



CITY OF CHICAGO **2023 EJ ACTION PLAN**

CUMULATIVE IMPACT ASSESSMENT



INTRODUCTION



Chicago’s 2023 Environmental Justice Action Plan (“EJ Action Plan”) is the first of its kind for Chicago, representing our commitment to environmental justice and equity by identifying specific goals and actions that the City will take to address the impacts from cumulative exposures in certain neighborhoods. Compiled jointly by the Office of Climate and Environmental Equity (OCEE) and the Chicago Department of Public Health (CDPH), the EJ Action Plan reflects data and input from 10 City departments that have authorities and make decisions that affect the environment, community organizations, local residents and technical experts.

Historically, the myth about environmental justice has sometimes been that it’s “just” an environmental issue or “just” a public health issue. In reality, environmental justice involves a combination of factors – from transportation, to housing, to health, to environment, to energy and climate, buildings, permits, policies and laws,

enforcement and more. Solutions, therefore, require fundamental shifts in how the City of Chicago conducts its business – from budgeting and resource allocation, to program design and service delivery, to policy and process changes. And that’s where we are today. The EJ Action Plan sets a course for City agencies to work together with nonprofit and community-based organizations, academic institutions, businesses/industry and others to address environmental and climate justice issues in a holistic way. Our efforts are focused on improving conditions that affect people’s health and quality of life, especially in low-income areas and communities of color.

The EJ Action Plan is one deliverable of the citywide Cumulative Impact Assessment. The Assessment was a comprehensive, community co-led effort that included collection and analysis of scientific data, as well as qualitative data and community input, to prepare a report that details how environmental, health and social-demographic factors vary across Chicago. The main outcomes of the Cumulative Impact Assessment were to: (1) identify neighborhoods that experience the most combined negative impacts, and (2) recommend actions needed to address those impacts and make sure that future decisions and policies will not result in more harm to these neighborhoods. The full Cumulative Impact Assessment is available on the City’s website:

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

The City considers this EJ Action Plan to be a “living document” that will be regularly updated to reflect ongoing community input, policy and technological advancements, and data collection efforts.

The Environmental Justice Movement

The concept of Environmental Justice (EJ) - in Chicago and nationally - started as a grassroots movement, with communities and civil rights leaders bringing attention to unsafe conditions affecting low-income areas and communities of color. For many years, they advocated for justice and pushed for change. As a result of a 1987 report that documented real injustices in communities on a national scale, government agencies started paying attention. The federal government has since taken action through Executive Orders issued under Presidents Clinton (1994) and Biden (2021).

For years, Chicago’s EJ organizations and community members have voiced concerns about the compounded, cumulative effects of industrial development on residents’ health and quality of life, particularly for people living in low-income areas and communities of color. Chicago has been among the cities leading the charge to make EJ a focal point. This is evident in how Chicago is committing resources to identify and address the causes of environmental and climate injustice through policy changes and better enforcement of existing laws, ordinances, and regulations, while it also considers new policies, procedures and activities that could be implemented.

Recent progress on environmental justice movement in Chicago

- **2020:** CDPH publishes *Air Quality and Health Report*, the first time the City attempts to characterize the combined impacts of air pollution, health and social stressors
- **2020:** City makes \$188 million investment in climate and environmental justice through Chicago Recovery Plan
- **2021:** City of Chicago launches the Environmental Equity Working Group to create a collaborative space for community representatives, environmental leaders, and local organizations to provide strategic counsel and advice on Chicago’s environmental initiatives
- **2021:** City of Chicago forms an Office of Climate & Environmental Equity and an Office of Equity & Racial Justice
- **2022:** Chicago’s *Climate Action Plan* and *We Will Chicago* comprehensive plan focus on reducing pollution and achieving equity
- **2022:** Chicago’s Office of Climate & Environmental Equity and Department of Public Health begin working in partnership with others on Chicago’s Cumulative Impact Assessment
- **2023:** Executive Order 2023-3 is issued, advancing Chicago’s Commitment to environmental justice for all Chicagoans
- **2023:** City of Chicago executes a Voluntary Compliance Agreement with the federal Department of Housing & Urban Development to resolve a civil rights complaint alleging that, “City actions and policies shifted polluting activities from predominantly white neighborhoods to predominantly Black and Hispanic neighborhoods that were known to the City to be overburdened by environmental hazards”

INTERDEPARTMENTAL ENVIRONMENTAL JUSTICE WORK GROUP



FOUNDING PARTICIPANTS (since Feb 2023)

- Office of Climate & Environmental Equity
- Department of Public Health
- Department of Assets, Information & Services
- Department of Housing
- Department of Planning & Development
- Department of Streets & Sanitation
- Department of Transportation
- Department of Water Management



NEW PARTICIPANTS (as of June 2023)

- Department of Buildings
- Department of Procurement Services

The Interdepartmental Environmental Justice Work Group (“Interdepartmental EJ Work Group”) was formed in March 2023 by the OCEE and CDPH to ensure that all City departments are working together to promote environmental justice by identifying and addressing inequities.

