



CHICAGO CUMULATIVE IMPACT ASSESSMENT

2023 SUMMARY REPORT

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CUMULATIVE IMPACT ASSESSMENT FINAL DELIVERABLES

(available at [Chicago.gov/cumulativeimpact](https://chicago.gov/cumulativeimpact))

- Initial Community Input Summary
- Landscape Assessment Summary
- Work Group Charters
- Summary of Community Input Provided During Assessment
- Community Co-Design Lessons Learned Assessment Plan
- Chicago Environmental Justice Index Methodology Overview
- EJ & Cumulative Impacts Policy Recommendations Overview
- City of Chicago Environmental Justice Action Plan



INTRODUCTION

In our daily lives, people can be exposed to pollution through the air, water, and land. These exposures add up over time, together with health conditions and social factors that can affect individuals and communities in both positive and negative ways. This is referred to as cumulative impacts.

The concept of Environmental Justice (EJ) started as a grassroots movement, with communities and civil rights leaders bringing attention to unsafe conditions affecting low-income areas and communities of color. Chicago has a long, rich history of community-led environmental justice advocacy. For years, Chicago's EJ organizations and community members have voiced concerns about cumulative impacts. Through the media, public participation in meetings, and written comments, people have described how intensive industry and truck traffic affect their neighborhoods' health and quality of life. They have called upon the City to recognize and remedy the harms caused by cumulative burdens in certain parts of Chicago.

Today, Chicago is among the cities leading the charge to make EJ a focal point. The City is committing resources to identify and address the causes of environmental and climate injustice through policy changes and better enforcement of existing laws, ordinances, and regulations, while it also considers new policies, procedures and activities that could be implemented.

Chicago's Cumulative Impact Assessment is spearheaded by the City of Chicago Department of Public Health (CDPH) and the Office of Climate & Environmental Equity (OCEE), with our community partners from the Environmental Equity Working Group (EEWG). It is a citywide project to provide data on how environmental burdens and other stressors vary in impact across the city. This work is co-led and co-designed with people and organizations who live these issues every day, and identifies neighborhoods that experience the greatest cumulative impacts. Recognizing that environmental protection and public health require a whole-government approach, the Assessment also provides strategies and actionable policy recommendations to guide decision-making on issues such as land use/zoning, permitting, enforcement, transportation planning, and more.



Chicago's Recent Environmental Justice Milestones:

- **2020:** CDPH publishes *Air Quality & Health Report*; \$188 million investment in climate and EJ initiatives through Chicago Recovery Plan
- **2021:** Launch of Environmental Equity Working Group
- **2022:** OCEE formed; City releases *Climate Action Plan* and *We Will Chicago*, which include commitments to address cumulative impacts
- **2023:** EJ Executive Order (2023-3) issued; City executes Voluntary Compliance Agreement with U.S. Department of Housing & Urban Development and Southeast Side organizations to resolve civil rights complaint, committing the City to continued reforms

The Cumulative Impact Assessment was conducted from May 2022 to August 2023, supported by funding from the Chicago Recovery Plan. Groups dedicated to data and methods, policy, communications and engagement, and interdepartmental coordination met regularly to guide this work, which will continue throughout 2023 and beyond as we analyze indicators, make data more accessible, and advance policy efforts.

This Summary Report provides an overview of the Cumulative Impact Assessment goals, process, findings and recommendations, and next steps - which are described in more detail in the final deliverables of this project, which are available at [Chicago.gov/cumulativeimpact](https://chicago.gov/cumulativeimpact):

- **Initial Community Input Summary**
- **Landscape Assessment Summary**
- **Working Group Charters**
- **Summary of Community Input Provided During Assessment**
- **Community Co-Design Lessons Learned Assessment Plan**
- **Chicago Environmental Justice Index Methodology Overview**
- **EJ & Cumulative Impacts Policy Recommendations Overview**
- **City of Chicago Environmental Justice Action Plan**

Change is already under way. An Executive Order issued in May 2023 – along with related commitments in a Voluntary Compliance Agreement executed with the federal Department of Housing & Urban Development (HUD) and Southeast Side organizations – voluntarily commit the City to producing this Cumulative Impact Assessment, pursuing strategies, and using the Cumulative Impact Assessment to inform decision-making in related policy areas. The Transition Team Report to Mayor Brandon Johnson also endorses the approach and reforms highlighted in this report.

These are critical steps to promote environmental justice in Chicago – and one way that we are collectively advancing the vision of Healthy Chicago 2025, the citywide plan to close Chicago’s racial life expectancy gap by addressing the root causes of health. A better, stronger, safer Chicago depends on the success of our continued work.

Figure 1: Cumulative Impact Assessment Values

ENVIRONMENTAL EQUITY WORKING GROUP PRINCIPLES

(adopted as Cumulative Impact Assessment Project Values)

ANTIRACISM - Actively challenge and redress racist systems through processes, policies, and strategies

EQUITY-FOCUSED - Consider who benefits and who is burdened by proposed solutions and how issues may disproportionately burden communities

FIRST-VOICE - Ability of individuals or community to express their condition in their own voice. Nothing about us without us: No policy should be decided without the direct participation of the members of the group being affected

ACCOUNTABILITY & TRANSPARENCY - Practice mutual accountability and transparency by sharing data, information, and resources, and taking responsibility

