

May 1, 2017

Commissioner David Reifman
 City of Chicago, Department of Planning & Development
 121 N. LaSalle St., 10th Floor
 Chicago, IL 60602

Dear Commissioner Reifman:

The Metropolitan Planning Council (MPC) commends you, Mayor Rahm Emanuel and the staff at the Department of Planning and Development (DPD) for their efforts to host an inclusive and transparent process to develop a land use framework plan for the North Branch Industrial Corridor. The plan is sensitive to the myriad interests, businesses and users existing along the North Branch of the Chicago River and within the North Branch Industrial Corridor. We also thank your staff for briefing a group of MPC Board and committee members, advisors and staff on this effort. These comments reflect a synthesis of feedback on a diverse array of interests, including industrial land use policy broadly, retention of manufacturing, job creation and protection, and the next series of industrial corridor reviews.

As you know, beginning in 2015 at Mayor Emanuel's request, MPC led an initiative in partnership with DPD and many others to create the city's first-ever unifying and forward-looking vision for all three of Chicago's rivers. In 2016, we released *Our Great Rivers*. The vision recognizes that each of Chicago's five riverfront industrial corridors has unique pressures and assets and recommended corridor-specific land use policies to attract an appropriate mix of productive enterprises and complementary uses. The vision also calls for creative ways to make our riverfronts into parks, much as DPD has envisioned here for the North Branch Canal, while also recognizing that some of the unique benefits of river frontage for open space lend themselves to a different character of park – full of wetlands, birding, and paddling, rather than ball fields.

The North Branch Framework plan builds off of the important role the Chicago River plays in our city as a natural, recreational and transportation asset. It also acknowledges the importance of manufacturing to our City's economy and its strategic location along the river.

MPC is pleased to lend our support to the North Branch Industrial Corridor Framework Plan. At the same time, recognizing that this particular plan and process set a precedent for plans in the two dozen other Industrial Corridors, we want to emphasize future policy needs as the city moves forward with Mayor Emanuel's Industrial Corridor Modernization Initiative. We believe there is opportunity to leverage investment at this location both to support needed infrastructure upgrades and to spur development in other places of need on the city's south and west sides. In the same way the City of Chicago deployed the Neighborhood Opportunity Bonus to leverage downtown growth into increase funding for commercial and cultural needs in low-income sections of the city, the City should signal a continued commitment to its equity goals by seizing on the opportunities presented in the

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North Branch Industrial Corridor to strengthen other industrial areas, ensuring business and jobs remain here.

At the end of this document we've also provided comments specific to sections of the framework plan and urban design guidelines documents.

Planned Manufacturing Districts

MPC believes Planned Manufacturing Districts (PMDs) can and should continue to protect one of our city's greatest economic strengths: manufacturing. PMDs have helped stem the outflow of good paying manufacturing jobs from Chicago during a time when cities throughout the Midwest have faced massive deindustrialization. Despite a decline in manufacturing jobs, the Chicago region still maintains the nation's third largest manufacturing economy and leads our peer cities (and the national average) in manufacturing exports, according to the Chicago Metropolitan Agency for Planning.

The North Branch Framework Plan signals a significant policy shift for the City of Chicago regarding Planned Manufacturing Districts. Similar forces that led to their creation – adjacent real estate development and land use pressures - are now motivating their significant modification and elimination in substantial portions of the North Branch Industrial Corridor. Such a policy shift raises important questions and concerns that the City should address before moving on to the remaining Industrial Corridors.

It is our assumption that the City continues to value the PMD as a planning, zoning and economic development tool, but that decades after the establishment of the PMD areas themselves, it is clear that this specific tool may no longer be the right one to guide development in every corner of the city. If that is the case, a clearer articulation is needed.

An additional assumption is that the data and research DPD conducted regarding the actual performance of PMDs (i.e. tax revenues, employment, wealth building, etc.) indicated that in the North Branch area, the PMD designation had served its purpose and was now impeding or stifling a broader range of economic development. Based on MPC's observation of the many robust public meetings, and our review of the document, DPD and the City should explicitly state that the PMD tool is simply no longer the best means of guiding development in parts of this corridor, but is still a valued tool overall and appropriate in other circumstances.

