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April 16, 2025

Chicago City Council  
City Hall, 121 N. LaSalle St.  
Chicago, IL 60602

Members of City Council:

Metropolitan Planning Council (MPC), a 90-year-old independent, nonprofit policy and planning organization dedicated to building equity in the built environment, submits this written testimony in support of the Hazel Johnson Cumulative Impacts Ordinance (O2025-0016697) to advance a more environmentally just, healthy, and sustainable Chicago.

As detailed below, MPC supports this proposed ordinance because (1) there is clear evidence that Latinx and Black Chicago residents suffer negative health impacts disproportionately due to their proximity to living near heavy industrial uses; (2) we can trace pollution exposures and negative health outcomes to the City's current and past land use practices; (3) air pollution and air quality have profound effects on individual, family, and community health and well-being; and because (4) it would meaningfully improve Chicago's industrial economy—and enable more good jobs—by replacing the *ad hoc* manner in which heavy industrial siting currently works.

Cumulative impacts are the totality of measured exposures in a community to environmental, social, and ecological stressors which have long-term impacts on the health and well-being of residents. The City of Chicago has a long-standing practice of shifting polluting uses from white neighborhoods to Latinx and Black neighborhoods as those neighborhoods' racial composition has evolved. This practice has been documented by the US Department of Housing and Urban Development's 2022 investigation and subsequent findings, the City's own Cumulative Impact Assessment Summary Report, as well as MPC's research on the relationship between pollution exposure, land use, and zoning.

MPC's analysis has shown that in the City of Chicago: 1) the amount of an area zoned for manufacturing is a significant predictor of higher levels of pollution exposure; and 2) Latinx and Black Chicagoans are more likely to live in neighborhoods that have more land zoned for manufacturing, as well as in neighborhoods that have heavier types of industries with pollution-emitting land uses. While all Chicagoans ultimately suffer the environmental and health harms of industrial pollution, the evidence is clear that residents living in closest proximity to polluting uses bear these impacts most directly, intensely, and disproportionately.

In addition to better protecting the public health of Black and Latinx residents living near industrial pollution, MPC also holds that this proposed ordinance will create a more certain, predictable, and transparent permitting regime on which industrial businesses can rely as they invest in Chicago's economy and create good jobs. The clear, citywide- and evidence-based approach of the proposed ordinance would replace the current approach that is used to make heavy industry land use decisions, which is *ad hoc* and site-by-site.



In particular, MPC strongly supports the following elements of the proposed ordinance:

- Requirement that the City conduct a “cumulative impact study” as part of the decision-making process for siting specific heavy manufacturing land uses.
- Establishment of an Environmental Justice Advisory Board to ensure that perspectives across government, community, and business are considered when making industrial land use decisions covered by this ordinance.
- Requirement that the Chief Sustainability Officer, in coordination with the Chicago Department of Public Health and Chicago Department of Transportation, review the public health externalities of new or expanded polluting land uses via the “cumulative impact study”.
- Requirement for hosting community meetings to provide a consistent and inclusive forum for information sharing and feedback that ensures members of impacted communities can be partners in these land use decisions.

MPC encourages the City to use this ordinance as a starting point for a larger strategy to grow sustainable, good jobs in all neighborhoods. For example, based on MPC’s review, industrial corridors with larger, higher-polluting land uses provide substantially less employment than other corridors with less polluting uses. The Calumet and Little Village industrial corridors, with growing bases of large-scale, high-polluting uses, both have less than one fifth of the job density per acre than the Ravenswood industrial corridor. Further, Chicago continues to attract next-generation industry, including investments in electrical component manufacturing at the Will Group’s K-Town campus, transit seating at Freedman Seating, and, next-generation computing at the Quantum Campus, all announced within the last year alone. The City’s efforts, like this proposed ordinance, to make permitting more predictable and to improve public health, can increase this momentum in drawing more employment opportunities.

At a time when evidence is mounting that our air quality has glaringly clear consequences for all Chicago residents, we are eager to see this kind of responsible and evidence-based policy solution that can serve as a model to other communities as they seek to better balance economic growth and protecting public health. We stand ready to answer any questions you have about our research during your deliberations and are eager to work with you and your colleagues in the Department of Environment and other key departments to ensure—if adopted—that this proposed ordinance is effectively implemented.

Sincerely,

Dan Lurie  
President & CEO  
Metropolitan Planning Council