



To: Chicago City Council
Date: December 16, 2020
Subject: NO. 20438 (11th WARD)—2420 S. Halsted St.

The Metropolitan Planning Council (MPC) believes that the proposed development at 2420 S. Halsted St. highlights the critical need for the City to engage in proactive planning for Chicago's riverfront industrial corridors. MPC appreciates that the proposed development is within the existing Pilsen Industrial Corridor, and that it will be subject to the standards in the Chicago River Design Guidelines. The developer's plan seems to embrace creating public access at the site. It meets the letter of relevant land use guidelines.

However, the City's repeated approval of warehouses on riverfront sites raises broader concerns about a lack of forward-looking, consistent, and whole-neighborhood based planning that is failing to unlock valuable riverfront land for more river-conscious, transit-oriented, and community-supported uses. Even if this particular development moves forward, it should serve as the final straw that prompts systemic change.

Proactive Riverfront and Industrial Corridor Modernization for All Neighborhoods

The Metropolitan Planning Council is a nonprofit planning, policy, and advocacy organization with over 85 years of experience developing solutions to complex regional and citywide challenges. MPC was a lead partner with the City of Chicago in the creation of the 2016 *Our Great Rivers* vision, and serves as a backbone organization in its implementation, including co-chairing multiple River Ecology & Governance Task Force working groups.

MPC works on riverfront issues—social, environmental, economic, and recreational—with partners across Chicago, including City departments, Cook County government, civic and community-based organizations, developers, and foundations. From our work with these partners, it is clear that Chicagoans want their rivers to be recreationally and environmentally thriving, as well as continue to support and grow innovative industries that use the river while improving water quality and the environment, and allow for public access. Neither MPC nor *Our Great Rivers* are anti-development: in fact, the vision calls for new land use planning to support productive community visions for the continued development and redevelopment of riverfronts.

For many years, MPC and partners have been advocating for proactive planning for Chicago's riverfronts, knowing that growing interest and investment in the rivers and projects such as the Industrial Corridor Modernization Initiative would begin to create development and industrial pressures. Industrial corridors have not remained the same over time, and their land uses should not be locked in place forever. The North Branch industrial modernization process assessed investments and developments in the surrounding area, and changed zoning and land uses along its corresponding stretch of the river. Yet other riverfront industrial corridors have not been evaluated—that work must commence immediately.

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Proactive Planning for Economic Development and Environmental Justice

The City of Chicago has prioritized Transportation, Distribution, and Logistics (TDL) facilities as an important economic development strategy. It is critical that the City quickly develop a citywide strategy for TDL placement. Such a plan should analyze current trends in TDL facility placement across the city, and identify ways to guide new developments and equitably distribute the burdens and benefits of TDL across Chicago neighborhoods. A plan should also set forth design guidelines such that each TDL facility meets high environmental standards (for example, supports a fully electric fleet, mitigates pollution), allows for multiple uses of the site whenever possible, and is sensitive to the context of the neighborhood within which it is situated.

MPC encourages the City to continue to pursue revisions to the Planned Development process via air quality and cumulative impact policies. It is imperative that the City establish an Environmental Equity Working Group as soon as possible, through which community-based and professional experts will guide the City's strategic planning to ensure economic development and environmental justice go hand-in-hand. This working group is vital to securing resident, worker, and environmental health in parts of the city where heavy industry remains a mainstay, as well as those that are in transition.

MPC also encourages the City to explore and promote more innovative and green economic development opportunities, in particular for neighborhoods that are in transition. In locations adjacent to rivers, parks, residences, and transit stations and stops, mixed-use, transit-oriented development (TOD) should be prioritized. High-quality TOD sites—such as 2420 S. Halsted—can simultaneously create recreational opportunities, preserve local biodiversity, and grow the tax revenue generated by the site more than can a single-use TDL warehouse. The City should ensure that proposed developments are also aligned with its own future-oriented policy plans, such as the draft Equitable Transit-Oriented Development Policy Plan.

2420 S. Halsted is one point in a longer pattern. The City continues to use outdated land use plans and policies to evaluate development that will be here far into the future. The City needs to proactively plan for the future of its riverfronts with inclusive community engagement—a process committed to through the *Our Great Rivers* partnership. Almost anything can be justified with a parcel-by-parcel approach, which has been the norm for too long. The City needs to proactively prepare a strategy that more equitably distributes the burdens and benefits of industrial development, rethinks what industrial development is and can be, protects the great asset that is our river system, and enables Chicagoans to shape the future of their communities.

Please contact the Metropolitan Planning Council with any questions regarding this statement.

Sincerely,

Chloe Gurin-Sands

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