DPD should make public more of its analysis of the performance of the PMDs, not just in the North Branch but also city-wide, and state more definitively that while some PMDs across the city have boundaries and allowed uses that need to be changed, the PMD tool itself is not going anywhere, and that in other Industrial Corridors there may be fewer, or even no changes, as a result of the Industrial Corridor Modernization process. To the extent that your existing data and research can be made public now to inform other corridor reviews, we encourage you to do so.

This is particularly true for corridors where DPD believes there may be substantial modifications to PMD boundaries and uses. More clarity on which remaining Industrial Corridors and PMDs in the rest of the City are likely to continue to have industry-friendly land use policies would put industrial stakeholders at ease, and might aid some in their decisions about relocation. Absent that overall system information, the danger is that they will leave Chicago for a more predictable land use scenario in the suburbs, outlying counties, or neighboring states.

Before moving forward with any efforts to assist with the relocation of industrial businesses (Principle 1.2), you should do an assessment of where different kinds of businesses should move to. A thorough and complete

analysis of the corridor system as a whole is needed to answer that question and other important questions: What impact will the removal of some PMDs in the corridor have on the relocation of industrial businesses from the North Branch to other industrial corridors in the city? Where would relocation be encouraged and how will those neighborhoods be impacted? How does that movement of business align with the labor market? Are we pushing manufacturing sector jobs to the physical periphery of the city despite the fact that the manufacturing labor base may reside in other locations of the city?

Furthermore, just as there will likely be a Planned Development process for many non-industrial uses that may be moving into the North Branch corridor, any activities that facilitate the relocation of industrial business out of the North Branch and into another corridor should have a public process for evaluating impacts on those neighborhoods.

Finally, MPC recognizes that dynamic economic forces require us to regularly reexamine our economic and land use strategies, including a re-evaluation of PMDs. We are supportive of maintaining a restrictive designation on Goose Island and in the area on the west side of the Chicago River between Chicago Ave. and Division St., west of Halsted, that protects land for a range of productive jobs. However, the framework plan does not fully articulate the rationale for the modified PMD boundaries being proposed, and we believe it would be valuable to do so. Much of the existing manufacturing that produces physical goods in the corridor (as opposed to other uses like office or logistics, which are allowable under a PMD) is along Elston Ave, both north and south of North Avenue. For the area pinned between Elston and I90-I94 in particular, it is difficult for us to imagine a great deal of investment in mixed uses that would be allowable under M-district zoning. So why not leave it as PMD? A more detailed examination of the boundary rationale would help to explain the impetus for DPD's thinking here.

One challenge in rationalizing changes to PMDs in the corridor lies in the misnomer that the label "planned manufacturing district" connotes. There are a multitude of other industrial, transportation and utility uses on Goose Island that are important, but they are not manufacturing. MPC suggests that DPD should take this opportunity to conceive of a new zoning protection tool to replace PMDs where appropriate. This tool could be called a "Planned Employment District" or a "Planned Innovation District" for example. It would still restrict residential land uses – which MPC very clearly understands the rationale for – but would promote a more diversified economy with compatible mixes next to each other and eliminate the confusion and conflict often associated with PMDs in high market areas like the North Branch Corridor. This kind of designation would also allow the city to approach each industrial corridor with a unique perspective, and aid in marketing of land and buildings.

In many ways it seems that the North Branch Framework Plan is attempting to advance a policy that MPC agrees with, but which doesn't actually exist within Chicago's zoning toolbox. So why not develop such a designation officially? MPC would be happy to work with DPD to develop a Planning Employment District designation.

Fee Structure

MPC recognizes that the North Branch Industrial corridor is a dynamic real estate market and an area with immense opportunity to spur new development and growth. However, much of this may happen at the expense of dedicated land for traditional manufacturing. The North Branch Framework plan correctly states that land which transitions out of industrial use within this corridor is a loss to the whole system and should entail compensation. It is also a loss to the city's economic diversity, and equity of job opportunity, when these land use conversions, and the manufacturing jobs they supported, are viewed in the aggregate.

