

## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name – Action Name:** Department of Planning & Development

**Department Scope and Authorities:**

Chapter 17 of the Municipal Code, commonly known as the Chicago Zoning Ordinance, is “adopted for the purpose of...promoting the public health, safety, and general welfare; preserving the quality of life for visitors and residents; retaining and expanding the city’s industrial base; maintaining orderly and compatible land use and development patterns; encouraging environmentally responsible development practices; and, accommodating growth and development that complies with the preceding stated purposes” (MCC § 17-1-1500) and “[t]he Zoning Administrator is responsible for administering and enforcing the provisions of this Zoning Ordinance” (MCC §§ 17-14-0202). The Zoning Administrator is also responsible for reviewing “each proposed text amendment application” and forwarding “a recommendation on the proposal to the City Council Committee on Zoning, Landmarks and Building Standards before the Committee's public hearing. The recommendation of the Zoning Administrator must also be forwarded to the City Council when the report of the City Council Committee on Zoning is initially submitted to the City Council.” (MCC §§ 17-13-0202). This authority also extends to zoning map amendment applications, both those proposed outside of (MCC §§ 17-13-0305) or within (MCC §§ 17-13-0400) Industrial Corridors or as part of Planned Developments (MCC §§ 17-13-0603).

The Calumet Design Guidelines, adopted by the Chicago Plan Commission on March 11, 2004 and referenced in the Chicago Zoning Ordinance (MCC §§ 17-11-0401), are intended to “act as a guide for developers, design professionals, city staff, and other city departments or public agencies; coordinate site development, landscape design, storm water management and environmental issues; [and] provide sustainable landscapes for industrial sites that complement the city's Calumet Land Use Plan and Calumet Open Space Reserve Plan.”

**Environmental Justice Strategy:**

DPD will work with local stakeholders, including residents, industrial business owners, environmental justice and community organizations, and others to develop and submit to the Chicago Plan Commission proposed *updates to the Calumet Design Guidelines*, which are site guidelines adopted by Chicago Plan Commission in 2004. DPD will begin reviewing the Calumet guidelines for an update beginning in September 2023, which will include a robust engagement process, with a focus on addressing the negative impacts of air and noise pollution, using the U.S. EPA's research on vegetative barriers as a starting point. After completion of the Calumet guidelines, DPD commits to developing an approach for site guidelines for other industrial corridors that the CIA identifies as being located in Environmental Justice Neighborhoods.

**Supporting Department(s):**

DPD may need to collaborate across multiple departments (including the Department of Transportation, the Department of Public Health, and others) to accomplish this strategy.

**Impact Measures:**

- Adoption of updated Calumet Design Guidelines by the Chicago Plan Commission
- Number of stakeholders engaged

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

### Related Department Investments & Prior Commitments:

The We Will Chicago (WWC) citywide plan is a 10-year framework for citywide growth and vibrancy. WWC is a critical tool to guide the city's future annual budgets, capital projects, and policy priorities to ensure public decision-making is focused on the needs of the entire City and all of its residents. Approved by the Chicago Plan Commission after three years of intensive neighborhood-based and virtual public engagement, WWC consists of more than 40 goals and 150 objectives to guide the City's governance across eight "planning pillars" for the next decade. The pillars include Housing & Neighborhoods; Arts & Culture; Environment, Climate & Energy; Lifelong Learning; Public Health & Safety; Transportation & Infrastructure; Civic & Community Engagement; and Economic Development.

DPD holds the following WWC pillars and goals as being most relevant to this EJ Action:

#### ECONOMIC DEVELOPMENT

Goal 2: Support business growth throughout Chicago, especially businesses owned by Black and Latino people.

#### ENVIRONMENT CLIMATE & ENERGY

Goal 1: Prioritize climate resiliency efforts in overburdened communities and for low- income individuals through both public- and private- sector efforts.

Goal 2: Use environmental justice principles to establish criteria and policies for geographies harmed by environmental degradation.

#### TRANSPORTATION & INFRASTRUCTURE

Goal 3: Balance the economic benefits of moving goods with negative impacts on communities, eliminating, then equitably distributing burdens.

Action Steps	Timeline	Status
Release Task Order Request (similar to RFP) to engage consultant team	Q3 - 2023	In progress
Engage local stakeholders, including industrial business groups and environmental justice organizations	Q4 2023 – Q4 2024	Conversations have begun
Draft updated Calumet Design Guidelines	Q4 2023 – Q4 2024	Not started
Informational presentations and public comment	Q1 2025	Not started
Submit Guidelines for adoption by Chicago Plan Commission	Q2 2025	Not started

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The Chicago Plan Commission (MCC §§ 2-120-370) reviews Planned Development (PD) applications, Lake Michigan and Chicago Lakefront Protection applications, proposed zoning map amendments within designated industrial corridors, and interagency referral items.

**Environmental Justice Strategy:**

DPD will initiate a ***review of its community engagement standards for planned developments*** as an implementation step for the recently adopted We Will Chicago citywide framework plan. This review process will include updates to internal checklists, materials required of applicants and possible enhancement to notices for public meetings. Per MCC 17-8-0903, all planned developments going forward need to be consistent with the goals and objectives of We Will Chicago. After completing the review process through the We Will Chicago framework, DPD will commit to putting forward a proposal for community engagement and updated materials available for public comment.

**Supporting Department(s):**

DPD may need to collaborate across multiple departments (including the Department of Transportation, the Department of Buildings, and others) to accomplish this strategy.

**Impact Measures:**

- Complete review of existing practices related to engagement
- Creation of development project engagement standards
- Creation of development project status website / transparency materials

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

### Related Department Investments & Prior Commitments:

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DPD holds the following WWC pillars and goals as being most relevant to this EJ Action:

#### CIVIC & COMMUNITY ENGAGEMENT

Goal #2: Increase public access and participation in civic and democratic processes.

Goal #3: Improve government transparency and Chicagoans' access to data.

#### ENVIRONMENT CLIMATE & ENERGY

Goal 1: Prioritize climate resiliency efforts in overburdened communities and for low- income individuals through both public- and private- sector efforts.

Goal 2: Use environmental justice principles to establish criteria and policies for geographies harmed by environmental degradation.

#### HOUSING & NEIGHBORHOODS

Goal 3: Attract and retain residents and increase density to strengthen neighborhood vibrancy, especially on the South and West Sides.

Action Steps	Timeline	Status
Release Task Order Request (similar to RFP) to engage consultant team	Q1 2023	Completed
Engage community stakeholders, ward offices, and developers to understand current development engagement practices	Q2 – Q3 2023	Not started
Develop engagement best practices	Q3 – Q4 2023	Not started

## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name – Action Name:** Department of Planning and Development

**Department Scope and Authorities:**

Title 16-8 Industrial Corridor System Fund was added to the municipal code by the Chicago City Council in July 2017 as part of a suite of changes related to industrial corridors. The purpose of this chapter is to mitigate the loss of industrial land and facilities in conversion areas (as defined and/or described in 16-8-020 and 16-8-030) by generating funds for investment in receiving corridors (defined in 16-8-020) in order to preserve and enhance the city's industrial base, support new and expanding industrial uses, and ensure a stable future for manufacturing and industrial employment in Chicago. The legislative intent of this chapter is to promote the city's vital interests. A summary of the process as described in Chapter 16-8 is below.

Funds are collected through fees applied to rezonings in identified conversion areas (as defined and/or described in 16-8-020 and 16-8-030). Conversion areas are identified through adopted land use plans and rezoned areas and rezonings (as defined in 16-8-020) must occur through the processes noted in The Chicago Zoning Ordinance (Title 17).

16-8-040 Industrial corridor system fund.

Established a separate fund (Industrial Corridor System Fund) into which 100% of the funds collected from any rezoning under this chapter will be deposited. The revenues of the Industrial Corridor System Fund shall be reserved and utilized exclusively in accordance with this chapter.

16-8-120 Use of funds.

The Industrial Corridor System Fund may be used for the following costs when they are necessary or desirable for the preservation, development and/or growth of industrial uses in receiving corridors:

- (a) costs to acquire land and buildings;
- (b) costs for environmental site assessment and remediation;
- (c) costs to demolish substandard, obsolete, or vacant buildings;
- (d) costs to rehabilitate or repurpose underutilized or out-of-date industrial buildings;
- (e) costs to provide key support infrastructure; and
- (f) administrative, reporting, and monitoring costs and expenses of the Industrial Corridor System Fund, provided such costs and expenses may not exceed 5% of the Fund.

16-8-150 Administration.

(a) The department shall administer the Industrial Corridor System Fund and all projects funded under this chapter. Any grant or loan of funds for a private project shall require city council approval and shall be subject to jobs covenants and other covenants, conditions and restrictions to ensure that the funds are devoted to the purpose described in this chapter.

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

(b) The commissioner is authorized to prescribe application forms and other forms necessary to collect relevant information concerning participants and projects utilizing the Industrial Corridor System Fund, and to adopt such rules as the commissioner may deem necessary for the proper implementation, administration, and enforcement of this chapter, including without limitation, rules setting forth criteria and guidelines for the selection of projects and disbursement of funds in a fair and equitable manner. The commissioner is further authorized, subject to the availability of duly appropriated funds, to negotiate and enter into contracts from time to time with outside providers to assist in administering this chapter. The contracts authorized by this section may contain terms that the commissioner determines to be reasonable and appropriate, including terms governing reasonable compensation.

(c) The commissioner shall post on the department's website an annual report detailing the receipt and expenditure of funds from the Industrial Corridor System Fund.

### **Environmental Justice Strategy:**

DPD will work with a group of informed stakeholders including Local Industrial Retention Initiative (LIRI) delegate agencies, industrial businesses, community organizations, environmental justice organizations, and others to propose amendments to the Industrial Corridor System Fund Ordinance (MCC 16-8-010) to provide that any funds generated by development in "conversion corridors" for use in "receiving corridors" shall be used to mitigate environmental impacts from existing and new industrial developments, and to prioritize funds for use in Environmental Justice Neighborhoods. Anticipated outcomes are noted below:

Amend relevant sections in 16-8 to:

1. Clarify and prioritize use of Industrial Corridor System Funds for development of vegetated or other buffers to help mitigate environmental and other impacts of industrial developments on adjacent residential areas.
2. Change the definition of "Receiving Corridors" to
  - a. Add North Branch PMD areas (NBCO-B) in "Receiving Corridors" definition
  - b. Amend reference to Kinzie in the list of "Receiving Corridors" to specify that the Kinzie area west of Ashland Ave

### **Supporting Department(s):**

DPD may need to collaborate across multiple departments (including the Department of Transportation, the Department of Public Health, and others) to accomplish this strategy.

