



# COMMUNITY INPUT PROVIDED DURING ASSESSMENT

## CHICAGO CUMULATIVE IMPACT ASSESSMENT



## INTRODUCTION



As demonstrated by Chicago's long history of environmental justice activism, receiving public comment and feedback from communities most impacted is essential to the success of the Cumulative Impact Assessment (CIA). Building upon the community input compiled during the scoping phase known as the **Initial Community Input Summary**, the Communications and Engagement Working Group (CEWG) created a range of engagement opportunities for community members and organizations to help inform and shape the Cumulative Impact Assessment deliverables during the assessment phase. Between April and August 2023, the CEWG collected community input through a range of events that were publicized through a dedicated CIA website, CDPH and partner social media, outreach to aldermanic offices, media coverage, and flyers distributed through community co-hosts. This deliverable describes the process of co-designing the engagement events with community partners and CDPH, as well as shares a summary of themes from the different activities conducted.

Before initiating any CIA engagement, at the request of the Environmental Equity Working Group (EEWG), CDPH analyzed relevant community input from previous public comments, hearings, and the media to understand what has already been shared with the City regarding cumulative impact and environmental justice and support shaping meaningful community engagement in later phases of the Assessment. In the summer of 2022, CDPH and the Illinois Public Health Institute (IPHI) consolidated qualitative data demonstrating the lived experience of cumulative environmental impact on Chicago residents. Findings are described in the **Initial Community Input Summary** which reflects the experience of Chicagoans from communities that experience environmental, health and social stressors – particularly majority Black and Latinx neighborhoods in the South and West Sides of Chicago with lower incomes. The CEWG then used the Initial Community Input Summary during their scoping phase to identify communities that have been negatively impacted by environmental stressors and used this information to inform the community engagement plan so that sessions could build on the lived experience that was already shared.

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## BACKGROUND OF COMMUNICATIONS AND ENGAGEMENT WORKING GROUP



The Communications and Engagement Working Group (CEWG) was formed in March 2023. The goals of the CEWG have been to ensure community members drive and co-design communication messages and engagement strategies so they are culturally responsive and accessible, to be transparent in multiple languages throughout the Cumulative Impact Assessment (CIA) process so that all members of the public have access to up-to-date information about the CIA process, and to ensure that the process is guided by community members' lived experiences, highlighting community power and assets

and letting community members tell their stories in their own voices. The CEWG also created engagement goals (Figure 1.) to help organize and guide the level of information, interaction, and participation. The CEWG community co-chairs are Courtney Hanson and Chloe Butler-Jones from People for Community Recovery (PCR), Alfredo Romo and Madalynn Benavides from Neighbors for Environmental Justice (N4EJ), and Eduardo Muñoz from the Chicago Department of Public Health (CDPH). Together with non-voting members, the CEWG worked together to develop multiple communication materials, an engagement plan, and a Cumulative Impact Assessment Lessons Learned Assessment Plan among other deliverables. Prior to the first full CEWG meeting, the working group co-chairs developed a charter and set of sixteen community agreements governing the conduct of the working group. The charter outlines the goals and function of the working group as well as the roles of the different members including delineating voting and non-voting members. The community agreements established a shared set of values to encourage a space and process that aligned with the CIA project values. Throughout the CIA process, the full working group would review, affirm, and adjust these community agreements. This included establishing a group decision making process and grievance procedure. The working group met weekly in the initial planning stages and then biweekly during the summer engagement sessions, often supplemented with smaller event or task specific meetings. The entire process, including the engagement planning, community input gathering and analysis, Lessons Learned Assessment design, and development of communication materials was co-led by the community co-chairs and reviewed by the CEWG and Project Management team.

Throughout the entire process, the primary goal of the working group was to center and uplift community voices particularly those from EJ communities. Community engagement locations were selected to provide easy access to various EJ communities. Engagements were collaboratively designed to inform and educate attendees, as well as provide a platform for community members to share feedback and lived experience. After each event, the working group evaluated the event and made adjustments to the event plan in order to provide a better experience for the community.



Figure 1: Community Engagement Goals for Summer 2023

- Inform and build momentum
- Co-design and cohost engagement between the City and environmental justice (EJ) organizations
- Gather input and on-the-ground expertise from community members in neighborhoods most affected
- Stories and Voice (a forum for community members to share)
- Provide follow-up (a way for participants to stay informed)
- Provide a foundation for longer-term ground truthing

COMMUNITY ENGAGEMENT METHODS – SUMMER 2023



In the early stages of designing the plans for community engagement for the Cumulative Impact Assessment, the CEWG made the decision that these engagements would require different methods to reach communities and gain meaningful input. The CEWG designed a threefold approach that included a range of engagement opportunities for people and organizations to help inform and shape CIA deliverables. The Working Group wanted to reach as many voices as possible, noting that not all members have access to the internet, or can travel to particular areas of the city for the CIA engagements. More detailed information about the types of summer engagement is shown in Table 1. The threefold approach included:

1. In-person CIA Engagement Sessions co-hosted by Environmental Justice organizations and City of Chicago (CDPH and Office of Climate & Environmental Equity OCEE): The in-person sessions were designed to foster personal and deeper conversations and meet community members in their areas. Most of the CIA engagement sessions were live-streamed to provide greater access.
2. Collecting Community Input at Existing Community-Based Environmental Justice Events: The CEWG and other CIA co-chairs staffed a table or booth at existing events to inform community members about the CIA work and gather input on a few documents related to Policy, the draft Environmental Justice Action Plan (EJ Action Plan), and Data and Methods.
3. Online survey and comment form: Community members were also able to review the CIA webpage and documents online, and could submit comments via a survey link or by sending their thoughts to a CIA email account.