PROCESS

Overview

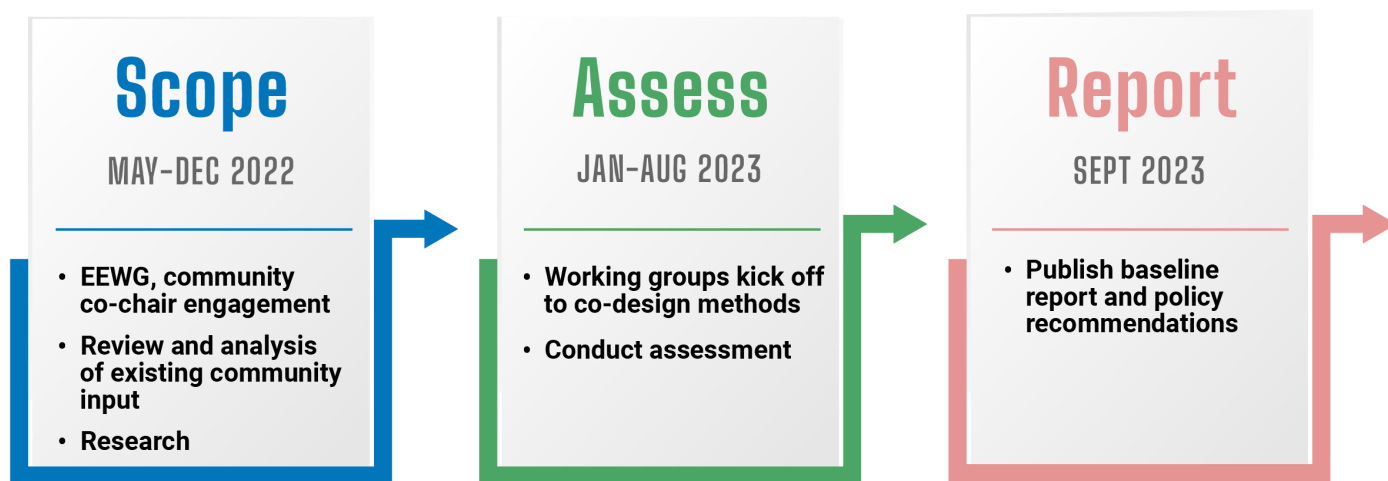
The Cumulative Impact Assessment officially launched in May 2022, when the City of Chicago Department of Public Health (CDPH) began to engage with a group of nongovernmental environmental justice leaders, convened by the Office of Climate and Environmental Equity (OCEE) as the Environmental Equity Working Group (EEWG). Together, we envisioned a community co-governance approach that would embody the values of the EEWG.

Under the Cumulative Impact Assessment project structure ultimately adopted (see figure below), the EEWG provided guidance on how the assessment should be conducted and served as the accountability body throughout the process. Three working groups, each co-chaired by representatives from CDPH and the EEWG, were formed for Data & Methods, Communications & Engagement, and Policy, and tasked with producing specific assessment deliverables. CDPH and OCEE established an Interdepartmental Environmental Justice Work Group to engage the various City departments that have authorities and responsibilities related to environmental protection. A Project Management Team consisting of representatives from each of the working groups, along with subcontracted organizations, provided day-to-day oversight and support to working groups to ensure that the assessment was carried out successfully.

Figure 2: Cumulative Impact Assessment Project Structure



Figure 3: Cumulative Impact Assessment Phases



The Cumulative Impact Assessment was planned to encompass three phases of work – scoping, assessment, and reporting – spanning from May 2022 to August 2023. This process is further described in the following section.

PHASE 1: SCOPE

To help scope the Cumulative Impact Assessment, the City engaged the EEWG starting in May 2022 to answer key questions such as:

- *What populations are most affected by cumulative impacts, such that their experiences should be centered in this assessment?*
- *What are the community impacts of greatest concern?*
- *What policy areas have the highest potential to promote environmental justice and address cumulative impacts?*

At the request of the 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.

As foundational research in support of the assessment, CDPH, OCEE, and subcontractors Tetra Tech, Inc. (Tetra Tech) and IPHI also prepared three reports:

- **People and Process Landscape Assessment:** explores community participation and co-design in select jurisdictions.
- **Data and Methods Landscape Assessment:** reviews underlying data sources and methodologies of existing federal, state, and local assessments and indicators.
- **Policy Landscape Assessment:** discusses state and local environmental justice and cumulative impact policies.

The EEWG, the Chicago Environmental Justice Network (CEJN), and the U.S. Environmental Protection Agency (EPA) provided resources, data, and recommendations to inform these landscape assessments. The compiled findings are described in the [Landscape Assessment Summary](#), which highlights the recommendations and key takeaways from the team’s research along with the gaps and opportunities identified in the underlying reports.

Finally, during this phase, CDPH and OCEE worked with the EEWG to structure the assessment, including identifying Cumulative Impact Assessment working groups and community co-chairs and establishing project values (see **Figures 1 and 2**). This process involved discussions with the EEWG on what co-design and accountability looked like, as well as what function each working group would serve; EEWG members then self-selected participation roles – including interest in serving as a community co-chair to guide the working group meetings. After community co-chairs were selected, each set of CDPH and community co-chairs met to establish roles and responsibilities. Members participating as an individual or representing a community-based organization were compensated through IPHI at a rate of \$100/hour.

PHASE 2: ASSESS

Beginning in January 2023, the Cumulative Impact Assessment progressed from planning activities conducted in the scoping phase to the core assessment effort. Working groups held a series of meetings through August 2023 to produce their assigned deliverables. To ensure that the values of the Cumulative Impact Assessment were carried forward, each group began by collectively drafting and adopting a [Working Group Charter](#) that included goals, community agreements, and a decision-making process that protected community power. The community agreements were created by each working group and co-chairs to foster a sense of belonging and promote a collaborative and supportive environment for members to share input and feedback. The groups also received and reviewed information from the [Initial Community Input Summary](#) and [Landscape Assessment Summary](#) relevant to their scope.

Data & Methods Working Group (DMWG)

SCOPE	VOTING MEMBERS	DELIVERABLES
<p>Provide data on where pollution is coming from, demonstrate how burdens vary in communities across Chicago, and show community-level vulnerability to pollution to inform policy decisions.</p>	<ul style="list-style-type: none"> • Little Village Environmental Justice Organization (Co-chair) • Greater Chicago Legal Clinic - (Co-chair) • Chicago Department of Public Health (Co-chair) • Natural Resources Defense Council • Center for Neighborhood Technology • Chicago Department of Planning & Development • Chicago Department of Transportation 	<p>Chicago Environmental Justice Index Methodology Overview - including map of EJ Neighborhoods</p>

The DMWG was formed in February 2023 to propose key indicators, data sources and methods for the Assessment. Over a series of 20 meetings through August 2023, the group:

- Reviewed and discussed findings and recommendations from the Landscape Assessments, Initial Community Input Summary and CEJN.
- Adopted the Air Quality & Health Index framework for establishing the Chicago EJ Index.
- Evaluated over 100 potential indicators for their inclusion in the Chicago EJ Index and data dashboard along with the DMWG Advisory Council.
- Selected the final Chicago EJ Index and dashboard indicators, utilizing community feedback from in-person engagements and the online survey to support the decision.

As a result of this process, the DMWG produced the Chicago EJ Index map, which identifies the EJ communities in Chicago. The DMWG will continue to meet throughout the fall to develop and build out the Chicago EJ Index Data Dashboard, planned for release in 2024.