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

### Impact Measures:

- Performance data: Project measures may include: linear or square feet of vegetated buffers, square feet or acres of buildings/land that is added or replaced, anticipated and post construction outcomes or types of impacts mitigated may be measured by City or external parties.
- Community-level data: Data on project location (in EJ community, surrounding populations, approximate distance from residential areas) as well as anticipated performance of project can be assessed.
- Post on the department's website an annual report detailing the receipt and expenditure of funds from the Industrial Corridor System Fund

### Related Department Investments & Prior Commitments:

The We Will Chicago (WWC) citywide plan is a 10-year framework for citywide growth and vibrancy. WWC is a critical tool to guide the city's future annual budgets, capital projects, and policy priorities to ensure public decision-making is focused on the needs of the entire City and all of its residents. Approved by the Chicago Plan Commission after three years of intensive neighborhood-based and virtual public engagement, WWC consists of more than 40 goals and 150 objectives to guide the City's governance across eight "planning pillars" for the next decade. The pillars include Housing & Neighborhoods; Arts & Culture; Environment, Climate & Energy; Lifelong Learning; Public Health & Safety; Transportation & Infrastructure; Civic & Community Engagement; and Economic Development.

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#### ECONOMIC DEVELOPMENT

Goal 2: Support business growth throughout Chicago, especially businesses owned by Black and Latino people.

#### ENVIRONMENT CLIMATE & ENERGY

Goal 1: Prioritize climate resiliency efforts in overburdened communities and for low- income individuals through both public- and private- sector efforts.

Goal 2: Use environmental justice principles to establish criteria and policies for geographies harmed by environmental degradation.

2.3 Remove barriers and constraints to participating in the workforce and accessing good quality jobs.

#### TRANSPORTATION & INFRASTRUCTURE

Goal 3: Balance the economic benefits of moving goods with negative impacts on communities, eliminating, then equitably distributing burdens.

3.2 Mitigate the health, safety and environmental burdens caused by trains, trucks and delivery vehicles.

3.5 Maintain the City's role as a global intermodal hub with strategic and innovative transportation and infrastructure investments.

DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

Action Steps	Timeline	Status
DPD will begin developing proposed changes to the text in 16-8 with input from informed stakeholder groups	2023 Q4	Not Started
Publish draft for public comment		
Incorporate feedback	2024 Q2	Not Started
Introduce ordinance changes to City Council	2024 Q3	Not Started

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**Environmental Justice Strategy:**

Update zoning regulations, such as the alteration or elimination of permitted-by-right or special use status for manufacturing, recycling, waste-related, and other intensive industrial land uses in Commercial, Manufacturing and Planned Manufacturing zoning districts.

Currently, Section 17-9-0117-G of the Zoning Ordinance, commonly known as the Air Quality Ordinance, which was approved by the Chicago City Council in February 2021, mandates internal reviews by the City Departments of Public Health and Transportation, along with public review of submitted materials and a community meeting, prior to any formal analysis by the Department of Planning and Development and the Office of the Zoning Administrator, pursuant to MCC §§ 17-13-0800. To supplement those requirements, additional restrictions on allowed uses, or the ability for certain land uses to be pursued by-right, will be proposed. This will require action by the Chicago City Council to modify use matrixes of the Zoning Ordinance and will eliminate or require greater oversight to certain intensive industrial uses, as identified in MCC §§ 17-9-0117-G.

**Supporting Department(s):** Public Health, Transportation, and Planning and Development

**Impact Measures:**

- Modification of the Chicago Zoning Ordinance to reflect alteration of structure of allowed uses in the manufacturing and planned manufacturing zoning districts.
- Data sharing with City Departments of Public Health and Transportation, along with interested community members, regarding proposed operations and intensity.
- Community meeting whereby the applicant is required to explain the project and hear (if not also address) community concerns and questions.
- Maintenance of a publicly accessible website to track projects.

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

### Related Department Investments & Prior Commitments:

The City Departments of Public Health, Transportation, and Planning and Development currently apply the aforementioned Air Quality Ordinance to the most intensive industrial land uses available in the City. This proposal would expand the list of potentially eligible uses while also increasing the legislative process to establish such uses so as to ensure greater public oversight of the potential projects.

Action Steps	Timeline	Status
Draft of legislative changes to reflect the above-mentioned land use changes and extend the Air Quality Ordinance to newly restricted industrial activities.	<u>Phase 1:</u> Q3 - Q4 2023	Drafted, pending discussions with aldermanic and administration representatives

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## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name – Action Item:** Department of Planning & Development

**Department Scope and Authorities (Related to Strategy Identified Below):**

As the principal planning agency for the City of Chicago, the Department of Planning and Development (DPD) promotes the comprehensive growth and sustainability of the City and its neighborhoods. The department also oversees the City's zoning and land use policies and employs a variety of resources to encourage business and real estate development, historic preservation, accessible waterfronts, walkable neighborhoods, and related community improvements.

**Environmental Justice Strategy:**

DPD will continue to maintain dedicated webpages for the Industrial Corridor Modernization, the City's Sustainable Development Policy, Chicago Plan Commission, and other land use planning initiatives.

**Supporting Department(s):**

DPD will need to work with the Department of Assets Information and Systems (AIS) and potentially others to accomplish this strategy.

**Impact Measures:**

**Related Department Investments & Prior Commitments:**

DPD's strategy is strongly aligned with the goals of We Will Chicago. DPD holds the following WWC pillar goals and objectives as being most relevant to environmental justice:

**CIVIC & COMMUNITY ENGAGEMENT**

**Goal 3:** Improve government transparency and Chicagoans' access to data.

**Objective 3.1** Improve and modernize City data collection, aggregation, and distribution systems to develop a best-in-class practice of affirmative and automated release of data and records.

**Objective 3.2** Ensure equitable access to data for all Chicagoans.

**Objective 3.3** Make it easier for Chicagoans to understand and participate in City Council, Committee, and other public body processes.

**ENVIRONMENT CLIMATE & ENERGY**

**DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN**

**Goal 1:** Prioritize climate resiliency efforts in Black and Latino community areas and for low-income individuals through both public and private sector efforts.

**Objective 1.3** Require decision makers to be transparent and provide community members access to environmental and scientific data used for decision-making.

Action Steps	Timeline	Status
Continue to update and maintain websites described in the strategy.		On-going

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## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name – Action Item:** Department of Planning & Development

**Department Scope and Authorities (Related to Strategy Identified Below):**

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Per Municipal Code 17-8-0900 Standards and Regulations, 17-8-0902 Other Regulations: Planned Developments (PDs) must comply with any special regulations that apply to the subject property including the Department of Planning and Development’s Sustainable Development Policy.

Per 2022 Air Quality Ordinance, 17-9-00117-G.5: All such uses [identified by the Air Quality Ordinance] are subject to compliance with the Department of Planning and Development’s Sustainable Development Policy.

Compliance with the Sustainable Development Policy is specifically called out in each PD ordinance: The [PD] applicant shall obtain the number of points necessary to meet the requirements of the Chicago Sustainable Development Policy, in effect at the time the Part II review process is initiated for each improvement that is subject to the aforementioned policy and must provide documentation verifying compliance. Full compliance with the policy is verified at the time a building permit is issued by way of the Part II review.

**Environmental Justice Strategy:**

DPD will update the Chicago Sustainable Development Policy to account for changes in development codes and building technologies, and to align with local climate and decarbonization goals. The policy update will include new and revised strategies to help improve environmental performance and mitigate negative impacts of industrial projects on surrounding communities – such as renewable energy, vegetative buffers and electrification of commercial fleets.

**Supporting Department(s):**

DPD will need work with the Department of Transportation, the Department of Buildings, the Department of Public Health, the Department of Housing, the Mayor’s Office for People with Disabilities, and potentially others to accomplish this strategy.

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

### Impact Measures:

- Number projects (PDs or others) required to comply with the SDP in or adjacent to identified “Environmental Justice” geographies
- Number of stakeholders who participated in the update process
- Public reporting of SDP benchmarks (strategies, locations, estimated impacts, etc.)

### Related Department Investments & Prior Commitments:

DPD’s strategy is strongly aligned with the goals of We Will Chicago. DPD holds the following WWC pillar goals and objectives as being most relevant to environmental justice:

#### ECONOMIC DEVELOPMENT

**Goal 2:** Support business growth throughout Chicago, especially businesses owned by Black and Latino people.

**Objective 2.1** Support Chicago’s economic clusters that have high potential for growth and benefit Chicagoans and their neighborhoods.

#### LIFELONG LEARNING

**Goal 2:** Create new sustainable educational pathways to the workforce, especially for Black, Latino and Native American residents and those negatively affected by the criminal-legal system.

**Objective 2.2** Strengthen the capacity of workforce training programs and partnerships for people negatively affected by the criminal-legal system.

#### TRANSPORTATION & INFRASTRUCTURE

**Goal 3:** Balance the economic benefits of moving goods with negative impacts on communities, eliminating, then equitably distributing burdens.

**Objective 3.1** Make freight corridors safe for all, prioritizing the safety of people walking, using transit and biking.

**Objective 3.2** Mitigate the health, safety and environmental burdens caused by trains, trucks and delivery vehicles.

Action Steps	Timeline	Status
Engage stakeholders on potential SDP strategies and process	Q2 2022 – Q2 2023	On-going
Release draft SDP for public review	Q2 2023	Not started
Informational presentations and public comment	Q3 2023	Not started
Finalize SDP and implement update	Q4 2023	Not started

## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name:** *Chicago Department of Transportation*

**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?*

- CDOT is responsible for more than 4,100 miles of streets, 413 bridges and viaducts, 368 miles of on-street bikeways, over 300,000 streetlights, 7,400 miles of sidewalks, and 3,000 signalized intersections citywide. Our mission is to keep the city's surface transportation networks and public way safe and accessible for all users, in a state of good repair, and to be responsive to local and citywide mobility and infrastructure needs. Various authority exists within the following buckets of work: road construction and maintenance, engineering and street design, management of sidewalks and street furniture in the public way, bridge reconstruction and operations, management of bike and e-scooter share, prioritizing safety for all road users.