COMMUNITY INPUT PROVIDED DURING ASSESSMENT

Summer Engagement (April to August 2023)

Between April and August 2023, community members’ input was collected through a range of events that were publicized through the CIA website, CDPH and partner social media, outreach to aldermanic offices, media coverage, and flyers posted and distributed by community partners. The CEWG partnered with frontline community organizations to host community engagement events intentionally selecting locations in historically overburdened neighborhoods on the South and West sides. For an even broader reach, the group tabled at several existing community events in the target communities. Input from these events was supplemented by online comments and survey responses. It is imperative to hear from EJ community and community members, to ensure that the EJ Action Plan and CIA aligns with community needs, preferences, expertise and aspirations as EJ communities will be directly affected by the EJAP and CIA ordinance.

Table 1. Summary of Summer Engagement Types

Cumulative Impact Assessment Engagement Sessions	The CEWG held three dedicated, in-person events focused on different areas in Chicago that are impacted by environmental burdens: Far South at Corliss High School in Pullman on July 12; West Side at Build, Inc. in Austin on August 2; and Southwest at Horizon Science Academy in McKinley on August 9. A total of 145 people attended the in-person sessions and participated in interactive activities designed to engage local residents, creating an inclusive atmosphere where people exchanged and shared ideas and feedback on the Cumulative Impact Assessment. The August 2nd and August 9th Cumulative Impact Assessment sessions were live streamed to provide greater access.
Tabling at Community Events	CEWG representatives staffed a table at seven community events to educate community members about the CIA and gather input directly from people who experience cumulative impacts. A total of 80 people participated in the short engagement activities.
Youth Focus Group	CEWG members led an engagement with the Mayor’s Youth Commission on April 27, 2023, to provide information about the assessment and to solicit their feedback on the ways in which they experience cumulative impacts in their communities.
Online Public Comment	Chicagoans were invited to take a short survey on the CIA website from June 29 through July 31, 2023, to provide input on data indicators, policy recommendations, and a summary of EJ Action Plan strategies. Chicagoans could also provide public comment on draft EJ Action Plan strategies via email. There were 58 individuals who responded to the online survey during this period, and 12 individuals sent comment by email.
Business Community Focus Group	In partnership with the City’s Department of Planning & Development, CDPH and CEWG held a series of three meetings (March 2, July 13, and July 27, 2023) with approximately 55 representatives of Local Industrial Retention Initiative organizations and Industrial Council members across all three meetings. Through focus group-style discussion, participants responded to questions about how the City can better support existing businesses to reduce neighborhood impacts and increase local benefits, as well as policy changes that would promote green, sustainable business growth.



Description of In-person CIA Engagement Sessions

**Co-hosting:** The CIA engagement events were purposely designed to co-host between the City and community-based EJ organizations to further reach communities and to increase visibility of the CIA project. Our co-hosting approach was to pool resources such as expertise, planning of events, and design of the CIA engagements and activities.

**Presentations:** Presentations showed the process of the CIA project, purpose, goals, how did we get here, reason why this project is important, background on the local community Environmental Justice burdens and provide information and progress on working groups’ deliverables with the purpose of obtaining feedback during the activities.

**Breakout groups and activities:** Each in-person session was designed to gather meaningful feedback/ input from residents, businesses, and individuals on diverse perspectives and expertise which enriched CIA content and discussions. All participants were able to participate in all three activities. Each activity was 15 minutes, for a total of 45 minutes for the activity sessions and was co-facilitated with PCR, N4EJ, Illinois Public Health Institute (IPHI), and Chicago Environmental Justice Network (CEJN) partners. Shortened versions of the same activities were also offered by the CIA team at tables or booths at existing community-based events.

**Policy Activity** - Community members were shown the [Preliminary Policy Recommendations](#) which was created by the Policy Working Group based on the landscape assessment and the Initial Community Input Summary findings. The Policy Recommendations were categorized into three goals, 1) Environmental Justice Fundamentals 2) Cumulative Impact Elements and 3) Community Benefits. The activity focused on explaining each goal and asking “what policy recommendations in the summary document stand out as particularly important?” and “is there a policy step that the city should take to protect EJ communities that you would like to see that is not reflected in the summary document of policy recommendations?”