The city should provide assurances and clarification on how much of the Industrial Corridor fee will be used to support the industrial corridor system city-wide to ensure our city's economy maintains a strong manufacturing sector vs. how much may be used within the North Branch Industrial Corridor. It is unclear what portion of the Industrial Corridor fee may be used for improvements in the North Branch Industrial Corridor or will be directed to other corridors in the system.

As with the neighborhood opportunity bonus, there is opportunity to leverage development in this corridor and a handful of other corridors with similar development opportunities, to make investments elsewhere in the city industrial corridor system. However, the transportation improvements and transit connections and amenities, and rivers aspirations in this vision also require a significant infusion of revenue to ensure they happen and support the kind of new development that is envisioned. It is important that the city signal as soon as possible how revenue extracted from development deals in this area will be apportioned to this corridor or go elsewhere. MPC is poised to assist DPD in addressing this dilemma.

Additionally, the framework plan states that the North Branch Floor Area Ratio Bonus will only apply to the North Sub-Area. While the fee is extracted from the north sub-area, it is our assumption, and preference, that it can be spent anywhere in the corridor, including projects in the other sub-areas. However, the document should clarify when it says the fee is to be used "in the corridor" on pg. 60. Does that mean in the north sub-area of the corridor, or throughout the entire corridor?

Whether in this framework document or some other platform, the city should provide answers sooner rather than later on the fee structure so that investors in this industrial corridor or others have the information they need to make investments in Chicago. The last thing we want is for hesitancy or doubt to lead people to relocate out of the region, in Indiana or elsewhere.

These are not just rhetorical questions, these are questions being asked by people following this process: What is the process for allocating those funds? What will the role of the public be? What portion of generated fees will be put back into the North Branch Corridor and what portion will be used to strengthen other industrial areas in the city? What criteria will be used to decide on any given investment? Will revenues be used to assist with relocation costs for industrial businesses wishing to relocate within the same industrial corridor, or only to move to other corridors in the city?

We acknowledge that the details of this will be in forthcoming draft ordinance language, but the sooner that draft language can be made available the better, as it is difficult without it to form strong conclusions about the likelihood of significant land use and zoning changes, or the feasibility of the in-river wetlands park or many proposed infrastructure projects that would be paid, at least in part, through any new fees collected.

It is also difficult for developers and existing businesses to make decisions until there is clarity on the amount of fee being assessed. Understanding the fee amount is also essential to determining whether the proposed levels of density within the corridor are appropriate. Clarity on the fee amount will help in estimating the total revenue anticipated from the fee programs, and therefore the amount of funding that needs to be secured from other sources for infrastructure improvements to support the new land uses and density that the framework allows. Again, MPC stands ready to assist as needed in developing the fee structure and system.

Chicago River

MPC applauds DPD for the inclusion of the in-river wetlands park along the east side of Goose Island in the Framework Plan goals. It's an ambitious and innovative proposal, as are many of the "Goal 3" proposals put forth in the framework document. MPC encourages DPD to take a step farther and develop a comprehensive

implementation plan for the green space assets discussed in the document – this is a missing element from the Implementation section of the framework. An indication of next steps – soil sampling, land acquisition, invasive species removal, etc., – and a possible timeline would be helpful for pushing the in-river park forward.

DPD should leverage interest from non-profit organizations, developers and neighborhood associations in the proposed wetlands park to identify an organization to lead the development of an implementation plan for the wetlands park. MPC is interested in working with local stakeholders on this effort.

MPC recognizes that through the planning process there were desires for recreational facilities – ball fields and supportive infrastructure – in the corridor. We wholeheartedly appreciate the desire for those amenities, and we are confident that through negotiation and public input during the Planned Development process for some of the larger anticipated developments, there will be ample opportunity to deliver them. However, we do not believe that the riverfront itself is necessarily the best location for them, and that dictating locations for ball fields in the plan might limit the ability to be creative and flexible through the Planning Development process.