**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:*

- *What specific change do you propose to a department policy, process, practice, and/or budget?*
  - 1) Commercial Truck Fleet Electrification (provide program and incentives)
  - 2) Encouraging eTOD – implementing the Connected Communities' Ordinance
    - a. Expanding Traffic Demand Management rules (commercial business or downtown zoning). Support the creation of a regional Traffic Demand Management (TDM) program to reduce traffic congestion and its environmental impacts, incentivize the use of public transit and bikes, and reduce single-occupancy vehicle trips.
  - 3) Low Carbon and Shared Micromobility in Industrial Corridors
    - a. Bike Network planning in Brighton Park, Gage Park, McKinley Park, and Little Village
    - b. Continue to uphold and enforce service level agreements and rules to ensure access to shared bikes and scooters in EJ communities
    - c. CDOT inhouse projects consider EJ communities in the design and implementation of pedestrian safety infrastructure
  - 4) Air quality ordinance requirements
    - a. Review traffic studies and verify trip generation is accurate
  - 5) Arterial tree planting; landscape & median maintenance; and malls & plazas
    - a. Continue to plant at least 5000 trees per year using tree canopy data to target EJ communities where possible
  - 6) Smart Lighting
    - a. Installed more efficient street lights citywide

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

- b. When the program began in 2017, most of the City's streetlights were High Pressure Sodium (HPS) lights, which is an outdated technology. LED lights are now the industry standard because they provide better light quality, last two or three times longer and are more cost and energy effective. The program will enhance quality of life for all Chicagoans by providing better, more reliable lighting along with improving responsiveness to streetlight service requests.
  - c. Due to the energy efficiency of LED lights, the City anticipates reducing electricity consumption by at least 50 percent, which will have a beneficial environmental impact.
- 7) Asphalt contracts - working with CDPH, CDOT established the following procedures for the City's asphalt contracts:
  - a. Limit maximum awards per vendor
  - b. Distributed burden to larger geographic area
  - c. Vendors must submit emissions control implementation plan
  - d. Blue smoke control system must be installed and operational by 4/1/25
- 8) Greencorps Chicago provides green job training for individuals with barriers to employment, including returning citizens. Continue to recruit from EJ communities and focus vacant lot rehabilitation on EJ communities.
- 9) Implement Southwest Industrial Corridor Transportation Study recommendations:
  - a. Develop freight-Impact reducing street design toolkit
  - b. Use truck restrictions where needed
  - c. Manage truck parking and idling
  - d. Expand the 3-11 system for truck complaints
  - e. Incorporate emission reduction goals into transportation planning and programming
  - f. Establish freight health metrics (CDPH)
- *What EJ community concern(s) does this strategy address (see Community Input Assessment-Key Findings)?*
  - EJ Focus areas, Env. Health Outcomes Associated with Pollution exposure, Community Recommendations (reducing traffic), Enviro Health outcomes associated with pollution exposure, Socio-economic impact, Anecdotes about decreasing traffic; safer streets for users (less crashes); potential to reduce UHI impacts on EJ communities; more vacant lots cleaned and greened creating community assets from blight; access to more mobility options
- *How will this strategy minimize burdens and/or maximize benefits for EJ communities?*
  - Mitigate pollution; safer roads for all users
  - Reduce UHI impacts & health impacts
  - Increase economic mobility to improve lives, families and communities
  - Improve mobility options for travel in communities and to/from transit

### **Supporting Department(s):**

3. DPD (zoning and industrial corridors), CDPH (air quality and asphalt), MO (Electrification), DPD, CTA, MO, DSS (micromobility)



## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

### Impact Measures:

*Insert indicators or information sources (quantitative and/or qualitative) that will evidence success. Consider both:*

- Performance data: *How will you measure whether you successfully executed the strategy?*
  - Electrification: how many trucks or chargers supported with incentives and where those trucks are domiciled/chargers located
  - Number of developments use TDM and their location; traffic counts; trip generation; modal split
  - Accessibility/Mobility: miles of low stress and protected bike lanes; safety designs installed; trips starting and/or ending in EJ communities
  - Air quality: Traffic studies verified
  - Asphalt: contracts, location and impact
  - Tree Planting: trees planted in EJ communities
  - Greencorps Chicago: trainees recruited, trained and employed
  
- Community-level data: *How will this affect the condition of EJ communities?*
  1. Environmental Health outcomes
  2. Community recommendations (reducing traffic)
  3. EJ focus Areas
  4. Enviro Health outcomes associated with pollution exposure
  5. Socio-economic impact
  6. TDM - Anecdotes about decreasing traffic; safer streets for users (less crashes)
  7. Tree Planting: potential to reduce UHI impacts on EJ communities
  8. Greencorps Chicago – more vacant lots cleaned and greened creating community assets from blight
  9. Low carbon mobility and shared micromobility – access to more mobility options
  10. Increase community engagement
  11. Engage in cross-agency data sharing
  12. Deploy Air Quality Monitoring Plan
  13. Promote alternative freight fuel and delivery models

### Related Department Investments & Prior Commitments:

- CDOT's Strategic Plan for Transportation; Implementing TDM guidelines for private development; air quality ordinance review; eTOD Connecting Communities' Ordinance; Climate Action Plan

### Action Steps

*Describe 2 or more specific actions that you will take to advance this strategy. At least one action step should discuss steps you will take to engage people who live in EJ communities to help you plan, implement, and evaluate the success of this strategy.*

### Timeline

*Note when this step is targeted to be completed*

### Status

*Note any progress to date*

**DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN**

Re-design incentives for EV chargers	Ongoing	Ongoing
TDM - Participate in Connected Communities Working Group Process Review	Ongoing	Ongoing
TDM - Develop rules and review with DPD	2024	In progress
Safety infrastructure and Bike Lane Planning	2023	In Progress
Air Quality Traffic Reviews	Ongoing	Ongoing
Tree planting	Ongoing	Ongoing
SWICTS Implementation	Ongoing	Ongoing

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## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name:** Water Management

**Department Scope and Authorities:**

The Department of Water Management (DWM) is responsible for the operation and maintenance of the waterworks and sewerage system of the City of Chicago. This includes purification and transmission of potable water to the homes and businesses of Chicago, and 120 suburban communities. And transmission of the effluent from the homes and business of Chicago, to the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) for treatment.

**Environmental Justice Strategy:**

**Regional Solution- Area 4:** The department’s focus regarding stormwater management has begun to include the Area 4 regional stormwater solution. This project will include an extension of MWRD TARP tunnel system as well as over 60 miles of local sewer improvement projects to alleviate overburdened sewers during storm events. The Area 4 sewer service area is bound by 87<sup>th</sup> St to the north, City limits to the south, west and east.

- This will address quality of life – reduction in flood risk reduces weather related stress and negative health impacts associated with flooded basements.

**Supporting Department(s):**

*List any departments you need to collaborate with to execute this strategy.*

**Impact Measures:**

**Area 4:**

- *311 data – after project implementation there should be a reduction in water in basement complaints.*
- *Property values – reduction in flood risk should increase property values*
- *Quality of life – reduction in flood risk reduces weather related stress and negative health impacts.*

**Related Department Investments & Prior Commitments:**

**Area 4:** The Area 4 regional solution is nearing completion of the phase I design. The department has committed over \$7M towards this phase. The phase II design is being programmed for 2024.

Action Steps	Timeline	Status
<i>Describe 2 or more specific actions that you will take to advance this strategy. At least one action step should discuss steps you will take to engage people who live in EJ communities to help you plan, implement, and evaluate the success of this strategy.</i>	<i>Note when this step is targeted to be completed</i>	<i>Note any progress to date</i>
<i>Develop and scope phase II design</i>	<i>18 months</i>	<i>Not started</i>
<i>Community outreach</i>	<i>6 months after design</i>	<i>Not started</i>

## ENVIRONMENTAL JUSTICE ACTION PLAN

**Department Name:** Chicago Department of Public Health (CDPH)

**Department Scope and Authorities:**

Chapter 11-4 of the Municipal Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to adopt rules “necessary or proper” to administer the City’s environmental ordinances, MCC §§ 2-112-070; 2-112-110(b)(6). The Commissioner is also empowered to “encourage and conduct studies, investigations and research, including joint cooperative investigation and research with public and private agencies and organizations, relating to the environmental protection authorities conferred on the Commissioner pursuant to subsection (b) of this section, as the Commissioner may deem advisable and necessary;” and is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(b)(12), (c).

**Environmental Justice Strategy: Expand the City’s community air monitoring network to increase the concentration of fence-line monitors and community sensors in Environmental Justice Neighborhoods. This network will be co-developed with organizations representing Environmental Justice Neighborhoods.**

Currently, air quality data for Chicago is derived from many disparate air sensor sources. It is collected and mapped by various levels of government, researchers, nonprofit organizations, and citizen scientists. This fragmentation is a problem for the community and the City: it doesn’t consistently add up to a sustainable, usable, comprehensive understanding of ambient air quality – particularly for EJ neighborhoods with concerns about the localized impacts of intensive industry and transportation. As a result, the data produced by these sensors are not generally used for enforcement or policy development outside of the EPA’s regulatory monitoring network. Community groups have also grown frustrated with repeatedly collecting data through pilot initiatives limited by time and funding, which has created a cycle of constantly “starting over” with new data collection.