Policy Working Group (PWG)

SCOPE	VOTING MEMBERS	DELIVERABLES
<p>Develop a set of policy recommendations and a draft ordinance that captures the vision of environmental justice communities for addressing cumulative impacts.</p>	<ul style="list-style-type: none"> • Greater Chicago Legal Clinic • Natural Resources Defense Council • Metropolitan Planning Council • Equitable Resilience Sustainability • Environmental Law and Policy Center (co-chair) • Little Village Environmental Justice Organization • CDPH (co-chair) 	<p>EJ & Cumulative Impacts Policy Recommendations Overview</p>



Members of the PWG met for six working sessions between January and April of 2023 to research and refine policy solutions. Process steps included:

- Identified and themed policy recommendations from the Initial Community Input Summary and Landscape Assessment Summary
- Drafted an overarching PWG Policy Goal (see **Figure 4**) and problem statement to guide the group’s work moving forward.
- Conducted additional research to determine potential policy mechanisms to advance recommendations.
- Engaged City partners to solicit input on ideas.
- Agreed upon key elements of a draft ordinance(s) and created a set of preliminary policy recommendations.

Figure 4: PWG Policy Goal

PWG Policy Goal

Our ambition is to reform community land use, the city zoning code, the environmental decision-making process, public enforcement, and transportation inequities to remedy health disparities, concentrated pollution, and uneven development. Community voice and well-being is centered in our decision-making process, and it will be reflected in the policies we propose.

The PWG then worked with City of Chicago departments to identify paths to advance preliminary policy recommendations.



Communications & Engagement Working Group (CEWG)

SCOPE	VOTING MEMBERS	DELIVERABLES
<p>Ensure community members drive and co-design communication messages and engagement strategies so they are culturally responsive and accessible.</p>	<ul style="list-style-type: none"> • Neighbors for Environmental Justice (co-chair) • People for Community Recovery (co-chair) • CDPH (co-chair) 	<ul style="list-style-type: none"> • Summary of Community Input Provided During Assessment • Community Co-Design Lessons Learned Assessment Plan

The CEWG was formed in March 2023, although consultation with co-chairs began informally starting in December 2022. Over the course of 15 meetings, the group participated in discussions and interactive activities to:

- Draft content for the Cumulative Impact Assessment website (chicago.gov/cumulativeimpact).
- Define and adopt CEWG Engagement Event Goals (see **Figure 5**).
- Prepare partners to engage in the mayoral transition process, including providing support to draft a transition letter.
- Work with partners to develop an engagement plan, then identify and organize engagement opportunities from April to August, 2023.
- Create materials for engagement events such as posters, handouts, social media toolkits, and note-taking templates.
- Provide input for an online survey.
- Capture and share community feedback on ways to continually improve engagement practices.
- Coordinate and implement a strategy to collect and analyze qualitative data.
- Plan and implement a robust communications strategy, including a major public announcement of the final report.

Figure 5: CEWG Engagement Event Goals

ENGAGEMENT EVENT GOALS

- 1. Provide the public- and particularly community members in neighborhoods most affected - with meaningful information about CIA and build momentum toward long-term policy change.**
- 2. Co-design and co-host engagement between the City and EJ action organizations.**
- 3. Gather input and on-the-ground expertise from community members in neighborhoods most affected to inform and enhance, policy, and inter-departmental strategies and deliverables.**
- 4. Provide a forum for community members to share their stories into the data and policy processes.**
- 5. Provide follow-up: Provide a way for participants to stay informed and be aware of ways to be involved .**
- 6. Provide a foundation for long-term ground truthing of cumulative impact data and implementation.**

Following engagement events, the CEWG then created a Summary of **Community Input Provided During Assessment** and provided this information to other working groups to inform deliverables. In an effort to hold ourselves accountable, the group also designed a plan for the **Community Co-Design Lessons Learned Assessment**, which will formally assess how well the CIA process embodied its stated values.

Interdepartmental Environmental Justice (EJ) Group

SCOPE	PARTICIPANTS	DELIVERABLES
<p>Help City departments promote environmental justice and address disproportionate environmental, health, and social stressors in certain neighborhoods.</p>	<ul style="list-style-type: none"> • OCEE • CDPH • Assets, Information & Services • Buildings • Housing • Planning & Development • Procurement Services • Streets & Sanitation • Transportation • Water Management 	<p>City of Chicago EJ Action Plan</p>

The Interdepartmental EJ Group was formed in March 2023 as a space for City departments to develop a vision and framework for collaboration across departments and with people from EJ communities. Over a series of 9 meetings through August 2023, the group:

- Reviewed City data, learned about the national efforts to advance EJ from a U.S. EPA Region 5 representative, and met with a community partner to begin a process of understanding cumulative impacts.
- Created and adopted a shared, City-wide EJ goal (see **Figure 6**) to guide action planning.
- Identified ways that individual and collective department powers and resources could advance EJ.
- Received direct support to develop EJ strategies through department-to-department discussion and consultations with CDPH and OCEE.
- Provided input on cumulative impacts policy recommendations.
- Explored community feedback in the form of direct comments and survey results, and incorporated this into EJ strategies.



Figure 6: City of Chicago EJ Goal

CITY OF CHICAGO EJ GOAL

All City of Chicago departments will work together and use their powers to improve the environment, Health, and quality of life in environmental justice communities through changes to internal decision-making processes, city wide policy meaningful community engagement, and equitable distribution of benefits and burdens of City actions.

As a result of this process, the group produced the **City of Chicago EJ Action Plan** with specific strategies each member department will pursue to advance the City's EJ goal with meaningful community involvement. These strategies represent changes to department practices and policies so that justice and equity principles are part of day-to-day operations and decision-making. The EJ Action Plan strategy template (see **Figure 7**), including guiding questions, was adapted from the City of Chicago's Racial Equity Action Plan and Equity Decision Support Tool created by CDPH's Health Equity in All Policies team.

