



To: Chicago Plan Commission
Date: November 17, 2020
Subject: 2420 S. Halsted St. / 2500 S. Corbett St. (Bridgeport, 11th Ward)

The Metropolitan Planning Council (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—human, environmental, economic, and recreational—with partners across the City of Chicago, including City departments, County governments, civic and community-based organizations, developers, and foundations.

MPC provides technical assistance to and has developed close partnerships with a number of riverfront communities along the South Branch of the Chicago River. In 2019, following a robust community input process in Bridgeport and neighboring communities, we co-released a South Branch Parks Framework Plan and River Trail Priorities Report for this stretch of the South Branch of the Chicago River.

These projects, and others, captured the public’s aspirations for their rivers to be recreationally and environmentally thriving, as well as continuing to support and grow innovative industries that utilize the river while improving water quality and the environment, and allowing for public access. MPC and *Our Great Rivers* are not 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.

The Metropolitan Planning Council is submitting testimony **not in support of** the proposed zoning change at 2420 S. Halsted / 2500 S. Corbett St.

Inconsistent and Incomplete Planning Processes

The proposed development is within the Pilsen Industrial Corridor. 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 changes such as the Industrial Corridor Modernization Initiative would begin to create development and industrial pressures along the riverfronts.

Beginning with the North Branch Framework Plan in 2017, the City has been reassessing current and future land and transportation uses of industrial corridors. The purpose of this process is to determine what new land uses would be appropriate given changing investments and development in industrial corridors and their surrounding areas. The North Branch industrial modernization process changed zoning and land use along its corresponding stretch of the river, yet other riverfront industrial corridors have not been revised. Why has the South Branch not been treated the same as the North Branch?

Along the South Branch, current zoning allows this type of development “by right.” However, the City has not proactively planned this industrial corridor, so zoning and land use practices have not been assessed in their current context. Industrial corridors have not remained the same over time, and their land uses should not be locked in place forever. Decisions about large, long-term developments on such

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valuable land should not be made before a proper assessment of the industrial corridor is complete.

Highest & Best Use of Valuable Land

MPC appreciates that the proposed development will be subject to the standards in the Chicago River Design Guidelines, and that the developer's plans seem to embrace creating public access at the site. However, another distribution warehouse is simply not the best use for this riverfront location.

The current land uses adjacent to this site include residences immediately to the South and West, two parks within a 10-minute walk, an Orange Line station, and nearby connections to I-55 and I-90/94. While there are industrial uses nearby, they are across the river, not adjacent to this site. These surrounding land uses indicate that despite this area being zoned for manufacturing and industrial purposes, this type of use should be transitioning out of this neighborhood. Continuing to promote incompatible industrial land uses will steal away yet another large riverfront site—valuable riverfront potential that this community will not get back for decades.

Given the site's proximity to residences, the river, parks, and transportation options, this site holds potential for a mixed-use, transit-oriented development that includes business, parkland, and residential space. Such a development could simultaneously create recreation, preserve local biodiversity, and grow the tax revenue generated by the site more than a single warehouse. Prioritizing this site for transit-oriented development would also be aligned with more future-oriented policy plans that have recently been released in draft form, such as the City's Equitable Transit-Oriented Development Policy Plan.

Approving this proposal implies that the City and Plan Commission agree that the most appropriate use of riverfront land next to residential areas is a distribution and logistics warehouse. Riverfront land should be preserved and used by communities as locations for recreation, ecological conservation, and innovative economic development opportunities that directly utilize or improve the waterway.

Community Engagement and Community Benefits

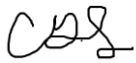
The most pressing concern MPC holds about the proposed development is the lack of meaningful community engagement and involvement in the process thus far. To MPC's knowledge, the developer has discussed this development at two public 11th Ward meetings, which are geared more toward presentation and public comment than true engagement. At the Ward meetings, the Alderman stated that local groups would be contacted to discuss their concerns, ideas for the public riverfront portion of the site, and community benefits or investments beyond this site (for example, improvements to nearby parks). To MPC's knowledge, none of the local organizations we work closely with in the area have been contacted; in fact, some have tried to reach out in good faith and been rejected.

As noted, local groups in Bridgeport and the surrounding communities have actively engaged their neighbors, civic organizations, and the design community in creating visions for this stretch of the South Branch of the Chicago River. These ideas, and the people who created them, should be engaged meaningfully throughout the development of the site—from concept creation to execution. It is unacceptable that site plans, traffic studies, and zoning change applications have

all been executed without even a bare minimum attempt to understand the work that local constituents have done.

In closing, the City of Chicago needs to proactively plan for the futures of its riverfronts with inclusive community engagement. To be part of *Our Great Rivers* while simultaneously not planning for the rivers and reacting to development and industry on a parcel-by-parcel basis is disingenuous. Uses surrounding this site are changing and there are residential communities with a desire for more green space and a different form of economic development that is not centered on distribution facilities, which *Our Great Rivers* would support. If today's proposal is approved, residents and stakeholders may have to wait decades for the chance to see the true potential of this site come to fruition.

Sincerely,



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