DRAFT Environmental Justice (EJ) Action Plan

The City's **Interdepartmental EJ Group** has produced a draft EJ Action Plan with strategies that change practices and policies so that justice and equity principles are part of day-to-day operations and decision-making. The City will transparently track and measure progress on the EJ Action Plan over time to ensure accountability. Departments adopted an **EJ Goal** for the City of Chicago that guides this shared work: *All City of Chicago departments will work together and use their powers to improve the environment, health, and quality of life in environmental justice communities through changes to internal decision-making processes, citywide policy, meaningful community engagement, and equitable distribution of benefits and burdens of City actions.*

Participating Departments:

Office of Climate & Environmental Equity Assets, Information & Services (AIS) Buildings (DOB)* Housing (DOH) Planning & Development (DPD) Procurement Services (DPS)* Public Health (CDPH) Streets & Sanitation (DSS) Transportation (CDOT) Water Management (DWM)

*strategies forthcoming

Improve Data Collection, Reporting & Transparency

- Expand the City's **community air monitoring network** to increase the concentration of fence-line monitors and community sensors in EJ Neighborhoods. (CDPH)
- Implement a process that provides more detail to enable **tracking the City's response to non-emergency complaints**, including those related to odor, dust, and air pollution. (CDPH)
- Develop an **electronic emission inventory collection tool** to ensure up-to-date accounting of all emission sources and controls at permitted facilities. (CDPH)
- Make environmental data, including air quality information and cumulative impact indicators, available through **publicly accessible website(s) and dashboard(s)**. (CDPH)
- Develop tools such as **real-time air-dispersion modeling** that assist in the identification of pollution sources impacting local air quality to aid in the investigation of air quality complaints. (CDPH)
- 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. (DPD)

Reduce Transportation Impacts

- Promote **denser, transit-oriented residential development** to reduce reliance on single-occupancy vehicle transportation and reduce greenhouse gas emissions. (DOH)
- Support the creation of a **regional Traffic Demand Management (TDM) program** to reduce traffic congestion, incentivize the use of public transit and bikes, and reduce single-occupancy vehicle trips. (CDOT)
- Prioritize electrification of Commercial Truck Fleet. (CDOT)
- Expand low carbon and shared mobility in Industrial corridors, ensuring access to shared bikes and scooters in EJ Neighborhoods. (CDOT)
- Implement Southwest Industrial Corridor Transportation Study Recommendations: develop freight-Impact reducing street design toolkit; use truck restrictions where needed; manage truck parking and idling; expand the 3-1-1 system for truck complaints; incorporate emission reduction goals into transportation planning and programming; and establish freight health metrics with CDPH. (CDOT)

Strengthen Regulation and Enforcement

- Develop **standard and special conditions** to attach to air quality pollution control permits and certificates of operation, beginning with facilities with higher impacts in EJ Neighborhoods. (CDPH)
- Create new and updated **industry-specific operational rules** for higher impact facilities, building on prior recent regulations for large recyclers, rock crushers, and bulk material facilities, which include strong provisions for public participation. (CDPH)
- Adopt a **compliance history review policy** for certain higher impact facilities that describes the factors CDPH will consider in making permit decisions on the basis of non-compliance. (CDPH)
- Update **guidelines for inspection and enforcement activities** to prioritize higher impact facilities located in Environmental Justice Neighborhoods. (CDPH)
- Continue to **require traffic studies** that verify trip generation from development types that are subject to the air quality zoning ordinance. (CDOT)

Expand Community Involvement in Decision-Making

- Continue to provide residents of EJ Neighborhoods with **notice and increased opportunity to participate** in decision-making through the following actions: continue to **update the CDPH website** with details about permit actions; apply new, **expanded public engagement guidelines**; and maintain a system by which community members can **register for email notifications**. (CDPH)
- Deepen commitment to engaging community in housing issues, including involving communities in critical conversations about housing development, affordability, gentrification, and neighborhood investment. (DOH)
- Initiate **review of community engagement standards for planned developments** as implementation step for the 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**. (DPD)

Increase Benefits for Environmental Justice Communities

- 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 EJ Neighborhoods. (DPD)
- Continue to increase and maintain arterial tree planting and median landscaping (CDOT)
- Extension of **MWRD TARP tunnel system as well as over 60 miles of local sewer improvement projects** to alleviate overburdened sewers during storm events. (DWM)
- Expand residential organic collection & waste diversion programming to divert waste from landfills.
- Continue to **recruit GreenCorps members** from EJ Neighborhoods and focus on **vacant lot rehabilitation** in these areas. (CDOT)
- Improve responsiveness to smart light requests which provides more efficient and more reliable lighting (CDOT)
- Deepen 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. (DOH)

Enhance Community Protections

- 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. (DPD)
- Utilize historical environmental review data from the Vacant Lot Reduction Program to prioritize **additional investigation and potential sampling of City-owned vacant lots** in EJ communities. (AIS)
- Utilize existing authority to **conduct environmental reviews of City activities and programs**, determine ability to expand current scope to add departments, programs, and environmental justice. Potential to engage the community in developing criteria, process and data requirements and monitoring success. (AIS)
- Implement enhanced process for **evaluation of proposed sites for multi-family developments**, including the evaluation of environmental justice risks, in coordination with related departments. (DOH)
- 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. (DOH)
- Fund organizations to provide city-wide capacity building related to climate resiliency, environmental justice, housing, and transit equity. (DOH)
- Add provisions in City contracts to **reduce community impacts of asphalt plants** by distributing the burden to larger geographic area and requiring emissions control implementation plan for odors. (CDOT)

Proactive Pollution Prevention

- Find long term solutions to maintaining and installing water management infrastructure without requiring the removal of mature high % canopy trees. (DSS)
- Expand/revise the Landscape Ordinance to include more rigorous **landscaping/environmental protection requirements for industrial properties**, while also re-examining the current requirements for all properties covered by the ordinance to ensure **green space** is included whenever possible. (DSS)
- **Propose updates to the Calumet Design Guidelines**, which will include a robust engagement process, with a focus on addressing the negative impacts of air and noise pollution. After completion of the Calumet guidelines, develop an approach for site guidelines for other industrial corridors in EJ Neighborhoods. (DPD)
- 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. (DPD)
- Plan to implement **Commercial Waste Franchise Zoning** that will establish assigned areas and then create (semi-) exclusive long-term contracts with a hauler(s) within each zone. Municipalities typically require haulers to abide by stringent regulations that promote a reduced environmental footprint and transparent business practices. (DSS)
- Pass **Extended Producer Responsibility (EPR) Packaging and Paper Products** legislation for Illinois that 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. (DSS)