**Interdepartmental Environmental Justice Action Plan Activity** - The Interdepartmental EJ Group, produced a draft EJ Action Plan with specific strategies from each city department to help advance the City’s EJ goal. The strategies represent changes to department practices and policies. The EJ Action Plan strategy template was adapted from the City’s Racial Equity Action Plan and the CDPH Health Equity in All Policies team’s draft Equity Decision Support Tool. The activities involved having members vote on the topics they were most interested in, and then facilitating a discussion around the selected strategy topics.

**Data and Methods Map Activity** - This activity’s purpose was to gather input of local areas where residents experience burdens. The maps used in every session changed based on the geographic area of the neighborhood the CIA engagement session would take place. For example, the session that took place in the Pullman area included the map that covered residential and industrial corridors, schools, parks, street names, and waterways on the Far South side of Chicago. Participants identified where they would experience burdens and would circle or call out specific areas and intersections related to their experience.

Profile of attendees:



The total number of attendees for the in-person engagements and for the existing tabling events was 225 and two of the three in-person CIA events were live-streamed to prove greater access reaching over 11,000 combined views. Participants who provided their community/ neighborhood area resided in Roseland, Woodlawn, Washington Heights, South Shore, South Chicago, South Deering, Rodgers

Park, Bridgeport, Auburn Gresham, Beverly, Pilsen, Bronzeville, McKinley Park, Edgewater, Humboldt Park, Brighton Park, Little Village, East Garfield, Back of the Yards, Edgewater, Jefferson Park, Austin, Logan Square, Garfield Park, and North Lawndale.

METHODS FOR COMPILING, ANALYZING, AND INCORPORATING COMMUNITY INPUT

The CEWG and Project Management Team worked together to develop the approach and methods to analyze and incorporate input from all of the community engagement opportunities. Illinois Public Health Institute (IPHI), APEX, and Tetra Tech were responsible for compiling and sorting qualitative input data for each of the working groups. The City’s working group co-chairs and staff leads were responsible for reviewing direct input and summary themes and takeaways to incorporate and address the input in their respective deliverables.

To compile and analyze community input, IPHI, APEX, and Tetra Tech worked with City and community co-chairs on the following process in August 2023:

1. Compiled all written comments and feedback word-for-word (online and in-person written comments) in a spreadsheet.
2. Compiled all notes from dialogue, discussion, and verbal comments shared within in-person engagement sessions and tabling events.
3. Established topical “codes” or categories based on (a) categories from the preliminary Community Input Summary, (b) categories from the summary documents for each working group, and (c) additional categories that emerged from review of community input.
4. Coded both the written comments and notes from verbal discussion so that each comment and piece of feedback was tagged with multiple codes.
5. Sorted both the spreadsheet of written comments and the notes from verbal discussion by working group, and distributed the lists of written comments and notes to each team working to develop CIA deliverables (teams consist of working group co-chairs, additional City colleagues, and support consultants).
6. Shared the sorted written and verbal comments with working group co-chairs and additional City or consultant colleagues responsible for writing and revising key CIA working documents, and advised on how to incorporate community input into working documents. (Specifically, the comments were shared with: City Department leads writing EJ Action Plan Strategies; City policy staff from CDPH, OCEE, and DoL writing draft ordinance language; and City and Tetra Tech staff analyzing data for the Chicago EJ Index and associated maps and methodology).
7. Worked with City co-chairs (and in most cases, community co-chairs) to develop summary takeaways and recommendations for each set of deliverables based on the best format to incorporate for those deliverables.
8. Also, because many of the comments are forward looking and important for policymaking and implementation of EJ work, the project management team developed a matrix to identify and track ideas, concerns, and recommendations from written and verbal comments that should be addressed in next phases of EJ/Cumulative Impacts, and incorporated review and response to community comments as part of the City’s and working group’s commitments within next steps.

SUMMARY OF INPUT DURING CUMULATIVE IMPACT ASSESSMENT – SUMMER 2023

CDPH and technical partners compiled all community input received through online comment and Cumulative Impact Assessment community engagement sessions between June and August 2023.

Summary Input for DATA AND METHODS

THE FEEDBACK AND INPUT ABOUT DATA AND METHODS IS SUMMARIZED IN SIX THEMES:

1. TOPICS AND TYPES OF DATA THAT SHOULD BE INCLUDED,
2. IDENTIFYING AND ADDRESSING DATA GAPS,
3. DEFINING EJ NEIGHBORHOODS,
4. COMMUNITY ENGAGEMENT WITH DATA,
5. APPLYING DATA FOR POLICY, AND
6. TRANSPARENCY AND REPORTING.

