccini/Pullin Group (BPG) has collected data for workforce and MBE/WBE participation, but the reporting is not easily accessible. As of July 2022, BPG has obtained 27% minority and 3% female construction work hours, and 22% MBE and 8% WBE for constructing FNB Financial Center – which is less than a quarter complete.⁷³</p>
<p>Accountability</p>	<p>There was little accountability on behalf of all stakeholders involved.</p>	<p>With a third-party agency monitoring the ordinance requirements and community engagement, it seems that all</p>	<p>The Obama Foundation are held accountable by requirements in the CBO.</p>	<p>As of April 2022, 11 projects have met CBO guidelines, 111 residents have served on NACs, 80 community</p>	<p>Developers seem to be held accountable because they were required to provide yearly reports, but they only needed to make good faith</p>	<p>The CCIP requirements are voluntary so there is little accountability on behalf of the developers to follow through with</p>

		stakeholders are being held accountable.		meetings have been held, and over 1,000 residents have participated in the process. ⁷⁴	efforts to meet goals. There were no consequences for failing to meet goals.	agreement requirements. As a side note, BPG failed the DRP process with the Hill CDC. BPG has yet to go back to the Hill CDC to seek approval. BPG did receive approval for the project from another community-based organization and by Pittsburgh's development agencies. ⁷⁵
Benefits – Meet Needs of Community	There seems to be modest gains for achieving a more diverse workforce in the construction industry as well as meeting higher utilization goals for MBEs and WBEs. The County of Cuyahoga came out with their 2022 Equity Commission Report, which showed a total of 14% of SBEs (Small Business Enterprises), MBEs, and WBEs were awarded contracts in 2021. From 2012-2021, MBEs were awarded 2% of contracts	With 88% of the rail transit complete, it is slightly concerning that less than half of the workforce participation goals have been achieved, but the Atlanta BeltLine does claim they regularly meet short-term goals. ⁷⁷ With the majority of the multi-use trails and mixed-use development surrounding the rail line still under construction, there is opportunity to reach workforce, affordable housing, and green space	After a year of construction, the Obama Foundation has met both the MBEs and local workforce utilization goals. It remains to be seen if this will continue till 2025, and whether local residents will be displaced once the center officially opens.	Examples of benefits for specific projects involve: <u>Fisher Loft 21</u> - Redeveloping the Fisher Body Plant 21 into a housing complex. After the community engagement process, the city agreed to 20% affordable housing at 80% Area Median Income (AMI). However, the Detroit People's Platform found that the rent at 80% AMI is still unaffordable. At 80% AMI it would cost \$52,000 a year to rent at Fisher	The majority of construction ended around 2018 with vacant lots still needing to be developed. More local job seekers are going through pre-apprenticeship and apprenticeship programs for construction-related trades compared to prior to the CBO. ⁸¹ In connection to PERC, the Milwaukee Bucks and the Alliance for Good Jobs Coalition entered into a CBA in 2016	One of the demands in the CCIP is affordable housing, and thus far no development has included housing, except for one proposal that was later withdrawn. There have been average results in terms of achieving MBE/WBE and workforce utilization goals, but the development area is in the beginning stages and needs to address other needs of the community and meet requirements of the

	<p>(totaling \$9.5 million), WBEs were awarded 4% (totaling \$23.9 million), and SBEs awarded 12% (\$70.9M); while Non-SBE/MBE/WBEs were awarded 82% of contracts (totaling \$474.2 million).⁷⁶</p>	<p>goals.</p>		<p>Loft 21 so roughly \$1,200 - \$1,300 a month, but residents around the impacted area make \$30,000 a year on average.⁷⁸</p> <p><u>Michigan Central</u> - Ford bought the Michigan Central Station to create an innovation hub for the future of mobility. The NAC approved a CBA that includes affordable housing requirements, upgrades to green space, funding for workforce development and training programs, a hiring hall for local residents, and community engagement on innovative transportation pilot projects and planning process.⁷⁹</p> <p><u>Pistons Training Facility</u> – The new training facility will create 250 jobs geared towards mostly local residents, and will fund community</p>	<p>that focuses on permanent jobs after construction. The benefits include a first source hiring center, at least half of employees in the entertainment area will come from local low-income neighborhoods and will be paid a living wage, and employees have the right to collectively bargain.⁸²</p>	<p>CCIP.</p>
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				recreation facilities and services, such as the construction of 60 outdoor basketball courts and a skate park. ⁸⁰		
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Summary of Findings