Additionally, because of the connectivity that the river and a future riverfront trail provide to parts of the city upstream and downstream, these rivers and riverbanks need to be thought of in a broader context – these are amenities for the whole city, and part of systems that stretch even into the suburbs. In that light, it's notable that throughout the extensive public process for Great Rivers Chicago, during which time MPC and its partners spoke with more than 6,000 people about our rivers, no desires for ball fields or similar park-style recreational uses came up. Instead, people focused on the unique kinds of open space and recreation that rivers can afford. MPC wholeheartedly supports the current framework plan's envisioned riverfront character, and believes it reflects the desires of a larger public. We commend DPD for advancing the Great Rivers Chicago vision here.

Finally, MPC supports the design guidelines that make a clear delineation between the development zone, setback area and riverbank zone. MPC also supports the design guidelines that highlight the importance of green space and natural plant life preservation, though we do believe that stormwater management on adjacent land, water quality, litter management, and shade impacts on the river could be more directly addressed. Please see the attached comments, which point to specific comments and questions related to the Urban Design Guidelines.

Infrastructure

MPC is concerned that the transportation infrastructure projects proposed through this framework plan will not quickly enough meet the needs that may be generated by the level of density being allowed. We recognize that it's often difficult to predict the development market cycle and that development itself could be a potential funding solution for infrastructure needs. However, MPC believes the city should assume development will come quickly and should not wait until it is proposed to move ahead with preparing and planning for the growth and land use changes that are being encouraged through this plan.

Proactive planning efforts should include a more comprehensive, committed implementation plan for the transportation and transit connection projects suggested in the document. A transportation plan should be created so that the city is primed to pursue grants, attract funding and move expediently as possible to make these transportation improvements happen. Many are needed today, regardless of any future development, so a comprehensive transportation plan and implementation plan for priority projects is needed now.

As large-scale real estate development projects occur, one of the first questions residents will ask is about congestion and transportation systems. Addressing transportation and transit connection concerns will be of critical importance.

Furthermore, more knowing the costs of needed infrastructure projects will help us understand whether revenues extracted from real estate deals in the corridor will be sufficient or if other revenue options will be needed.

MPC also believes strong partnerships with the business sector are essential to achieving infrastructure goals in this corridor. The City should explore ways beyond the proposed fee programs to require developers to be responsible for needed infrastructure improvements within the corridor to support their proposals. Furthermore, the city should continue to work with developers and existing businesses to address traffic management issues through the formation of a transportation demand management authority (see below). As new developments and density is added to the corridor, the role of an organization like that will become critical to addressing new congestion issues.

Furthermore, the design guidelines encourage parking development that MPC is generally supportive of, but we believe the City could go farther in addressing parking issues through the zoning overlay ordinances, which could be used to relieve parking requirements, particularly in the north sub zone area. Furthermore, the city should study where metered and zoned parking would be most appropriate.

Finally, many aspects of the plan call for consideration of infrastructure changes through a Planned Development (PD) process and on a case-by-case basis, including supporting freight needs. However, the City's transportation infrastructure is a comprehensive system and should be treated as such. The City should be proactive in funding and implementing infrastructure improvements in this corridor in anticipation of new development. MPC also encourages DPD to conduct an equally open and transparent public process when weighing PD proposals so that the public has an opportunity to weigh in on these issues.

Implementation

Many of the implications of what the framework plan proposes will be implemented and funded by the private sector, such as open space, river access, infrastructure improvements and traffic management. DPD should develop an implementation plan for these elements to guide private developers more clearly. Implementation plans also need to be created for those elements that need to be publicly implemented so that this document does not become another "plan on a shelf".

MPC recognizes that this plan is simply meant to be a guiding framework for future land use decisions and developments. However, the success of the plan lies in the details of the implementation ordinance and changes to existing ordinances that will go before the Plan Commission and City Council. Because the devil is in the details, MPC strongly recommends that DPD ensure there is an equally transparent process for public input in the adoption of ordinance changes.

MPC also encourages DPD to include a provision on the framework plan to revisit it periodically in the future. Our economy is changing fast and our land use plans must be equally as nimble.