Topics and types of data that should be included in assessing and addressing cumulative impacts

Community members who provided input in Summer 2023 emphasized the importance of including environmental data, health data, and socioeconomic data to understand and monitor the effects of pollution and environmental hazards on the community. This should include both statistics and lived experience data from community members, particularly community members in environmental justice communities. Key types of data that came up consistently across the community input were:

- Air pollution including industrial, vehicles, and smells
- Trash/litter
- Green space and trees
- Health statistics (cancer rates, heart disease, etc.)
- First person data from the community
- Comparing and monitoring data across race/ethnicity and socioeconomic factors
- Understanding data for groups at higher health risk including children and youth, older adults, people with disabilities, and racial/ethnic groups that are over-burdened by environmental and health conditions in Chicago

Identifying and addressing data gaps

Many potential data gaps were identified by community members who provided input in Summer 2023 including input and experiences from youth, environmental hazards in and around schools, environmental hazards in and around senior buildings, effects of industry located outside of Chicago city limits, data on stormwater and flooding, need for more localized air-monitoring, and need for more site-specific data (both for industrial and transportation sites). Community members also stressed the need to examine synergistic effects including additional pollution due to construction or compounding hazards. Data should also include a company’s history of violations and/or investment in the community. The following data gaps were each mentioned by multiple community members through in-person and online engagement:

- Youth
- Environmental hazards in and around schools
- Environmental hazards in and around affordable housing, particularly senior buildings
- Investment in communities by companies for “reduction of harms”
- Company history of violations
- Synergistic effects
- Pairing existing research with air quality monitoring in Chicago, particularly for more localized air quality monitoring
- Stormwater and flooding
- Effects of companies across state/community borders on Chicago
- Additional transportation data monitoring and availability
- How road closures and other policy decisions affect truck routes, increasing pollution in certain areas



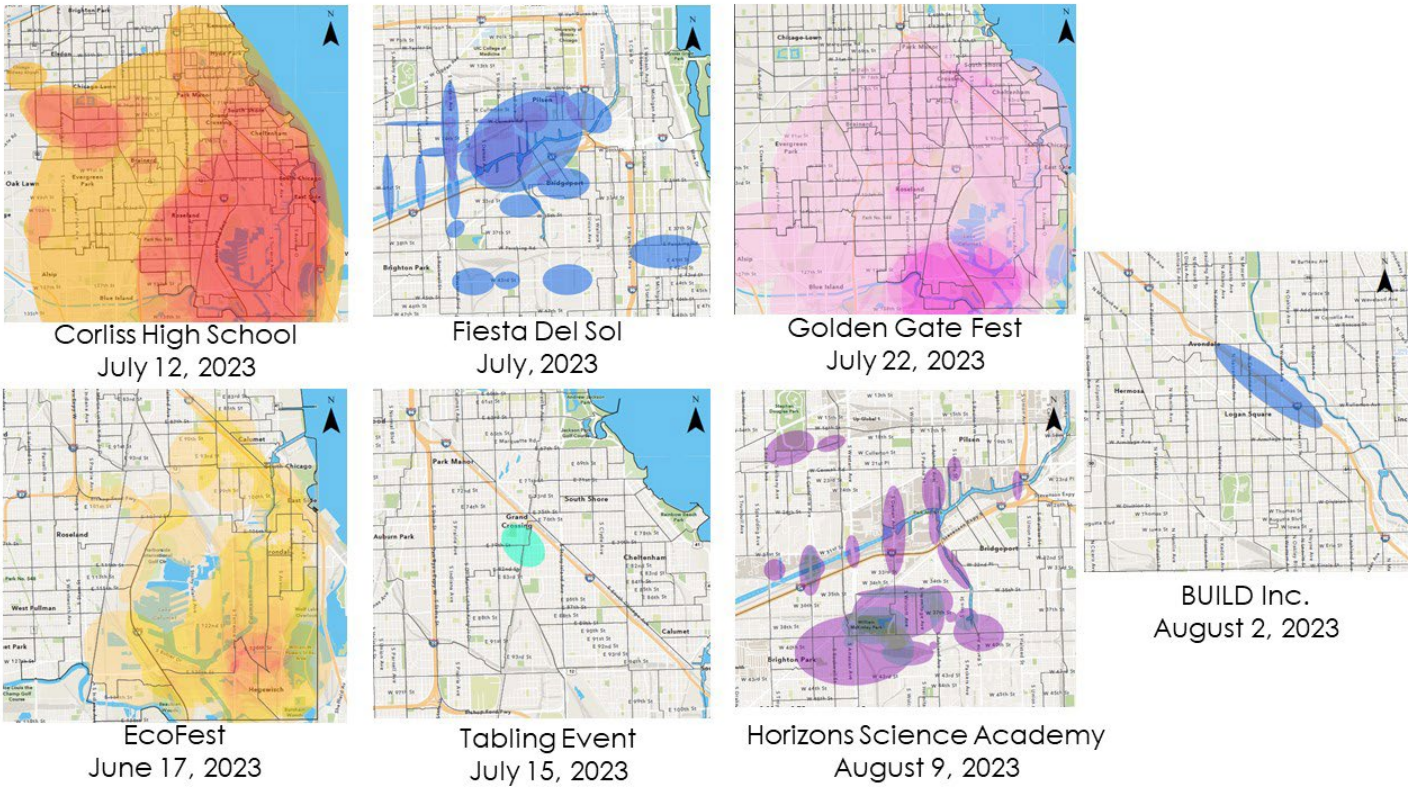
Defining EJ neighborhoods

Based on community member input in Summer 2023, there was guidance that the Cumulative Impact Assessment needs to clearly define Environmental Justice (EJ) Neighborhoods. The process for defining EJ Neighborhoods needs to reflect diverse types of data (see above), needs to reflect synergistic and cumulative burdens, and there needs to be a transparent and ongoing process for tracking, monitoring, revising and updating data in partnership with affected communities. Several community members also noted that defining EJ neighborhoods includes defining how a community is determined to be “burdened” and what qualifies as “pollution”.