Each of the CBAs (listed above) have strengths and weaknesses we can learn from. One positive is the opportunity for citizens to raise views about proposed development projects, and have their needs and concerns heard by the city and developers. The level of community involvement and engagement during the negotiation and implementation stages varies. Nearly all CBA campaigns have either government-led meetings or meetings held by community-based organizations where residents can attend and give their input on the potential impact of a proposed development. The process is rarely fair and effective because while coalitions and community leaders are included in negotiations, for the most part, there is still a power differential between community residents and business and political leaders. Coalitions, especially ones made up of several organizations, have greater political power organizing together; but sometimes their influence is finite. As an example, large coalitions in Milwaukee, Chicago, and Detroit advocated for a CBA, but local government hindered the strength of the CBA. In Detroit, the coalition lost in the elections to business leaders who were promoting a weaker CBO. On the other hand, negotiations for CBAs in Cleveland and Pittsburgh had less community representation compared to the others, because the parties involved were business and government leaders. Although negotiations with only elite stakeholders can still produce strong community benefits, excluding the community in the process will most likely diminish the effectiveness of the CBA in meeting the needs of the community.

In assessing CBA outcomes, it is necessary to examine transparency, reporting, monitoring and enforcement, and accountability. Most agreements include workforce development and MBE/WBE business initiatives, an affordable housing piece, and an element of environmental justice. Due to lack of reporting, including community’s responses to the CBA’s overall results, it is difficult to assess whether the CBA did in fact benefit the local community. The Atlanta Beltline and the Obama Presidential Center were the only CBAs to include accessible reporting on reaching goals from the agreement. The Atlanta Beltline Racial Equity Plan included an extensive equity and inclusion metrics, like the metrics designed to track the City of St. Louis’ economic development framework. In 2020, the city commissioned the St. Louis Development Corporation to design an equitable economic growth plan, which utilizes various data sources to track goals. The metrics measure the rate of growth, equity and diversity in good (middle-class) jobs, diverse entrepreneurs and entrepreneurship opportunities, job and population retention, poverty rates, vacant lands, displacement, and community representation.⁸³

Each CBA had some form of advisory committee to monitor and/or implement the agreement. The committee's results varied depending on timing, capacity, and elements outside their control. For instance, it was difficult for Milwaukee's advisory committee to monitor the implementation of the agreement when construction was halted due to a recession. Detroit's CBO established both a Neighborhood Advisory Committee and an Enforcement Committee to implement community benefit provisions more effectively. However, the downside with Detroit's CBA is that less projects will be able to qualify for CBAs because the project requirements are extremely high. Lastly, all CBAs encourage developers to make good faith efforts to achieve CBA goals, meaning parties cannot enforce or penalize developers for underperforming. When institutional leaders in communities, such as in Cleveland, are willing to adopt CBAs and other similar initiatives, that bodes well for the success of the CBA. But there also needs to be a cultural shift, where all stakeholders - including developers - express support for community benefits to have diversity, equity, and inclusion in development, the workforce and entrepreneurship.

In this article, I described and examined the process and outcomes for various CBAs. I discussed what worked and did not work in a handful of CBAs in the Midwest. This information will be examined more thoroughly in an upcoming article discussing the principles likely to produce effective CBAs in the future.

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¹ Community Benefits Agreements are defined as “a legally enforceable contract, signed by community groups and by a developer, setting forth a range of community benefits that the developer agrees to provide as part of a development project” (Gross, LeRoy, and Janis-Aparicio 2005:9).

Gross, Julian, Greg LeRoy and Madeline Janis-Aparicio. 2005. “Community Benefits Agreements. Making Developmental Projects Accountable.” Los Angeles, CA: Good Jobs First and the California Public Subsidies Project. <http://www.goodjobsfirst.org/sites/default/files/docs/pdf/cba2005final.pdf>.

² While CBAs are implemented on a project-by-project basis, CBOs offer a model of community benefits [for multiple projects or a development area] which parties are required to abide by and are formally adopted into local legislation.

³ Baxamusa, Murtasa. 2008. “Empowering Communities Through Deliberation: The Model of Community Benefits Agreements.” *Journal of Planning Education and Research* 27:261–76. doi:10.1177/0739456X07308448.

