CHICAGOLAND
CHAMBER OF COMMERCE

September 8, 2000

Mr. Steven Marquardt
US Environmental Protection Agencey
AR – 18J
77 West Jackson Blvd.
Chicago, IL 60604

Re: Comments in Support of the Chicago Regional Air Quality and Economic Development Strategy Project XL

Dear Mr. Marquardt:

The Chicagoland Chamber of Commerce represents 2500 businesses throughout the Chicagoland area. We are also very active in support of the regional efforts to achieve air quality improvements that support both the need to comply with the federal Clean Air Act and encourage economic growth of the metropolitan area. The Chicago Regional Air Quality and Economic Development Strategy Project XL epitomizes such a strategy and thus has our full support.

While promoting clean air, this program simultaneously encourages economic development. More important, the project provides incentives for communities to make smart development decisions that are consistent with sustainability goals. Examples include, brownfield redevelopment, infill development, and transit-oriented development. Under current requirements, many companies opt to locate out of the nonattainment area, contributing to sprawl and a drain on infrastructure budgets. This program will afford communities the opportunity to not only promote economic development but an incentive to make better development decisions.

Comments On the Development Zone Designation

The criteria for defining the Development Zones should consider a broad range of environmental characteristics. This program is designed to provide incentives to communities to implement clean air programs and to make smart development decisions. Given the superior environmental benefit of this program, it should be the goal of the sponsors to make the program as inclusive as possible within the nonattainment area. More communities participating in this program means more area and mobile source reduction projects and more sound development decisions being made.

The criteria should not be too heavily weighted on income and poverty characteristics. As previously stated the project should be as inclusive as possible. Clearly, low-income areas in the region should be considered for economic development opportunities. However, this consideration should not be at the expense of communities in which many of the income based criteria do not apply. The program should create incentives for communities of all types to engage in clean air and sustainable development activities.

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Further, while it is clear that there is no shifting of burden in this case, a criteria heavily focused on income and poverty could create this impression.

Transportation criteria for this project are not only appropriate but essential. As a major contributor to air quality problems, auto emissions should be a target of any clean air program. By encouraging the location of employment opportunities near bus and train stops, the XL project effectively promotes alternatives to driving to work.

We thank you for the opportunity to comment on this innovative initiative.

Sincerely,

Jerry Roper

Gerald J. Roper
President/CEO