Locations of pollution and environmental hazards identified in community engagement events

During the mapping activities, community members highlighted areas of concern (see Figure 2). These align with census tracts highlighted within the CEJI. They also align with areas along the Chicago River, major highways, and industrial corridors. These maps capture written feedback during the map activities at CIA engagement events and community tabling events. The maps do not capture verbal comments shared at engagements - Community participation at ecofest event on July 15 and at BUILD, Inc on Aug 2 were more conversational, and as a result, did not generate bigger heat maps.

Figure 2. Census Tracts Highlighted by Community Members at Summer Engagements



Community engagement with data

Based on community member input in Summer 2023, there is a desire for the City to make data more accessible for communities including using translation and plain language, educational materials on the meaning and implications of the data and how to respond, and informing community members early of any changes or new information. Also, the input emphasized that community members’ experiences and insights can help with filling in data gaps and support meaningful application of data-driven decisions. Community members also highlighted the need for more engagement with youth and to use non-traditional channels to collect and disseminate data including churches, schools, door-to-door visits, and other non-digital means.



- Using non-traditional channels to collect and disseminate data: schools, churches, block clubs, door-to-door, etc.
- Using plain language and translation to share information with the community
- More engagement with youth
- Inform community early on about potential changes/new information
- Educating community on what the data means and how to respond
- Recognizing community on-the-ground experience and expertise as data in the process and as integral to the ongoing cumulative impacts process

Applying data for policy

Community members who provided input in Summer 2023 expressed the importance of the policy implications of the data being used. Community members stressed the importance of holding City departments, elected officials, and polluting industries accountable for creating or perpetuating hazardous conditions. There is a wish for the data to be used to create both proactive and responsive policy based on objective analysis of the data as well as using data to support financial investment in the most affected areas of the community. There needs to be an easy way for community members to submit complaints or evidence of hazards—many respondents specified that current processes including calling 311 and reporting to aldermanic offices are not effective. Also, many respondents highlighted that land use and permitting decisions should consider a company’s history of violations and/or improvements.

- Using data to hold people accountable
- Considering company history of violations for permitting decisions
- Areas/Businesses that have improved should also be acknowledged
- Need an easy way for community members to submit complaints/evidence – current processes with 311 and aldermanic offices do not work
- Creating policy proactively instead of reactively
- Policy recommendations should be based in objective analysis of the data
- Using data to support financial investment in the most affected areas



Transparency and reporting

A consistent theme across community input in Summer 2023 was that more continuous testing and monitoring of the environment is needed including regular air, water, and soil testing. These results and any environmental data from all departments and agencies need to be made easily available to the public in plain language and translated. And, community members emphasized that clear communication channels and protocols are essential to ensure that communities are informed early on about potential or documented changes or new information.

- Reporting from all departments and agencies needs to be available online
- Make lead testing results public on a neighborhood or block level
- Continuous testing and reporting of water, air, and soil quality
- Making sure reporting is accessible including language and translation
- Inform community early on about potential changes and/or new information
- Support ways to work across jurisdictions and agencies for data transparency and reporting

SUMMARY INPUT FOR INTERDEPARTMENTAL EJ GROUP / EJ ACTION PLANS

FOR INTERDEPARTMENTAL EJ GROUP AND EJ ACTION PLANS, CDPH AND OCEE WORKED WITH CONTRACTED PARTNER APEX TO COMPILE AND ANALYZE COMMUNITY INPUT USING THE FOLLOWING PROCESS:

1. COMPILED ALL WRITTEN COMMENTS AND FEEDBACK WORD-FOR-WORD (ONLINE AND IN-PERSON WRITTEN COMMENTS) IN A SPREADSHEET.
  2. COMPILED ALL NOTES FROM DIALOGUE, DISCUSSION, AND VERBAL COMMENTS SHARED WITHIN IN-PERSON ENGAGEMENT SESSIONS AND TABLING EVENTS.
  3. ESTABLISHED TOPICAL “CODES” OR CATEGORIES AND CODED BOTH THE WRITTEN COMMENTS AND NOTES FROM VERBAL DISCUSSION.
  4. SHARED WRITTEN AND VERBAL COMMENTS WITH WORKING GROUP CO-CHAIRS AND ADDITIONAL CITY OR CONSULTANT COLLEAGUES RESPONSIBLE FOR WRITING AND REVISING KEY CIA WORKING DOCUMENTS, AND ADVISED ON HOW TO INCORPORATE COMMUNITY INPUT INTO WORKING DOCUMENTS.
  5. WORKED WITH CITY CO-CHAIRS (AND IN MOST CASES, COMMUNITY CO-CHAIRS) TO DEVELOP SUMMARY TAKEAWAYS AND RECOMMENDATIONS FOR EACH SET OF DELIVERABLES.
- ★ FOR A FULL DISCUSSION OF COMMUNITY INPUT RELATED TO EJ ACTION PLANS RECEIVED DURING THE ASSESSMENT PHASE AND PROVIDED TO DEPARTMENTS, SEE CITY OF CHICAGO EJ ACTION PLAN, APPENDIX J. DEPARTMENT MEMBERS OF THE INTERDEPARTMENTAL EJ GROUP USED THIS INFORMATION TO REFINE, EXPAND, AND UPDATE THEIR STRATEGIES, AS DESCRIBED IN EACH INDIVIDUAL DEPARTMENT’S EJ ACTION PLAN WRITEUP.