The amount of proposed change in this framework plan is ambitious, to say the least. A strong local partner will be needed to coordinate local stakeholders, and conceivably to clean and buy land, oversee streetscaping and maintenance, push infrastructure projects and big ideas, apply for grants, manage an SSA or other funding program, and perhaps oversee a transportation demand management program. Such an entity – essentially a Goose Island Local Development Corporation – could dramatically increase the likelihood of plan implementation. Some of the local stakeholders – North Branch Works, the Halsted Triangle Owners Association, the Alderman's office – do elements of this, and potentially one of those actors could evolve their role to take on more. That process won't just happen, however. MPC stands ready to assist DPD and neighborhood stakeholders in determining the most appropriate governance and revenue system for the area,

taking into account the ramifications for other Industrial Corridors and the city's river system, which may well merit its own such development entity.

Future Corridor Framework Plans

We applaud DPD for creating a transparent and iterative process for the creation of this framework plan. It's an unprecedented planning effort that sought out the voices of all stakeholders within the North Branch Industrial Corridor. As the City replicates the development of framework plans for the other 25 industrial corridors, MPC would like to offer a few general suggestions about how to adapt the process.

In advance of the public process for each industrial corridor, DPD should release more in-depth data about the performance of the individual industrial corridor across specific industry sectors, not just as an aggregate of manufacturing jobs. The process should start with an evaluation of how the corridor is currently performing. MPC would gladly assist with, or even undertake on behalf of the city, these data reports for each corridor.

DPD should then approach each corridor through the specific neighborhood context, identifying primary concerns of the community and businesses within the community and industrial corridor. The primary concerns in the neighborhood adjacent to each corridor are most likely different – being close to a river is different than being close to an airport, and being close to contained facilities in a place like the Ravenswood Corridor is different than being close to open air industrial activities like those in the Calumet. Once these concerns have been identified in the community, DPD should approach the framework development process through that lens to better align with the unique neighborhood goals. This approach for each corridor will result in the strongest, most resilient industrial corridor system for our city's economy.

Thank you for the opportunity to offer comments on the North Branch Industrial Framework Plan and Design Guidelines. Please do not hesitate if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to be "J. Ellis", written over a horizontal line.

Josh Ellis
Vice President

North Branch Framework Document Specific Comments

Goal 1: Maintain the North Branch Industrial Corridor as an Important Economic Engine and Vital Job Center within the City of Chicago

- Page 36, Principle 1.1: Strengthen the language around affordable housing requirements. Rather than saying “provisions” for affordable housing in areas allowing for mixed-use, the framework plan should set a standard that on-site affordability will be *required*.
- Page 36, Principle 1.2: The city should support companies who want to stay within the North Branch industrial corridor if possible. Furthermore, MPC has concerns about the city’s willingness to assist with relocation of industry to other industrial corridors in the system without having conducted the same planning process in the other corridors or the system overall.

Goal 2: Provide Better Access for All Transportation Modes

- From a transportation perspective, the largest development sites are in some of the worst locations in terms of condition of street infrastructure, lack of pedestrian infrastructure, etc. MPC encourages DPD to work with developers to require them to contribute to infrastructure improvements.
- MPC would like to see Ashland BRT included in the infrastructure discussion in this framework, given that existing plans have Ashland BRT ending at Cortland.

Goal 3: Build Upon the North Branch Industrial Corridor’s Unique Natural and Built Environment

- While the document states that the river should be treated as a mixed-use asset moving forward, the document lacks clarity on allowed river access for recreational users. Clarify allowed water access issues and if possible, include renderings to show water access in addition to riverfront access – is a launch for motorized boats envisioned? Or simply launches for canoes or kayaks?
- As the plan encourages additional water users and activity, it should also emphasize enhanced safety measures for all users and clarify who would be responsible for regulating water traffic in the turning basin, between barges, water taxi, recreational boaters, kayakers, etc.
- Pg. 48, Principle 3.4: While MPC supports this principle, we are curious about the inclusion of a proposal to fill in the turning basin, which is part of a federally regulated navigable waterway. Would Congressional action be required to legally narrow the navigable channel? (Additionally, the turning basin includes two large combined sewer outfalls below North Avenue on both sides of the river. Are those envisioning to remain? While the forthcoming completion of the Deep Tunnel will dramatically reduce the frequency of combined sewer overflows, they will stay occur in intense storms, which could undermine the health of the ecological improvements envisioned here.
- The plan seems to lack a way to enforce the implementation of publicly accessible open spaces on private development. Furthermore, the framework should establish a process for the prioritization of parks vs. large fields in future planned developments (Pg. 49, principle #3.5).
- Principle 3.6: The framework plan should state with more clarity the role of the City and DPD in encouraging community associations, recreational organizations and cultural institutions to engage their constituents with the river.
- The framework plan should more clearly state that open spaces and the entire riverfront trail should be ADA accessible. This is only mentioned on pg. 31 of the design guidelines section, in a call-out comment about the under-bridge.
- The plan should more specifically address stormwater management in new development that is both on the riverfront and in the adjacent area. There are other City policies, plans and design guidelines that can be cited here to note that new development will have to play a role in reducing total volumes of

