



CHICAGO CUMULATIVE IMPACT ASSESSMENT

INITIAL COMMUNITY INPUT SUMMARY

CHICAGO DEPARTMENT OF PUBLIC HEALTH
AND PARTNERS AT THE ILLINOIS PUBLIC
HEALTH INSTITUTE | JULY 2023

TABLE OF CONTENTS

ACKNOWLEDGMENTS.....	3
ABBREVIATED GLOSSARY OF TERMS.....	4
EXECUTIVE SUMMARY.....	5
I. INTRODUCTION.....	6
II. METHODOLOGY.....	7
III. CUMULATIVE IMPACTS DESCRIBED BY COMMUNITY MEMBERS.....	10
• ENVIRONMENTAL JUSTICE FOCUS AREAS.....	11
• ENVIRONMENTAL HEALTH OUTCOMES ASSOCIATED WITH POLLUTION EXPOSURE.....	16
• SOCIOECONOMIC IMPACT ASSOCIATED WITH POLLUTING FACILITIES.....	18
• GOVERNMENT-COMMUNITY PROCESS AND DECISION-MAKING.....	20
IV. COMMUNITY RECOMMENDATIONS.....	25
• CHANGES TO EXISTING ORDINANCES, CODES AND PROCESSES.....	25
• IMPLEMENTATION OF SOLUTIONS AND REGULATORY ACTIONS.....	28
V. AREAS FOR ADDITIONAL COMMUNITY INPUT GATHERING.....	30
APPENDIX A: ADDITIONAL GLOSSARY OF TERMS.....	31
APPENDIX B: DESCRIPTION OF PRIMARY DATA SOURCES.....	33
APPENDIX C: FULL LIST OF COMMUNITY DATA SOURCES.....	35

ACKNOWLEDGMENTS

The Chicago Department of Public Health (CDPH) would like to first and foremost thank the Environmental Equity Working Group (EEWG) for their contributions developing the concept of this Community Input Summary. This Community Input Summary came out of the EEWG's desire to ensure the Cumulative Impact Assessment is co-designed from the beginning and reflects the decades of community-led environmental justice work in Chicago. Members of the EEWG also reviewed and contributed to the most recent iteration of this draft including:

- **Meleah Geertsma**, Natural Resources Defense Council
- **Chloe Gurin-Sands**, Metropolitan Planning Council

CDPH would also like to express gratitude for the contributions of those who significantly helped inform the shape of this Community Input Summary. We give thanks and credit for data analysis and synthesis to:

- **Kendall Bahl**, 2022 Health Equity in All Policies Intern, CDPH
- **Cara Bradley**, Summer 2022 Mayoral Fellow
- **Leah Barth**, Illinois Public Health Institute
- **Jess Lynch**, Illinois Public Health Institute
- **Susan Martinez**, Coordinating Planner, CDPH
- **Clayton Oeth**, Senior Policy Analyst, CDPH

Lastly, CDPH gives thanks to People for Community Recovery for sharing photos from their years of organizing, which are included throughout this Initial Community Input Summary.



ABBREVIATED GLOSSARY OF TERMS

Cumulative impacts: The total burden – positive, neutral or negative – from chemical and non-chemical stressors and their interactions that affect the health, well-being, and quality of life of an individual, community, or population at a given point in time or over a period of time (US EPA Office of Research and Development Operational Definitions).

Cumulative impact assessment: The process of accounting for cumulative impacts in the context of problem identification and decision-making. It requires consideration and characterization of total exposures to both chemical and non-chemical stressors, as well as the interactions of those stressors, over time across the affected population (US EPA Office of Research and Development Operational Definition).

Environmental justice (EJ): The fair treatment and meaningful involvement of all people regardless of race, color, culture, national origin, income, and educational levels with respect to the development, implementation, and enforcement of protective environmental laws, regulations, and policies (US EPA EJ Definitions).

Health impact assessment (HIA): A practice that aims to protect and promote health and to reduce inequities in health during a decision-making process (Min. Elements and Practice Standards for HIA, v. 3).

Industrial corridor: Refers to formally designated Industrial Corridors, designated in 1992 by the Chicago Plan Commission. Their boundaries are located nearby railroad embankments, waterways, highways, arterial streets and other manmade and natural buffers that effectively separate interior industrial uses from adjacent residential and commercial activity. Chicago has implemented plans and policies to concentrate industrial activity in such areas since the 475-acre Stockyards opened in 1865. Their zoning and uses are primarily restricted to industrial or manufacturing activities, and any proposed land use changes require review by the Plan Commission and City Council (City of Chicago).

Industrial use: Refers to city land zoned for light industry (M2: moderate manufacturing, warehouses, freight, and recycling facilities) or heavy industry (M3: heavy manufacturing, warehouses, and waste disposal – junkyards, landfills, and incinerators) (Chicago Municipal Code).

Overburdened communities: Minority, low-income, tribal, or indigenous populations or geographic locations in the United States that potentially experience disproportionate environmental harms and risks. This disproportionality can be as a result of greater vulnerability to environmental hazards, lack of opportunity for public participation, or other factors. Increased vulnerability may be attributable to an accumulation of negative or lack of positive environmental, health, economic, or social conditions within these populations or places. The term describes situations where multiple factors, including both environmental and socio-economic stressors, may act cumulatively to affect health and the environment and contribute to persistent environmental health disparities (US EPA EJ Definitions).

Permit: Refers to the issuing or renewal of permits for operations and activities impacting the environment. CDPH issues permits for work involving above ground and underground storage tanks, recycling facilities, waste handling facilities, construction site rock crushers, sandblasting, grinding, chemical washing, and the installation and operation of any equipment that has the potential to create or control air pollution (CDPH Environmental Permitting & Inspection).

EXECUTIVE SUMMARY

In Spring 2022, the Chicago Department of Public Health (CDPH) initiated work on the first city-wide Cumulative Impact Assessment (CIA). The Chicago CIA aims to provide a more comprehensive inventory of pollution sources, describe how overall pollution burden varies across community areas, and characterize community-level experiences of and vulnerability to pollution. The results of the CIA will inform decision-making in policy areas such as land use/zoning, permitting, enforcement, health interventions, etc. This process will include three phases of work: Scope, Assess, and Report.

CDPH committed to co-designing the CIA process with members of the Environmental Equity Working Group (EEWG), a group of environmental justice leaders and advocates convened by the Office of Climate & Environmental Equity (OCEE, formerly the Mayor's Office of Sustainability). As a part of the scoping phase, the EEWG requested that CDPH first review and analyze existing community input before initiating any new engagement with environmental justice (EJ) communities in Chicago. For decades, EJ communities have voiced their concerns to the City through public comment and other engagement processes and continue to express a desire to see their input incorporated into decision-making processes.

As such, this Community Input Summary begins to consolidate qualitative data demonstrating the lived experience of cumulative environmental impact on Chicago residents in order to inform the CIA as part of the scoping phase. CDPH looked at public comments provided to the City to identify themes and subthemes reflecting the lived experience of Chicagoans from communities disproportionately impacted by environmental hazards – low-income, Black and Latinx neighborhoods in the South and West side of Chicago. This summary of comments we received from advocates and the community reflects some of the impacts of environmental hazards not easily quantified: environmental health outcomes, tradeoffs between economic benefits and community burdens, and impacts of government-community processes and decision-making, as shown in the following table.

The Community Input Summary serves as an initial data point demonstrating the cumulative impact of pollution on Chicago EJ communities and providing direction to the Chicago CIA. Through the gaps identified in this summary, the City will focus further engagement efforts on communities whose perspectives are not already reflected in this data to ensure the CIA is representative of all Chicagoans experiencing cumulative environmental burden. As an immediate next step, participants in the CIA working groups (Data and Methods, Communications and Engagement, and Policy) will review this Community Input Summary as a foundational document as they develop scopes of work to carry the assessment forward.

Theme	Subtheme(s)
Environmental Justice Focus Areas	Disproportionate impact of pollution on South and West sides of Chicago; polluting industries continue to move from white neighborhoods to overburdened Black and Latinx communities; normalization of pollution in overburdened communities; isolation from other neighborhoods; environmental hazards due to air and water pollution.
Environmental Health Outcomes Associated With Pollution Exposure	Asthma and respiratory concerns; cancer; mental health impacts; hidden toxins and difficulty identifying source of health concerns; odors; obstacles to health-promoting behaviors; impact on community longevity.
Socioeconomic Impact Associated With Polluting Facilities	Questioning of burdens and benefits of polluting industries; lack of industrial economic benefits, relative to costs; lack of investment or reinvestment in overburdened communities; perception of a neighborhood being used as the City's dumpsite; corporate influence.
Government Community Process and Decision-Making	Criticism of government actions: Disinvestment and damage; lack of government consistency; lack of transparency in criteria and data used to make decisions; use of inadequate criteria for pollution metrics; inauthentic community engagement process and perception of a matter being a "done deal"; lack of corporate responsibility. Recommendations for community-driven decision-making in government processes: Inclusion of all community members in decision-making; need for historical reckoning and to address trauma as part of decision-making processes; importance of lived experience and community voices.
Community Recommendations	Changes to existing ordinances, codes and processes: Regulations and standards for industrial operations; enforcement measures; increasing emphasis on proactive pollution prevention. Recommendations related to the implementation of solutions and regulatory actions: Investing in overburdened communities; community ownership; additional opportunities.

I. INTRODUCTION



Communities on the South and West Sides of Chicago continue to organize in order to fight the disproportionate impacts of pollutants in their communities, tracing back to community organizing in Altgeld Gardens led by Hazel M. Johnson. In present-day, community groups and coalitions, referred to throughout this summary as Environmental Justice (EJ) communities, continue to raise their concerns to the City through public comment and engagement processes, calling for action from the City and to see their concerns are being meaningfully incorporated into decision-making.

This Community Input Summary focuses on the cumulative impacts of both environmental and social stressors over time impacting the South and West sides of Chicago, which are disproportionately low-income, majority Black and Latinx neighborhoods. This Summary consolidates

community feedback and perspectives as a first step in the scoping phase of the City of Chicago's cumulative impact assessment process.

The Community Input Summary came from a request by the Environmental Equity Working Group (EEWG) to the Chicago Department of Public Health (CDPH) to synthesize and digest existing sources of public comment as a preliminary step to meaningfully engaging in a Cumulative Impact Assessment process. As such, this summary also recognizes community perceptions of the City's historical actions, and inactions, that have contributed to the persistence and creation of inequitable environmental harms.

Going forward, working groups, consisting of CDPH staff, EEWG members, and other partners, will incorporate identified community priorities to scope and assess various work streams. Working groups will center local voices as the City takes steps to mitigate ongoing environmental hazards and prevent future harm. Primary data sources for this endeavor were recommended by EEWG members. The data sources include written testimonies and public comment submissions from community members across Chicago, including residents, environmental justice organizers, and policy experts. As part of the analysis, we attempt to reflect the reported physical, economic, and social harms caused by environmental hazards. We also summarize the many community recommendations provided for addressing them.