Figure 7: EJ Action Plan Strategy Template

Department Name
<p>DEPARTMENT SCOPE AND AUTHORITIES: Based on your internal power audit, what specific authorities does your department have that can help to improve and protect the environment, health, and quality of life in EJ communities?</p>
<p>ENVIRONMENTAL JUSTICE STRATEGY: Departments are encouraged to consider strategies that will improve existing conditions for EJ communities and/or prevent future impacts. Describe your strategy with attention to:</p> <ul style="list-style-type: none"> • What specific change do you propose to a department policy, process, practice, and/or budget? • What EJ community concern(s) does this strategy address (see Community Input Assessment-Key Findings)? • How will this strategy minimize burdens and/or maximize benefits for EJ communities?
<p>SUPPORTING DEPARTMENT(S): List any departments you need to collaborate with to execute this strategy.</p>
<p>IMPACT MEASURES: Insert indicators or information sources (quantitative and/or qualitative) that will evidence success. Consider both:</p> <ul style="list-style-type: none"> • Performance data: How will you measure whether you successfully executed the strategy? • Community-level data: How will this affect the condition of EJ communities?
COMMUNITY INPUT & RESPONSE
<p>COMMUNITY INPUT: Summarize community input you received on this strategy. What were the suggestions to change or expand upon your original proposal?</p>
<p>RESPONSE TO COMMUNITY INPUT: Describe how you updated the proposal in response to feedback. If you were not able to incorporate a proposed change, explain that decision as clearly and possible.</p>

Community Input During Assessment Phase

Building upon community input provided during the scoping phase (see [Initial Community Input Summary](#)), the CEWG also created a range of engagement opportunities for people and organizations to help inform and shape CIA deliverables during the assessment phase. From April to August, 2023, we collected community input through a range of events that were publicized through a dedicated website, CDPH and partner social media, outreach to aldermanic offices, media coverage, and flyers distributed through community co-hosts.

The CEWG and Project Management Team worked together to develop the approach and methods to analyze and incorporate input from the community engagement opportunities (see **Figure 8**). Team members were responsible for compiling, coding, and sorting qualitative input data for each of the working groups. The City’s co-chairs were responsible for reviewing direct input and summary themes and takeaways to incorporate in their respective deliverables. For a full discussion of methods used and community input collected, see the [Summary of Community Input Provided During Assessment](#). Because many of the ideas, concerns, and recommendations provided are forward looking, the Project Management Team also developed a matrix with feedback that should be addressed in future phases of EJ and cumulative impacts policymaking and implementation. Steps to continue review and response to community comments are included in the Roadmap for Future Action.

Figure 8: Community Engagement Opportunities During Assessment Phase

Tabling at Community Events	CEWG representatives staffed a table at seven community events to educate community members about the Cumulative Impact Assessment and gather input directly from people who experience cumulative impacts. A total of 80 people participated in the short engagement activities.
Cumulative Impact Assessment 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.
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 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 or organizations provided comment by email.
Business Community Focus Group	In partnership with the City’s Department of Planning & Development, we 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. 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.

PHASE 3: Report

The City of Chicago’s Environmental Justice Executive Order, as well as the HUD Voluntary Compliance Agreement, commit OCEE and CDPH to complete a baseline Cumulative Impact Assessment by September 1, 2023. Following the completion of the Assessment, the Executive Order specifies that the Chief Sustainability Officer and the Commissioner of Public Health will present findings to the Mayor and Chair of the City Council Committee on Environmental Protection and Energy by October 31, 2023.

This Summary Report and all of the final deliverables available at Chicago.gov/cumulativeimpact are offered by OCEE, CDPH and the EEWG as the baseline Cumulative Impact Assessment, inclusive of the findings and recommendations that we are prepared to present to the Mayor and Committee Chair.



DELIVERABLES AND RECOMMENDATIONS

Through the Cumulative Impact Assessment process, the working groups created a final set of deliverables. Working groups incorporated community input received during the assessment phase to update and refine their products, to ensure that community voice and priorities are reflected. This section describes each product, with the full documents available at Chicago.gov/cumulativeimpact.

Chicago Environmental Justice Index and Map

The Data & Methods Working Group, in consultation with their Advisory Council, developed the Chicago Environmental Justice Index (Chicago EJ Index) to represent the communities that experience the greatest combined environmental, health, and social stressors.

The Chicago EJ Index is built upon Chicago’s 2020 Air Quality & Health Index, which itself is based on the CalEnviroScreen model for cumulative impacts. The model is place-based and provides information for the entire City of Chicago at the geographic level of census tract, to allow comparisons between individual communities. The model includes Pollution Burden (including components for Environmental Exposures and Environmental Conditions), as well as Population Characteristics (including components for Sensitive Populations and Socioeconomic Factors). The Chicago EJ Index uses 28 indicators to characterize Pollution Burden and Population Characteristics, as shown in **Figure 9**.

Figure 9: Chicago EJ Index Indicators

POLLUTION BURDEN CATEGORY	POPULATION CHARACTERISTICS CATEGORY
<p>Environmental Exposures Component: Represent pollutants people may come into contact with.</p> <ul style="list-style-type: none"> • Air toxics all-organ hazard index • Air toxics cancer risk • Childhood lead poisoning • Diesel Particulate Matter (PM) • Ozone • PM 2.5 • Toxic releases • Traffic volume and proximity 	<p>Sensitive Populations Component: Are those with physiological conditions resulting in increased vulnerability to pollution.</p> <ul style="list-style-type: none"> • Asthma • Coronary heart disease • Disability • Low birth weight • Old age (65 years and older) • Young age (Less than 18 years)
<p>Environmental Conditions Component: Represent proximity to locations of potentially toxic chemicals.</p> <ul style="list-style-type: none"> • Consequential facilities • Freight rail lines • Hazardous waste facilities • Polluted sites • Risk Management Plan sites • Toxic Release Inventory sites • Wastewater discharge 	<p>Socioeconomic Factors Component: Are community characteristics resulting in increased vulnerability to pollution.</p> <ul style="list-style-type: none"> • Housing burdened, low income • Less than high school education • Linguistic isolation • Low income • No health insurance • People of color • Unemployment

The Chicago EJ Index Score for each Chicago census tract is calculated by performing a series of steps. First, we ranked census tracts based on their value for each individual indicator. Next, we averaged the rankings of individual indicators for each component within a category. Finally, we multiplied the category scores for Pollution Burden and Population Characteristics together to get the final Chicago EJ Index Score for each census tract, as depicted in the formula below.