water to the sewer system (and, by association the river, given the reality of combined sewer overflows) and improving water quality. Essentially, the riverfront and wetland park should not be envisioned as the only place in the corridor where onsite stormwater management and habitat enhancements should occur.

Implementation

Zoning:

- MPC applauds the plan's sensitivity to existing critical industrial users by restricting residential uses around those locations.
- The document should contain a zoning map showing current zoning. Additionally, in areas where the PMD is being reverted to zoning that existed before the PMD was created, a map should be included to show what that zoning was.
- Pg. 56 and 57: According to the proposed zoning map, the strip of land east of Goose Island and the River along Kingsbury Ave. will remain unaffected by the zoning implementation recommendations presented in the Framework Plan. Our assumption is that this strip is intended to be a buffer from the industrial uses on Goose Island, but we contend that the river is also an appropriate buffer and encourage DPD to consider whether this area might benefit from greater density or mixed uses allowed under the North Sub-Area overlay district. Given its proximity to the proposed North Branch Canal wetlands park, MPC believes this area represents a unique opportunity. Some of the parcels along that stretch, including one very large and unproductive parking lot, have failed to attract development under the current zoning.
- North Sub-Area: The framework plan does not explain why this area drops below North Ave. The parcels south of North Ave. and west of the River are currently light industrial and buffered by the highway. The framework plan should support manufacturing in these locations by including them in the Central Sub-Area instead.
- Furthermore, the city-owned Fleet and Facility Management parcel is a large riverfront site located in the North Sub-Area, but surrounded by manufacturing. It should be made clear somewhere whether or not city proceeds from a sale of this land will be reinvested in the immediate area, including to jumpstart some of the infrastructure projects the plan envisions.
- Pg. 58: The plan states that the Overlay Districts will include additional restrictions on residential uses to serve as a buffer in certain areas of the Industrial Corridor. However, it remains unclear in the Framework plan how the Zoning Overlay districts will help ensure smooth transitional and buffer areas for future development. We encourage greater clarity on "buffers" in the north sub-zone as uses change over next to existing manufacturing. A more comprehensive approach would be better than addressing "buffer" areas case-by-case. Beyond the residential restrictions mapped, are there other restrictions or procedural changes that will be utilized to ensure smooth transition?
- Additionally, the plan could go farther in explaining the criteria by which zoning change requests will be evaluated to determine impacts on neighbors and resolve issues between industrial uses and proposed projects, particularly when residential use is being proposed in mixed-use areas. A standard evaluation process and criteria to guide individual proposals will help meet the inherent challenges that occur when residential and industrial uses are within close proximity to one another.
- Consider using the overlay districts to relieve parking requirements and promoting shared parking through zoning requirements, not just the proposed parking zones depicted on pg. 24 of the Design Guidelines document.
- As the document states, the North sub-zone area will contain the broadest uses, however, the framework misses an opportunity to create a vision for an appropriate balance of uses. How much residential vs. office vs. retail will be targeted? What other uses will be encouraged? How will you balance that? Design Guideline principle 1.1 states that 50 percent of the corridor's land should be

allocated for employment-oriented development. This standard should be made clearer in the framework plan itself (perhaps in the Overlay Districts section). Moreover, given Goal 1 of the plan to maintain the corridor as an economic engine, allocating only 50 percent of land for employer-oriented development does not seem like an ambitious enough goal.