COMMUNITY COMMENTS AND FEEDBACK ON DEPARTMENTS’ EJ ACTION PLANS RELATES TO FIVE THEMES:

1. HEALTH AND ENVIRONMENT
2. COMMUNITY INPUT AND ENGAGEMENT PROCESS
3. DATA COLLECTION AND USE
4. ZONING, PLANNING AND ENFORCEMENT
5. COMMUNITY INVESTMENT AND IMPROVEMENTS



THE FEEDBACK AND INPUT ABOUT POLICY IS SUMMARIZED IN EIGHT THEMES:

1. CUMULATIVE IMPACTS ELEMENTS
2. ZONING/LAND USE/TRANSPORTATION/CONTRACTS POLICY-MAKING AND DECISION-MAKING
3. PERMITTING POLICY-MAKING AND DECISION-MAKING
4. WATER-RELATED POLICY-MAKING AND DECISION-MAKING
5. ENFORCEMENT
6. COMMUNITY BENEFITS AND INVESTMENTS
7. GOVERNANCE SYSTEMS AND STRUCTURES
8. COMMUNITY ENGAGEMENT - INCREASE COMMUNITY MEMBERS’ VOICES AS A FACTOR IN DECISION-MAKING AND ACCOUNTABILITY

Cumulative Impacts Elements:

Overall, community members who provided input in Summer 2023 agreed that the City needs to be expansive in considering environmental, health, and social impacts in decision-making. This includes historical as well as current impacts, impacts on vulnerable groups and community gathering places such as schools, elder care homes, parks, etc. Decisions should be made on an individual basis, considering all environmental, health, and social factors, not with one blanket policy. Considerations should be made to avoid displacement and gentrification and when data is unclear, decision makers should err on the side of community benefit.

- Look at historical as well as current data when appraising impact
- If evidence is uncertain, err on the side of least harm to the community
- Communities who are already burdened should not receive any more industry
- Prioritize environmentally beneficial development
- Take into account the impact on schools, elder care, parks, etc.
- Avoid displacement/gentrification
- Review each individual situation, no blanket policy

Zoning/Land Use/Transportation/Contracts Policy-making and Decision-making

Zoning code should ensure an equitable burden throughout the city. Zoning should take into account vulnerable populations such as youth and the elderly as well as establishing and maintaining “buffer zones” between industrial and residential areas. The main thing stressed by communities was the need for strict enforcement of all policies and regulations.

- Strictly enforce any policies/restrictions
- Take into account the impact on schools, elder care, parks, etc.
- Equitable distribution of burden throughout the city
- Establish/enforce “buffer zones” between residential and industry
- Consider a company’s history of EJ actions (violations/improvements) when awarding city contracts or authorizing economic development projects

Permitting Policy-making and Decision-making

When making permitting decisions, the city should consider a company’s history of violations. All permitting requirements should be clear and well defined. The city needs to strictly enforce permitting restrictions and regulations including limiting the time a company can operate on a temporary permit.

- Shorten time a company can operate on a temporary permit
- Consider a company’s history or current violations
- Strictly enforce any policies/restrictions
- Make requirements/rules clear

Water-related Policy-making and Decision-making

Community members expressed a need for more frequent and consistent testing of water quality to ensure compliance with all regulations. There is a need for strict enforcement of regulations including green infrastructure such as the use of lead-free pipes.

- More testing of water quality in EJ Neighborhoods
- Strictly enforce any policies/restrictions
- Enforce green infrastructure – lead free pipes

Enforcement

Many members of the community expressed the need for more consistent, strict enforcement of regulations and laws limiting pollution. There needs to be more monitoring of industry by both the City and communities including having short permit terms requiring compliance for renewal. Communities need a clear way to report violations and potentially get polluting facilities shut down. Once violations are reported, there needs to be a quick response and a transparent record of violation history. The presence of any open violations should prohibit a company from receiving city contracts or other benefits. If a company is not able to come into compliance within a reasonable, predefined amount of time, their permit should be revoked. There is a need for cross department accountability in enforcement efforts as well as a system of checks and balances.