II. METHODOLOGY

This Community Input Summary compiles, analyzes and summarizes existing documented community feedback and experiences from communities most impacted by environmental and health inequities relevant to the Chicago Cumulative Impact Assessment. Throughout the different phases of work (data analysis and drafting content), CDPH consulted the EEWG at regular intervals to ensure their input was incorporated. In Summer 2022, CDPH consulted with the EEWG to identify sources of data from both (a) public input into City decision-making processes and (b) community input into independent assessment and planning processes such as the Calumet Connect Databook. The EEWG also identified sources that document the history of community-led environmental justice advocacy in Chicago; and suggested ways to frame both the Community Input Summary and the broader Cumulative Impact Assessment. CDPH team members categorized the sources into the following buckets:



- **Primary sources:** Contain written narratives such as direct quotes or testimonies from community residents and leaders. They make up the bulk of the qualitative data analyzed in this process. These formed the basis of the guiding questions and were used to identify themes and sub-themes (Appendix B).
- **Community history sources:** Provide additional background information on EJ communities in Chicago, often written from the perspective of the community. These sources include material provided and/or recommended by EEWG membership. These materials further support insights shared within the primary data but were not used to inform themes (Appendix C).
- **Background resources:** Help inform the structure of the report and CIA process (Appendix C).
- **Secondary sources:** News articles or other forms of writing that include quantitative data in addition to quotes from community residents. These were used to further support and clarify insights shared within the primary sources and are also included as footnotes (Appendix C).

Table 2 provides a shortened list of the analyzed primary data sources; a longer description of each source is listed in Appendix B. To achieve the purpose of this analysis to understand the input of community members most impacted by environmental and health inequities in Chicago, the research team focused analysis on input from those impacted community members and their representative organizations. Thus, all the primary data sources include narrative data such as testimonies and public comment from community members impacted by environmental permitting decisions, as well as community members who participated in forums or meetings hosted by governmental agencies (such as the City of Chicago and the Illinois Environmental Protection Agency).

Table 2: List of Primary Data Sources Used in the Community Input Summary

Year	Source	Description
2017	Illinois Commission on Environmental Justice	Recommendations for Definition of Environmental Justice Community Under the Future Energy Jobs Act
2021	Chicago Department of Planning and Development	We Will Chicago Citywide Planning Process: Environment, Climate and Energy Pillar Meetings (#2-13)
2021	Chicago Department of Public Health	RMG/Southside Recycling Health Impact Assessment, Community Input Summary and Jamboards from Public Meeting #3
2021	Alliance for the Great Lakes	Calumet Connect Databook, Qualitative Community Needs Assessment
2021	City of Chicago	Rules Concerning Demolition By Implosion – Public Comments and Hearing
2021	Chicago Mayor’s Office of Sustainability	2022 Climate Action Plan Feedback
2022	U.S. Environmental Protection Agency	Alliance of the SouthEast (ASE) at the U.S. Environmental Protection Agency’s Science Advisory Board Meeting for the Review of Cumulative Impacts: Recommendations for ORD Research
2022	Center for Neighborhood Technology	Southwest Industrial Corridor Transportation Study (SWICTS) Submission
2022	Chicago Department of Public Health	Metal Management Midwest, Inc. Permit Application – Public Comments

For this Community Input Summary, CDPH employed a thematic analysis. To begin the thematic analysis and define the codes that would be utilized, CDPH took a three-step process:

- STEP 1.** A CDPH analyst reviewed the primary data sources to develop an initial set of possible codes
- STEP 2.** Based on the initial review of primary data sources (see Table 2), CDPH drafted guiding questions and gathered feedback from EEWG in July 2022
- STEP 3.** CDPH cross-referenced existing code books from the primary source data—namely the Calumet Connect qualitative assessment code book—to align and refine the code book for this analysis

The initial review identified the following categories: environmental justice focus areas, environmental health and justice outcomes, economic impacts, process and decision-making factors, and community recommendations. CDPH team members used the following questions to begin identifying and categorizing information (Table 3).

Table 3: Guiding Questions for Analysis

Theme	Subtheme(s)
Environmental Justice Focus Areas	<ul style="list-style-type: none"> Which communities have a disproportionate burden of environmental hazards and their cumulative health effects both historically and presently? What types of environmental threats are these communities facing? Are these threats remains from previous actions or are they new/ongoing threats?
Environmental Health Outcomes	<ul style="list-style-type: none"> What health concerns are the priority communities experiencing? What are the quality of life impacts of these health threats? What are the potential links between environmental conditions and health outcomes in these communities? What is the trauma and harm associated with environmental hazards in the community?
Economic Impact	<ul style="list-style-type: none"> What are the economic impacts of polluting industries within communities? Do community members feel the cost is worth the benefit? How does the presence of polluting industries in communities impact future investment or contribute to ongoing inequities? In what ways is the City contributing to or mitigating the historical and present impacts of polluting industries within communities?
Process and Decision-making	<ul style="list-style-type: none"> What policies have been actively harming communities? Helping communities? What must be improved in the government’s decision-making process to improve success of potential solutions? How can community-driven decision making be integrated into processes?
Community Recommendations	<ul style="list-style-type: none"> What solutions have communities suggested? What do communities see as their role in these solutions? How would resource distribution need to change to implement these solutions? What evidence-based community-driven and racial equity focused strategies and models exist?

Three members of the research team then coded the data in an Excel spreadsheet – identifying main themes and sub-themes for sections of narrative and/or quotes from the primary data sources. Once the data had been coded and grouped by theme and subtheme, a preliminary summary of key themes, quotes, and insights from the data were shared with EEWG for discussion in September 2022. CDPH incorporated EEWG insights and feedback and drafted this summary report.

CDPH shared the draft summary report in October 2022 with EEWG membership to review the report. Throughout November and December 2022, EEWG membership provided additional recommendations to further develop the findings, including, but not limited to, re-assessing the title of “economic impact” for one of the findings. In December 2022, EEWG listened to an overview of the report and provided reflections to guide next steps to incorporate findings into the Cumulative Impact Assessment process.

III. CUMULATIVE IMPACTS DESCRIBED BY COMMUNITY MEMBERS

This section explores the common themes and subthemes found throughout primary sources (Table 4). For the purposes of this summary, we describe individuals as community members and use descriptors related to their location in Chicago. When geographic information is not available, we refer to the person as a Chicago community member.

Table 4: Themes and Subthemes Across Primary Data Sources

Theme	Subtheme(s)
Environmental Justice Focus Areas	Disproportionate impact of pollution on South and West sides of Chicago; harmful industries continue to move from white neighborhoods to overburdened Black and Latinx communities; normalization of pollution in overburdened communities; isolation from other neighborhoods; environmental hazards due to air and water pollution
Environmental Health Outcomes Associated With Pollution Exposure	Asthma and respiratory concerns; cancer; mental health impacts; hidden toxins and difficulty identifying source of health concerns; odors; obstacles to health-promoting behaviors; impact on community longevity
Socioeconomic Impact Associated With Polluting Facilities	Questioning of costs and benefits of polluting industries; lack of industrial economic benefits, relative to costs; lack of investment or reinvestment in overburdened communities; perception of a neighborhood being used as the City's dumpsite; corporate influence
Government Community Process and Decision-Making	<p>Criticism of government actions: Damage and disinvestment; lack of government consistency; lack of transparency in criteria and data used to make decisions; use of inadequate criteria for pollution metrics; inauthentic community engagement process and perception of a matter being a "done deal"; lack of corporate responsibility</p> <p>Recommendations for community-driven decision-making in government processes: Inclusion of all community members in decision making; need for historical reckoning and to address trauma as part of decision-making processes; importance of lived experience and community voices</p>
Community Recommendations	<p>Changes to existing ordinances, codes and processes: Regulations and standards for industrial operations; enforcement measures; increasing emphasis on proactive pollution prevention</p> <p>Recommendations related to the implementation of solutions and regulatory actions: Investing in overburdened communities; community ownership; additional opportunities</p>

This chapter is organized by the five major themes outlined in Table 4. First, we name the South and West sides of Chicago, low-income and predominantly Black and Latinx communities, as the environmental justice focus areas. We outline the ways in which community members have articulated experiencing the disproportionate burden of environmental hazards in their communities, both historically and in their daily lives. Second, we reflect back the environmental health outcomes community members describe experiencing associated with exposure to environmental hazards. Third, we make sense of the socio-economic impact described by community members as a result of pollution emitting from nearby facilities and related regulations and policies. This section does not focus on any quantitative data – rather, the qualitative data explains what disinvestment in overburdened communities looks like and the impact cumulative impacts have had on community members’ quality of life. Fourth, we unpack the decision-making process of policies that impact overburdened communities. Finally, we recognize community recommendations provided. These encompass potential solutions to avoid or mitigate harms caused by environmental hazards and pollution.

ENVIRONMENTAL JUSTICE FOCUS AREAS



This section of the summary begins to outline environmental justice focus areas throughout the shared primary sources. Materials provided by the Chicago Environmental Justice Network (CEJN) provided working definitions for what cumulative impact looks like in communities experiencing environmental injustice. One draft statement on cumulative impact notes: *“Decades of social, environmental, and economic decisions have concentrated people and pollution into impacted communities across racial lines, environmental degradation, and unequal distribution of benefits.”*¹ It goes on to describe cumulative impacts as *“the result of many decisions by many individuals, organizations, and government institutions.”*² CDPH consulted this and US EPA’s definitions of overburdened communities to inform our understanding of environmental justice focus areas. Community members described overburdened communities in Chicago and their vulnerability to the cumulative impacts of pollution

exposure. For instance, a Latinx Southeast Side community member shares, *“In Chicago, the most environmentally overburdened communities in Chicago were minority communities. Pollution is concentrated in majority minority neighborhoods. The Air Quality and Health Index overlapped with the racial lines of the city”* (Comments at an US EPA Scientific Advisory Board Meeting).

¹ Chicago Environmental Justice Network (n.d.), “Greater Chicago Legal Clinic – CEJN Cumulative Impact Indicator Comparison”. Materials within the Comparison document may still be under discussion/in draft form. These are subject to change consistent with updates to federal definitions.

² Chicago Environmental Justice Network (n.d.), “Greater Chicago Legal Clinic – CEJN Cumulative Impact Indicator Comparison”

The Disproportionate Impact of Pollution on South and West Sides of Chicago

Community members shared that pollution disproportionately impacts South and West side neighborhoods, compared to other areas of Chicago. A 2018 Natural Resources Defense Council (NRDC) study found that neighborhoods on the South and West sides experience the greatest exposure to environmental hazards, including air pollution and hazardous waste, across the city.³ Image 1 displays a heat map of environmental exposure and vulnerability with an overlay of industrial corridors throughout Chicago. Image 2 focuses in on the siting of Southwest industrial corridors.