The Interdepartmental EJ Work Group is a shared space for City departments to:

- Review citywide and neighborhood level impact data, including lived experience
- Examine City policies that contribute to cumulative impacts
- Develop a vision and framework to promote EJ across departments and with people from EJ neighborhoods
- Identify and solve potential barriers to collaboration to enable City-wide action
- Pursue immediate and longer-term strategies to reduce burdens and promote benefits for EJ neighborhoods
- Consistently track and publicly report on progress toward EJ goals

An Executive Order (2023-3) formalized the Interdepartmental EJ Work Group to lead and coordinate City-wide EJ strategy going forward. The Executive Order directs the Interdepartmental EJ Work Group to: (1) identify actions within the scope of each department’s authority to promote environmental justice and address cumulative impacts; (2) produce an EJ Action Plan by September 1, 2023, that outlines the City departments’ respective commitments to reform internal policies, programs, and practices to better protect neighborhoods from combined negative environmental impacts; (3) seek public input on the EJ Action Plan and formally respond to comments received; and (4) publish a report by December 31, 2023, and on an annual basis thereafter, to share updates on progress toward the goals listed in the EJ Action Plan.

Over the course of seven months and nine meetings, the Interdepartmental EJ Work Group has made significant progress on these important steps.

Building Knowledge Base for EJ Work Group Members

As a first step upon formation of the EJ Work Group, City departments had an opportunity to learn about environmental justice and cumulative impacts through a variety of sources, including:

- **Presentation from Alan Walts, Director of Tribal and Multimedia Programs, U.S. Environmental Protection Agency Region 5**, about environmental justice efforts on the national and regional level – specifically, the release of the 2023 Executive Order on Further Advancing Racial Equity and Support for Underserved Communities Through The Federal Government, the 2022 update on EPA’s Legal Tools to Advance Environmental Justice document, and the White House’s Justice40 Initiative, which calls for “40 percent of the overall benefits of certain Federal investments [to] flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution.”
- **Presentation from Olga Bautista, Executive Director of the Southeast Environmental Task Force**, who provided a community voice and perspective on the progress made by community groups working together on environmental justice issues.
- Preview of how **local data** on indicators of environmental pollution, health outcomes, and social factors reflect cumulative impacts.
- Discussion of **community input** previously collected through City processes, including written narratives and testimonials from local residents, as described in the [Initial Community Input Summary](#).

Alignment on City of Chicago Environmental Justice Goal

Through a process of discussion, theming, reflection and refinement, EJ Work Group then developed a goal statement to guide the City’s ongoing efforts:

ENVIRONMENTAL JUSTICE GOAL

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



EJ ACTION PLAN DEVELOPMENT

EJ Work Group members referred to the EJ Goal as they proceeded to work on the City's EJ Action Plan. First, each member reviewed their department's authority, based on existing laws and policies, to improve the environment, health, and quality of life in low-income areas and communities of color. Departments then considered strategies to improve conditions and prevent future harms.

After individually identifying opportunities and discussing these with other members to get feedback, each department was asked to refine strategies for inclusion in the EJ Action Plan. These strategies represent improvements to their department's policies, processes, and practices to promote environmental justice.

OCEE and CDPH collaborated to create a template that each department would use to outline their strategy. To ensure that departments kept environmental justice principles in mind as they were planning, the template adapted elements and guiding questions from the City of Chicago's Racial Equity Action Plan (REAP) and Equity Decision Support Tool (currently in development by CDPH's Health Equity in All Policies Team) – including questions to help departments evaluate benefits and burdens, prioritize access and opportunities for groups who have the greatest need, and commit to engaging the community in co-creating solutions. Departments also named other departments they would need to collaborate with to execute the proposed improvements, and described how the results would be measured to track whether improvements were made over time.



The EJ Action Plan Strategy Template is shown on the following page.

OCEE and CDPH supported EJ Work Group members to plan out their strategies by holding individual “office hours” sessions to review draft EJ Action Plans. Time was also allocated during an EJ Work Group meeting for peer discussion of the department-specific strategies to exchange feedback.

ENVIRONMENTAL JUSTICE ACTION PLAN STRATEGY TEMPLATE

Department Name

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?

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?

SUPPORTING DEPARTMENT(S):

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

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?

ACTION STEPS	TIMELINE	STATUS
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.	Note when this step is targeted to be completed	Note any progress to date

COMMUNITY INPUT & RESPONSE

COMMUNITY INPUT:

Summarize community input you received on this strategy. What were the suggestions to change or expand upon your original proposal?