⁴ A MOU is “a written agreement [or template] between two parties that is usually not a legally enforceable contract” (Campos, Conway, and Mogharei 2022:14).

Campos, Alma, Sarah Conway, and Phoebve Mogharei. 2022. “Will that New Development Benefit Your Community?: The People’s Guide to Community Benefits Agreements & Alternatives.” *City Bureau*, February. <http://www.citybureau.org/cba>.

⁵ Partnership for Working Families. 2016. “Common Challenges in Negotiating Community Benefits Agreements and How to Avoid Them.” <https://www.datocms-assets.com/64990/1657040054-effective-cbas.pdf>.

⁶ Uddin, Kamal, and Bhuiyan Monwar Alam. 2022. *Public Participation Process in Urban Planning: Evaluation Approaches of Fairness and Effectiveness Criteria of Planning Advisory Committees*. Routledge: New York, NY.

⁷ The PLA, known as the Vision 2010, included a targeted goal of 20% local hiring, 5% WBE, 15% MBE, 80% goods and services purchased from Northeast Ohio businesses, increased funding for a pre-apprenticeship program at May Hayes high school, and the hiring of a third-party consulting agency to monitor implementation (Zuckerman 2013).

Zuckerman, David. 2013. *Hospitals Building Healthier Communities: Embracing the Anchor Mission*. The Democracy Collaborative. Takoma Park, MD.

⁸ The impetus for Cleveland's Model CBA is a result of the success of the 2010 University Hospital's Project Labor Agreement (PLA) ⁸ that encouraged greater diversity in the workforce and MBE (Minority Business Enterprises) and Women Business Enterprises (WBE) participation. And the Fannie M. Lewis Cleveland Resident Employment Law enacted in 2004, which guaranteed 20% of workers on publicly subsidized projects over \$100,000 are low-income Cleveland residents.

⁹ The following parties signed the MOU: the City of Cleveland, MBEs (e.g., Ozanne Construction Company, McTech Corporation, Coleman-Spohn Corporation, JWT&A LLC), Construction Employers Association (CEA), Hispanic Roundtable, Hard Hatted Women, Cuyahoga Community College, Greater Cleveland Partnership, Urban League of Greater Cleveland, Cleveland Metropolitan School District, Cleveland Building and Construction Trades Council (CBTC), and several institutional actors (e.g., Cleveland Clinic, Cuyahoga Community College (Tri-C), etc.).

¹⁰ While developers were not required to report workforce and MBE/WBE participation goals in the MOU, developers were mandated to report data due to CBOs. Developers were required to report workforce participation goals on projects exceeding \$100,000 due to the Fannie Lewis law (prior to it being ceased in 2019). Developers are also required to meet MBE/WBE utilization goals - 15% for MBEs and 7% for WBEs - on projects exceeding \$100,000 in the City of Cleveland. The Mayor's Office of Equal Opportunity regularly monitors contracting goals and releases annual reports.

¹¹ The impetus for the Belt Line was originally proposed in Ryan Gravel's master's thesis in December 1999.

Davidson, Ethan. 2011. *The Atlanta Beltline: A Green Future*. U.S. Department of Transportation Federal Highway Administration. FHWA-HRT-11-006.

<https://highways.dot.gov/public-roads/septemberoctober-2011/atlanta-beltline-green-future#:~:text=In%201999%2C%20Ryan%20Gravel%20wrote%20a%20graduate%20thesis%2C,system%20combined%20with%20economic%20development%20and%20connectivity%20strategies>.

¹² Atlanta BeltLine. 2022. "FAQS." <https://beltline.org/faqs/>.

¹³ PowerSwitch Action. 2022. "Policy Toolkit: Community Benefits Agreements." <https://www.powerswitchaction.org/resources/community-benefits-agreements#examples>.

¹⁴ Wells, Kathy. 2017. "How One of the Country's Largest Urban Redevelopment Projects is Paving the Way for Change." *Construction Business Owner*, August 9. <https://www.constructionbusinessowner.com/technology/building-atlanta-beltline#:~:text=Alongside%20the%2022-mile%20transit%20system%20and%2033-mile%20trail,to%20%24%20billion%20in%20total%20projected%20economic%20development>.