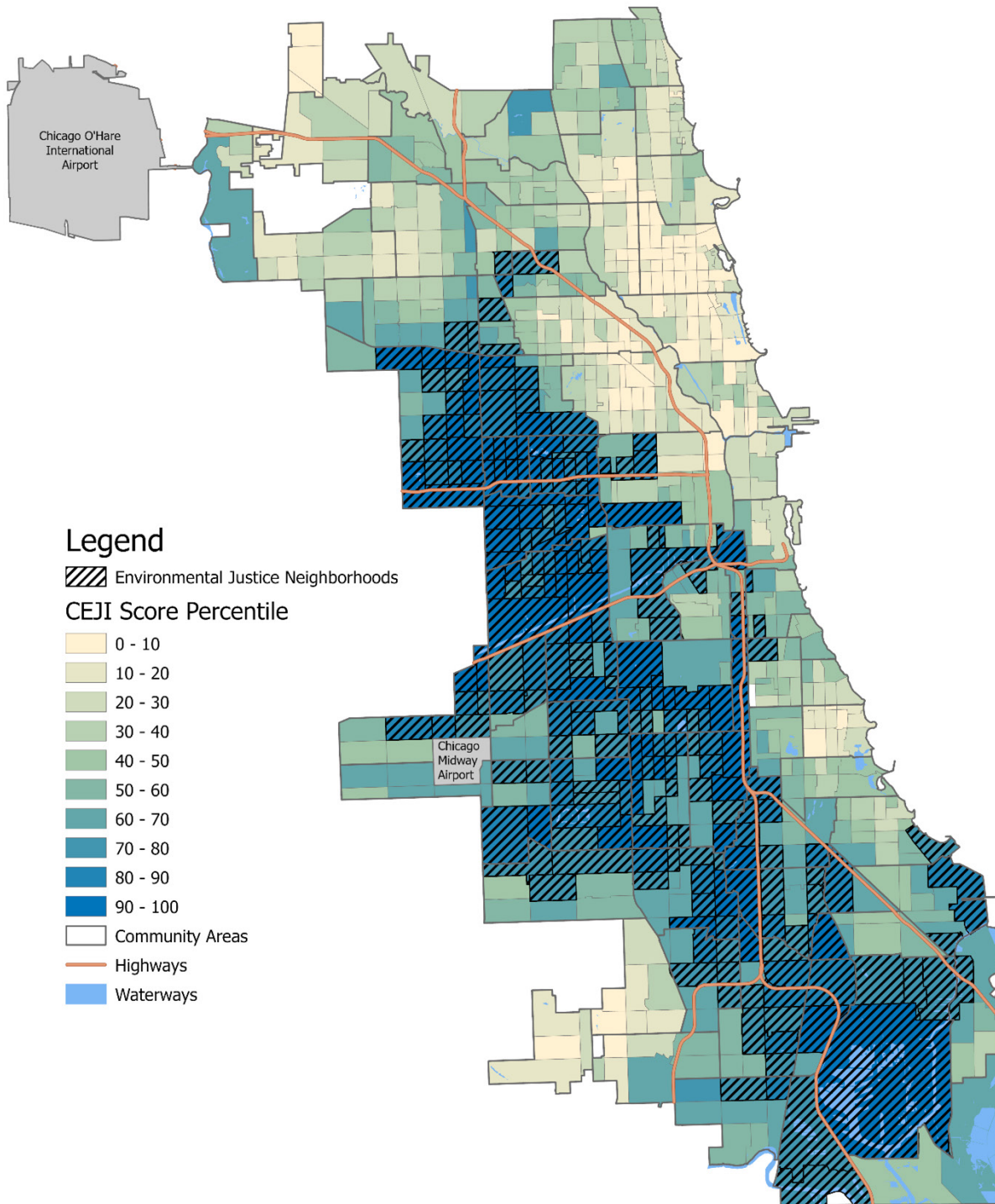


*The Environmental Conditions score is weighted half as much as the Exposures score because they represent proximity to potential polluting sites compared to actual measured exposure to pollution.

The final result is the **Chicago EJ Index Map** (see **Figure 10**), which visualizes the cumulative impact of and vulnerability to environmental pollution in Chicago neighborhoods. Census tracts are colored according to their Chicago EJ Index score (e.g., level of cumulative burden and vulnerability). Neighborhoods in blue experience a higher burden than those in yellow or green. Using the Chicago EJ Index scores, Environmental Justice (EJ) Neighborhoods are designated as those census tracts with a Chicago EJ Index Score of 75 or greater, or whose Chicago EJ Index score is 70 or greater and contiguous with another census tract with a Chicago EJ Index Score of 75 or greater. EJ Neighborhoods are represented by cross-hatching in the map. These neighborhoods are taken into special consideration in the **City of Chicago EJ Action Plan** and **EJ & Cumulative Impacts Ordinance Recommendations Overview**. More detail on the Chicago EJ Index development and methodology can be found in the **Chicago Environmental Justice Index Methodology Overview**.



Figure 10. Chicago EJ Index Map



The resulting Chicago EJ Index map shows that the areas of greatest concern for pollution burdens and vulnerability to its effects are located on the South and West Sides of the city. These EJ Neighborhoods are often bisected by major highways and have high concentrations of industry, including community areas such as Austin, East Garfield Park, Englewood, Humboldt Park, Lower West Side, McKinley Park, New City, North Lawndale, Roseland, South Deering, South Lawndale, West Englewood and West Garfield Park.



City Policy & Practice Change Recommendations

Through the series of Policy Working Group meetings, as well as consultations with City departments and additional EEWG member organizations, we identified dozens of specific, actionable policy changes the City could make to better protect EJ communities from cumulative impacts. Departments considered these recommendations for inclusion in the **City of Chicago EJ Action Plan**. Further recommendations that individual departments may not have existing authority to implement were considered for the EJ & Cumulative Impacts Ordinance. A full list of policy recommendations solicited through this process and a description of how they are being addressed is included in the **EJ & Cumulative Impacts Policy Recommendations Overview**.

City of Chicago EJ Action Plan

Members of the Interdepartmental EJ Work Group reviewed community input on the draft EJ Action Plan strategies received through the public comment period, online surveys, and during in-person events. The EEWG additionally requested “deep dive” consultations with three departments – Planning & Development, Transportation, and Water – during which participants had an opportunity to hear more from City representatives about their plans and to provide more detailed feedback on the proposed strategies. Departments updated their proposals for the **City of Chicago EJ Action Plan**, with strategies summarized in **Figure 11**. In several areas, new strategy ideas were raised during the assessment phase. Where possible, these have been incorporated in this initial release of the EJ Action Plan. Others that require additional evaluation and/or resources have been noted as opportunities for future development; departments will revisit these in consultation with the EEWG as we continue to update the EJ Action Plan strategies over time.