RESPONSE TO COMMUNITY INPUT:

Describe how you updated the proposal in response to feedback. If you were not able to incorporate a proposed change, explain that decision as clearly and possible.

COMMUNITY INPUT AND INVOLVEMENT

Community input and involvement has been a central part of the Cumulative Impact Assessment process and development of the City's EJ Action Plan. A variety of approaches were used to collect information and gain a better understanding of the community's needs, concerns, questions and requests. Data from past efforts to collect community input were combined with current community engagements to ensure that the recommendations are responsive to community needs.

City departments received initial community input to help identify and develop potential strategies.

Before drafting their strategies, each department was provided with information from the [Initial Community Input Summary](#). Interdepartmental EJ Work Group members were instructed to take this input into account while developing proposed changes and evaluating potential benefits. Prior to publishing the draft EJ Action Plan, EJ community members who co-chair and serve on one or more of the Assessment project work groups were invited to attend an Interdepartmental EJ Work Group meeting to review and discuss proposed strategies. Based on their feedback, each department revised their draft plans to address the issues and concerns raised.

From April through August 2023, a combination of methods were used to collect community input on EJ Action Plan strategies, including:

In-person and online events with community members scheduled and co-hosted by CDPH and local community organizations:

- **April 27** - online (virtual event) with Mayor's Youth Commission
- **June 17** - information table at Eco Fest
- **July 12** - in-person community meeting in Pullman
- **July 15** - information table at community block party
- **July 22** - information table at community block party
- **July 27-30** - information table at Fiesta del Sol
- **August 2** - in-person community meeting in Austin
- **August 9** - in-person community meeting in McKinley Park

Meetings hosted by CDPH with community members representing business and industry:

- **July 13, 2023** - virtual meeting
- **July 27, 2023** - virtual meeting

Online engagement (comments and feedback form):

- Public comment period open from **June 29** to **July 31, 2023**, to submit comments and questions on the Assessment process and the draft report.

Departments participated in “deep dive” sessions with EEWG members.

To ensure that EEWG members had an opportunity to engage directly with departments on their EJ Action Plans, the OCEE facilitated a “deep dive” session in August 2023 between representatives of the EEWG and departments they identified for further discussion, including the Departments of Planning and Development, Transportation, and Water Management. During the session, department staff provided more details about their strategies and then EEWG participants shared additional subject matter expertise and insights into community needs.

Departments incorporate feedback into final plans.

Departments received summarized feedback from all community engagements to incorporate into their final plans. In August 2023, community input was compiled and analyzed using the following process:

1. Compiled all written comments and feedback word-for-word (online and in-person written comments) in a spreadsheet.
2. Compiled all notes from dialogue, discussion, and verbal comments shared within in-person engagement sessions and tabling events.
3. Established topical “codes” or categories and coded both the written comments and notes from verbal discussion.
4. Shared the sorted written and verbal comments with working group co-chairs and additional City or consultant colleagues, and advised on how to incorporate community input into final Assessment deliverables.
5. Worked with City co-chairs (and in most cases, community co-chairs) to develop summary takeaways and recommendations for each set of deliverables.

For a full discussion of community input received during the assessment phase and provided to departments, see **EJ Action Plan Community Input Overview**. Interdepartmental EJ Work Group members used this information to refine, expand, and update their strategies, as described in each individual EJ Action Plan strategy writeup.



SPECIFIC PLANS BY CITY DEPARTMENTS

This section summarizes the strategies developed by City departments for the EJ Action Plan. Collectively, these efforts to reform policies, processes, and practices move the City toward its Environmental Justice Goal. The complete writeup for each strategy is provided at [Chicago.gov/cumulativeimpact](https://www.chicago.gov/cumulativeimpact) (see [EJ Action Plan Strategies](#)).

Improve Data Collection, Reporting & Transparency

Current Commitments:

- Expand the City's **community air monitoring network** (which is a collection of locations where air quality is measured), to increase the concentration of fence-line monitors and sensors in Environmental Justice Neighborhoods (fence-line is a term used to describe communities in close proximity to pollution sources). (CDPH)
- Implement a process to **track the City's response to non-emergency complaints** (that is, those that do not require an immediate response), including those related to odor, dust, and air pollution. (CDPH)
- Develop an **electronic emission inventory collection tool**, which would be an online method to measure and track air quality. This would provide up-to-date information and tracking of all emission sources (meaning, all sources of air output) and emission controls (meaning, all sources to prevent or control air output) at permitted facilities. (CDPH)
- Make environmental **data available to the public online**, including air quality information and cumulative impact indicators (or measurements of combined indicators of potential health hazards). (CDPH)
- Develop tools to predict the spread of air quality using existing data (often referred to as **real-time air-dispersion modeling**). These tools would assist in identifying pollution sources and investigating air quality complaints. (CDPH)
- Continue to maintain **dedicated webpages** for the City's land use plans and initiatives. (DPD)

For Future Development: City departments will evaluate and update how and where data on air, water, and land is captured, and continue to provide information on City-owned assets including websites.