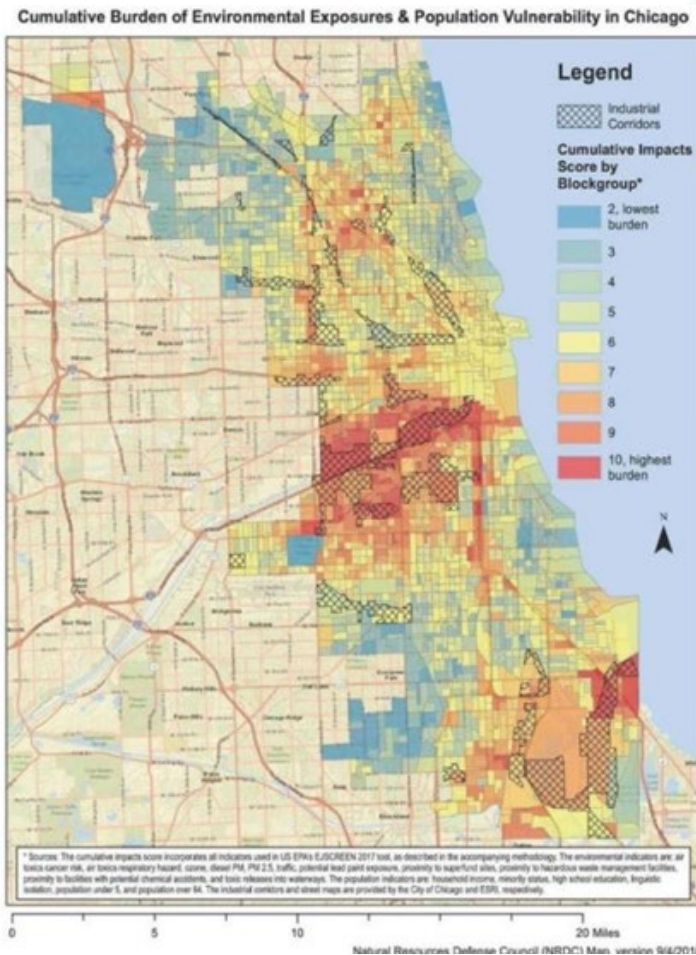


Image 1: Cumulative Burden of Environmental Exposures & Population Vulnerability in Chicago, NRDC (2018)

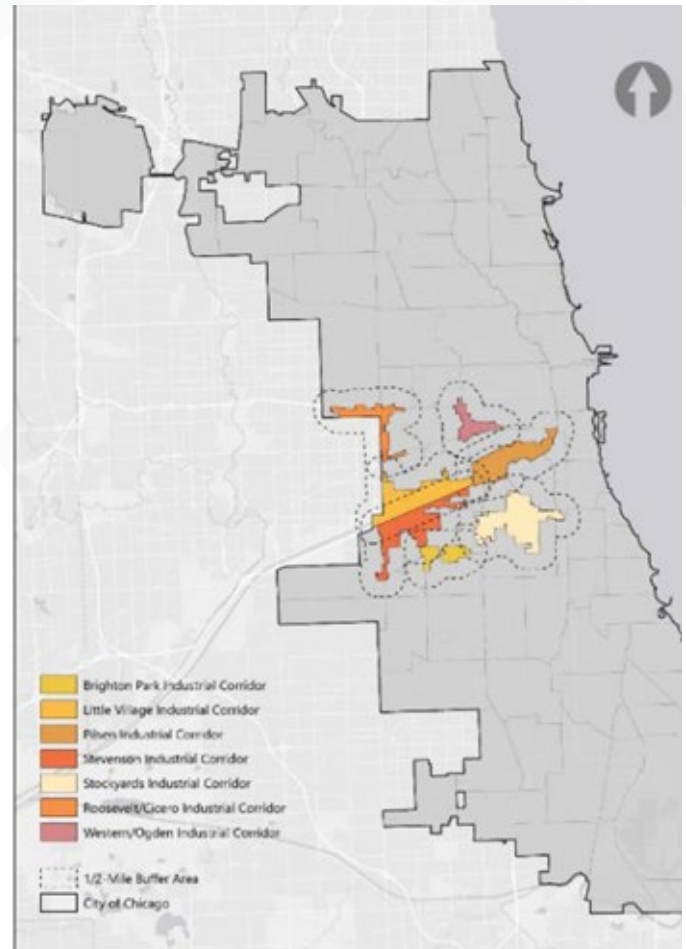


Image 2: Southwest Industrial Corridors, Metropolitan Planning Council, 2022

Throughout the primary sources we analyzed, community members living on the South and West side note the heavy presence of industrial corridors in their communities, which are majority Black and Latinx. Community members also share their perspectives on how systemic racism compounds the effects of pollution. Community members described the cumulative burden of environmental hazards over time, due to industrial sites polluting neighborhoods. As a Southeast Side community member explained, *“We live in a community that has legacy pollution from many steel companies from the turn of the century, which existed before the EPA. This means there are a number of toxins already in the area- in the land, water, and air”* (Comments to US EPA Scientific Advisory Board Meeting).



³ Geertsma, M. (2021, February 1). New Map Shows Chicago Needs Environmental Justice Reforms. NRDC. Retrieved August 22, 2022, from <https://www.nrdc.org/experts/meleah-geertsma/new-map-shows-chicago-needs-environmental-justice-reforms>

Harmful Industries Continue to Move From White Neighborhoods to Overburdened Black and Latinx Communities

In recent years, polluting facilities have moved from the predominantly white and affluent neighborhoods on the North Side of Chicago to predominantly Black and Latinx neighborhoods in the South and the West Sides. South Side community members described the impact of pollutants on their daily lives and the potential impacts of new industry moving into their neighborhoods.

Another community member described polluting industries moving from the North Side to the Calumet Industrial Corridor, located on the Southeast Side, as, *“Lately, there’s been a lot of, like, push from residents, maybe from the North Side, to, like, take the industries out of their community, but at the same time, like, that’s not solving the problem, because they want to send them over to, like, communities over here on this side[...]. So it doesn’t really solve the issue, and it actually creates a bigger distance between us and them. Like, you know, we’re never going to be able to connect if, you know, we want to solve our problems, by sending them over to someone else”* (Calumet Connect Databook).

Community organizations voiced concern with the RMG/Southside Recycling Plant. In November 2020, Reserve Management Group (RMG), doing business as Southside Recycling, applied to CDPH for a permit to operate a large metal recycling facility on the Southeast Side. A community member described the proposed move as “environmental racism” stating, *“Moving an industrial facility’s operations from a gentrified, mostly white neighborhood to a community with the majority Black, Brown, Immigrant, and working-class residents already overburdened with polluting industry is a prime example of environmental racism”* (RMG/Southside Recycling Health Impact Assessment). In remarks to the US EPA, a Southeast Side community member referred to the operator as *“...a toxic company that was moving from a majority white, more affluent neighborhood to a well-documented environmentally overburdened, minority neighborhood. The City did decide to deny the permit on February 18, but it took 3.5 years of community organizing efforts, and support from community residents across Chicago and across the United States to get this done.”* (Comments to US EPA Scientific Advisory Board Meeting)



Cumulative Impacts Increase Community Vulnerability to Environmental Hazards and Health Effects

Historical and current pollution impacts intertwine with health and environmental outcomes to form cumulative impacts. Community members spoke of preexisting health and social conditions that leave neighborhoods vulnerable to the health impacts stemming from environmental hazards and pollution.

For example, individuals noted members of their community living with chronic conditions, leaving them vulnerable to pollution’s impact. When commenting on the potential burdens of the RMG proposal on themselves and their community, community members referred to *“people with chronic conditions”* and said that *“PM [particulate matter] emissions from RMG operations, NO² [nitrogen dioxide] and other pollutants from trucks will affect residents, especially those with underlying conditions”* (RMG/Southside Health Impact Assessment Townhall).

Community members shared the disproportionate impact the COVID-19 pandemic had on overburdened communities. One Southeast Side community member shared, ***“Areas that have a disproportionate amount of industrial pollution also have had higher rates of COVID death”*** (We Will Chicago: Environment, Climate and Energy Pillar Meeting).

Community members also mentioned demographics of populations especially vulnerable to pollutions’ health impacts due to their age, specifically children and the elderly. Southeast Side community members in particular referred to ***“impacts on vulnerable populations (youth and elderly),”*** and ***“impacts on children, especially Black, Latinx, low-income people”*** in reference to potential burdens of the RMG proposal.

Finally, community members described the impact of pollution on children’s brain development as a concern. According to a Southeast Side community member, ***“Toxins don’t stay in one area. Air doesn’t stop at a quarter mile. During the permitting process for [the] General Iron [facility], an argument made for the location of General Iron about the location a quarter mile from an elementary school, a high school, and local park. The area already has issues with manganese, which impacts child brain development. Again, the area has a high air quality and health impact index”*** (Comments to US EPA Scientific Advisory Board Meeting).

Normalization of Pollution in Overburdened Communities

Community members described the perception of pollution as “normal” in overburdened communities. A Calumet community member said, ***“I never even questioned [the pollution] because I think [another participant] mentioned earlier it’s normal. So everything like that we’re used to is normal. Pollution, we’re used to it. Like fumes, it’s-it’s -- everything is so normal until you start questioning it. So we -- I -- after school, we just -- like me and my friends, [...] we just go to Coal Hills and hang out. Um, and we’d just be on top of the rocks and just like hanging out. And it’s so weird looking back. You know, I’m like I was literally. Like if I was sick now, I’m like damn”*** (Calumet Connect Databook).

A Calumet community member also described community members living near industrial sites becoming less aware of pollution and odors due to their prevalence. They remarked, ***“I mean, uh, whoever is right there and lives closest by and smells it every day -- they’re probably used to it...But I’m sure it’s like -Nose blind...”***

Community members also described the power of polluting facilities in their everyday lives and the lack of control to change it. A Calumet community member described their experience as ***“Horrible, horrible. I mean, it’s unbelievable that this company is allowed to interfere with my daily life. There are days where I can -- I have to leave my garden in the summer because of the over -- just the stench that the city pl [sic]- and the city does nothing”*** (Calumet Connect Databook).

Isolation From Other Neighborhoods

Due to associated impacts of pollution, community members share their perspectives on how their neighborhoods are seen in comparison to others. For instance, one community member shares, ***“It [the neighborhood] pretty much is a cut off from [everybody]. There’s like three bridges that connects this piece to Chicago”*** (Calumet Connect Databook). Another community member says, ***“Like this area, it’s like, okay. You say South Chicago. Most people think like South Side of Chicago. Like I’ve went like as far north and west as you can go. And people don’t even know the East Side exists. Like when you say East Side, they think like downtown like Lake Shore Drive”*** (Calumet Connect Databook).

Environmental Threats Due to Air Pollution

Community members described their experience living with debris and air hazards associated with industrial uses, including trucks, freight trains, and respective usage routes. A Calumet community member remarked, ***“I just don’t***

think it would be that good to keep on hailing inhaling, uh, that, uh, that pollution from those trucks and from those freight those trains on a daily basis” (Calumet Connect Databook).

Community members also mentioned the presence of dust and particulate pollution in their communities. A Calumet community member described dust that remained even after extensive cleaning. They said, “[Someone I know] lives around the area where the mountains of salt are that every morning when she wakes up and she washes her car [...] when she wakes up there’s like dust on all the cars that are around that area. She was also talking-talking-talking about her children, that she has kids, and she worries that that does, like they’re breathing that in and getting it into their system. [...] She cleans her house like every day but there’s still a lot of dust especially when she opens the windows. And it looks like it’s two, one to two years that she hasn’t cleaned the house but she literally cleans like every day. But the dust is so much that-that it stays in the house[...].” Another community member in Calumet noted that the dust remained even after windows were replaced. “...the dust from these plants are getting in my windows. You can see it. You can wipe it off my window on the inside[...] And they’ve actually ha-had to come to our whole block and change everybody’s windows out of their house because of the lawsuit. And it hasn’t changed, still [see the build up]” (Calumet Connect Databook).