Figure 11: Summary of EJ Action Plan Strategies

INITIAL COMMITMENTS	CONSIDERATIONS FOR THE FUTURE
<p>Improve Data Collection, Reporting and Transparency</p>	<p>City departments will make it easier to track the response to 3-1-1 non-emergency complaints; expand community air monitoring; develop an emission inventory and real-time air-dispersion modeling tools; make environmental data available to the public online; maintain dedicated webpages for the City’s land use plans and initiatives; and prioritize environmental investigation and potential sampling of City-owned vacant lots in EJ Neighborhoods (CDPH, DPD, AIS)</p> <p>City departments will evaluate and update how and where data on air, water, and land is captured, and continue to provide information on City-owned assets including websites</p>
<p>Reduce Transportation Impacts</p>	<p>City departments will promote affordable housing development near public transit; implement recommendations from the “Southwest Industrial Corridor Transportation Study” to minimize the impact of trucks and heavy vehicles on streets, restrict truck traffic, manage truck parking and idling, expand the 3-1-1 system for truck complaints, incorporate emission reduction goals into transportation planning, and establish freight health metrics; create a regional program to reduce traffic congestion, incentivize use of public transit and bikes, and reduce single-occupancy vehicle trips; convert existing commercial vehicles to electric power (CDOT, CDPH, DOH)</p> <p>City departments will consider ways to increase and improve bike and pedestrian infrastructure and ways to minimize impacts from truck emissions, including a path for truck electrification, low-carbon micro mobility, and low-emission zones</p>
<p>Strengthen Business Regulation and Enforcement</p>	<p>City departments will develop standard and special conditions for air pollution control permits; create new/update industry-specific operational rules; adopt a policy that describes factors CDPH will consider in making permit decisions, based on facilities’ history and past non-compliance; update guidelines for inspection and enforcement activities to prioritize facilities located in EJ Neighborhoods; and implement Air Quality Zoning ordinance (or rules) requirements based on studies about traffic patterns (CDPH, CDOT)</p> <p>City departments will consider ways to improve responds response time to 3-1-1 non-emergency complaints</p>
<p>Expand Community Involvement in Decision-Making</p>	<p>City departments will provide residents with notice and increased opportunity to participate in decision-making through website updates, expanded public engagement guidelines, and email alert system; engage community in housing issues, including in critical conversations about housing development, affordability, gentrification, and neighborhood investment; review community engagement standards for planned developments, internal checklists, and materials required of applicants; improve announcements for public meetings; and strengthen implementation of new process for environmentally complex demolitions, which includes strong provisions for public participation (CDPH, DOH, DPD, DOB)</p> <p>City departments will continue to make adjustments and improvements by which community input and participation occurs in a decision process and move towards proactive engagement earlier in processes</p>

Figure 11: Summary of EJ Action Plan Strategies

Increase Benefits for EJ Communities

City departments will propose amendments to the Industrial Corridor System Fund Ordinance so funds are used to benefit EJ Neighborhoods; increase tree planting, landscaping and median maintenance; implement tunnel and sewer system improvements to reduce flooding and pollution caused by overflows; expand residential waste collection program to increase organic waste collection; continue to recruit GreenCorps Program participants from EJ Neighborhoods to conduct rehabilitation of vacant lots; increase housing choices for low-income Chicagoans; include more rigorous landscaping and environmental protection requirements for industrial properties; fund local organizations to increase their capacity to address climate change, EJ, housing, and transit equity.

City departments will consider creating amendments to the Industrial Corridor System Fund by evaluating how receiving corridors and conversion corridors align with environmental justice communities

(DPD, CDOT, DWM, DSS, DOH)

Change Where and How Development Happens

City departments will update zoning regulations for intensive industrial uses; evaluate EJ risks when considering proposed sites for multi-family developments and enhance design review process; propose updates to the Calumet Design Guidelines to address the negative impacts of air and noise pollution and use this as model for other industrial corridors; update the Chicago Sustainable Development Policy to help improve environmental performance and reduce negative impacts of industrial projects; and conduct environmental reviews of City activities and programs to include greater emphasis on EJ

(DPD, DOH, AIS)

Additional Pollution Mitigations

City departments will Install smart lighting in EJ Neighborhoods; establish new processes and standards for City commodity contracts to minimize impacts on EJ Neighborhoods; maintain and install water management infrastructure without requiring the removal of mature canopy trees; implement Commercial Waste Franchise Zoning that will reduce environmental impacts in waste hauling; pass legislation for Illinois to require manufacturers of packaging and paper products to either reimburse or to provide curbside recycling programs

(CDOT, DPS, DSS)

City departments will continue to assess and address how their operations impact climate change and EJ Neighborhoods, and make necessary adjustments by implementing sustainable practices to promote resilience and health; engage community partners in planning for environmental emergency response

In addition to these commitments, City departments will consult with the Department of Law, as appropriate, on Code, regulatory, contract, and other issues to more effectively achieve EJ goals and implement EJ-related ordinances and executive orders.

EJ & Cumulative Impacts Ordinance Recommendations

Beyond the EJ Action Plan, the City will also require new governance structures, authorities, and resources in order to more fully protect EJ neighborhoods from cumulative burdens. The Policy Working Group outlined detailed recommendations for an EJ & Cumulative Impacts ordinance, with recommendations categorized in three key areas:

- **Environmental Justice Fundamentals**
- **Cumulative Impacts Elements**
- **Community Benefits.**

Figure 12 summarizes the overarching goal and proposed policy approach for each of these areas. For a full description, including open questions that require continued discussion so that we can release a consensus draft of the ordinance, see [EJ & Cumulative Impacts Policy Recommendations Overview](#).



Figure 12: EJ & Cumulative Impacts Ordinance Recommendations

	GOAL	PROPOSED APPROACH
<p>ENVIRONMENTAL JUSTICE (EJ) FUNDAMENTALS</p>	<p>Governance systems and structures ensure that City policies and processes promote EJ</p>	<p>Codify Environmental Justice Executive Order (2023-3) to:</p> <ul style="list-style-type: none"> • Define “environmental justice” • Designate EJ Neighborhoods based on the Chicago EJ Index • Formalize EJ Advisory Body • Require cumulative impact assessment at least every three years to update Chicago EJ Index; require departments to collect and report related data • Adopt EJ Action Plan and require public reporting on progress • Institute community engagement standards
<p>CUMULATIVE IMPACTS ELEMENTS</p>	<p>The City is required to consider environmental, health, and social stressors in decision-making</p>	<p>Amend the City’s Air Quality Zoning (AQZ) ordinance to:</p> <ul style="list-style-type: none"> • Require cumulative impact study, the form and content of which will be developed by departments in consultation with the EJ Advisory Body • Remove by-right zoning to expand review process for uses subject to the AQZ ordinance • Provide opportunity for EJ Advisory Body to submit written recommendation on proposed facilities in EJ Neighborhoods <p>Amend/add environmental permitting regulations and authorities to:</p> <ul style="list-style-type: none"> • Align requirements for permits not otherwise subject to the AQZ ordinance to require cumulative impact study for new/expanding facilities • Provide opportunity for public comment on permit applications • Consider reforms to the current fines and fees structure for violations, as guided by community input
<p>COMMUNITY BENEFITS</p>	<p>People who live in EJ Neighborhoods directly benefit from local development</p>	<ul style="list-style-type: none"> • Establish a designated fund, with funds to potentially come from new fees and/or fines generated by violations, for use in community benefits projects as guided by the EJ Advisory Body • Develop an internal policy to enable use of supplemental environmental projects in settlement agreements • Consider opportunities to update Sustainable Development Policy to better align with EJ goals (see DPD EJ Action Plan strategy) • Identify incentives for businesses to reduce emissions