Reduce Transportation Impacts

Current Commitments:

- **Promote public transit** in more congested areas and in dense, residential areas to reduce reliance on single-occupancy vehicles and reduce greenhouse gas emissions. (CDOT)

- Support the creation of a **regional program** to reduce traffic congestion, provide incentives for using public transit and bikes, and reduce single-occupancy vehicle trips. (CDOT)
- Convert existing commercial vehicles to electric power (which is referred to as the **Commercial Fleet Electrification Program**). (CDOT)
- Lower carbon emissions in areas with more industrial facilities, by **encouraging shared transportation and access to shared bikes and scooters** in EJ neighborhoods (such as, bike network planning in Brighton Park, Gage Park, McKinley Park, Little Village). (CDOT)
- Implement the recommendations from the “Southwest Industrial Corridor Transportation Study,” to minimize the impact of trucks and heavy vehicles on streets, restrict truck traffic, manage truck parking and idling, expand the 3-1-1 system for truck complaints; incorporate **emission reduction goals into transportation planning; and establish freight health metrics** (that is, measurement factor to assess the impact of heavy vehicles on health). (CDOT)

For Future Development: City departments will consider ways to increase and improve bike and pedestrian infrastructure and ways to minimize impacts from truck emissions, including a path for truck electrification, low-carbon micro mobility, and low-emission zones.

Expand Community Involvement in Decision-Making

Current Commitments:

- Continue to notify residents **and provide increased opportunity for community participation** 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**. In parallel, continue to invest in expanding capacity for meaningful and timely community engagement. (DOH)
- Initiate a **review of community engagement standards for planned development** in accordance with the *We Will Chicago* citywide framework plan. This review process will include updates to internal checklists, materials required of applicants and possible enhancements to public meeting notices. (DPD)

For Future Development: City departments will continue to make adjustments and improvements by which community input and participation occurs in a decision process and move towards proactive engagement earlier in processes.

Increase Benefits for Environmental Justice Communities

Current Commitments:

- Propose **amendments to the Industrial Corridor System Fund Ordinance** (MCC 16-8-010) to allow funds generated by development in “conversion corridors” to be used in “receiving corridors” to address environmental impacts from existing and new industrial developments. Prioritize funds for use in neighborhoods with environmental justice concerns. (DPD)
- **Plant more trees** on through or side roads, and conduct more landscaping and median maintenance to keep the natural areas between and around roads in good shape. (CDOT)
- Work with other agencies to **extend the Tunnel and Reservoir Plan (TARP) system**, which was designed to reduce flooding and pollution caused by sewer overflows. Also extend over 60 miles of local sewer improvement projects to alleviate sewer overflows during storm events. (DWM)
- Expand residential waste collection program to **increase organic waste collection** and reduce waste sent to landfills. (DSS)
- Continue to recruit GreenCorps Program participants from neighborhoods with environmental justice concerns, and focus on **reviving vacant lots** in those neighborhoods. (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)
- Fund organizations to provide **city-wide capacity building** related to climate resiliency, environmental justice, housing, and transit equity (fair access to transit by everyone). (DOH)

For Future Development: City departments will evaluate how the Industrial Corridor System Fund’s designation of receiving corridors and conversion corridors aligns with environmental justice commitments.

Change Where and How Development Happens

Current Commitments:

- **Propose updated 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)
- Use historical environmental review data from the Vacant Lot Reduction Program (which aims to make empty lots productive again) to prioritize **additional investigation and potential sampling of City-owned vacant lots** in communities with environmental justice concerns. (AIS)

- Use existing authority to **conduct environmental reviews of City activities and programs**, and determine the department’s ability to expand its scope to include greater emphasis on environmental justice. Also assess ways to engage the community in developing environmental criteria 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)
- Enhance the **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)

For Future Development:

Additional Pollution Mitigations

Current Commitments:

- **Enforce provisions in City contracts for asphalt plants** (that is, facilities that make road paving materials), to reduce negative impacts to neighborhoods and require greater measures to control air emissions and odor. (CDOT, CDPH, DPS)
- Require City Departments to **identify projects that could present environmental impacts in EJ Neighborhoods during the procurement (purchasing) process**, triggering further review and steps to mitigate potential threats before awarding contracts. (DPS)
- Find long-term solutions for maintaining and installing water management infrastructure (for example, water pipelines) **without requiring the removal of mature canopy trees** (or older trees that provide shading over large areas). (DSS)
- Expand and revise the Landscape Ordinance to include more rigorous **landscaping and environmental protection requirements for industrial properties**. Also re-examine 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**, to include a robust community 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 guidelines for other industrial corridors in neighborhoods with environmental justice concerns. (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 reduce negative impacts of industrial projects on surrounding communities. (DPD)