Community members also described air pollution stemming from salt piles. According to a Calumet community member, “When it gets windy. And-and it-it’ll [salt piles] pick up whatever kind of piles of stuff you got and blow that through the neighborhood.” Another community member noted, “I’ve heard that, um, those sells are usually correlated to sulfur, and sometimes there’s high piles of sulfur in that area, so yeah” (Calumet Connect Databook).

Another reported concern was petroleum coke, (i.e., petcoke). According to a Calumet community member, “Asthma is a big thing, because my dad actually got it, um, as a result of when [PECO] [name of a nearby operating facility] was still around. Um, so he spends a lot of time outside you especially during the summer, and so, a lot because we live on 106th, and Petco was only, like, maybe two or three blocks away. Um, whenever there was high winds, um, a lot of that stuff would fly over to us, and so he got asthma as a result of that” (Calumet Connect Databook).

Environmental Threats Due to Water Pollution

Community members described water pollution in water where community members fished. One Calumet community member said, “[...] the river is contaminated and that sometimes people go on the bridges and they’re fishing from there. But she wonders why it is not, no one tells them don’t fish there because the water is contaminated because all of the -- because of all the industries that are-around the riverbank [...]” (Calumet Connect Databook).

Other community members described polluted swimming water near industrial sites. As a Calumet community member remarked, “You could see all those -- you know, you’re on the beach. You see all those factories right there. So again, that alone -- it just doesn’t feel healthy being in the same water where there’s -- a giant oil refinery is just there, you know.” Another community member noted Calumet Park’s “dirty” water where community members swam, “Like, in Cal Park, we see that the lake is very dirty. Like, you don’t even want to go swimming in there. I remember, back then, like, I wouldn’t mind going swimming there. And now I see it. I’m like, ‘I don’t want to go’” (Calumet Connect Databook).

Community members also described water pollution caused by dredging. One community member shared, “We are dealing with climate change with the Confined Disposal Facility (CDF), which is located on the lakefront of Lake Michigan. Rising lake levels have meant that wave action may be eroding the dirt walls of the facility, which separate toxic dredgings from the region’s drinking water of Lake Michigan.” A Calumet community member also noted dredging, remarking “And if you talk about the dredging that’s being done and then being dumped out on -- right on the lake, or like Cal Park” (Calumet Connect Databook).

ENVIRONMENTAL HEALTH OUTCOMES ASSOCIATED WITH POLLUTION EXPOSURE

This section of the summary focuses on the environmental health outcomes identified by community members as a result of pollution exposure. Community members describe specific health concerns as a byproduct of pollution exposure and describe their community environments as containing unsafe and health-depleting public spaces.

Asthma and Respiratory Concerns

Many Pilsen community members named environmental health concerns as a reason for their opposition to a Metal Management Inc. permit renewal, with one community member writing, *“Our rates of asthma and respiratory issues outpace other neighborhoods and suburbs – and given the glut of last mile facilities, this is only going to get worse”* (SIMS Public Comment, 2022).



Cancer

A Calumet community member described the prevalence of cancer, specifically breast cancer, in their community and the potential connection to industrial sites, *“Oh, they-they do -- they do believe from all the factories and everything that we do have here that there was a -- that there’s so many cases of breast cancer with the women that are here, or, you know, have lived here their lives, um, and it-it does seem to be kind of true like in a sense because everyone I know that is like my mom’s age all had some type of breast cancer”* (Calumet Connect Databook).

Mental Health Impacts

Community members described the mental and emotional impact of pollution and associated odors. Community members described how pollution hindered their mental wellbeing. According to a Calumet community member: *“But also like that’s not a nice way to start your day that way. Like you know, it’s just -- it’s-it’s hard to keep that smile on your face when y -- you know, could be in the middle of summer with your windows down. And all of a sudden, you’ve got to roll your windows up.”* A Southeast Side community member also identified a need for more research on the *“link between mental health and pollution exposure”* (RMG/Southside Health Impact Assessment Engagement Session).

Hidden Toxins and Difficulty in Identifying Source of Health Concerns

Community members described difficulty in identifying toxins that could be causing health concerns. A Calumet community member described the odors from industrial sites and the inability for community members to identify potential toxins causing them harm, due to a lack of transparency and disclosure. They shared, *“And they had the stench, and that smell was going on, uh, in the summertime. You couldn’t enjoy your outdoors and your property. You have to run from your house to your car. It smells like dead stuff and-and-and bad stuff mixed together. And, uh, a lot of the people who, uh, have had health problems couldn’t identify exactly what was happening simply because they were allowed to operate unchecked. No one was measuring, or monitoring, or even having a clue of what kinds of toxins these companies were eliminating because they were making donations to the political people. And the donations gave them a lifetime permit to operate unchecked. Are you kidding me?”* (Calumet Connect Databook).

Another community member shared, *“How can this place still be running?? The smells coming from this business are disgusting and place the citizens health at risk. Does the public health department even know what is in the auto fluff blowing around the neighborhood? There is no way they should be allowed to continue to operate. I am asking for you to deny the permit application”* (SIMS public comments).

Odors

Community members expressed concerns with the prevalence of odors in overburdened neighborhoods. For example, since 2018, community members of Little Village, a primarily Latinx community, have expressed concerns about odors emitted from the MAT Asphalt plant. One Little Village member said of the plant, *“It smells horribly in the neighborhood...It’s quite scary to think about to know that potentially we could be smelling this all day, every day or all morning when we’re coming out.”* (Illinois Commission on Environmental Justice)

Another community member in Calumet reflected similar concerns around odors in their community, *“I feel like those smell and they know the smell is there, but I feel like it also, like, prevents them from, like, smelling, like, other, like, odors that are probably bad, which is coming from, like, the polluted air, probably. So if, like it causes, like, a block for other things that you’re probably used to already”* (Calumet Databook).

Overall, many comments reflected the sentiment that the presence of continuous or regular noxious odors, as additionally explored within the economic impact section, deters investment by individual, families, and businesses in a community.



reason for them to stay?” (Calumet Connect Databook).

Obstacles to Health-Promoting Behaviors

Community members described pollution preventing them from engaging in other health-promoting behaviors like walking outside. Community members described not being able to enjoy their environment because of the pollution and not being able to go about their daily activities outside.

One Calumet community member noted, *“And if you talk about walking as a solution [to poor health], but then you’re going to get some other thing in your system”* (Calumet Connect Databook).

Another Southeast Side community member shared, *“We are paying with our lungs and lives. There is no safe amount of pollution”* (RMG/Southside Health Impact Assessment Breakout Group).

Pollution’s Impact on Community Longevity

Community members described the impact of pollution on their quality of life and its role in disincentivizing people to stay in the community. According to a Calumet community member *“... there’s not really incentives for people to stay, there’s a hundred reasons for them to leave but is there*

SOCIOECONOMIC IMPACT ASSOCIATED WITH POLLUTING FACILITIES

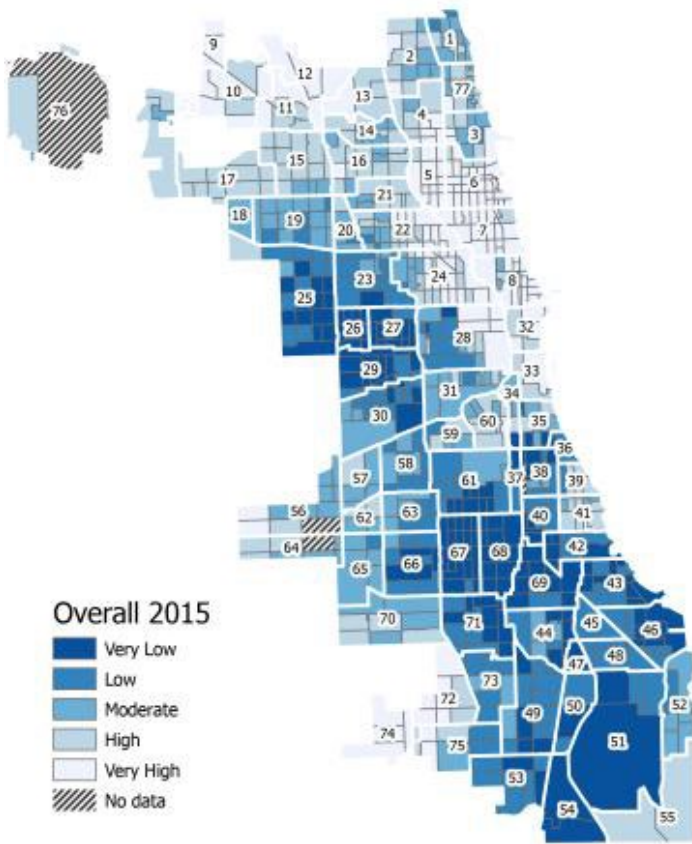


Image 3: Chicago Child Opportunity Index, Chicago Department of Public Health (2015).

Community members described the socio-economic impact of pollution, including disinvestment in overburdened neighborhoods and diminished quality of life. During a July meeting of the EEWG, the research team received feedback that questioned whether “economic impact” was the best way to describe the findings in this section because often “economic impact” of industry focuses on measuring impact in terms of job creation, etc, without due consideration to economic costs such as lost work when community members’ health is negatively impacted by pollution.

One EEWG member suggested comparing heat maps of environmental hazards with other data, such as the child opportunity index (see Image 3) and other health data, to highlight the lack of a range of benefits to community members that may add to the cumulative burden of living with pollution. Data sources used point to the qualitative costs and benefits of job creation in nearby facilities, as well as the impact on community quality of life and perceptions of City disinvestment. This holistic understanding of economic benefits and burdens and their relationship to community members’ social lives will be important to carry forward in future stages of Chicago’s Cumulative Impact Assessment.

Questioning Benefits and Burdens of Polluting Industries

Community members described their relationships between the economic benefits and environmental burdens that come as a result of the presence of polluting industries. According to one Calumet community member, *“So I think it’s-it’s kind of like a love-hate relationship, because it’s like, well, on the one hand, it’s, like, it’s kind of like a love-hate relationship, like it causes pollution, but on the other hand, it’s like, a lot of people’s livelihoods”* (Calumet Connect Databook). Members mentioned how these burdens and benefits too often forced the community to take economic benefits at the expense of their wellbeing. One community member said that they *“shouldn’t have to choose between a job and breathing clean air”* (RMG/Southside).

Lack of Industrial Economic Benefits, Relative to The Burdens

Many community members described industry’s environmental and social costs outweighing the potential benefits of job creation, especially when compared to jobs previously available during the industrial expansion of the early twentieth century, *“I think it’s just -- it’s-it’s a waste. And it-it’s not that it’s a waste. It’s historical. It was an industrial river to support the steel mills at the turn of the century. And they’re gone, and you’ve got, you know, various industries still there. You know, it’s not this great job creator that it was, um, last century. And it’s just a waste. There is no access. Or he gets on it on a boat. Like I said, I’ve lived here 65 years. I’ve never been on it. I cross it. It’s-it’s just -- there’s no*

access” (Calumet Connect Databook).