With this strategy, CDPH will partner with the Chicagoland Environmental Justice Network (CEJN), Center for Neighborhood Technology (CNT), and UIC School of Public Health (UIC) to advance EJ through a better understanding of air quality. An equitable network design requires citywide coverage with a focus and super-saturation in communities that are most burdened by and vulnerable to air pollution. For the City of Chicago, a robust network of community air sensors will have a variety of applications, including efforts to:

- Determine ‘hot spots’ for future regulatory monitor placement, public education, outreach, and advocacy efforts
- Assess cumulative impact of air pollutants in a city-wide analysis
- Improve the prioritization and allocation of inspections and enforcement activities
- Develop new policies and evaluate the effectiveness of existing policies to improve air quality
- Create models to predict emission sources and facilitate response to resident inquiries
- Validate/calibrate air quality sensor and modeling data

**Supporting Department(s):** For sensor placement: Chicago Public Schools, Chicago Park District, Department of Finance (e.g., for bus shelters); for data use/application: Department of Planning & Development and Department of Transportation, among others; for leadership coordination: Office of Climate & Environmental Equity

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

<p><b>Impact Measures:</b></p> <ul style="list-style-type: none"> <li>• Community partners engaged in planning and decision-making related to sensor network technology, placement, and governance</li> <li>• Number of sensors in place and operating</li> <li>• Public data platform launch, number of unique visitors</li> <li>• Evidence of data being applied to improve air quality in EJ areas</li> </ul>		
<p><b>Related Department Investments &amp; Prior Commitments:</b></p> <p>CDPH included its commitment to a citywide air monitoring network in the Chicago Climate Action Plan. The City allocated approximately \$4.5 million through the Chicago Recovery Plan and a grant from the Partnership for Healthy Cities to carry out this work, together with CEJN. UIC and CNT have also secured independent funding to support their aligned efforts.</p>		
Action Steps	Timeline	Status
Inventory past air quality data collection efforts in Chicago and other jurisdictions; evaluate hardware, software, and data processing options; identify best practices in community co-ownership and management of monitoring strategies; consider sensor location, installation, maintenance, QA/QC; develop recommendations for Chicago’s air monitoring network.	<u>Phase 1:</u> Q1 – Q4 2023	<i>In progress; project team (CDPH, CNT, CEJN, UIC) meeting regularly</i>
Procure and deploy sensors; pilot a program to directly fund community organizations to help install, maintain, and analyze data from the network.	<u>Phase 2:</u> Q1 – Q4 2024	<i>Scopes to be developed based on recommendations from Phase 1</i>
Organize existing data sources and create a unified, public-facing platform to support data analysis, visualization, and community-driven decision-making.	<u>Phase 3:</u> Q2 – Q4 2024	<i>Scopes to be developed based on recommendations from Phase 1</i>
Pursue strategies to secure sustainable funding for the network, which may include increasing permit fees and/or requiring companies to fund fence-line monitors as a condition of their permits.	2024	<i>Planned</i>

## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name:** Department of Public Health

**Department Scope and Authorities:**

Chapter 11-4 of the Municipal Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to “supervise the execution of and implement all laws, ordinances, and rules pertaining to environmental protection and control as provided in Chapter 11-4 of the Municipal Code of Chicago.” MCC §2-112-110(b)(1). Section 2-112-070 of the Code provides that, except for certain emergency rules or administrative and procedural rules, the Commissioner “shall not enact any rule ... until the Commissioner holds a public hearing on such rule or ... provides an opportunity for the public to submit comments in written or electronic form,” and further provides specific requirements about “notice of the time and place of such hearing” and “notice of the solicitation of comments,” and also requires the Commissioner to “accept written or electronically submitted comments for a period of not less than thirty (30) calendar days from the date of the notice.” MCC § 2-112-070(a). The Commissioner is further empowered “to publish a code of recommended practices under which Chapter 11-4 is to be administered, providing with clarity and in detail the necessary information by which the public is to be guided and to establish standards of quality” and to “publish adopted rules or standards and the code of recommended practices in a convenient form,” MCC § 2-112-110(b)(6), (7); and is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(b)(12), (c).

**Environmental Justice Strategy: Continue to provide residents of EJ Neighborhoods with notice and increased opportunity to participate in decision-making.**

Environmental justice requires the participation of affected communities in the development, implementation and enforcement of environmental laws. The U.S. Environmental Protection Agency (U.S. EPA) defines “[meaningful involvement](#)” as:

- People have an opportunity to participate in decisions about activities that may affect their environment and/or health;
- The public's contribution can influence the regulatory agency's decision;
- Community concerns will be considered in the decision making process; and
- Decision makers will seek out and facilitate the involvement of those potentially affected.

Through input at community meetings and a review of public comments, and as reflected in the Cumulative Impact Assessment “Community Input Summary,” CDPH has heard a call for us to include community members in decision-making. The community’s perception of inauthentic engagement in the past has given rise to concern that CDPH does not fully understand and consider community impacts, and that we put the interests of companies above those of EJ Neighborhoods.

In response, since 2022 CDPH has taken several steps to ensure meaningful opportunities for people living in EJ Neighborhoods to learn about and get involved in our work, including:

- Updated the [CDPH website](#) with details about permit actions related to Consequential Facilities.

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

- Adopted new, expanded [public engagement guidelines](#) for Consequential Facilities, which include additional opportunities for community meetings and public comment periods.
- Developed a system by which community members can [register for email notifications](#) about environmental permitting, enforcement, and regulatory actions that affect their neighborhood and/or the city overall, including public engagement opportunities.

Through this work, we hope to build trust with EJ Neighborhoods and ensure more fully informed decision-making to protect the environment, health, and quality of life in EJ Neighborhoods.

**Supporting Department(s):** Office of Climate & Environmental Equity, for alignment with City-wide engagement protocols

**Impact Measures:**

- Number of webpage views and time on webpage
- Number of new communications products (e.g., one-pagers on topics of community interest)
- Number of people who register for email notifications and number of alerts sent
- Number of engagements held for EJ Neighborhoods and number of community members in attendance
- Number of public comments received
- Effectiveness of engagement, determined based on qualitative feedback provided through engagement survey
- Percent of Chicago adults who trust the City of Chicago to make the right decision on issues related to pollution in their neighborhood (Healthy Chicago Survey)

**Related Department Investments & Prior Commitments:**

As part of the Chicago Recovery Plan, CDPH has allocated American Rescue Plan (ARP) funding to improve our public outreach, communications, and engagement efforts. With assistance from a public relations and strategic communications consultant since May 2022, we have already made strides to update our website, develop and implement improved public engagement guidelines, and establish an email-based notification system. In addition, we created and posted on our website guidelines for submitting effective public [comments](#) to assist the public in preparing and submitting comments that have an impact and help inform CDPH's decision-making process.

Action Steps	Timeline	Status
Continue to update website, apply public engagement guidelines, and maintain email-based notification system.	Ongoing	<i>In progress</i>
Develop and implement data collection strategy (e.g., surveys, tracking tools) to monitor and report on the effectiveness of community engagement activities.	Q3 2023	<i>In progress</i>
Work with the Environmental Equity Working Group and/or any formally approved community advisory body to solicit feedback on CDPH's existing engagement strategies and to identify opportunities for continued improvement, applying lessons learned through the Cumulative Impact Assessment process.	Q4 2023	<i>Planned</i>
Formalize process for seeking community input in new CDPH rulemaking, building on the approach taken for Bulk Material Rules.	Q4 2023	<i>Planned</i>

**DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN**

Develop a public training (such as a webinar or video recording) as another way for people to learn about our public engagement processes and guidance.	Q4 2023	<i>Planned</i>
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## ENVIRONMENTAL JUSTICE ACTION PLAN

**Department Name:** *Department of Public Health*

**Department Scope and Authorities:**

Chapter 11-4 of the Municipal Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to adopt rules “necessary or proper” to administer the City’s environmental ordinances, MCC §§ 2-112-070; 2-112-110(b)(6). The Commissioner is also empowered to “encourage and conduct studies, investigations and research, including joint cooperative investigation and research with public and private agencies and organizations, relating to the environmental protection authorities conferred on the Commissioner pursuant to subsection (b) of this section, as the Commissioner may deem advisable and necessary;” and is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(b)(12), (c).

**Environmental Justice Strategy:** **Develop an electronic emission inventory collection tool to ensure up-to-date accounting of all emission sources and controls at permitted facilities.**

CDPH is committed to protecting the health of all Chicagoans, particularly those who live in Environmental Justice Neighborhoods that are disproportionately impacted by air pollution. Community residents have called upon CDPH to improve its capacity to collect and disseminate data for use in land use planning and zoning as well as environmental permitting, monitoring and enforcement. Through input at community meetings and a review of public comments, and as reflected in the Cumulative Impact Assessment “Community Input Summary,” CDPH has heard a call for us to address data gaps in pollution monitoring and be more transparent about how data is being used to hold companies accountable for their community impacts.

To that end, CDPH will develop a database to collect emissions data from facilities subject to the Department’s air pollution control permitting requirements. The database will include a web-based and/or mobile application, as well as detailed technical guidance, to assist applicants in the identification and collection of regulated sources at their facility and in the preparation, validation, and submission of the data to CDPH. To the extent possible, CDPH will try to minimize redundant efforts by facilities already subject to Illinois Environmental Protection Agency’s annual air emissions reporting requirements. Collected data will be made available to the public through a spatial data portal such as the City’s open data portal or ESRI’s ArcGIS Online platform.

The emissions inventory data will allow for the following:

- More accurate categorization of certificates of operations issued by CDPH

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

- Better prioritization of CDPH’s limited permitting and inspection resources
- Support for the City’s Zoning Air Quality Ordinance by allowing cumulative air dispersion and human health risk modeling that inform cumulative air quality and health impacts to surrounding neighborhoods (such modeling is currently difficult or impossible due to the lack of emissions data)
- Identification of contributions from specific sources
- Tracking progress towards emissions reduction goals
- Comparison of emissions across city neighborhoods
- Information for public policy and regulatory decisions

Assembling emissions inventory data is an important step in addressing environmental justice, climate change, and air quality problems. By collecting and analyzing this data, CDPH can better understand the sources of air pollution and develop strategies to reduce emissions.

**Supporting Department(s):** Assets, Information & Services (AIS)

**Impact Measures:**

To improve transparency and maximize usage of the data, the emissions inventory will be published on a publicly available website where industry and community stakeholders, as well as researchers, will have access to this information.

Impact indicators may include the following:

- percent-compliance of facilities to this emissions reporting requirements;
- the accuracy, currency, and completeness of the data; and
- the level of utilization of the data by the City, other government agencies, the regulated community, researchers, and the general public.

**Related Department Investments & Prior Commitments:**

CDPH is in the process of promulgating rules and incorporating special conditions to its air permits to require submission of emissions data from certain facilities. CDPH is also working with a consultant and AIS to pilot the collection of the data using a mobile application and the publishing of the data to a Geographic Information System (GIS) enabled website.

Action Steps	Timeline	Status
Adopted rules for the annual collection of emissions inventory data from aggregate-reprocessing facilities	2022-2023	Completed
Piloting ESRI’s Survey 123 application to collect spatially enabled data from aggregate-reprocessing facilities and publishing data to ARCGIS Online.	2023-2024	Ongoing

**DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN**

Adoption of permit conditions or rules to require larger facilities (Class A1, A2, and B Air Certificate of Operation (COOs)) to submit emissions inventory data annually	2023-2025	Planned
Adoption of permit conditions or rules to require small facilities (Class C COOs) to submit emissions inventory data annually	2025-2027	Planned
Provide online tool for community to report apparent data inconsistencies or refer non-reporting facilities to CDPH. Provide training to community on the use of the tool.	2025-2027	Planned

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## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name:** Chicago Department of Public Health

**Department Scope and Authorities:**

Chapter 11-4 of the Municipal Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to adopt rules “necessary or proper” to administer the City’s environmental ordinances, MCC §§ 2-112-070; 2-112-110(b)(6). The Commissioner is also empowered to **“make inspections of newly installed, constructed, reconstructed, repaired or altered fuel-burning, combustion or process equipment, devices, or areas, furnaces, and smoke prevention, air pollution, water pollution control devices, storage tanks and waste handling facilities, and to make annual or periodic inspections to determine whether compliance is being had with the provisions of Chapter 11-4; and to “institute necessary proceedings to prosecute violations of Chapter 11-4, and all other provisions of this Code which the Commissioner is expressly authorized to enforce, and otherwise to compel the prevention and abatement of the issuance of smoke or gases, solids or liquids or other matter causing air or water pollution, and nuisances arising therefrom;”** and is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(b)(2)(4), (c).