- Implement **Commercial Waste Franchise Zoning**, which will establish assigned waste areas and create (semi-) exclusive long-term contracts with waste 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)
- Support **“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)

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

Strengthen Regulation and Enforcement

Current Commitments:

- Develop **standard and special conditions** (or criteria) for air quality pollution control permits and certificates of operation, where operations may impact neighborhoods with environmental justice concerns. Begin with large industrial operations. (CDPH)
- Create **new and updated industry-specific operational rules** (or guidelines) for certain facilities, such as large recyclers, rock crushers, and bulk material facilities, and include strong provisions for public participation. (CDPH)
- Adopt a **policy that describes factors that will be considered in making permit decisions**, based on facilities’ history and past non-compliance. (CDPH)
- Update **guidelines for inspection and enforcement activities** and prioritize large and significant industries located in neighborhoods with environmental justice concerns. (CDPH)
- Under the Air Quality ordinance enforcement, **review traffic studies and verify that trip generation is accurate**. (CDOT)

For Future Development: City departments will consider ways to improve response time to 3-1-1 non-emergency complaints.

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

NEXT STEPS & CONTINUING ACCOUNTABILITY

The City is committed to implementing the strategies described in the EJ Action Plan in close partnership with the people who live in EJ neighborhoods. We will monitor progress on each strategy to hold City departments accountable, as well as to measure progress toward achieving City-wide goals to achieve environmental and racial justice and equity.

Expand Interdepartmental Coordination

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

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

Advance EJ Action Plan Strategies

Departments will continue community engagement in the planning, implementation, and evaluation of the EJ Action Plan, as described in their individual strategy writeups. OCEE, CDPH and EEWG will provide departments with general training, /capacity building and/or assistance to enhance their engagement practices, as well as offering more targeted support as needed to co-design and co-lead strategies with community partners. Departments will be encouraged to align their EJ Action Plan efforts with activities under way through their Racial Equity Action Plans, and to apply the forthcoming Equity Decision Support Tool to further inform their approach

Additionally, the City considers this EJ Action Plan to be a “living document” that will be regularly updated to reflect ongoing community input and data collection efforts. As previously described, public input during the assessment phase yielded several ideas for additional strategies that City departments could pursue to advance environmental justice. It is the City’s intention for departments to add new strategies over time in consultation with the EEWG. All updates to this document, as well as data used to develop the cumulative impacts report and related indicators, will be made available to the public.

Ensure Accountability

The Interdepartmental EJ Work Group will transparently track and measure progress on the EJ Action Plan. Consistent with the terms of the EJ Executive Order and HUD Voluntary Compliance Agreement, the City will publish a report by December 31, 2023, and on an annual basis thereafter, to detail

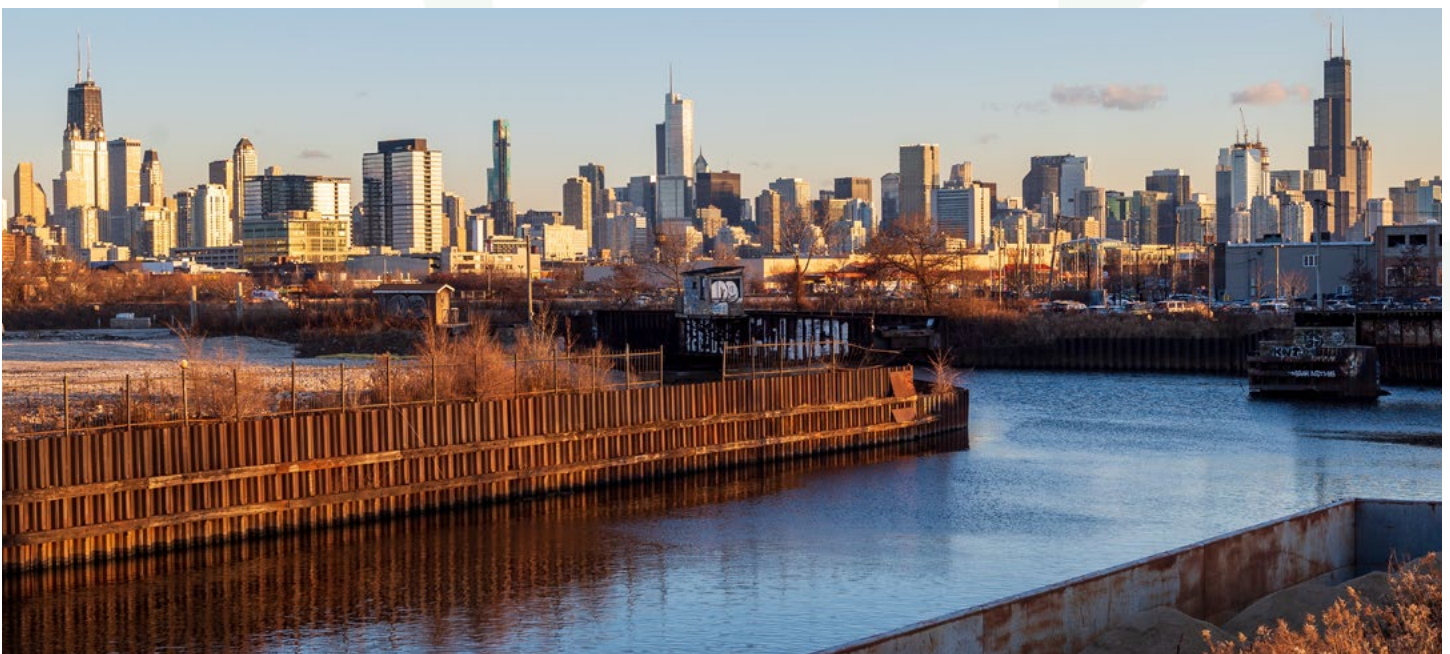
progress toward the strategies outlined in the EJ Action Plan. The annual report will be presented to and reviewed by the City Council Committee on Environmental Protection and Energy. Additionally, the EEWG and/or any formally approved community advisory body may request a verbal report on progress on a quarterly basis to ensure ongoing accountability.