ROADMAP FOR FUTURE ACTION

The Cumulative Impact Assessment marks an important initial step to promote environmental justice in Chicago. However, significant work remains to ensure that City departments, 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. Our working groups identified future actions for data analysis and dissemination, accountability for City policy and practice change, and approaches for continued and strengthened community engagement.



Ongoing Data Analysis & Dissemination

Develop Public-Facing Data Dashboard and Publish Technical Documentation for the Chicago EJ Index

During engagement events, community members, EJ organizations, and business entities requested to have direct access to the underlying Chicago EJ Index data as well as other relevant indicators for their own use and decision-making. To improve data access and transparency, we will develop the Chicago EJ Index Data Dashboard – an interactive, online tool to visualize the Chicago EJ Index, its components, and individual indicators as well as other environmental, health and socioeconomic data measures. We will create a plan to gather input from community members this Fall to inform the design and usability of the Data Dashboard, with anticipated completion in early 2024.

By the end of 2023, CDPH will publish a technical documentation report to provide details on the data and methods used to select the indicators and create the Chicago EJ Index, as well as to describe the qualitative and quantitative data collection performed as part of the Cumulative Impact Assessment and development of the Data Dashboard.

Collect Additional Quantitative Data

During the indicator selection and review process, we identified data gaps and improvements to be addressed in future versions of the Chicago EJ Index and Data Dashboard. They include:

- Community levels of criteria pollutants
- Emission inventories
- Water contamination
- Violations and enforcement actions
- Transportation/Traffic data
- High density of low-polluting sites
- Odors and noise affecting quality of life
- Historical locations of polluting industries
- Best methodology for approximating number of pregnant women at any given time
- Actual disease rates as compared to self-reported disease (e.g., hospitalization data)
- Chronic disease rates in children
- Community resilience
- Measures of persistent poverty, generation wealth, etc.

As part of its commitments through the EJ Action Plan, CDPH has already begun addressing several of these data gaps and needed improvements in order to improve long-term data collection. New and updated indicators will be considered for inclusion in periodic updates of the Chicago EJ Index, and progress made towards their collection and refinement will be reported to community members, elected officials and other stakeholders. CDPH and the OCEE will continue to work on and advocate for better data to measure cumulative burden in Chicago communities.

Formalize Structure for Ground-Truthing via Qualitative Data Collection

“Ground-truthing” refers to a process to validate and bring data closer to lived experience, usually by engaging community members directly. Throughout the Cumulative Impact Assessment, community activities were crafted to gather input and on-the-ground expertise from community members in EJ neighborhoods. Input from these engagements noted a need for a formal structure to support ground-truthing data in the longer term.

Development of the Chicago EJ Index Data Dashboard provides continued opportunity to work with community partners to formalize a framework for ground-truthing that includes considerations for data collection and validation; and ways to continue to inform community members about how quantitative and qualitative data are used. An initial step includes co-creating an engagement plan that builds upon lessons learned from the Cumulative Impact Assessment engagement process.

Accountability for City Policy and Practice Changes

Continue Co-Governance with Environmental Equity Working Group

OCEE will continue to engage and hold meetings with the EEWG on the cumulative impact initiative and provide critical guidance and feedback to advance environmental justice policy. OCEE will work closely with the EEWG to develop and support legislation that incorporates cumulative impacts in land use decision-making, and to oversee the implementation of the City’s Environmental Justice Action Plan.

Finalize and Advocate for the EJ & Cumulative Impacts Ordinance

With the Cumulative Impact Assessment now complete, the City has data to identify EJ neighborhoods and recommendations for an ordinance that would better protect these communities from further environmental and health harms. CDPH and OCEE will continue to engage the EEWG to resolve open questions as needed to finalize a full draft ordinance by October 31, 2023. We will also continue to educate Mayor Johnson, City Council members, and the general public about the assessment findings and will support ordinance introduction through participation in briefings, public hearings, and in other settings as needed.

Proceed with Cumulative Impacts-Related Rulemaking

If an EJ & Cumulative Impacts ordinance is passed, the City intends to develop, as appropriate, guidance, rules, and standards to inform decision-making for zoning, permitting, and enforcement. This could include preparation of draft rules, ordinance amendments, and technical guidance that will allow applicants to determine if a project is subject to cumulative impacts study and what such a study entails. Draft materials would be published for public comment and the City would consult with the EEWG and others to design and lead engagements in other forms to solicit input from people who live in EJ neighborhoods.



Expand Interdepartmental Coordination

The Interdepartmental EJ Work Group will continue to serve as a space for City departments to review citywide and neighborhood level impact data, including lived experience; examine City policies that contribute to cumulative impacts; foster collaboration across departments and with people from EJ communities; and track and report on progress toward immediate and longer-term commitments under the EJ Action Plan. At this time, it is expected that OCEE will continue to convene the group on at least a quarterly basis, with supplemental meetings as needed.

During the assessment phase, communities called for additional City departments and Sister Agencies to participate in the Interdepartmental EJ Work Group. The Buildings and Procurement Services departments both joined the group in June 2023. OCEE will further seek to engage representatives from public safety departments such as the Office of Emergency Management & Communications and Fire Department, as well as Chicago Public Schools, Chicago Transit Authority, and Chicago Housing Authority.