- Pg. 57 (and Design Guidelines Pg. 5): Clarify what is meant by “permits existing uses” while accommodating transition. Does that mean *new entities* doing one of the existing uses can come in? Or are the businesses currently there just grandfathered in? For example, would new industry be permitted to move into the north and south sub-areas? MPC believes new business that aligns with existing industrial and manufacturing uses should be allowed to locate to the corridor if desired.

North Branch Design Guidelines Specific Comments

Goal 1: Maintain the North Branch Industrial Corridor as an Important Economic Engine and Vital Job Center within the City of Chicago

- Pg. 6, Principle 1.1: Strengthen the language around affordable housing requirements. Rather than saying “provisions” for affordable housing in areas allowing for mixed-use, the framework plan should set a standard that on-site affordability will be *required*.
- Pg. 6, Principle 1.2 is missing. MPC believes more guidelines are necessary to assist the relocation of business to other industrial corridors and within the same corridor. What criteria will be used to determine the most advantageous city locations? How will DPD determine this without having produced land use frameworks for the other corridors or studied the system as a whole?
- Pg. 10: MPC supports restrictions on surface parking. Furthermore, the design guidelines should explicitly state that parking lots fronting the river are not permitted and that all development along the river should have a river orientation (i.e. no large windowless walls).
- Pg. 13, Principle 1.5: Consider greater setback from river for buildings with greater height, in addition to the step-back approach. We recommend density transition down to both the neighborhood and river.

Goal 2: Provide Better Access for All Transportation Modes

- Pg. 15, Principles 2.2 and 2.3 warrant some street design guidelines that could be provided by the CTA or CDOT. In addition to improvements to bus route infrastructure, MPC encourages the CTA to consider re-introducing fixed bus route service on Elston and Clybourn Avenues. The CTA once ran service on both of these streets but no longer does.
- Pg. 19, Principle 2.4: The Design Guidelines state that opportunities exist to transition four key streets from auto-oriented configurations to pedestrian-oriented configurations, but does not name those four streets.
- Pg. 24, Principle 2.7: MPC is generally supportive of parking development recommendations, but we encourage the City to consider addressing parking issues through the zoning overlay ordinances, which could include provisions to relieve parking requirements for new development, particularly in the north sub zone area. Furthermore, the city should study where metered and zoned parking would be most appropriate.

Goal 3: Build Upon the North Branch Industrial Corridor's Unique Natural and Built Environment

- Consider including the riverfront trail in the maps on pgs. 16, 17 and 20 as it could become a critical route for bikes and pedestrian.
- Pg. 26: Consider increasing the development setback for large sites to be greater than 30' or require additional open space that is publicly accessible in the "development zone". Perhaps some sort of bonus can be given to developers who include a setback larger than 30' could be created.
- Pgs. 28 and 29: MPC supports the idea of accommodating separate paths, but dimension requirements to accommodate these trails seem a bit narrow. The cross section on pg. 103 shows 2' separating the bike and pedestrian trails, which is very narrow. Furthermore, separation requires 20' of trail width within a 30' setback, allowing only 10' of landscape between the trails and development structure if the trail is immediately on the river edge, and less if the trail is set back from the riverfront. MPC suggests expanding the river setback to at least 40'.
- While the idea of a Riverbank Zone is welcome, outside the envisioned in-river park in the North Branch Canal, we have doubts that much in the way of sloped, naturalized riverbank will be built in this area. However, the type of modular wetland units depicted on page 27, Principle 3.4, are quite likely to be built – they need consistent design standards from the City, U.S. Corps of Engineers and other relevant parties. This framework plan may not be the place to put them, but they are needed.
- In the section on Vegetation and Biodiversity, it is worth noting that while shade is a good thing for rivers for many reasons, too much shade can be a bad thing. The allowable building heights and densities in the framework plan have the potential to cause shade issues for surrounding buildings, but also for the river. Any shade studies required of new development should include potential shade cast on the river and riverfront.
- We encourage additions to the Green Infrastructure and Stormwater Management section to show how water will be managed on non-riverfront sites in the corridor.