**Environmental Justice Strategy:** Update guidelines for inspection and enforcement activities to prioritize Consequential Facilities located in Environmental Justice Neighborhoods.

Through input at community meetings and a review of public comments, and as reflected in the Cumulative Impact Assessment “Community Input Summary,” CDPH has heard a call for us to make changes to existing ordinances, codes and processes to ensure adequate protection for EJ Neighborhoods, particularly by holding regulated facilities more fully accountable for their environmental and health impacts. Local EJ advocacy organizations also recently published an [analysis](#) of environmental citations, fines and settlements, which recommended that the City strengthen its enforcement practices. Improvements to inspection and enforcement practices will help to reduce impacts in EJ Neighborhoods and improve quality of life for Chicago residents who live near regulated facilities.

CDPH’s Office of Environmental Permitting & Inspections (OEPI) inspects regulated facilities and responds to complaints related to pollution, noise and odors, and carries out enforcement as needed. OEPI is committed to strengthening its inspection and enforcement practices to ensure that permitted facilities are operating in accordance with the Municipal Code of Chicago, IEPA and federal regulations. Achieving this includes:

- Developing inspection priorities and goals based on factors such as proximity of facilities to EJ communities, patterns indicating a higher likelihood of violations at certain facilities, and review of inspection practices in peer jurisdictions as well as considering our own current and future staffing capacity.
- Reviewing and updating current procedures to expedite the violation process, which will decrease the time for inspectors to issue notice of violations and ensure that the information included in the report is more accurate and consistent.
- Adopting a penalty policy under which CDPH will consider the location of facility, in or near an EJ Neighborhood, when making recommendations for fines and settlements.

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

<b>Supporting Department(s):</b> Department of Law, Department of Administrative Hearings		
<b>Impact Measures:</b> <ul style="list-style-type: none"> <li>• Number of inspections conducted (periodic and complaint) by location (OEPI)</li> <li>• Number of violations issued (periodic and complaint) by location (OEPI)</li> <li>• Fines collected (periodic and complaint) by location (OEPI)</li> <li>• Percent of Chicago adults who trust the City of Chicago to make the right decision on issues related to pollution in their neighborhood (Healthy Chicago Survey)</li> <li>• Percent of Chicago adults who rate the outdoor air quality in their neighborhood as “excellent” or “good” (Healthy Chicago Survey)</li> <li>• Percent of Chicago adults who are concerned about air pollution from industrial sources and other businesses in their neighborhood (Healthy Chicago Survey)</li> <li>• Percent of Chicago adults who are concerned about dumping of dangerous chemicals in their neighborhood (Healthy Chicago Survey)</li> <li>• Percent of Chicago adults who are concerned about water quality in their neighborhood lakes or rivers in which they swim, fish or do other activities (Healthy Chicago Survey)</li> <li>• Percent of Chicago adults who are concerned about lead paint in their homes or workplace (Healthy Chicago Survey)</li> <li>• Percent of Chicago adults who are concerned about soil pollution (e.g., gas stations, hazardous sites, etc.) in their neighborhood (Healthy Chicago Survey)</li> </ul>		
<b>Related Department Investments &amp; Prior Commitments:</b> CDPH initiated this work in 2022 in response to findings and recommendations from an OIG report on air pollution prevention activities. We retained a consultant group, Tetra Tech, to assist CDPH with this strategy.		
Action Steps	Timeline	Status
Evaluate past 10 years of inspection activities.	2023 Q3	OEPI has started evaluation of inspections
Review peer jurisdiction inspection practices as well as local, state and federal regulatory requirements and practices, and determine if there are any opportunities to enhance inspection and enforcement activities.	2023 Q3	Tetra Tech has started review of peer jurisdictions and regulatory requirements
Create policy regarding how EJ community location for facilities will be considered during penalty recommendation phase.	2023 Q4	
Draft recommendations for inspection frequency of facilities permitted by CDPH or investigated by CDPH in response to citizen complaints with specific consideration of proximity to EJ communities, requirements of	2023 Q4	

**DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN**

Chicago Municipal Code, IL and federal regulatory requirements, historical pattern of violations, and evidence-based best practices.		
Share recommendations with public for review and feedback.	2023 Q4	
Update inspection policies and procedures and provide training to staff	2024 Q1	
Develop data collection and dissemination processes for operational metrics (e.g., inspections, violations, etc.)	2024 Q2	

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## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name:** *Department of Public Health*

**Department Scope and Authorities:**

Chapter 11-4 of the Municipal Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to adopt rules “necessary or proper” to administer the City’s environmental ordinances, MCC §§ 2-112-070; 2-112-110(b)(6). The Commissioner is also empowered to “encourage and conduct studies, investigations and research, including joint cooperative investigation and research with public and private agencies and organizations, relating to the environmental protection authorities conferred on the Commissioner pursuant to subsection (b) of this section, as the Commissioner may deem advisable and necessary;” and is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(b)(12), (c).

**Environmental Justice Strategy:** Make environmental data, including air quality information and cumulative impact indicators, available through publicly accessible website(s) and dashboard(s).

CDPH is committed to protecting the health of all Chicagoans, particularly those who live in Environmental Justice Neighborhoods. Community residents have called upon CDPH to improve its capacity to collect and disseminate data for use in land use planning and zoning as well as environmental permitting and enforcement. Through input at community meetings and a review of public comments, and as reflected in the Cumulative Impact Assessment “Community Input Summary,” CDPH has heard a call for us to address data gaps in pollution monitoring and be more transparent about how data is being used to hold companies accountable for their community impacts.

CDPH is committed to making its environmental data more accessible and useful to the public. To this end, CDPH intends to develop and maintain a cloud-based geographic information system (GIS) and/or web portal to provide regulated businesses and the community with access to environmental data, such as emissions inventory data and cumulative impact indicators. The portal will also include dashboards for visualizing and analyzing air quality, meteorological, and environmental data. The GIS/web portal will be a valuable tool for regulated businesses and the community. It will allow them to:

- Access environmental data in a user-friendly format.
- Visualize and analyze environmental data.
- Identify potential environmental risks.
- Make informed decisions about environmental compliance.

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

- Participate in environmental planning and decision-making.

The GIS/web portal helps build public trust by demonstrating that CDPH is committed to sharing information and working with the community to address environmental concerns. It can also help to promote environmental stewardship by providing businesses and the community with the information they need to make informed decisions about environmental issues.

**Supporting Department(s):** This effort will require support from AIS for development support, and CDOT and DPD for data sources. It's envisioned other City departments will use the dashboard for planning and decision making.

**Impact Measures:**

- Percent of CDPH-collected data made publicly available
- Quality of data in terms of completeness and accuracy
- Timeliness of data publication
- Utilization of the data by regulators, industry, researchers, and the general public

**Related Department Investments & Prior Commitments:** In 2012, CDPH started publishing its environmental permitting, inspections, complaints, and enforcement data in the City's Open Data Portal. CDPH also makes a wide range of health-related data available on the Chicago Health Atlas (<https://chicagohealthatlas.org/>).

Action Steps	Timeline	Status
Publish bulk storage air quality and meteorological data in the City's Open Data Portal	2023	Ongoing
Develop system to allow real-time ingestion of fence line air quality and meteorological data from regulated facilities	2023-2024	Ongoing
Work with the Environmental Equity Working Group and/or any formally approved community advisory body to co-develop the content and format of data tools to ensure that they can be readily used and understood.	Early 2024 -2025	Planned
Develop GIS portal to display and distribute emissions inventory data and other environmental data such as air sensor and meteorological data	2023-2025	Planned



## ENVIRONMENTAL JUSTICE ACTION PLAN

**Department Name:** Chicago Department of Public Health

**Department Scope and Authorities:**

Chapter 11-4 of the Municipal Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to adopt rules “necessary or proper” to administer the City’s environmental ordinances, MCC §§ 2-112-070; 2-112-110(b)(6). The Commissioner is also empowered to “issue all permits, certificates, notices or other documents required under the provisions of Chapter 11-4” and “to impose conditions necessary to achieve the purposes of [Article II, Air Pollution Control] upon any permit issued pursuant to this section,” and “upon any certificate of operation issued pursuant to this section.” MCC § 2-112-110(b)(9), 11-4-630(b), 11-4-670(b). The Commissioner is further is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(c).

**Environmental Justice Strategy: Develop standard and special conditions to attach to air quality pollution control permits (AQPCP) and certificates of operation (COO), beginning with Consequential Facilities which may impact EJ Neighborhoods.**

Through input at community meetings and a review of public comments, and as reflected in the Cumulative Impact Assessment “Community Input Summary,” CDPH has heard a call for us to make changes to existing ordinances, codes and processes to ensure adequate protection for EJ Neighborhoods. A recently published [analysis](#) on environmental citations, fines and settlements conducted by local EJ advocacy organizations specifically recommended the City utilize special conditions as part of its permitting process.

In order to address these recommendations, CDPH will develop:

- Standard conditions that are applicable to all AQPCP and COO issued by CDPH;
- Special conditions that are applicable to specific emission sources and facility site; and
- A matrix correlating the applicability of the special conditions developed to a facility’s Standard Industrial Classification (SIC) code, equipment, air pollution control devices and IEPA permit type and COO classification.

Standard conditions may include, but are not limited to, compliance with all local, state and federal rules, permit does not release them from liability in relation to facility, CDPH has entry access to facility at reasonable times for inspection to monitor compliance with permit and rules, changes or modifications to plan must be submitted to CDPH for approval, etc. Special conditions may include, but are not limited to, required usage of specific types of pollution control technologies, visible emissions opacity limits, handling of potentially airborne substances, hours of operation, traffic volume limits, etc. Collectively, these changes will further protect vulnerable communities from potential exposure to pollutants.