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

Build out City-wide Environmental Justice Program

The Chief Sustainability Officer has appointed an Environmental Justice Project Manager who will coordinate closely with the Interdepartmental EJ Work Group and EEWG to develop standard policies and operations to advance environmental justice and equity across departments, including:

- An enhanced notification process so that residents of neighborhoods in areas with environmental justice concerns have greater awareness of land use/zoning, permitting, and enforcement activities.
- A public participation policy, including a language access plan, with clear standards for community outreach, public meetings, and hearings.
- A procedure by which residents can raise complaints of discrimination based on race, color, national origin, religion, disability, income, age, or gender.



CONCLUSION

As Hazel Johnson, an environmental activist from the South Side of Chicago widely hailed as a founder of the national environmental justice movement told the Chicago Tribune in 1995, “If we want a safe environment for our children and grandchildren, we must clean up our act, no matter how hard a task it might be.”

The Office of Climate & Environmental Equity, Chicago Department of Public Health, and EJ Work Group are proud to release Chicago’s first Environmental Justice Action Plan. These reforms to our City departments’ internal policies, programs, and practices are an important output from the Cumulative Impact Assessment, which also includes data and maps that identify our city’s EJ neighborhoods, as well as recommendations for a proposed ordinance to achieve EJ and cumulative impacts policy reforms. Collectively, these steps will reduce burdens from combined environmental, health, and social stressors; increase direct benefits; and build power for the people who live EJ neighborhoods to participate in the decisions that affect them.

While the City acknowledges this will be a hard task, we commit to doing the work.



APPENDIX A: COMMUNITY INPUT FOR EJ ACTION PLAN

Below is a compilation of comments that were submitted by community members and businesses as part of the Cumulative Impact Assessment. While City Departments reviewed the submissions to inform their EJ Action Plan strategies, their consideration of public feedback and the reporting of it in this document does not constitute an agreement with or endorsement by the City of any specific assertions. For a full discussion of community input received during the assessment process, see the [Summary of Input Provided During Assessment](#).

Overview of comments received from members of the Mayor's Youth Council during an event on April 27, 2023:

When asked what was most important to them, youth participants provided the following responses:

- Safety, especially on public transit
- After school resources and programs
- Summer events and block parties
- Legislation that makes environmental justice a priority
- Community meetings, discussions and getting citizens more involved
- Continuing to inform and engage youth in discussions and decisions about their communities
- Providing information via multiple channels including social media, newsletters, email lists
- Providing incentives for youth participation

Overview of requests and comments submitted by community members, grouped by major themes:

Health and environment

- Identify which neighborhoods bear the greatest burdens from environmental hazards and related health effects, both historically and present.
- Specify the types of environmental threats those neighborhoods face, and whether the threats are a result of past or present/ongoing activities.
- In addition to health threats, identify/describe the other threats that are posed to the quality of life for people living in the most burdened neighborhoods.
- Need more health solutions to address health problems in overburdened areas. Address pollution from diesel trucks and car traffic, and pollution control along the expressways.
- Re-think expressways and highways going through the middle of the city and along Lake Shore Drive because it makes the lake and neighborhoods less enjoyable and increases stress due to noise and air pollution.