Advance EJ Action Plan Strategies & Ensure Accountability

Consistent with the terms of the EJ Executive Order and HUD Voluntary Compliance Agreement, the City will publish a report by December 31, 2023 (and on an annual basis thereafter) to detail progress toward the strategies outlined in the EJ Action Plan. The EEWG and/or any formally approved community advisory body may further request a verbal report on progress on a quarterly basis. As previously described, public input during the assessment phase yielded several ideas for additional strategies that City departments could pursue to advance environmental justice. It is the City's intention for the initial EJ Action Plan to be a living document; we expect departments to add new strategies over time in consultation with the EEWG.

Communities also requested that the City identify overarching process and outcome metrics related to the City's Environmental Justice goal. In the fall, the Interdepartmental EJ Work Group will work with the EEWG to develop an 'EJ Scorecard' for Chicago. This will transparently track the extent to which EJ Action Plan strategies actually help to improve the environment, health, and quality of life in EJ neighborhoods through changes to internal decision-making processes, citywide policy, meaningful community engagement, and equitable distribution of benefits and burdens of City actions.

Build Out City-wide EJ Program as Required By Executive Order

Since the EJ Executive Order was issued in May 2023, OCEE has taken important steps toward implementing an EJ Program for the City of Chicago in accordance with its requirements. First, the Chief Sustainability Officer has designated an EJ Project Manager within the OCEE who has the primary responsibility for coordinating EJ efforts on behalf of the City. The EJ Project Manager was involved in all aspects of the Cumulative Impact Assessment to ensure deep understanding of the methods, data, community input, and policy recommendations. With this background, the EJ Project Manager will work with the EEWG and cross-departmentally to develop and oversee the implementation of improved internal policies and operations, including: an enhanced notification process so that residents of EJ neighborhoods have greater awareness of land use/zoning, permitting, and enforcement activities; a public participation policy, including a language access plan, with standards for community outreach, public meetings, and hearings; and a procedure by which residents of EJ neighborhoods can raise discrimination complaints.

Meaningful Community Engagement

Complete Community Co-Design Lessons Learned Assessment

This Fall, we will document experiences and assess the success of centering community voices of those who have been most impacted by environmental injustices throughout the Cumulative Impact Assessment. The Illinois Public Health Institute (IPHI), UIC School of Public Health, representatives from CDPH, and community co-chairs are using a mixed-methods approach focused on document review, short feedback surveys, interviews and dialogues, and observational notetaking from community engagement sessions. The key findings and recommendations will be developed in collaboration with CEWG and working group co-chairs, and shared with the EEWG for feedback. The team will communicate Lessons Learned Assessment results through various products, including a case study and briefs or infographics.

Develop Engagement Approach for Future EJ/Cumulative Impacts Efforts

As we transition into the next phase of EJ & Cumulative Impact efforts with a focus on policy change and implementation, it will be critical to deepen our engagement with the people and communities who are most affected by environmental, health, and social stressors – along with businesses and decision-makers who can address them. The EEWG will help to guide OCEE and CDPH on engagement approaches, building on the CEWG’s efforts and lessons learned during the assessment process. The ongoing governance and project management structures to support this work will also be determined through collaborative decision-making.

Components of an engagement plan will focus on EJ community members, the business sector, and policymakers, with engagement goals outlined in **Figure 13**.



Figure 13: Future EJ & Cumulative Impacts Engagement Goals

PARTNER TYPE	ENGAGEMENT GOALS
<p>EJ Community Members</p>	<p>The CEWG recommends continued outreach for EJ community members to:</p> <ul style="list-style-type: none"> • Create materials and space for people to learn and educate about the findings and recommendations from the assessment • Provide input on public facing data dashboard and participate in ground-truthing • Participate in the planning, implementation, and evaluation of City department’s EJ Action Plan strategies • Build public momentum for policy change
<p>Community-Based Organizations</p>	<p>The EEWG will work with OCEE and CDPH to:</p> <ul style="list-style-type: none"> • Deepen engagement of diverse community-based organizations to support outreach, public education, and engagement of community members • Continue EJ organizations’ involvement with EJ Action Plan strategies through EEWG engagement with the Interdepartmental EJ Work Group
<p>Business Sector (e.g., Local Industrial Retention Initiative, Industrial Business Council representatives)</p>	<p>Focus group input during the assessment phase lifted up several opportunities for business sector engagement, including:</p> <ul style="list-style-type: none"> • Educate sectors on cumulative impacts and how to reduce burdens and maximize direct benefits to EJ neighborhoods • Facilitate dialogue between business leaders and community representatives • Identify ways to leverage existing and potential resources (e.g. state and federal grant programs, tax incentives) to help businesses reduce their impacts • Partner to develop and expand green economy and workforce programs
<p>Policy-Makers</p>	<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>

Conclusion

When the Chicago Department of Public Health, the Office of Climate and Environmental Equity, and the Environmental Equity Working Group embarked on this Cumulative Impact Assessment more than a year ago, it was not intended to be an academic exercise. This report is not an end, but rather a call to further action for Chicago – and, in particular, its elected leaders, City departments, community organizations, and the industrial sector.

The Cumulative Impact Assessment has shown that communities of greatest concern for pollution burdens and vulnerability to its effects – specifically with regard to intensive industry and truck traffic – are primarily located on the South and West Sides of the City. The combined environmental, health, and social stressors make these areas more vulnerable to negative health outcomes and widens equity gaps.

Of course, economic development is an important aim for any city. Expanding Chicago’s tax base and providing higher-wage job opportunities are also essential strategies to improve community health and well-being. We recognize and respect the business community as an economic engine, and we ask them to review this report in the spirit of asking: How can my business be a better neighbor, minimizing burdens and maximizing benefits for the people who live nearby?

We also recognize the role City policy has in rectifying the burdens faced by EJ communities. It’s for that reason that the City of Chicago’s [Environmental Justice Executive Order](#) states that the Cumulative Impact Assessment:

“...shall be used by the Mayor’s Office and all City departments and offices to inform decision-making in policy areas such as land use and zoning, transportation, permitting, enforcement, and other interventions that consider the burdens of existing and proposed intensive industrial operations and better protect Environmental Justice Neighborhoods, as described in the Environmental Justice Action Plan.”

How to ensure a better balance between environmental protection, business growth, and public health is a complicated issue. Our report offers detailed recommendations for policy solutions that are deserving of full consideration by our local government. As such, we encourage the City Council Committee on Environmental Protection and Energy to discuss the findings and recommendations through one or more public hearings, including at least one subject matter hearing.

We look forward to continued collaboration with the Mayor, City Council, community and business leaders to show that economic development and environmental justice are both possible – and in fact necessary for a better, safer, stronger Chicago.

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