Other community members questioned the impact of jobs created for neighborhood community members. For instance, one Calumet community member said, *“But it’s kind of like in the same -- and like they-they did create jobs but I can’t even tell you, I don’t know how many people in the area actually get an opportunity to work there”* (Calumet Connect Databook). Elsewhere, a Southeast Side resident shared, *“[The RMG facility provides] no meaningful economic benefit, jobs for residents”* (RMG/Southside Health Impact Assessment Breakout Group). Community members also reported supporting polluting facilities through property taxes while not receiving benefits or clean-up efforts. A Calumet community member said, *“They can’t put anything on it because it has all of this waste that’s so toxic that nobody can clean it up, and you want to tell me that that’s smart to have right next to your fresh water, and not help people who live over there, and not help communities who are still supporting this industry? Apparently, they still need our tax money. We don’t live over here for free. We pay property taxes. Uh, why should they -- why should their interests be so much more than mine?”* (Calumet Connect Databook).

Lack of Investment or Reinvestment in Overburdened Communities

Community members described a lack of economic investment and reinvestment in overburdened communities and connected this inaction to pollution’s presence. One Southeast Side community member noted, *“Is this really the only type of investment that can be offered to our neighborhood? I’m tired of seeing dirty piles of scrap when I come home...”* (RMG/Southside Health Impact Assessment Breakout Group).

A Calumet community member described pollution’s aesthetic and sensory impact as a deterrent for potential new community members. They said *“I think, being residents of the area, it went from a positive thing to something negative because it does make our area look ugly. And it does make it smell ugly. And this is what turns a lot of people off from coming here, you know, whereas before it was beneficial because it created jobs. But now, like you said, they’re not even hiring people from this area. So how is it benefitting us at all?”* (Calumet Connect Databook).

Another Calumet community member also noted how pollution contributed to diminished home property values in the community, explaining, *“But if you’re too aware, then there go your property taxes, I mean, your property values. So do you want -- you know, do you want anyone to know that you live next to a Superfund [site]? No, not if you’re going to try and sell your house or --. So that’s a -- that’s a--dilemma”* (Calumet Connect Databook).

While areas across Chicago historically experienced industrialization, community members noted inequity in reinvestment and redevelopment across communities. A Chicago community member shared, the following observation: *“I think [participant]’s point about redevelopment on industrial lots on the North Side is really important. Inequity affecting the environment is not just a question of which places saw disinvestment and which didn’t—it’s also a question of which areas receive reinvestment. I live in the South Loop, where there was historically plenty of heavy infrastructure and industrial land use, but those places have mostly been redeveloped or remediated. They don’t stay vacant long, unlike in many neighborhoods further South and West”* (We Will Chicago: Environment, Climate and Energy Pillar Meeting).

Perception of a Neighborhood Being Used as the City’s Dumpsite

Community members pointed to the use, and perception, of their neighborhoods as dumping grounds and connected this reality to continuing disinvestment.

One Calumet community member noted that their *“[neighborhood was] considered a dumping ground”* and another said that *“we’re considered a utility”* (Calumet Connect Databook). As a result, community members describe feeling that the City does not prioritize their wellbeing. Another Calumet community member described the polluted condition of the land available for gardening, stating, *“The only dirt that the city makes available [gardens on the south side that have human waste in it]”* (Calumet Connect Databook)

Corporate Influence

Community members described how they see the role of pollutant facilities and corporations in their community. As one community member shared, *“I mean, it’s unbelievable that this company is allowed to interfere with my daily life”* (Calumet Connect Databook). Other comments, particularly from the RMG/Southside Health Impact Assessment Breakout Groups, shared that they felt the profit generated by pollutant factories outweighed community (e.g., *“This industry benefits wealthy people at the cost of local residents”*; *Put people over profit - care”* etc.).

Community members living near the Sims/Metal Management facility in Pilsen shared their perspectives.

One Pilsen community member shared, *“The company has the money to make needed improvements to the facility to prevent polluting the area. The company has a market capitalization of over \$3 billion. They restructured their business last year (laying off thousands of people) and, combined with the increase in commodity prices, will likely exceed their 2021 performance which by all measures was exceptionally strong. Sims has a history of permit violations and is currently being sued by the attorney general for these violations. Sims should be meeting permit levels at a minimum in order to operate. The company should be installing new technologies to reduce pollution in the area”* (Sims Metal Management Public Comments). Another Pilsen community member shared which community members they thought would be burdened by pollutant facilities, *“A lot of the alley scrappers burdened...They’ve suffered because only one company operating - Sims in Pilsen”* (RMG/Southside Health Impact Assessment Breakout Group).



GOVERNMENT–COMMUNITY PROCESS AND DECISION–MAKING

Criticism of government actions

While criticism of government actions was identified as subtheme of the government-community process and decision-making, several other subthemes within those criticisms were uncovered, which are explored below.

Damage and Disinvestment

Within the We Will Chicago: Environment, Climate and Energy Pillar meetings, community members described intentional damage and disinvestment imposed on Black neighborhoods due to city negligence along with corporate harm and failure to care for all community members. An Englewood community member described the intentional systemic inequities that Black Chicagoans experience saying, *“Well, I’ll tell you the thing that’s profoundly annoying for a lot of Black people...[systemic injustice] wasn’t accidental, it was intended.”* The resident also described the barriers South Side communities face to access water for public gardens and lack of support or major investment from the public or private sectors, *“We waited all season long and never got access to city water for the public gardens we managed, including those producing food. We had to gerrymander and do all kinds of extraordinary stuff to get water to our communities. So my point here is the outcome is the ability of the community to feed*

itself, and what supports that, and what are the barriers? [...] Englewood has been fighting like hell for decades to get food system funding. Where is the food system economy on the South Side? Where is the major investment?" (We Will Chicago: Environment, Climate and Energy Pillar Meetings). A Chicago community member described intentional exhaustion as a result of historical reckoning, stating, *"Once you start to work in this space, you see how bureaucratic it is...I see a lot of exhaustion as a result of this historical reckoning. And I think that's intentional"* (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

Lack of Government Consistency

Community members described a lack of government follow-through in environmental hazard avoidance and mitigation measures. An Englewood resident described the acknowledgment of harm without action, remarking, *"This is not new information—we're talking about it in new ways, and that's better than a sharp stick in the eye [...] I want to see what we're going to do to actually level the playing field, [...] Are we doing that? Are Black and brown communities first in line? We just want to talk about and acknowledge the harm and do nothing about it—unacceptable."* (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

A Hegewisch community member described communities taking care of each other due to the City's inaction, saying, *"It's incredibly frustrating to watch a city with multi-millions of dollars not take care of folks and communities having to take care of each other. And that's what gives me hope"* (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

Community members also described a lack of enforcement of environmental regulations and safety measures. A Calumet community member remarked, *"And it was -- it was only up until like a few years ago that they were -- I mean, I g -- I guess breaking law -- their own laws or breaking laws of like not having their stuff contained or covered. And you know, it was only until people from the neighborhood starting sending videos of just big whirlwinds of it blowing in the wind that they actually did something about it. So that -- right off the bat, [just you know], like they'll get away whatever they-want to as long as -- until they get caught or whatever. You know, so they're just like [that alone they're just kind of like], uh, yeah. Th-they're not respecting th-the river, you know. What can we do about it? [They're some big] companies"* (Calumet Connect Databook).

A Calumet community member expressed a desire for regulatory bodies to follow through on enforcement if industrial sites are to remain in their community, stating *"I think as a positive, we know we're never going to get rid of this industry. But it would be better if we can find and make sure that-that the EPA and whatever regulations they need to impose, that they follow through, because they're never going to leave. But at least we could try to make them a little bit cleaner and a little bit safer. And for the lands that we could, it would be nice to get some of that revenue"* (Calumet Connect Databook).

Lack of Transparency in Criteria and Data Used to Make Decisions

Community members described a lack of transparency in what information, process and priorities are used by the City to inform or make decisions. During the Sims/Metal Management public comment period, one Pilsen community member wrote, *"In an effort to protect the people of Pilsen and ensure fairness and equity, CDPH should request that the permit application address the same questions that were asked of RMG for the Southside Recycling facility including, but not limited to, the following:*

1. *Air dispersion modeling should include detailed accounting and modeling of emissions from all processes, vehicle travel over paved and unpaved surfaces, material storage and staging piles, non-road diesel engines, and torch or plasma cutting. The air quality assessment should also include a percent-silt and metals analysis for all unpaved surfaces and stockpiles.*
2. *Address whether post-processed ASR ("auto fluff") is treated prior to disposal. Should treatment of the post-processed ASR ("auto fluff") become necessary or desired, the application process should be*

described including where the process would be conducted, the stabilizing chemical name(s) and their application quantities, personal protective equipment (“PPE”) requirements, and copies of all SDSs.

- 3. Drawings should be provided of the shredder and shredder emissions capture hood in plan, elevation, and isometric views, that make clear any and all openings where emissions may escape without treatment. Calculations should be provided on the estimated capture efficiency of the shredder exhaust capture system, including sizing calculations for all fans, blowers, ducting systems, and hood. The shredder emissions capture hood is referenced in a permit application submitted to Illinois EPA” (SIMS Public Comment).*

Use of Inadequate Criteria for Pollution Metrics

Community members also described the use of inadequate environmental data and criteria in decisions surrounding industrial sites. Members also expressed a desire that industrial sites to go beyond meeting minimum standards, in order to protect the health of overburdened communities.

During CDPH’s RMG/Southside Health Impact Assessment process, community members expressed that regulators consider more detailed, sensitive scientific data, beyond just “visible” dust and particulate matter. During this HIA process, a Southeast Side community member stated that *“CDPH should consider more than ‘visible’ particulate matter (PM), but all the pollution released by RMG’s recycling facility (and co-located facilities) including PM10 and PM2.5 emissions.”* (RMG/Southside Health Impact Assessment Townhall)

Community members commenting on the RMG/Southside proposal described pollution levels that did not meet more rigorous criteria, like World Health Organization (WHO) standards. One Southeast Side member stated, *“We need to be protected from more than ‘visible dust.’” ...not comfortable with issues of ‘on-road mobile emissions sources and PM2.5’ being addressed” in future rules. They continued, “RMG has acknowledged that the background PM10 measured by the IEPA Air Quality Monitors at GWHS is already at 77 micrograms/L. These levels are considered dangerous by the World Health Organization and are illegal in the European Union”* (RMG/Southside Health Impact Assessment Townhall)

RMG HIA Engagement Session participants also shared that *“Emissions do exceed WHO standards”* and *“EPA analysis does not apply best current science on health effects on PM 2.5: should apply WHO guidelines, which are more stringent than NAAQS.”* One community member commented on the inadequacy of metal shredder emissions model provided by General Iron, stating *“This assumption is not scientifically supported and would certainly depend on the exact nature of the equipment proposed and the design of the process. This approach is overly simplistic and does not appear to reflect sound engineering practice.”*

Inauthentic Community Engagement Process and Perception Of a “Done Deal”

Community members described inauthentic community engagement processes from the City and the perception that industrial site decisions were already “done deal[s]” between the City and the operator.