**Supporting Department(s):**

Department of Law, Chicago Department of Transportation (if traffic conditions are being considered)

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

### Impact Measures:

- Number of AQPCPs with standard and special conditions
- Number of COOs with standard and special conditions
- Percent of air control permits in EJ Neighborhoods with standard and special conditions
- Percent of certificates of operations in EJ Neighborhoods with standard and special conditions
- Emission inventories (e.g., tons of pollutants released) by regulated facilities in Chicago (stratified by EJ Neighborhood status and year)
- Air quality measures (e.g., PM 2.5, PM10, NOX, ozone, etc.) from current federal monitors and once air sensor network is established over time
- Percent of Chicago adults who trust the City of Chicago to make the right decision on issues related to pollution in their neighborhood (Healthy Chicago Survey)
- Percent of Chicago adults who rate the outdoor air quality in their neighborhood as “excellent” or “good” (Healthy Chicago Survey)
- Percent of Chicago adults who are concerned about air pollution from industrial sources and other businesses in their neighborhood (Healthy Chicago Survey)
- Percent of Chicago adults who are concerned about dumping of dangerous chemicals in their neighborhood (Healthy Chicago Survey)
- Percent of Chicago adults who are concerned about water quality in their neighborhood lakes or rivers in which they swim, fish or do other activities (Healthy Chicago Survey)
- Percent of Chicago adults who are concerned about soil pollution (e.g., gas stations, hazardous sites, etc.) in their neighborhood (Healthy Chicago Survey)

### Related Department Investments & Prior Commitments:

Complementary to strategy for the creation of new and updated industry-specific operational rules, building on prior recent regulations for large recyclers, rock crushers, and bulk material facilities, which include strong provisions for public participation. Permit conditions and rules both contain technical requirements to protect the environment and minimize impacts on surrounding communities. Whereas rules apply more broadly to an entire category of facilities, permit conditions can be tailored to the unique circumstances of individual facilities. CDPH is currently working with Tetra Tech on internal process improvements.

Action Steps	Timeline	Status
Draft standard and special conditions based on Illinois Administrative Code and Chicago Municipal Code	2023 Q2 – Q3	Tetra Tech is currently drafting these and waiting for CIA report to finalize
Draft matrix correlating the applicability of the special conditions developed to a facility’s Standard Industrial Classification (SIC) code, equipment, air pollution control devices and IEPA permit type and COO classification.	2023 Q2 – Q3	Tetra Tech is currently drafting these and waiting

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		for CIA report to finalize
Publish standard and special conditions, and matrix for public review and comment.	2023 Q4	
Finalize standard and special conditions and matrix.	December 31, 2023	

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## ENVIRONMENTAL JUSTICE ACTION PLAN

**Department Name:** *Department of Public Health*

**Department Scope and Authorities:**

Chapter 11-4 of the Municipal Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to adopt rules “necessary or proper” to administer the City’s environmental ordinances, MCC §§ 2-112-070; 2-112-110(b)(6). The Commissioner is also empowered to “encourage and conduct studies, investigations and research, including joint cooperative investigation and research with public and private agencies and organizations, relating to the environmental protection authorities conferred on the Commissioner pursuant to subsection (b) of this section, as the Commissioner may deem advisable and necessary;” and is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(b)(12), (c).

**Environmental Justice Strategy:** Develop tools such as real-time air-dispersion modeling that assist in the identification of pollution sources impacting local air quality. Such tools enhance compliance-monitoring of certain facilities and aid in the investigation of air quality complaints.

CDPH is committed to protecting the health of all Chicagoans, particularly those who live in Environmental Justice Neighborhoods that are disproportionately impacted by air pollution. Community residents have called upon CDPH to improve its capacity to collect and disseminate data for use in land use planning and zoning as well as environmental permitting, monitoring and enforcement. Through input at community meetings and a review of public comments, and as reflected in the Cumulative Impact Assessment “Community Input Summary,” CDPH has heard a call for us to address data gaps in pollution monitoring and be more transparent about how data is being used to hold companies accountable for their community impacts.

One way that CDPH is doing this is by piloting a real-time air dispersion modeling system for potential future adoption. This system will quantify the contributions of specific facilities’ air quality impacts to sensitive areas (e.g., schools, hospitals, etc.) and neighborhoods. The system will use emissions data collected from facilities subject to CDPH’s air pollution control permitting requirements. The data will be used to create a model that can predict how air pollutants will disperse in the atmosphere. This information can be used to identify areas that are at risk of air pollution exposure and to develop strategies to reduce exposure.

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The system will also be capable of doing retrospective and predictive modeling. Retrospective modeling can be used to investigate air quality complaints and to identify the sources of air pollution. Predictive modeling can be used to forecast air quality conditions and warn the public of potential air quality problems.

The system will be a valuable tool for CDPH in its efforts to protect the community. It will help CDPH to identify and mitigate the largest contributors of particulate emissions to the surrounding community. It will also help CDPH to predict and avert air quality episodes, identify and prosecute air quality complaint sources, and install or relocate air quality monitors.

**Supporting Department(s): Chicago Park District (siting of weather stations and monitors); CDOT (for traffic count data)**

### **Impact Measures:**

The following are some of the impact measures that CDPH may use to evaluate the success of this initiative:

- Identification and effective mitigation of the largest contributors of particulate emissions to the surrounding community.
- Number of air quality episodes predicted correctly and averted, or early warning provided to the community and regulated industries.
- Successful identification and prosecution of air quality complaint sources.
- Instances where modeled data led to the installation or relocation of an air quality monitor.

### **Related Department Investments & Prior Commitments:**

For the past year, CDPH has been piloting the [Envirosuite](#) platform to:

- Collect and display real-time data provided by remote sensors, including fence-line PM10 sensors and meteorological data from regulated facilities. This effort goes towards CDPH's goal of continuous vigilance of emission levels from regulated facilities near sensitive populations.
- Estimate contributions of various operations from an auto-shredding facility to a local high-school and surrounding residences to support the Department's review of the company's operating permit and help address heightened community concerns regarding the facility.

**DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN**

- Help understand the origin of observed pollution impacts, particularly from a controversial asphalt plant.

Action Steps	Timeline	Status
Continue piloting Envirosuite platform through: <ul style="list-style-type: none"> <li>• modeling of all Consequential Facilities (large recyclers, waste transfer stations, rock crushers) for PM10 or PM2.5, and certain gases,</li> <li>• evaluation of modeled versus observed (from monitors) concentrations, and</li> <li>• utilization of trajectory and dispersion modeling for complaint inspections and proactive mitigation (e.g., notifications and inspection scheduling)</li> <li>• Send risk reports associated with predicted meteorological/dispersion data to regulated facilities and communities</li> <li>• Obtain confirmation/feedback on risk reports from regulated facilities and the community</li> </ul>	2022-2025	<i>Ongoing</i>
Install weather stations to improve modeling accuracy	2023-2024	<i>Ongoing</i>
Full deployment of Envirosuite or similar platform	2026	<i>Tentative</i>

## ENVIRONMENTAL JUSTICE ACTION PLAN

**Department Name:** Chicago Department of Public Health

**Department Scope and Authorities:**

Chapter 11-4 of the Municipal Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to adopt rules “necessary or proper” to administer the City’s environmental ordinances, MCC §§ 2-112-070; 2-112-110(b)(6). The Commissioner is also empowered to “supervise the execution of and implement all laws, ordinances, and rules pertaining to environmental protection and control as provided in Chapter 11-4;” and is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(b)(12), (c).

**Environmental Justice Strategy: Create new and updated industry-specific operational rules, building on prior recent regulations for large recyclers, rock crushers, and bulk material facilities, which include strong provisions for public participation.**

EJ communities are located in proximity to areas with more intensive industrial uses. These uses often have environmental, health, and quality of life impacts, such as noise, odors, dust, and emissions. Communities expressed a desire to have CDPH more tightly regulate this type of industry to minimize these impacts. CDPH’s industry-specific regulations aim to reduce pollution and improve air quality in surrounding communities, through the use of enhanced pollution control measures, continuous monitoring, and greater operator reporting and recordkeeping requirements. CDPH has continually expanded opportunities for public participation in the rulemaking process by extending comment periods, holding community meetings, and developing forms and guidelines for effective written comments. Future rules will incorporate community recommendations to strengthen standards for industrial operations, placing increased emphasis on proactive pollution prevention.

Proposed regulations under consideration include:

- New rules for asphalt plants
- Updated rules for all recycling facilities
- Updated rules for bulk material facilities
- New rules under the Air Quality Zoning (AQZ) ordinance (partnering with DPD and CDOT)
- New air pollution control rules for industrial facilities
- New rules for asbestos abatement projects
- Updated rules for construction site rock crushers

**Supporting Department(s):**

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For general drafting support and input on all rules: the Department of Law; for creation of AQZ Rules: Department of Planning & Development (DPD) and Department of Transportation (CDOT); for awareness and review of asphalt rules (CDOT); for awareness and review of asbestos rules and construction site rock crushing rules: Department of Buildings

**Impact Measures:**

- Level of community participation in rulemaking process (number of comments received, participants in meetings)
- Community perceptions regarding rulemaking process, as measured in Healthy Chicago Survey
- Number of rules implemented
- Evidence of facility compliance with new rules

**Related Department Investments & Prior Commitments:**

CDPH has publicly stated its intention to adopt new rules for asphalt plants and other industries.

Further, in response to community concerns, recent rules include more transparency and additional opportunities for public engagement. For example, the Bulk Material Facility Rules, Rules for Large Recyclers, and Rules for Rock Crushing Facilities provide that CDPH will not grant any variance from the rules until members of the public have had an opportunity to submit written comments on the variance application. In addition, in response to public comments, the Rock Crusher Rules require facilities to submit more detailed monitoring information in a format that is easier to analyze. Also in response to public comments, these rules include a requirement that facilities create a public complaint management plan, outlining the facility’s process for receiving and recording public complaints.

	Timeline	Status
Create proposed CDPH rulemaking agenda, with list of proposed new rules and amendments, timeline, and responsible parties, etc.	Q3 2023	Preliminary list has been created (above)
Publish proposed rulemaking agenda on CDPH website and seek community feedback regarding prioritization and other ideas	Q4 2023	Under consideration
With input from EEWG, develop/update policies to guide stakeholder meetings with affected industry representatives and community groups to share draft rules and receive early feedback, either before or in conjunction with written comment period	Q4 2023	Can be modeled after outreach process used during creation of the bulk material rules



## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name:** Chicago Department of Public Health

**Department Scope and Authorities:**

Chapter 11-4 of the Municipal Code, the Chicago Environmental Protection and Control Ordinance, is “enforced by the commissioner of the department of health,” with “[a]ll duties and powers granted” under that ordinance to be exercised by her. MCC § 11-4-020. The Commissioner is empowered to adopt rules “necessary or proper” to administer the City’s environmental ordinances, MCC §§ 2-112-070; 2-112-110(b)(6). The Commissioner is also empowered to **“investigate complaints of violations of Chapter 11-4 and to make inspections and observations of environmental conditions;”** and is granted wide authority to “do any and all other acts which may be necessary for the implementation of other powers conferred on the Commissioner under [the Municipal Code].” MCC § 2-112-110(b)(5), (c).