- Facilities violating air quality ordinances or permits should be required to conduct fenceline monitoring for a minimum of 1 year.
- Consistent enforcement of regulations and penalties for violations
- More community oversight
- Enforce strict permitting and zoning laws, don’t allow industry right next to residential
- More stringent monitoring of industry
- Checks and balances to make sure ordinances are followed
- Temporary Permits for no longer than 6 months, then denial if still not compliant
- No contracts with the City if there are unresolved issues/violations
- Shorter permit terms (not 50 years, etc.) requiring continued compliance for renewal
- Track history of violations with increasing penalties
- A clearly written process by which a polluting facility in an EJ community can be deemed a public nuisance and be shut down
- More transparency in enforcement
- Cross department accountability for enforcement
- Have readily available inspectors for quick action when a hazard is reported



Governance systems and structures

Community members expressed the need for several different governance systems and structures. There is a need for a way for community members to report violations/hazards and to provide input on proposed policies or developments. Complementary to this, there needs to be a more robust system of community engagement, providing education and soliciting feedback from the community using diverse communication strategies. There needs to be relationships and agreement between city departments and with sister agencies to further EJ goals. It was suggested that there be a department created to facilitate co-operation and communication between these departments, agencies, and the community. It was also suggested that the city establish the Department of the Environment. There is a desire for a fund to be established that polluters pay into and is managed by the community for community improvements. There also need to be funding structures that allow for the allocation of more resources to EJ neighborhoods. Another suggestion was that there be a system to provide healthcare for those who have been affected by environmental injustice. There needs to be a system for responding to emergencies including emergency health services, relocation of affected residents, and the remediation of any contamination. Once contaminated land is cleaned up, it should be returned to community control.

- System for Community to report violations/hazards – 311 and aldermen’s offices are not responsive
- Relationship/Agreement with sister agencies (CPS, CFD, Library, Parks, etc.) to further EJ improvements
- More community input in policy development
- Funding structures that allocate more funding to EJ Neighborhoods
- Emergency planning for both natural and man-made disasters (flooding, contamination, etc) for short term relocation and long-term remediation
- System to provide healthcare to those affected by Environmental injustice
- System to keep the community educated and informed on EJ efforts and for the community to provide input/veto on new industry in their neighborhood
- Incentive system for creating green space and green business
- Establish a fund that polluters pay in to and is used for community development managed by the community members
- Department that branches between all the City departments and community to aid communication and coordinate efforts
- Establish the Department of Environment
- More active/diverse communication for awareness and response to health hazards (air quality, etc.)
- System for cleaning up contaminated land and returning it to community control

Community Benefits and Investments

Many of the benefits to EJ communities from the proposed policies would only be possible with more community involvement throughout the process. This requires education, information accessibility, and transparency on the part of the City and industry. The potential benefits include building generational value through community ownership of land, community control or input on how funds are spent on community improvement, and overall cleaner, healthier, and safer communities. EJ Neighborhoods would benefit from a more equitable distribution of environmental burden and sustainable economic opportunities as well as better preparedness for emergencies and support for those affected by current and past environmental injustice.

- Establish funds to be used for neighborhood improvements in EJ areas, potentially to be funded by facilities that contribute to cumulative impacts
  - Community control over how funds are spent, not just for industry improvements
- Explore opportunities for community ownership of land in EJ neighborhoods (e.g., land trust)
  - Communities able to build generational value through community ownership of land
- Ensure developments and infrastructures are environmentally friendly
  - Cleaner, healthier, safer communities
  - More equitably shared burden
- Allow the City to require local environmental improvement projects in addition to financial penalties for businesses that violate zoning or permit requirements
- Community should have agency and ownership over established benefits
  - Community education and involvement in policy development – more community engagement throughout the process
  - Transparency with policy development and implementation
  - Train some community members as monitors to keep industry and the city accountable
- Additional Community Benefits
  - Quick, effective response to hazards, especially in emergencies
  - Care and assistance for those already impacted by past injustice
  - Economic benefit – Jobs and tax revenue from businesses that support the community with minimal harm
  - Fewer health impacts, less stress on healthcare in communities



Community Engagement - Increase community members’ voices as a factor in decision-making and accountability

There is a strong desire among community members who participated in Summer 2023 engagements for more involvement with and influence on decision-making. The City needs to increase community engagement including engaging with vulnerable groups, utilizing various communication methods, and increased transparency overall. There needs to be education for the community on city processes and policies to solicit more beneficial feedback. There needs to be a process to shut down already operating facilities that are causing harm as well as preventing the opening of new facilities that would cause additional harm to already burdened neighborhoods. There needs to be community-led oversight to hold the city and companies responsible. This includes informing the community early on in the decision-making process to allow time for community education and input.