An RMG/Southside Health Impact Assessment Engagement Session participant described *“concern that this is a done deal” already.* A Calumet community member remarked *“It’s hard for me to see the City would do anything for us because they’ve already got plans. And it’s not for us. It’s about us, but it’s not for us. I don’t see it at all. I don’t.”*

One Southeast Side community member described past CDPH public comment sessions as inadequate, describing,



⁴Change.org (n.d.) “STOP GENERAL IRON: A letter from 10th ward neighbors to the Chicago Dept. Of Public health,” <https://chnng.it/sgRc8ByZ>

⁵Facebook.com, (Nov 2021) “#StopGeneralIron Community Meeting: General Iron Updates,” <https://bit.ly/CmtyHealhPresentation11-2021>

"...the public needs to be included in the planning, zoning, and permitting processes that affect them. The public comment sessions held by CDPH and the 10th ward do not constitute community involvement" (RMG/Southside Health Impact Assessment).

Another Southeast Side community member described that community members had to advocate and "push" for community input within the RMG HIA, stating, *"For the RMG/General Iron HIA, community residents pushed the process forward. Local residents collated a lot of the research on health burdens: - Letter from residents to Chicago Dept. of Public Health outlining research on pollution and health impacts⁴- Data shared by the community on air pollution, health impacts, and health⁵. Residents had to push for community input. Only 1 out of 3 sessions allowed community input."*

Lack of Transparency In Criteria and Data Used to Make Decisions Surrounding Polluting Site

Community members described a lack of transparency in the criteria and data used to make decisions surrounding polluting site.

For example, a Calumet community member shared, *"I feel like it's real secretive. Like you don't really know what's going on there. Even though there's a big factory there, like you really have no information of what's going on [...]"* (Calumet Connect Databook).

Community members expressed questions and requested additional information on industrial permit applications. Regarding transparency during the RMG/Southside Recycling permitting process, Robert Stoodt stated, *"Permits should be explicit on the chemical composition of the washer solvent and... better characterize the used oil and what contaminants that oil might contain or where it is going to be treated. Are these wastes to be trucked off site as hazardous waste? If so, they should be listed as hazardous waste effluents. What sampling and analysis is done on these waste streams?"*

Lack of Corporate Responsibility

Community members describe frustration at both the City's failure to enforce or shut down harmful facilities and a lack of accountability for the facility. For instance, one Bridgeport community member shared, *"Projections show that toxic metal shredder dust is blowing directly towards [Benito Juarez] High School and residents of an already environmentally burdened community. Please shut down Sims Metals operations until they can prove they are operating according to good faith and environmental law. The health of local residents cannot be a cost of their operations. I DEMAND ACCOUNTABILITY. THE CITIZENS OF CHICAGO DEMAND ACCOUNTABILITY"* (Sims/Metal Management Public Comments)

Another community member shared, *"Do you know, there are schools, house, grocery stores and a youth wellness center all within a few blocks of Sims Shredder? They have been fined numerous times for violation of pollution regulations. What is it going to take to protect the Pilsen community and all these children? This community deserves better. You have the power to make a difference and force Sims to shut down and rid this community of toxic pollution. DENY THE PERMIT"* (Sims/Metal Management Public Comments).

Recommendations for Community-Driven Decision-Making in Government Processes

The following recommendations outline a desire shared across many participants for the City to engage in a more inclusive decision-making process. A Chicago community member suggested, *"...Rather than just a share-out, report back to the city, it would be great to have some forum for two-way dialogue with the stakeholders - like City Council - who ultimately need to implement the work"* (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

Inclusion of All Community Members in Decision Making

Community members described the need for overburdened community members to be involved, and centered, in decision making around industrial sites and investments.

A Pilsen community member asked, *“How do we center and platform people in community, and not just those folks who are attached to specific organizational structures or frameworks, [...] those who are just in their neighborhood, just in their community, and how can we draw them into this conversation?”* (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

Community members expressed a desire for more engagement among neighborhood community members. According to a Calumet community member, *“Our community’s really missing community engagement, and then like activism. Like we’re here but like this is probably the most activists you’ll see in a room in this neighborhood”* (Calumet Connect Databook).

Community members described a desire to contribute to the planning processes of investment. Calumet community members remarked, *“I would love to have like a part in like the whole design aspect if we could give like, hey, this would be cool. We could put a center here. We could put, you know, a path here. I would even go out there [and build that],”* And *“...I want to talk to a planner that is willing to open up and see what our ideas are, you know, because we talk about the -- we-we talk about the corridor and everything”* (Calumet Connect Databook).

Need for Reckoning and to Address Trauma as part of Decision-Making Processes

Community members described a need for a historical reckoning of racial injustice and addressing associated trauma, as part of decision-making processes.

A Chicago community member stated *“Bringing in professionals that know how to address these traumas these conversations can get contentious”* (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

An Englewood community member remarked *“I highly recommend that we all ground ourselves in self transformation work, especially those aspiring to be white allies to ‘priority communities’ and those working in the city...”* (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

The Center for Neighborhood Technology (CNT)’s Southwest Industrial Corridor Transportation Study emphasized the consideration of police violence experienced by Black communities and other communities of color when developing enforcement measures for pollution violators. Based on focus group conversations with community residents impacted by environmental injustice, CNT staff stated, *“Enforcement is highly recommended to take place without policing because of the violent history city policing has in disproportionately targeting and harming BIPOC individuals and communities; the same communities that experience the brunt of environmental injustices like freight-related air quality hazards”* (SWICTS)

Importance of Lived Experience and Community Voices

Community members expressed the importance of lived experience and community voices in processes and decision making. As the ones closest to the issue, impacted community members can provide recommendations and solutions that reflect their experiences as opposed to well-intentioned policymakers who may be more removed from the issue. A Southeast Side community member explained, *“I’m aware of the environment because I’m living in it. I don’t have to necessarily research it because I am living it. My greatest impact is on the ground.”*

A Calumet community member also described the importance of lived experience, stating, *“So that has to be a big part of it. And we have to have people -- and we definitely need people like [Participant]. [Participant], I -- you know, my hat’s off to you. But you also have to have people that have lived here, that have experience, that are willing to*

work because we have to work together. At the beginning when we started, I said that we-we live like in silos. This one doesn't talk go this-this community, that one. We can't do that. And we have to be organized" (Calumet Connect Databook).

Another Southeast Side community member also recommends having community members set the agenda: "Community members should also help set context for research needed and evaluation of outcomes. Community residents are the most familiar with the area in which they live and work, and should assess what data has been or should be collected."

IV. COMMUNITY RECOMMENDATIONS



Community members recommended potential solutions to avoid or mitigate harms caused by environmental hazards and pollution. These include changes to existing regulations and standards; and additional opportunities to put decision-making or other power back into community member's hands.

Changes To Existing Ordinances, Codes And Processes

Regulations And Standards For Industrial Operations

Community members described regulations and standards the City could implement in order to avoid or mitigate environmental

hazards in overburdened neighborhoods, particularly related to industrial operations. Table 5 shares community recommendations, including what community members have described as driving the need for it.

Table 5: Community Recommendations: Regulations and standards for industrial operations

Recommendation	Selected Quotes From Community Members
<p>Require a Cumulative Impacts Assessment During the Permitting Process</p>	<p>"We don't want to just look at permits one by one, which is what the current Illinois EPA reviews, but actually look at the cumulative impact of the different types of pollution in the area around the development" (Comments to US EPA Scientific Advisory Board Meeting).</p> <p>"Ordering a cumulative impacts assessment is important to prevent disproportionate exposure in a community and requires data on the differences in baseline environmental impacts across communities" (SWICTS Submission).</p>

Table 5: Community Recommendations: Regulations and standards for industrial operations

Require Industries to Provide More Data on Operations' Potential Emissions and Pollution

"Modeling should also include the impact from the shredder fluff or ASR left in open piles, as it is unclear the impact that the piles have on emissions. Also, the study should not be limited to the area that is General III, but should also account for the emissions from other operations at RMG" (Environmental Law and Policy Center).

"A range of impacts: conservative, moderate or likely impacts, and the upper range of health impacts for the proposed development as well as for the area, to give a true accounting of the health impact" (Comments to US EPA Scientific Advisory Board Meeting).

"...Utilize USEPA's EJSCREEN tool as a platform to map the relevant suggested indicators, as well as communicate with IEPA and the EJ Commission, where appropriate, on identification of EJ communities in Illinois" (Illinois Commission on Environmental Justice).

"Two monitors isn't enough... We need North, South, East, and West at a minimum. Especially going towards Avenue O, Rowan Park and the residential neighborhood" (RMG - Mark Velez).

Require Industries to Provide More Data on Operations' Potential Emissions and Pollution (Air, Noise, Health Indicators)

"Readings from air monitors from both disproportionately impacted and overburdened communities, AND communities that do not have a history of heavy air pollution in their communities, so that there could be comparative readings" (Comments to US EPA Scientific Advisory Board Meeting).

"...To mitigate harm 1) use datasets to quantify emissions for a range of pollutants (not just PM 2.5), and 2) fund data collection on neighborhood-scale truck pollution and truck traffic activity" (Southwest Industrial Corridor Transportation Study (SWICTS) Submission).

"To ensure that operations if permitted are protective of air quality, CDPH should require that General III utilize electric vehicles or vehicles are of the most protective class. For instance, General III should be required to use electric forklifts or at least Tier 4/ Tier 4 Final forklifts if the forklifts must be powered by diesel fuel" (RMG/Southside Recycling HIA). "The Diesel Technology Forum makes recommendations for engine standards that could be implemented prior to full electrification: One recommended policy is that prior to electrification, engines are required to be 2012 models and onward. Engine models 2011 and older would not be allowed for use within city boundaries under this policy" (Southwest Industrial Corridor Transportation Study (SWICTS) Submission).

Change Truck Emissions Standards to Require the Use of Electric Vehicles or Additional Restrictions if Heavy Machinery Must Use Diesel Fuel.

Table 5: Community Recommendations: Regulations and standards for industrial operations

Require Industrial Pollution Prevention, Cleanup, and Emergency Response Plans

“There is no objective distance for the proposed clean-up provided, so the applicant must clarify whether it is proposing to clean the default minimum of ¼ mile from the facility boundary or some other metric” (RMG/Southside Recycling HIA).

Develop Worker Safety Protections and Labor Protections

“...All employees need job safety training that will educate them on the hazards and potential chemical exposures. See OSHA 3348-05 Guidance...Where does an employee go to find MSDS sheets or report a potential exposure to harmful chemicals?” (RMG/Southside Recycling HIA)

“Require companies to directly hire-on workers from the first day of their employment and forgo temporary agency hiring. This will allow workers to immediately receive benefits and improve their quality of life. Require acceptable pay as condition of city permit.” (SWICTS Submission).