- Need to address students' exposure to environmental hazards in school and prioritize funding for repairs or replacement of outdated school buildings to ensure that students in low-income areas and communities of color have access to healthy schools.
- Need to address the issue of violence in neighborhoods and its contribution to stress, health problems, and decreased quality of life.
- Smells are a problem. We report smells but it doesn't make sense that there is a permitting process but no inspector when there are smells. I'm tired of reacting vs preventing. It's not right.
- The Dept of Transportation's draft EJ Action Plan includes projects that are already completed or irrelevant, and lacks clear objectives.
- In Illinois, vehicle emissions are the largest source of air pollution. These impacts are not evenly distributed. CDOT needs to fundamentally shift priorities away from traffic flow towards traffic reduction.
- CDOT must prioritize the health and safety of environmental justice communities and non-drivers over convenient driving.
- The Dept of Procurement's draft EJ Action Plan fails to acknowledge their role in facilitating harm experienced by environmental justice communities as a result of city contracting. The reality is that they have failed to use the tools already at their disposal. For example, asphalt and road work contracts issued previous to the revisions made in 2022 already contained some strong language regarding environmental compliance.

Community input and engagement process:

- Need more meaningful, community-driven decision-making. Involve the community and listen to their input before decisions are made (address perception of community input after things are a "done deal").
- Provide more opportunities for community voices to be heard in zoning reform, zoning decisions and environmental improvement projects.
- Include opportunities for all residents to be heard, not just those who represent community or environmental organizations. Would like to see residents, politicians, and subject matter experts working together more to address problems.
- Would like to see less emphasis on Advisory Groups made up of people representing their corporation or organization's interest instead of the community's collective interests.
- Need to inform and educate people before asking for their input. People need to be aware of the issues first.
- Need education so people can make better decisions for themselves. For example, just because something "looks" clean doesn't mean it's safe, especially when it comes to lead contamination.
- Need training sessions to educate residents on environmental hazards and ways to protect themselves.
- Need to clarify terminology – what is "good" industry? "bad" industry? Not all industry is bad.

- Need to use a variety of methods to reach people – online, mailing lists, community ambassadors. And share information in places where people go – churches, schools, parks.
- There needs to be better follow up. Don't just ask people for input. What happens after that?
- Need to include and reach out to seniors. They are not tech savvy. Consider things like "wellness checks" to make sure seniors have the information needed with respect to their health and safety.
- Consider the reality that people who have to work (often more than 1 job), are left out of meetings like this. Their voices matter too. Consider ways to reach people who may never attend a meeting.
- Consider meetings where people are at – work, school.
- Simplify the language. And include other languages to reach the affected populations (Spanish, Polish, and others).
- Use more visuals and infographics, for visual learners.
- Consider using "cultural ambassadors" to help with ways to reach people.
- Utilize physical mailings, and television/news channels to make announcements and share information. Monthly mailings would be nice.

Data collection and use:

- Need more transparency, in terms of the criteria and data used to make decisions.
- Need to establish contamination exposure standards and randomly test air, water, and soil to determine exposure and hazards posed to residents. Issue fines to polluters if/when levels are above the allowable limits.
- Need a system for reporting environmental information. Could be an app people can use, to report smells and potential violations. Or, a phone number people can call (other than 311).
- People don't trust 311 because of a lack of follow up. Also, by the time investigators are sent to respond, it's too late.
- Need to consider multiple exposures. For example, lead at school as well as at home. Are impacts to children at schools being considered?
- Data collected needs to reflect, or be intertwined with, what's actually happening in the communities. Communities need to be able to tell their own stories and influence the assessment.
- Train community members to conduct monitoring and read the data. (Example: [A facility] had several violations, and community members were part of an enforcement program where they were trained and given 24/7 access to the facility to monitor operations.)
- Information regarding data and methods needs to be simplified.
- On "pre-filled data sites," our community in Altgeld Gardens is misrepresented and the data isn't real because our zip code mixes with Riverdale. During Covid, the data for our

community was misrepresented, so we didn't get the help we need. By us living in a toxic donut, the data should be raw data based on existing residents that breathe the air, rather than statistics. Unless you go into the communities, from a boots on the ground perspective, you don't see the big picture.

- Install air monitors inside and outside of every school. There is existing research on diesel and particulate matter from trucks and cars – why are there still schools and communities near heavily impacted areas? We want industry to fund this monitoring, and also be subject to tickets and fines.
- What about communities that are left out of the mapping? There needs to be a process for considering them too.
- Provide resources and training for community members to interpret data.
- CDOT needs to specifically prioritize safer, slower, calmer streets that are accessible to people walking, biking, and busing. To do this, CDOT will need to improve data collection and reporting. Develop and publish data about the type and location of traffic calming measures. And identify better ways to collect and publish vehicle traffic data, especially truck traffic.
- To reduce carbon emissions, CDOT needs to track and become accountable for the emissions impact of its work.
- Need to have more centralized reporting, tracking, with aggregate maps, and use this in the permitting decisions.