¹⁵ Municipal Code of Atlanta Ordinance 05-O-1733 BeltLine Ordinance (2005). <https://beltline.org/wp-content/uploads/2019/03/Community-Benefits-Agreement-Resolution-and-Principles.pdf>.

¹⁶ TAD bonds incentivize developers to build projects in low-income areas, and developers are required to pay bonds for receiving public subsidies.

¹⁷ Municipal Code of Atlanta Ordinance, supra note 15.

¹⁸ Leslie, Katie. 2013. "Atlanta Council Passes Community Benefits Plan, Clears Path for Construction." *The Atlanta Journal-Constitution*, December 3. <https://www.ajc.com/news/local-govt--politics/atlanta-council-passes-community-benefits-plan-clears-path-for-construction/pmVjGZWs1Y7YYpg090y8mN/>.

¹⁹ Interview with John Goldstein, founder of the Coalitions, Campaigns and Community Benefits, in November 2022.

²⁰ Atlanta Beltline. 2023. "The Numbers Tell the Tale." <https://beltline.org/the-project/project-goals/equity-and-inclusion/#measuring-our-progress>.

²¹ Thibault, Matthew. 2022. "Work Resumes on \$830M Obama Presidential Center Project." *ConstructionDive*, November 16.

<https://www.constructiondive.com/news/noose-found-830m-obama-presidential-center-jobsite-construction-chicago/636372/>.

²² Deloitte Consulting LLP. 2017. "Obama Presidential Center Economic Impact Assessment Key Findings." *Obama Foundation*. https://www.obama.org/wp-content/uploads/Fact-Sheet__OPC-Economic-Impact.pdf.

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- ²³ One priority was to hire the Lakeside Alliance, which is comprised of several construction firms – including MBEs, to oversee the construction. The Lakeside Alliance plans to foster greater local workforce development and ensure that half of the subcontracts are awarded to MBEs. Berner, Kate. 2018. “Obama Foundation Announces Lakeside Alliance as Construction Manager for Obama Presidential Center.” Obama Foundation. <https://www.obama.org/updates/construction-manager/#unique-identifier>.
- ²⁴ Evans, Maxwell. 2020. “City’s Scaled-Back Obama Center Housing Plan Doesn’t Do Enough to Protect Woodlawn, Alderman Says.” *Block Club Chicago*, January 29. <https://blockclubchicago.org/2020/01/29/woodlawn-alderman-says-shell-stop-city-officials-werent-listening-to-a-lot-of-resident-concerns-about-its-affordable-housing-proposal/>.
- ²⁵ Obama Community Benefits Agreement Coalitions. 2022. “Statement from CBA Coalition on Recently-Announced Affordable Housing on 63rd Street Near Obama Center.” <http://www.obamacba.org/announcements>.
- ²⁶ Belongie, Nicholas, and Robert Mark Silverman. 2018. “Model CBAs and Community Benefits Ordinances as Tools for Negotiating Equitable Development: Three Critical Cases.” *Journal of Community Practice* 26(3):308-327. doi: 10.1080/10705422.2018.1476427
- ²⁷ Tate, Monique. 2018. “Time to Reconsider Detroit’s Weak Community Benefits Ordinance.” *Detroit Free Press*, March 13. <https://www.freep.com/story/opinion/contributors/2018/03/13/detroit-development-community-benefits-ordinance/414944002/>.
- ²⁸ Colvin, Rukiya. 2021. “A Detroit Law Promised Residents a Voice in Redevelopment Projects. Many Say Their Concerns Remain Unheard.” *Energy News Network*, September 28. <https://energynews.us/2021/09/28/a-detroit-law-promised-residents-a-voice-in-redevelopment-projects-many-say-their-concerns-remain-unheard/>.
- ²⁹ Belongie and Silverman, supra note 25.
- ³⁰ Tate, supra note 26.
- ³¹ City of Detroit, Department of Planning & Development. 2022. “Welcome to the Fisher Body Plant 21 Community Benefits Meeting.” Power Point Presentation. https://detroitmi.gov/sites/detroitmi.localhost/files/2022-04/Fisher21_Community%20Meeting1_04.12.2022.pdf.
- ³² HUD User. 2012. “Community Benefits Agreement Guides Development in Milwaukee’s Park East Corridor.” https://www.huduser.gov/portal/pdredge/pdr_edge_inpractice_072012.html.
- ³³ Milwaukee Business Times. 2015. “Bucks pledge community benefits for Park East development plans.”
- ³⁴ Goldstein, supra note 19.
- ³⁵ Ryan, Sean. 2004. “Milwaukee County Picks Up Community Benefits Debate.” *Daily Reporter*, August 31.
- ³⁶ In 2009, the City of Milwaukee eventually implemented the “Milwaukee Opportunities for Restoring Employment” Ordinance, which requires developers to offer community benefits, such as prevailing wage and local hire goals, for private projects that are receiving public dollars. Goldstein, supra note 19.
- ³⁷ HUD User, supra notes 31
- ³⁸ Biz Times. 2015. “Bucks Pledge Community Benefits for Park East Development Plans.” *Milwaukee Business Times*, June 3. <https://biztimes.com/bucks-pledge-community-benefits-for-park-east-development-plans/>.
- ³⁹ Municipal Code of Milwaukee County Section 1i(vi) and (vii) Park East Redevelopment Compact (2004). https://www.datocms-assets.com/64990/1656455733-perc_0.pdf.
- ⁴⁰ HUD User, supra note 31.
- ⁴¹ Goldstein, supra note 19.
- ⁴² Ryan, Sean. 2016. “Abele: 98% of Park East Being Developed or Under Option for Sale.” *Milwaukee Business Journal*, March 21.
- ⁴³ Hill CDC. 2014. “Lower Hill Community Collaboration and Implementation Plan.” https://www.hilldistrict.org/sites/default/files/lowerhilldistrict-communitycollaborationandimplementationplan-final_0.pdf.
- ⁴⁴ Pittsburgh Arena Real Estate Redevelopment team (PAR) is the Pittsburgh Penguins’ development team.