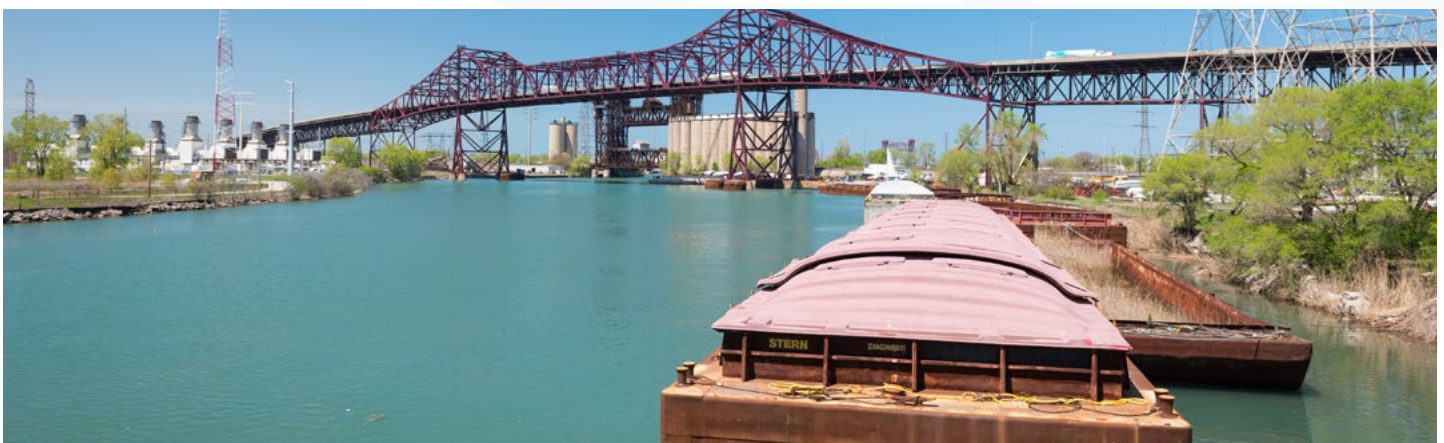
Additionally, community members describe enforcement measures City departments could adopt to protect communities from environmental hazards and pollution.

Some of these recommended enforcement measures include:

- Setting consequences for noncompliance, including permit denial and revocation: **“CDPH should expressly state its reservation of rights to revoke the permit based on evidence of noncompliance,” and “require the permit applicant to anticipate and have a fully realized plan to address noncompliance”** (RMG/Southside Recycling).
- Enforcing truck activity restrictions: **“Enforce existing diesel truck restrictions regarding 1) prohibited truck location on certain roads, and 2) truck idling. Ticket trucks on restricted roads and charge fines to the company and facility owners rather than truck drivers and operators. Charging owners rather than drivers assures the financial burden does not go to the individual worker”** (Southwest Industrial Corridor Transportation Study (SWICTS) Submission).

Increasing Emphasis on Proactive Pollution Prevention

Community members shared suggestions to avoid pollution in communities by known pollution offenders. A number of sources came from recent engagements related to facilities seeking permits and reflected speaker’s understanding and reaction to recent events. For instance, some of the recommendations listed below emerged from the reaction to the Hilco demolition in Little Village in 2021. One community member shared, **“I cannot attest**



to what happened on the Little Village smokestack demolition, but every implosion I have been made aware of falls within its own footprint. Why this structure fell to its side is unbeknownst to me. Demolition companies who fail at reducing the overall footprint of their demolitions/implosions should be fined” (Hilco Demolition Public Comments).

Other suggestions and reflections included:

- Increasing alignment between economic justice and environmental justice work: ***“Industries that have left Southeast Side were very bad polluters. We have the opportunity to rebuild the industry in a clean way. We should create economic justice as well as environmental justice”*** (RMG/Southside HIA Breakout Group).
- Requiring development projects in Chicago perform and follow a Health Impact Assessment: ***“Ensure that all development projects in Chicago follow HIA. From O’Hare 21, Chicago CASINO, CDOT [Chicago Department of Transportation] projects”*** (RMG/Southside HIA Breakout Group).
- Requiring demolition plans submitted before the City demonstrate adequate planning to ensure implosions will be downward before permitting: ***“The use of water is a primary source of dust control on construction demolition sites anyway. Demolishing buildings during rain events is a common sense solution that uses enterprise environmental factors as an advantage. Rainfall as a natural occurrence provides a greater horizontal and vertical coverage area than any man made dust suppression methods could ever come close to. Scheduling detonations during times of natural, and perhaps heavy rainfall would have a significant and measurable impact on dust reduction. Furthermore, far fewer people would be outdoors during these events, adding an additional benefit to public safety and public health”*** (Hilco Public Comments).

Implementation of Solutions and Regulatory Actions

Community members shared recommendations based on amplifying existing partnerships, whether local businesses or other community-wide planning initiatives, to mobilize attention around environmental justice.

Investing in overburdened communities

Community members expressed that resources and investments need to be directed specifically to overburdened communities by the City.

One Hyde Park community member explained the need for intentional allocation of resources to overburdened communities, stating ***“the data can tell us one thing about the inequitable distribution of amenities and burdens in our city right now ... that was the product of conscious decisions about where to put resources and the only way to undo that is to make conscious decisions about putting resources different places now”*** (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

A Chicago community member recommended a needs assessment informed and led by community members, stating ***“Do a gap analysis—get input from each community on its needs and direct resources accordingly”*** (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

An Englewood community member proposed a directed allocation of TIF funds, saying ***“Reverse TIF [Tax Increment Funding] porting so that rich neighborhood TIFs are being delivered across town to actually blighted communities—or eliminate TIF financing”*** (We Will Chicago: Environment, Climate and Energy Pillar Meetings). They also proposed using a “...racial audit lens⁶ to ensure greater investment in disinvested neighborhoods” (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

A business owner with a site located in Little Village remarked, *“the underserved communities will also be responsible for contributing to the offset expenses but may not be able to seize the incentives/rebates or be aware of the future jobs in energy. This is the reason the equitable distribution of resources must have a call-out for underserved communities.”*

Community ownership

Community members suggested provisions within community benefits agreements to ensure compliance from polluting industries. For instance, one member shared, *“If the permit is granted, RMG must commit in writing to a community benefits agreement to enhance the lives of the East Side community... RMG should be randomly audited at least once quarterly and the reports shared with East Side residents...”* (RMG/Southside Recycling Health Impact Assessment).

A Hegewisch community member shared, *“Incorporate indigenous land stewardship into our park district and fully fund local nations to do this work”* (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

A West Loop community member shared, *“Treat all resource reallocation (i.e., waste) as a communal resource that has to be shared deaccessioned”* (We Will Chicago: Environment, Climate and Energy Pillar Meetings).

Additional Opportunities

Community members described additional ways to address environmental hazards and pollution in overburdened communities. These included:

- Opportunity to reinvest in communities through green jobs: *“The ‘green renaissance’ should bring a lot of opportunities for new jobs. This wealth of opportunity shouldn’t just bring opportunities to the Amazons of the world, especially when addressing the themes of historical reckoning”* (We Will Chicago: Environment, Climate and Energy Pillar Meetings).
- Polluted land remediation: *“We need to remediate the soil and add bike paths; don’t let corporate entities steal our riverwalk access”* (Climate Action Plan).

In the breakout rooms for the RMG/Southside Recycling permit application, speakers shared additional ways in which government and pollutant actors could take accountability for their community:

- Improved community engagement process: *“When community meetings are being placed for residents, it should require some proof of residence (i.e., address) as this meeting was meant for community members [and] it was filled with non-residents who only work for RMG and are not forced to live in the pollution in the community.”*
- Changes to current zoning and planning practices: *“Separate industrial and residential zoning uses.”*

.....

⁶ Racial equity audits refer to evaluations of an employer’s policies, procedures and practices to identify and address systemic bias and discrimination. Society of Human Resource Management (2020), “Equity Audits Address Racism in the Workplace”: <https://www.shrm.org/resourcesandtools/legal-and-compliance/employment-law/pages/racial-equity-audits-increase.aspx#:~:text=A%20racial%20equity%20audit%20is,diverse%2C%20equitable%20and%20inclusive%20workplace.>

V. AREAS FOR ADDITIONAL COMMUNITY INPUT GATHERING

As an initial step in CDPH's Cumulative Impact Assessment (CIA) process, CDPH aimed to review what the City has heard from environmental justice communities in Chicago and to refrain from making any assumptions about or comments on what was shared in these documents. As such, this community input summary is not meant to be an exhaustive list of the vast history of community-led advocacy around environmental justice in Chicago, though it is informed by it. We acknowledge the gaps in our analysis and look to these gaps as potential areas for continued work as CDPH enters the assessment phase of the Chicago Cumulative Impact Assessment process.

CDPH identified a few opportunities within the Community Input Summary that can help inform the scopes of CIA working groups, including: Data and Methods, Communications & Engagement, and Policy.

For instance, this summary features many perspectives from the Southeast and Southwest sides and none from communities in the West or Northwest sides. This gap will inform our future engagement planning in order to ensure all voices are reflected in the Cumulative Impact Assessment. While one of our initial guiding questions focused on the economic impact of pollution, CDPH engaged at various times with EEWG to further flesh out this theme. As primary data did not reflect quantitative costs and began to share impacts on quality of life, EEWG recommended to consider naming social impacts within this theme as well. Cumulative impact assessment work will explore how to continue to bring together quantitative and qualitative data to measure cumulative burden in Chicago.

Current analysis focused on environmental justice, specifically industrial-related environmental justice concerns and experiences. Some of the data we looked at, however, has some overlap with climate justice, particularly the recommendations around reducing emissions (e.g., electrification, public transit, etc.). Cumulative impact work could also incorporate intersections between environmental justice and climate justice work to support ongoing initiatives such as the Chicago Climate Action Plan.

This summary places a heavy emphasis on air pollution and the impacts of air pollution on community members. When discussing the Community Input Summary project at a September EEWG meeting, EEWG members noted additional important areas for consideration as the cumulative impact assessment moves forward, particularly water and noise pollution and their impact on communities already experiencing the burdens of living with air pollution.

A set of guiding questions developed in partnership with the EEWG formed the structure of this Community Input Summary (see Table 2). While the review of existing primary data sources has shed light on many of these questions, some remain to be explored as the existing data sources did not speak to them in depth. Because of this Summary's strict focus on public comments and engagement sessions, we did not articulate how community members would describe their roles in environmental justice. This is an important question for further consideration as we move forward together.

APPENDIX A: ADDITIONAL GLOSSARY OF TERMS

Air dispersion modeling: Modeling that uses mathematical formulations to characterize the atmospheric processes that disperse a pollutant emitted by a source (US EPA Air Quality Dispersion Modeling).

Auto fluff: (abbreviated ASR) Automotive shredder residue, including plastics, foam, textiles, rubber and glass.

Confined Disposal Facility (CDF): A facility used for the handling and disposal of dredged material from local waterway systems (Illinois EPA: Chicago Area Confined Disposal Facility).

Cumulative impacts: The total burden – positive, neutral or negative – from chemical and non-chemical stressors and their interactions that affect the health, well-being, and quality of life of an individual, community, or population at a given point in time or over a period of time (US EPA EJ Definitions).

Cumulative impact assessment: The process of accounting for cumulative impacts in the context of problem identification and decision-making. It requires consideration and characterization of total exposures to both chemical and non-chemical stressors, as well as the interactions of those stressors, over time across the affected population. (US EPA EJ Definitions).

Dredging: The removal of sediments and debris from the bottom of lakes, rivers, harbors, and other water bodies (NOAA).

Emissions: The term used to describe the gases and particles that are put into the air or emitted by various sources (US EPA).

Environmental justice: The fair treatment and meaningful involvement of all people regardless of race, color, culture, national origin, income, and educational levels with respect to the development, implementation, and enforcement of protective environmental laws, regulations, and policies (US EPA EJ Definitions).

Facility: The land and all structures, equipment, and ancillary fixtures on said land used to process, store, or recycle materials, including structures, buildings, scales, roadways, parking areas, queuing areas, fences, tipping floors, processing equipment, processing areas, staging areas, and monitoring stations (CDPH Rules for Large Facilities).