**Environmental Justice Strategy: Implement a process to provide more detail to enable tracking the City’s response to non-emergency complaints including those related to odor, dust, and air pollution**

The City of Chicago and community partners are working on the first city-wide CIA to describe how environmental, health and social stressors affect our communities, and to identify neighborhoods that experience the greatest impacts. As a starting point, EJ leaders and advocates called upon the City to review input already provided by people living in community areas most affected by industrial development - primarily lower-income, Black and Latinx neighborhoods on the South and West sides of Chicago. For years, community members have provided comments on permitting and zoning decisions, regulations, and City plans. We analyzed this qualitative data to better understand the lived experience of cumulative impacts and described our findings in the Community Input Summary. Findings from this analysis included City residents often don't know whether/what follow up occurred after submitting a 311 complaint resulting in feelings of disempowerment by this lack of information and loss of trust that CPDH is taking appropriate action in response.

The Office of Environmental Permitting & Inspections (OEPI) inspects regulated facilities and responds to complaints related to pollution, noise and odors, and carries out enforcement as required. OEPI is committed to improving the transparency of its response to community complaints through the 311 system by:

- Integrating the 311 Salesforce and OEPI’s internal permitting and inspection database system (IPS 11) to “communicate” with each other thereby reducing the need for duplicative data entry and decreasing the response time to complaints;
- Working with Salesforce to determine if 311 system can enable notification of complainants the resolution of their complaint directly via the 311 system; and
- Updating the information on the City of Chicago Data Portal for Environmental Complaints to include the resolution of the inspection/investigation so persons don’t need to do a separate look-up in the Inspection database on the City of Chicago Data Portal

CDPH has been working on enhancing our communications and community engagement regarding environmental issues in Chicago over the past couple of years. Substantial improvements to our website have been completed that addresses ease of finding information, signing up for our distribution list and providing feedback on proposed ordinances and rules, permit applications, etc. As part of this improvement, CDPH developed a one-pager specifically on the process of reporting non-emergency complaints to 311. This one-pager is available on our website, was distributed to

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alderman and to our environmental distribution list. CDPH plans to evaluate the incoming complaints received through 311 via phone, web or app and make updates to this one-pager, as well as considering other communication/engagement activities to spread the message to ensure 311 complaints are being routed correctly and with the best information possible for action.

**Supporting Department(s):**

OEMC 311, AIS

**Impact Measures:**

- Number of complaints received via 311 by location
- Response rate to complaints received via 311 by location

**Related Department Investments & Prior Commitments:**

Integration of IPS 11 and Salesforce was committed to as part of ARP funding as a one-time investment in process improvement. Currently, CDPH OEPI inspectors reach out to 311 complainants, if contact information was provided, to get more information before or during their inspection/investigation. Resolution of the complaint can be found on the City of Chicago Data Portal environmental inspections database by searching for the address associated with the complaint.

Action Steps	Timeline	Status
Integrate IPS 11 and 311 Salesforce systems	2023 Q4	OEPI has started working with AIS and Salesforce on this integration process
Work with Salesforce to create feature to send notification on outcome of complaint to complainant	2023 Q2 – Q4	
Update fields in Data Portal to include outcome of complaint in the Complaint database	2023 Q4	
Conduct assessment of 311 fields completed by OEMC operators (phone complaint) and complainants (311 app or online)	2024 Q2	
Based on assessment, make recommendations to OEMC and Salesforce regarding 311 processes and system.	2024 Q3	
Update 311 one-pager to reflect any findings from assessment and consider other community outreach modalities to reach consumers regarding 311 best practices	2024 Q4	

## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name:** Department of Streets and Sanitation (DSS), Recycling and Materials Management

**Department Scope and Authorities:** The Recycling and Materials Management (RMM) team oversees the Blue Cart recycling and yard waste collection programs of the City's 625,000 1 – 4 unit residential households. 1/3 of those households are served by DSS Sanitation crews, and 2/3rds of those households are served by LRS. The RMM team provides education and engagement through its [chicagorecycles.org](http://chicagorecycles.org) microsite, responds to questions and service issues from the households it serves. The RMM team also has duties pertaining to the oversight and enforcement of Chapter 11-5 of the Municipal Code, the Chicago Recycling Ordinance (CRO). In the CRO, requirements pertaining to high-density households (5+ units) and industrial, commercial, and institutional entities are outlined, as well as annual reporting requirements for Chicago's privately licensed haulers.

### Environmental Justice Strategy:

- 1. Expand residential organic collection & waste diversion programming.** Food scrap composting is an increasingly popular activity across the City of Chicago. It helps divert waste from landfills that are as a rule located in rural, economically distressed areas, which means that those landfills can be operated longer before reaching capacity.

Food scrap composting is unfortunately cost-prohibitive for many of Chicago's EJ communities, with weekly service by the private sector on par with the cost of the City's monthly garbage fee. The DSS RMM team thus is working on providing this service as an expansion of its waste diversion programming that would require no additional fees to its 625,000 City households.

Following the guidance provided by the 2021 Chicago Waste Strategy, DSS RMM plans on introducing these programs and resources as quickly as City budget and procurement policies will permit:

- The roll out of food scrap collection pilot programs
- Locating food scrap drop off sites around the city
- Distributing free or discounted backyard compost bins directly to residents and community gardens (TBD, PER MO APPROVAL)

- 2. Develop a Plan to Implement Commercial Waste Franchise Zoning.** With a franchise zone system, municipalities establish assigned areas and then create (semi-) exclusive long-term contracts with a hauler(s) within each zone. The haulers are typically selected through a bidding process, where haulers provide the municipalities with collection services details and options. Municipalities typically require haulers to abide by stringent regulations that promote a reduced environmental footprint and transparent business practices.

Environmental Justice communities would benefit from this waste collection model in numerous ways: street traffic and air pollution will be reduced; waste collection and recycling services will improve, more and better regulated/safe jobs will be created, and there will be more transparency in collection pricing and competition.

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**3. Pass Extended Producer Responsibility (EPR) Packaging and Paper Products legislation for Illinois.** Since 2022 DSS has been collaborating on an EPR bill for Illinois with Solid Waste Agency staff from Northern Cook County, Lake County, Du Page County. The legislation would require manufacturers of packaging and paper products to either reimburse or to provide curbside recycling programs for every community and qualifying agency in the state with more than 1,500 residents. There are several environmental justice principles that are connected to this effort. One is the polluter pays principle. IL landfills are nearly maxed out in the Chicago Region, in no small part due to their capacity going towards single use packaging and paper products. This means that Chicago must send its waste streams further and further away from the city, which increases the financial burden on Chicago residents due to increasing hauler expenses. Additionally, the added waste from these waste streams brings truck emissions and road congestion into largely rural, low-income and distressed communities. With this EPR legislation, Chicago and its sister agencies would see their recycling program fully reimbursed. With the budget savings, DSS would have the resources to introduce curbside compost collection. In a larger sense, the cities and towns that currently cannot afford to provide curbside recycling would have that obstacle removed; there are 12 cities in Cook County alone that are currently not providing this service.

**Supporting Department(s):** **1)** DSS has been collaborating with the Office of Climate & Environmental Equity for the procurement issues, and the Chicago Department of Public Health on food rescue and food waste prevention programming. **2)** This is a longer-term goal, DSS would need to collaborate with CDOT, and likely CDPH and DPD, all of whom have a vested interest in seeing healthier built environments for Environmental Justice communities in the form of less air pollution and less truck traffic. **3)** DSS has been working closely with staff in the Mayor's Office, including the lobbying team and the CSO.

### Impact Measures:

1.
  - Community engagement will be enhanced by the restoration of the popular Recycling Block Captain program, which was originally managed by the Department of the Environment.
  - Metrics pertaining to food scrap and organics composting will be tracked for the community garden composting pilot with NeighborSpace. Metrics will also be requested from participants in food scrap drop off programs, those programs will require signing up through an online form, so residents can be reached electronically and easily.
  - Metrics pertaining to GHG reductions will be tracked as technology and data allow.
2.
  - Reduced truck traffic by reducing the number of waste haulers in a given zone of the city.
  - CDOT and possibly DPD would need to help DSS with a traffic flow planning study, but a NYC study found that truck traffic was likely to decrease by approximately 63% from their baseline.
  - Recycling and composting can be incentivized in these systems, NYC included a mandate that both of those collection services cost less than waste hauling.

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- 3.**
- Reduced material going to landfills due to circularity measures that are built into the EPR model; extending the life of existing landfills is critical for Chicago and DSS.
  - Recycling systems in the state receiving the investment that they need in order to sort and process increasingly complex packaging waste streams, while also more effectively capturing high-value material in the stream such as metals and specific grades of plastic.
  - Improved financial health of DSS (and CPS and the Park District)

**Related Department Investments & Prior Commitments:**

1. The City allocated approximately \$5 million through the Chicago Recovery Plan to DSS RMM, and has also received grant support via NRDC’s Food Matters program. RMM also submitted the first-ever EPA grant for the department in February, seeking \$2.7m in funding that would allow five EJ communities to receive 30 months of food scrap curbside collection at no charge.
2. No formal commitments have been made to date outside of staff time for researching best practices and policies.
3. To hire a consultant from PSI, DSS contributed funding along with the solid waste agencies noted earlier. Investment has otherwise been a modest amount of existing staff time.