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- ⁴⁵ Atlanta BeltLine. 2022. “FAQS.” <https://beltline.org/faqs/>.
- ⁴⁶ Greater Cleveland Partnership. 2016. *Construction Diversity & Inclusion (aka Community Benefits): Leveraging Smart Economic Development Strategies and Good Faith*. Commission on Economic Inclusion.
- ⁴⁷ Municipal Code of Atlanta Ordinance, *supra* note 15.
- ⁴⁸ Municipal Code of Chicago Section 2-44-135 Obama CBA Residential Area Affordable Housing Pilot Ordinance (2019). https://www.scribd.com/document/419645777/ordinance-cba-2019-housing?secret_password=96dRmhiHa5xxnw9rVelB#download&from_embed.
- ⁴⁹ City of Chicago’s Department of Housing. 2020. “Woodlawn Housing Preservation Ordinance.” https://www.chicago.gov/city/en/depts/doh/supp_info/woodlawn-housing-ordinance.html.
- ⁵⁰ Belongie and Silverman, *supra* note 25.
- ⁵¹ HUD User, *supra* notes 31.
- ⁵² Biz Times, *supra* note 37.
- ⁵³ Municipal Code of Milwaukee County, *supra* note 38.
- ⁵⁴ HUD User, *supra* note 31.
- ⁵⁵ Hill CDC. 2014. “Lower Hill Redevelopment: Community Collaboration & Implementation Plan.” https://www.hilldistrict.org/sites/default/files/lowerhilldistrict-communitycollaborationandimplementationplan-final_0.pdf.
- ⁵⁶ Leslie, *supra* note 18.
- ⁵⁷ Evans, *supra* note 23.
- ⁵⁸ Hill CDC. 2014. “Lower Hill Community Collaboration and Implementation Plan.” https://www.hilldistrict.org/sites/default/files/lowerhilldistrict-communitycollaborationandimplementationplan-final_0.pdf.
- ⁵⁹ Goldstein, *supra* note 19.
- ⁶⁰ Davidson, Ethan. 2011. *The Atlanta Beltline: A Green Future*. U.S. Department of Transportation Federal Highway Administration. FHWA-HRT-11-006. <https://highways.dot.gov/public-roads/septemberoctober-2011/atlanta-beltline-green->
- ⁶¹ Obama Community Benefits Agreement Coalitions, *supra* note 24.
- ⁶² City of Chicago’s Department of Housing. 2020. “Woodlawn Housing Preservation Ordinance.” https://www.chicago.gov/city/en/depts/doh/supp_info/woodlawn-housing-ordinance.html.
- ⁶³ Obama Community Benefits Agreement Coalitions. 2022. “CBA South Shore.” <http://www.obamacba.org/southshore.html>.
- ⁶⁴ Belongie and Silverman, *supra* note 25.
- ⁶⁵ Tate, *supra* note 26.
- ⁶⁶ Colvin, *supra* note 27.
- ⁶⁷ Separate from the CCIP, there is a CBO that established a process where developers must go through the DRP process with Registered Community Organizations (RCOs) to approve their development. The RCO legislation was implemented as a result of organizing efforts by the Hill CDC and the Hill District Consensus Group.
- ⁶⁸ City of Detroit. 2021. “Community Benefits Ordinance.” Planning and Development Department. <https://detroitmi.gov/departments/planning-and-development-department/design-and-development-innovation/community-benefits-ordinance#:~:text=The%20Community%20Benefits%20Ordinance%20%28CBO%29%20is%20a%20law,2016%20and%20amended%20by%20City%20Council%20in%202021>.
- ⁶⁹ Goldstein, *supra* note 19.
- ⁷⁰ While developers were not required to report workforce and MBE/WBE participation goals in the MOU, developers were mandated to report data due to CBOs. Developers were required to report workforce participation goals on projects exceeding \$100,000 due to the Fannie Lewis law (prior to it being ceased in

