

US EPA ARCHIVE DOCUMENT

September 8, 2000

Mr. Steve Marquardt
USEPA Region V (AR-18J)
77 West Jackson Street
Chicago, IL 60604
Fax: 312-886-5824

Dear Mr. Marquardt:

This letter is in response to the U.S. EPA's request for public comments on the draft Project XL Final Project Agreement for the Chicago Regional Air Quality and Economic Development Project.

The U.S. Conference of Mayors strongly supports this project and commends the U.S. EPA entering into this agreement with the City of Chicago. The Conference believes that this project is especially important because it provides incentives for municipalities to develop and implement clean air projects that focus on area and mobile sources.

These sources, which have not traditionally been a focus of reduction activities, now account for a substantial percentage of emission sources in many cities, including more than 80% of the Chicago region's VOC emissions. Allowing municipalities to track and utilize the credits from area and mobile source reduction activities provides a justification for allocating resources toward these programs.

The Conference also believes that this program is noteworthy because, while promoting clean air, it simultaneously encourages economic development. More important, the project provides incentives for communities to make smart development decisions that are consistent with sustainability goals. Examples of these goals include brownfield redevelopment, infill development, and transit-oriented development. Under current requirements, many companies opt to locate out of the non-attainment 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.

As spelled out in the Proposed Final Project Agreement, the program provides a superior environmental benefit over current regulations. In addition to retiring 40% of the growth allowance from reduction activities, the program will contribute directly and indirectly to an increase in the number of communities implementing area and mobile source reduction programs, a reduction in the effects of urban sprawl,

and an increase in transit-oriented development.

We also believe that the criteria for defining the Development Zones should consider a broad range of environmental characteristics. After all, this program is designed to provide incentives to communities to implement clean air programs as well as 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 non-attainment area. More communities participating in this program means more area and mobile source reduction projects and more sound development decisions being made.

The program should create incentives for communities of all types to engage in clean air and sustainable development activities. Instead of focusing on socioeconomic criteria, a more equitable set of criteria for this project would focus on transportation. 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.

If you need further clarification, please contact Judy Sheahan of my staff at 202-861-6775.

Thank you for your consideration.

Sincerely:

J. Thomas Cochran
Executive Director