Health impact assessment (HIA): A practice that aims to protect and promote health and to reduce inequities in health during a decision-making process (Min. Elements and Practice Standards for HIA, v. 3).

Implosion: A method of demolition that involves making the facility collapse down onto its footprint. This is necessary when a building is surrounded by other buildings (How Stuff Works).

Industrial corridor: Refers to formally designated Industrial Corridors, designated in 1992 by the Chicago Plan Commission. Their boundaries are located nearby railroad embankments, waterways, highways, arterial streets and other manmade and natural buffers that effectively separate interior industrial uses from adjacent residential and commercial activity. Chicago has implemented plans and policies to concentrate industrial activity in such areas since the 475-acre Stockyards opened in 1865. Their zoning and uses are primarily restricted to industrial or manufacturing activities, and any proposed land use changes require review by the Plan Commission and City Council (City of Chicago).

Industrial use: Refers to city land zoned for light industry (M2: moderate manufacturing, warehouses, freight, and recycling facilities) or heavy industry (M3: heavy manufacturing, warehouses, and waste disposal – junkyards, landfills, and incinerators) (Chicago Municipal Code).

Large Recycling Facility: A facility that is authorized to accept 1,000 tons or more per day of Recyclable Materials operates a metal Shredder that Processes vehicles or that has a rated capacity of greater than 25 tons per hour, or utilizes Mechanical Sorting Equipment in the Processing of ASR in the City of Chicago (CDPH Rules for Large Recycling Facilities).

Metal recycling facility: A facility which accepts and processes metal by separating, shearing, sorting, shredding, compacting, bailing, cutting, or sizing to produce a principle commodity grade product of prepared scrap metal for sale or use for remelting purposes.

Nitrogen dioxide: (abbreviated NO²) One of a group of highly reactive gases known as oxides of nitrogen or nitrogen oxides (NO_x). Other nitrogen oxides include nitrous acid and nitric acid. NO² is used as the indicator for the larger group of nitrogen oxides. NO² primarily gets in the air from the burning of fuel. NO² forms from emissions from cars, trucks and buses, power plants, and off-road equipment (US EPA).

Overburdened communities: Minority, low-income, tribal, or indigenous populations or geographic locations in the United States that potentially experience disproportionate environmental harms and risks. This disproportionality can be as a result of greater vulnerability to environmental hazards, lack of opportunity for public participation, or other factors. Increased vulnerability may be attributable to an accumulation of negative or lack of positive environmental, health, economic, or social conditions within these populations or places. The term describes situations where multiple factors, including both environmental and socio-economic stressors, may act cumulatively to affect health and the environment and contribute to persistent environmental health disparities (US EPA EJ Definitions).

Particulate matter: Microscopic solids or liquid droplets that are so small that they can be inhaled and cause serious health problems (US EPA).

Permit: Refers to the issuing or renewal of permits for operations and activities impacting the environment. The Chicago Department of Public Health (CDPH) issues permits for work involving above ground and underground storage tanks, recycling facilities, waste handling facilities, construction site rock crushers, sandblasting, grinding, chemical washing, and the installation and operation of any equipment that has the potential to create or control air pollution (CDPH Environmental Permitting & Inspection).

Petroleum coke: (abbreviated petcoke) a solid, carbon material derived as a byproduct of the oil refining process (CDPH).

Salt storage pile: (abbreviated salt pile) Commonly found in operations that use minerals in aggregate form and are usually left uncovered. Dust emissions can occur at several points in the storage cycle, such as material loading onto the pile, disturbances by strong wind currents, and loadout from the pile (US EPA Aggregate Handling And Storage Piles).

Smokestack: A large chimney or vertical pipe through which combustion vapors, gases, and smoke are discharged.

Sulfur dioxide: (shorthand in this summary is sulfur) a colorless gas or liquid with a strong, choking odor produced from the burning of fossil fuels (Wisconsin Department of Health Services).

Superfund: The informal name for the 1980 Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) established by US Congress. CERCLA provides EPA the funds and authority to clean up contaminated sites (US EPA, What is Superfund?).

APPENDIX B: Description of Primary Data Sources

Recommendation	Detailed Description of Source
<p>City of Chicago: We Will Chicago: Environment, Climate and Energy Meetings (Summer 2022 draft plan)</p>	<p>“We Will Chicago” is a citywide planning initiative currently underway under Mayor Lori E. Lightfoot that will encourage neighborhood growth and vibrancy while addressing social and economic inequities that impair Chicago’s legacy as a global city. We Will Pillar Research Teams met monthly to develop and review the key questions, objectives, and recommendations that are shaping the We Will Chicago plan. Each pillar team was comprised of local volunteers and organizations, artists and organizers from the collaboration with, city departments and agencies, and nonprofit community partners.</p>
<p>City of Chicago, Mayor’s Office of Sustainability: 2022 Climate Action Plan Feedback</p>	<p>The City of Chicago updated its Climate Action Plan in 2022 to reflect the bold action needed to protect and strengthen communities – locally and globally. The updated climate goals were designed to reduce carbon emissions while also increasing household savings, advancing environmental justice, and improving community health. Chicagoans were invited to share their climate priorities through an online survey.</p>
<p>Chicago Department of Public Health (CDPH): RMG/Southside Recycling Health Impact Assessment, Community Input Summary, and Jamboards</p>	<p>The Chicago Department of Public Health (CDPH) completed a Health Impact Assessment (HIA) Report on Reserve Management Group’s (RMG) application for a permit to operate a metal recycling plant on the southeast side of Chicago. As part of the HIA, CDPH solicited broad input on the RMG/Southside Recycling permit. Through public town halls, an extended public comment period, daily media monitoring, surveys and facilitated small group discussions, CDPH received insight from thousands of community members, local organizations, environmental advocacy groups, public health professionals, and other stakeholders to help us understand the impacts – both positive and negative – of greatest interest, how to assess these impacts, and ideas for future action. Specific community feedback shared in this summary came from an engagement session in December 2021, which was recorded on Jamboards. This feedback was then transcribed and analyzed for this report. As described in this Community Input Summary, CDPH used feedback on impacts across steps of the HIA process, including Scoping, Assessment, and Recommendations for policy and process change.</p>

Alliance of the SouthEast (ASE) at the U.S. Environmental Protection Agency’s Science Advisory Board Meeting for the Review of Cumulative Impacts: Recommendations for ORD Research

Amalia NietoGomez, Executive Director for the Alliance of the SouthEast (ASE), presented comments to the U.S. Environmental Protection Agency’s Science Advisory Board Meeting for the Review of Cumulative Impacts. In the comments, NietoGomez addressed cumulative impact efforts, *“particularly around establishing the decision context and stakeholder engagement, addressing scientific concerns, and empowering local decisions and actions.”*

Illinois Commission on Environmental Justice: Recommendations for Definition of Environmental Justice Community Under the Future Energy Jobs Act

The Illinois Commission on Environmental Justice provided a letter to the Illinois Power Agency “to provide information and suggestions regarding defining, *“EJ [environmental justice] communities”, as well as provide information on existing tools and methods.”*

Alliance for the Great Lakes: Calumet Connect Databook, Qualitative Community Needs Assessment

The Calumet Connect Databook was compiled to serve as a resource in guiding policy and planning in the Calumet Industrial Corridor. The Databook is the product of more than a year of collaborative research. As part of the Databook, Alliance for the Great Lakes conducted a qualitative community needs assessment. This process focused on understanding Corridor residents’ experiences and ideas for solutions to address the needs of their communities South Chicago, South Deering, East Side and Hegewisch.

Center for Neighborhood Technology: Southwest Industrial Corridor Transportation Study (SWICTS) Submission

The Center for Neighborhood Technology (CNT) created this strategy document as part of the Southwest Industrial Corridor Transportation Study (SWICTS).

Chicago Department of Public Health: Metal Management Midwest, Inc. Permit Application – Public Comments

In response to a permit received by the Chicago Department of Public Health (CDPH) from Sims Metal Management, there was a written comment period stretching from December 2021 through October 2022. These comments were published on CDPH’s website. These comments support ongoing investigation and community input regarding the renewal permit and support an in-person input session occurring in late 2022.

City of Chicago: Rules Concerning Demolition By Implosion – Public Comments and Hearing

After the demolition of a smokestack in Little Village, the City drafted new regulations surrounding demolitions by implosion. These regulations were open to public comment online and there was also a public meeting held for community members to provide input. The transcript of these comments and this meeting were also published to the City of Chicago website for archival purposes.

APPENDIX C: Full List of Community Data Sources

Primary Source

Source	Description
We Will Chicago	Environment, Climate and Energy Pillar Meetings (Meetings #2, #3, #4, #5, #6, #7, #8, #9, #10, #11, #12, and #13)
Mayor's Office of Sustainability	2022 Climate Action Plan Public Comment Feedback
CDPH	RMG/Southside Recycling Health Impact Assessment - Breakout Session Materials (Dec 2021), HIA Community Input Summary
Alliance of the Southeast (ASE)	U.S. Environmental Protection Agency's Science Advisory Board Meeting for the Review of Cumulative Impacts: Recommendations for ORD Research
Illinois Commission on Environmental Justice	Recommendations for Definition of Environmental Justice Community Under the Future Energy Jobs Act
Alliance for the Great Lakes	Calumet Connect Databook
Center for Neighborhood Technology	Southwest Industrial Corridor Transportation Study (SWICTS) Submission
CDPH	Metal Management Midwest, Inc Permit Application - Public Comments
City of Chicago	Rules Concerning Demolition By Implosion -Public Comments and Hearing

Community History Sources

Source	Description
Little Village Environmental Justice Organization (LVEJO)	Comments on Demolition rules, rock crushing facilities
LVEJO	Water Justice Program
LVEJO	Water & Health in Little Village 1.0: An Environmental Study
LVEJO	Water & Health in Little Village 2.0: An Environmental Study
LVEJO	Little Village Economic and Public Health Analysis
SETF, SSCBP, PCR, and NRDC	General III Risk Assessment Comments to CDPH
LVEJO	Chicagoland Latinx Communities Face Barriersto Water Access

Background Sources

Source	Description
LVEJO	Public Comments, Draft Little Village Framework Plan
CNT	Flood Equity White Paper
MPC	List of Facilities Within Southwest Industrial Corridors
CEJN	Comparison of Newark Ordinance Draft & Comparison Table
CEJN	Cumulative Impacts Briefing Package

Secondary Sources

Source	Description
University of Illinois at Chicago, Great Cities Institute	2022 Budget Community Engagement Report (Prepared for the Mayor's Office of Community Engagement and Chicago's Office of Budget and Management)
Chicago Department of Planning and Development	SWICTS Public Meeting Summaries (Little Village/South Lawndale)
Chicago Sun-Times	City Explores Moving Controversial McKinley Park Asphalt Plant
Block Club Chicago	Neighbors Slam McKinley Park Asphalt Plant's Bid For \$500 Million City Contract
McKinley Park News	Civic Association Meeting Focuses on Asphalt Plant
McKinley Park News	Asphalt Manufacturer, Community Members Engage Concerns and Plans Around New Plant
Chicago Tribune	McKinley Park Residents Want Asphalt Plant Shut Down
South Side Weekly	The Norfolk Expansion