2019). Developers are also required to meet MBE/WBE utilization goals - 15% for MBEs and 7% for WBEs - on projects exceeding \$100,000 in the City of Cleveland. The Mayor's Office of Equal Opportunity regularly monitors contracting goals and releases annual reports.

⁷¹ Atlanta BeltLine. 2022. "Project Goals." <https://beltline.org/the-project/project-goals/>.

⁷² The Obama Foundation. "The Latest Construction Updates for the Center." <https://www.obama.org/the-center/construction/>.

⁷³ My Hill District. 2022. "City of Pittsburgh. Development Activities Meeting (DAM) 10-17-22." <https://www.youtube.com/watch?v=VHpR-OOwQxo>.

⁷⁴ City of Detroit, *supra* note 30.

⁷⁵ The DRP process need to be further updated because developers can shop around and go with an RCO that they know will support their project.

⁷⁶ Cuyahoga County. 2022. "Cuyahoga County 2022 Equity Commission Report." <https://cuyahogacounty.us/docs/default-source/executive-library/2022equityreport.pdf>.

⁷⁷ WSB-TV21. 2022. "Is iAtlanta's BeltLine Keeping Its Promise of Creating Affordable Housing Along Path?" *Yahoo!News*, September 6. <https://news.yahoo.com/atlanta-beltline-keeping-promise-creating-215957854.html>.

⁷⁸ Detroit's People's Platform. 2022. "Fisher Body Community Benefits." <https://www.detroitpeoplesplatform.org/economic-justice/fisher-body-community-benefits/>.

⁷⁹ Hicks, Mark. 2018. "Ford Reveals Benefits for Detroit as Part of Train Depot Plans." *The Detroit News*, September 24.

<https://www.detroitnews.com/story/news/local/detroit-city/2018/09/24/ford-reveals-benefits-detroiters-part-train-depot-plans/1411984002/>.

⁸⁰ Ellis, Vince. 2017. "Detroit Pistons Hope New Practice Facility Becomes Part of City's Fabric." *Detroit Free Press*, September 20.

<https://www.freep.com/story/sports/nba/pistons/2017/09/20/detroit-pistons-practice-facility-new-center-midtown/683296001/>.

⁸¹ Ryan, *supra* note 34.

⁸² Kaiser, Lisa. 2015. "Leaders Applaud First-of-Its-Kind Community Benefits agreement with Milwaukee Bucks." *Shepherd Express*, May 24. <https://shepherdexpress.com/news/leaders-applaud-first-of-its-kind-community-benefits-agreement-milwaukee-bucks/>.

⁸³ St. Louis Development Corporation. 2020. "2020 Vision: An Equitable Economic Development Framework for St. Louis." https://www.stlouis-mo.gov/government/departments/sldc/documents/upload/STL_EEDF_Report_090920_Updated_Web.pdf.

⁸⁴ If you have any questions or comments about the article, please contact me at alast@syr.edu.