Action Steps	Timeline	Status
1. Research and procure backyard compost bins from a local organization that provides economic opportunity in the form of workforce training, procure compost bins suitable for drop off and curbside collection.	<u>Phase 1:</u> Q1 – Q4 2023	In progress; initial order of compost bins has been placed, RMM is working with local non-profits to source backyard bins
Collaborate on compost educational programming with/for the community garden communities that are part of the NRDC and NeighborSpace pilot.	<u>Phase 1:</u> Q1 – Q4 2023	Underway. An online webinar workshop was held in March, an in-person workshop will be held at the El Paseo garden on Earth Day.
Create a roll-out plan including education and outreach related to new drop off and curbside collection programs, as well as the improvement of ongoing yard waste pickups.	<u>Phase 2:</u> Q1, 2023 – Q3, 2024	A plan was created for RMM’s EPA grant proposal, elements of it will be used for

**DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN**

		the other compost programs.
<p><b>2.</b> Engage CDOT on viability and timetable for a traffic study. Engage CDPH, DPD, other interested City collaborators on the merits and challenges of the system. Finding elected representatives who are interested will also be critical; the new chair of the Solid Waste and Sanitation Committee in City Council might be a helpful ally.</p>	<p><u>Phase 1:</u> Q 1 – 4, 2023</p>	<p>A traffic study is required before implementation can begin. Engagement and education efforts for other departments and elected representatives can occur simultaneously.</p>
<p><b>3.</b> Form working group from regional solid waste agencies, hire consultant from PSI in order to produce initial draft of EPR legislation, engage stakeholder groups (trade associations, environmental advocates, etc.) for feedback.</p>	<p><u>Phase 1:</u> Q2, 2022 – Q4, 2023</p>	<p>This is a multi-year effort.</p>
<p>Find sponsors and introduce legislation in Springfield.</p>	<p><u>Phase 2:</u> Q1 – Q2, 2023</p>	<p>The EPR bill passed the House, but is currently stuck in its Senate committee. A pivot is underway to split this complex legislation into two parts to help keep up the momentum (Maryland recycling advocates set a precedent for this approach).</p>
<p>EPR legislation goes into effect.</p>	<p><u>Phase 2:</u> Q1, 2024 – Q4, 2026</p>	<p>Timeline is in flux depending on</p>

DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

		success of latest approach.
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## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name: Assets, Information, and Services – EHS Bureau DRAFT 4/28/2023**

**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?*

- Under Chapter 2-51 of the Municipal Code, Section 34 gives the Commissioner the authority to conduct **advisory evaluations of environmentally significant projects and activities within or affecting the City**, which are undertaken by **City departments or agencies**, including a review for **compliance with environmental requirements** and the **environmental policy implications of such activities**, and to provide such evaluations to the Mayor.

**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:*

- *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?*

Proposed Change to Improve and Prevent	EJ Community Concern	Minimize burdens/Maximize benefits
Document current processes for environmental reviews. Determine ability to expand current scope to add departments and programs and incorporate environmental justice into the reviews. Engage the community in developing criteria, process and data requirements and monitoring success. <i>Changes Policy, Process and Practice; Requires budget increase and FTE based on scope of engagement; heavily dependent on Mayoral initiatives and Departmental goals</i>	1)Environmental Justice Focus Areas 2)Environmental Health Outcomes 3)Socio-Economic Impact 4)Decision-making Process	1) Minimize burdens and improve environmental conditions in EJC 2) Identify potential hidden toxins and odors and minimize burdens 3) Minimize any environmental impact by optimizing environmental and economic benefits 4) Maximize transparency and community engagement in decision-making process

**Supporting Department(s):**

*List any departments you need to collaborate with to execute this strategy.*

- **CDPH, OCEE, DOL** will be key in developing and formalizing the procedures, ordinance changes, and community engagement.
- **EHS** will engage other departments to determine potentially applicable programs and activities that would benefit from an environmental review.



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**Impact Measures:**

*Insert indicators or information sources (quantitative and/or qualitative) that will evidence success. Consider both:*

- Performance data: *How will you measure whether you successfully executed the strategy?*
- Community-level data: *How will this affect the condition of EJ communities?*

Performance data: *Success will be measured by percent completion and other measures with input from the community.*

Community-level data: *EJ communities will benefit through their input on the process and access to environmental information related to projects and initiatives with potential impact to their communities.*

**Related Department Investments & Prior Commitments:**

*Briefly describe current/planned initiatives related to this strategy – for example, through the Chicago Recovery Plan, Climate Action Plan, or We Will Chicago.*

- AIS EHS currently serves as the Responsible Entity for conducting environmental reviews of City and CHA projects using federal HUD funds for compliance with NEPA per 24 CFR Part 58.
- AIS EHS currently reviews DPD and DOH programs and projects for environmental compliance and risk, some of which are funded through the Chicago Recovery Plan, e.g., Vacant Lot Reduction Program.

Action Steps	Timeline	Status
<i>Describe 2 or more specific actions that you will take to advance this strategy. At least one action step should discuss steps you will take to engage people who live in EJ communities to help you plan, implement, and evaluate the success of this strategy.</i>	<i>Note when this step is targeted to be completed</i>	<i>Note any progress to date</i>
Determine resource needs and steps to document the current process.	6/30/23	
Document the current processes for environmental reviews.	8/30/23	
Assess the current process and definitions and identify improvements, e.g., EJ/CIA	10/30/23	

## ENVIROMENTAL JUSTICE ACTION PLAN

**Department Name:** Department of Housing

**Department Scope and Authorities:**

- Competitively select sites for multi-family affordable housing development and maintain design review and construction compliance authority over said sites. This is primarily done via the Department’s Qualified Allocation Plan (QAP), with design standards enforced by the Department’s Architectural Technical Standards (ATS) Manual.
  - The 2023 QAP, recently released, now states: “In accordance with this City-wide effort, and in recognition that the climate crisis places a disproportionate burden on low-income residents, communities of color, and other marginalized populations, the 2023 Qualified Allocation Plan (QAP).
  - The 2023 Architectural Technical Standards include new language, preferences, and requirements related to energy efficiency, decarbonization, and climate resilience” (2023 QAP, p. 27). The 2023 ATS manual now requires most buildings funded by DOH to be all-electric, and to avoid fuel combustion in residential units or common areas. The 2023 QAP allows the Department to further preference applications that exceed these standards.
  - The 2021 QAP supported equitable transit-oriented development by introducing a selection preference for multifamily projects in transit-served locations (TSLs). The 2023 QAP furthered this commitment by reinforcing the TSL preference and adding clarity about its implementation.
- Develop and publish RFPs for specific residential development sites (e.g., on city-owned land).
- Develop and implement ordinance-enabled programs and policies that influence residential development across the city, e.g., the Affordable Requirements Ordinance (SO2021-1226), Woodlawn Housing Preservation ordinance (O2020-3987), Accessible Dwelling Units program (SO2020-2850), and Connected Communities Ordinance (SO2022-2000).
- Lead distribution of rental and mortgage assistance programs, including court-based eviction proceeding rental assistance.
- Subsidize the development of affordable single-family homes.
- Fund critical home repairs for low-income homeowners (Home Repair Program, Emergency Heat Program).
- Fund the purchase and rehabilitation of various housing types to improve choice and quality and better neighborhoods.
- Fund a network of delegate agencies that provide direct housing assistance to Chicago residents including Housing Counseling Centers (HCC), and housing technical assistance providers (TACIT and TACOM).
- Advocate for state and federal policy changes related to affordable housing, housing development and choice, and the elimination of residential segregation.

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

### **Environmental Justice Strategy:**

Based on the wide range of authorities reviewed above, DOH is committed to pursuing a variety of strategies to enhance our approach to environmental justice, and integrate that work with that of other departments:

- Implement enhanced process for evaluation of proposed sites for multi-family developments, including the evaluation of environmental justice risks, in coordination with related departments.
- Implement enhanced design review process for multi-family developments to better protect residents and local communities from environmental justice risks including pollution, flooding, extreme heat, shade access, green space access, and major freight routes.
- Deepen DOH's commitment to dismantling residential segregation by increasing housing choice for low-income Chicagoans. Continue to pursue a "both/and" strategy that promotes development of high-quality housing and amenities in disinvested areas, and affordable housing in amenity-rich areas.
- Fund organizations to provide city-wide capacity building related to climate resiliency, environmental justice, housing, and transit equity.
- Continue to pursue policy and public investment strategies that promote denser, transit-oriented residential development to reduce reliance on single-occupancy vehicle transportation and reduce greenhouse gas emissions.
- Deepen DOH's commitment to engaging community in housing issues, including involving communities in critical conversations about housing development, affordability, gentrification, and neighborhood investment.

### **Supporting Department(s):**

- Department of Planning and Development
- Department of Transportation
- Department of Public Health

### **Impact Measures:**

- Community partners engaged in planning and decision-making related to housing development.
- Number of housing units developed and/or rehabilitated, including the distribution of units across disinvested and amenity-rich communities, and number of units built in transit-served locations.
- Number of design interventions employed to address environmental justice concerns, including cooling rooms, resilient utility infrastructure, flood-resilient design, etc.

### **Related Department Investments & Prior Commitments:**

- 2019 completion of first ever Racial Equity Impact Assessment (REIA) of a Qualified Allocation Plan (QAP).
- 2021 ATS requires developers to include air conditioning in all dwelling units and common areas in multifamily projects.
- 2021 QAP included multiple application "tracts" to encourage the selection of projects from diverse neighborhoods. This new approach led to an increase in development of affordable units in affluent and amenity-rich "opportunity area" communities.
- Of 24 affordable housing multi-family projects announced in the 2021 LIHTC funding round, 18 were in transit-served locations.
- The Affordable Requirements Ordinance [Chicago's inclusionary housing program] generated over 600 units in 2022, the majority in transit-served locations.

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

- 2022 passage of Connected Communities Ordinance (SO2022-2000) changed the Chicago Zoning Code to facilitate and incentivize the development of affordable, dense housing near transit.
- Emergency Heating Repairs and Heat Receivership Program.

Action Steps	Timeline	Status
Implement an improved multi-family financing application and internal application review processes to better evaluate proposals based through an Environmental Justice lens for site concerns and the inclusion of mitigating design measures.	Q3 2023	Currently underway
Develop and implement a five-year housing plan to explicitly incorporate goals related for environmental justice and the specific needs of environmental justice communities, engage and consult with community groups and stakeholders—especially those representing environmental justice communities—during plan development, and establish reporting structures through the planning process to hold DOH accountable to environmental justice goals.	Q4 2023	Planning process currently being initiated
Establish an energy efficiency and decarbonization grant program for low-income homeowners and tenants to decrease energy use, utility bills, and indoor fuel combustion and to improve indoor air quality and the City’s overall carbon footprint.	Q4 2023	RFP drafting underway
Fund delegate agencies to provide capacity building and technical assistance related to climate resiliency, environmental justice, housing, and transit equity through the Technical Assistance – Citywide (TACIT) program via the 2024 CDGA RFP.	Q2 2024	Follows fixed CDGA RFP cycle
Work with Mayor’s Office, departments, Council, and external stakeholders to continue to push for ETOD zoning reforms and other changes to programs and policies that will promote equitable transit-oriented development.	TBD	Planning in process with partners