- Community lead oversight to hold city accountable
- Need a process to shut down already operating facilities that are hazardous to communities
- Community involved in defining EJ Neighborhoods, burden, and other relevant terms
- More transparency overall
- Outreach/input through various methods, not all virtual
- Engage community groups, youth, unions, elderly, etc.
- Education of community on processes for permitting/zoning to solicit better feedback
- More frequent/consistent community engagement
- Inform community early on in the decision-making process, not after decisions have already been made

ONGOING ENGAGEMENT FOR ENVIRONMENTAL JUSTICE / CUMULATIVE IMPACTS EFFORTS

Future community engagements play a crucial role in continuing to shape a shared environment, fostering inclusivity and ensuring community voices contribute to the decisions that affect communities who have been most impacted. Listening to community members’ and business representatives’ input and concerns will help address community needs and priorities effectively. Therefore, significant work remains to ensure that City departments and sister agencies, elected officials, local industry, and community partners are following through, together, on changes that better protect EJ neighborhoods from the cumulative effects of environmental, health, and social stressors. The CIA team plans to work with the EEWG and different working groups to create a plan for engagement to gather input from community members this Fall to inform the remaining deliverables including the public facing data dashboard, a framework for ground-truthing, and materials for people to learn and educate about the findings and recommendations from the assessment.

Components of an engagement plan will include the following:

Partner Type	Engagement Goals
EJ Community Members	<p>The Communications &amp; Engagement Work Group recommends continued outreach for EJ community members to:</p> <ul style="list-style-type: none"><li>• Create materials and space for people to learn about the findings and recommendations from the assessment</li><li>• Provide input on public facing data dashboard and participate in ground-truthing</li><li>• Participate in the planning, implementation, and evaluation of City department’s EJ Action Plan strategies</li><li>• Build public momentum for policy change</li></ul>
Community-Based Organizations	<p>The EEWG will work with OCEE and CDPH to:</p> <ul style="list-style-type: none"><li>• Deepen engagement of diverse community based organizations to support outreach, public education, and engagement of community members</li><li>• Continue EJ organizations’ involvement with EJ Action Plan strategies through EEWG engagement with the Interdepartmental EJ Group</li></ul>
Business Sector (via Local Industrial Retention Initiative, Industrial Business Council representatives)	<p>Focus group input during the assessment phase lifted up several opportunities for business sector engagement, including:</p> <ul style="list-style-type: none"><li>• Educate sectors on cumulative impacts and how to reduce burdens and maximize direct benefits to EJ neighborhoods</li><li>• Facilitate dialogue between business leaders and community representatives</li><li>• Identify ways to leverage existing and potential resources (e.g. state and federal grant programs, tax incentives) to help businesses reduce their impacts</li><li>• Partner to develop and expand green economy and workforce programs</li></ul>
Policy-Makers	<p>Coordination with local elected officials along with other state and federal public agencies (such as the Illinois and U.S. Environmental Protection Agencies) will also be important in this next phase of work to advance an aligned policy change agenda</p>



# ACKNOWLEDGEMENTS

This Cumulative Impact Assessment work would not have been as successful as it was without our Environmental Justice community partners, contractors, and CDPH staff who helped put together many of the CIA engagements, materials, plans and CEWG deliverables.

- Chloe Butler-Jones, People for Community Recovery (Co-chair)
- Courtney Hanson, People for Community Recovery (Co-chair)
- Cheryl Johnson, People for Community Recovery
- Mia Berrios, People for Community Recovery
- Madalynn Benavides, Neighbors for Environmental Justice (Co-chair)
- Alfredo Romo, Neighbors for Environmental Justice (Co-chair)
- Darek Lau, Neighbors for Environmental Justice
- Brandon Murillo, Neighbors for Environmental Justice
- Dany Robles, Illinois Environmental Council
- Ellis Walton, Environmental Law & Policy Center
- Myrna Salgado, CEJN
- Kim Wasserman, Little Village Environmental Justice Organization
- Olga Bautista, Southeast Environmental Task Force
- Sydney Edmond, Chicago Department of Public Health
- Eduardo Muñoz, Chicago Department of Public Health (Co-chair)
- Gabrielle Guerrero, Chicago Department of Public Health
- Ivonne Sambolin, Chicago Department of Public Health
- Grace Adams, Chicago Department of Public Health
- Susan Martinez, Chicago Department of Public Health
- Clayton Oeth, Chicago Department of Public Health
- Kirsti Bocskay, Chicago Department of Public Health
- Megan Cunningham, Chicago Department of Public Health

# ACKNOWLEDGEMENTS Cont'd

- Gabriela Wagener-Sobrero, Office of Climate & Environmental Equity
- Angela Tovar, Office of Climate & Environmental Equity
- Joi Ross, APEX
- Suzette Tay Lee, APEX
- Sam Young, Illinois Public Health Institute
- Rashidat Balogun, Illinois Public Health Institute
- Jess Lynch, Illinois Public Health Institute
- Rachel Thomas, Illinois Public Health Institute
- Adrian Blasi, Illinois Public Health Institute
- Daisy Magaña, UIC
- Jeni Hebert-Beirne, UIC
- Serap Erdal, UIC
- Maggie Acosta, UIC
- Stacey Durley, Tetra Tech
- Rachel Houle, Tetra Tech
- Morgan McDonough, Jasculca Terman Strategic Communications
- Holly Bartecki, Jasculca Terman Strategic Communications
- Wendy Abrams, Jasculca Terman Strategic Communications

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- Citlalli Trujillo
- Hannah Williams
- Lara Kowalczyk

Thank you to Corliss High School, BUILD, Inc., and Horizon Science Academy staff for providing space for the three CIA engagement sessions.