Zoning, planning and enforcement:

- Need stronger commitment to stop systematically moving industry into the poorer, less white neighborhoods.
- Need changes to City zoning and planning practices.
- Need to hold polluting companies responsible and take greater enforcement actions against them.
- Need to emphasize “preventing” the problems more, instead of “reacting” after the problems are created.
- Need to shut down polluters that keep violating the laws.
- If an area is “zoned for industry,” that’s actually part of the problem. Why are areas “zoned for industry”?
- Please explain the process for getting a permit, and for zoning. We can't provide input if we don't know how it works.
- Need to look at proximity to schools, as well as existing impacts. Children shouldn't have to be exposed to air pollution from truck traffic and industry near their schools.
- How we talk about development is important. A “receiving corridor” designation means that other areas no longer want industry and they send them to our neighborhood. It seems like the permit process is intended for businesses, not for residents.

- Need to have more centralized reporting, tracking, with aggregate maps, and use this in the permitting decisions – “if you don’t have these things, you don’t pass go.”
- There needs to be more transparency. Put zoning information online and make it easily available to the public. Be responsible about the statements you make. Zoning has caused many of the problems, but industry is often attacked when they may not be responsible.
- There needs to be a transparent scorecard for tracking enforcement actions.
- There is bad air quality and unemployment in the “red zone”. One suggestion is to look at OSHA and labor violations as part of the permitting process. The community has been trying to raise issues to the state level so that companies just can’t move out to the suburbs.
- Facilities violating air quality ordinances or permits should be required to conduct fenceline monitoring for a minimum of 1 year.
- A limit should be set on the number of facilities requiring air permits in any one corridor; set limits based on the number of tons of emissions allowable or type of emissions.
- The Dept of Procurement Services has clear and unambiguous powers that have gone completely unexercised. During the budget hearings in October 2022, DPS advised city council that they did not directly monitor the environmental compliance status of any city contractors, and relied upon CDPH to proactively communicate any such issues. Council then asked Dr Allison Arwady, at that time the commissioner of CDPH, if the department communicated with DPS about environmental noncompliance by city contractors; Dr Arwady responded that “I think it’s a good point [...] I think it’s an interesting thought.” DPS needs to own their role in the administration of city contracts, take responsibility for the environmental harm that has resulted from it, and seek to actively address that harm through their own process.
- Suggestions for DPS: Implement a process of standard environmental compliance review; collect and publish vendor compliance data; use existing powers to enforce environmental contract provisions; and require city projects to estimate their emissions impact.

Community investment and improvements:

- Need more investment in overburdened communities, and more “green jobs”
- Provide more funding for park improvements, streetscaping, green alley ways, and other neighborhood improvements.
- Make companies pay fines. There should be a “3 strikes and you’re out” rule.
- Use fines imposed on businesses who violate the rules, for community benefits.
- Companies who operate in communities (especially those with environmental justice concerns) should be required to contribute to parks, green spaces, schools, etc., in those communities.
- Explain the term “community ownership.” Does this mean that residents will get to own the land and receive some type of payment?
- If a fund is established from industry fines, how will that work? Industry should not have a voice in how the funds get distributed. (Example: EPA established a Southeast Task Force fund, but industry had power to choose how funds were used.)

- If land is given back to the community, how will the City make sure the land is “safe”? The land has been contaminated historically, as a result of many industries operating for many years. Who pays to clean it up?
- A lot of industry is in Tax Increment Financing (TIF) districts, and a lot of those businesses use racist staffing agencies who send blacks to the suburbs and Hispanics to the city jobs. They stir up conflict by telling people that other racial groups are taking the job, which is not true.
- There needs to be economic development. We need to continue making steel somewhere. Where can we redirect those impacts from overburdened communities? The signal some companies are getting is, don’t invest in Chicago.
- Could there be direct community benefits like reductions on water bills or taxes in communities with environmental justice concerns and cumulative impacts?
- With the establishment of a fund to help enforce health equity, what does it look like from a medical perspective for residents who are already affected? What’s the plan for continuous support to those communities?
- Will programs like Enterprise Zones continue, and how will that work in terms of environmental justice?

Preliminary list of questions raised by community members:

- What policies or ordinances have been harming (or helping) communities?
- What policies or ordinances will the City be changing to improve conditions in the most impacted neighborhoods?
- How will resources be distributed (or redistributed) to ensure that solutions are implemented in neighborhoods that most need it?
- What will be done to address the lack of investment (or reinvestment) in overburdened neighborhoods?
- This process needs to continue. It shouldn’t be “one and done.” What happens after this, to make sure that environmental justice issues remain a priority, and to engage the community?
- Does the city have a list of local Pastors/churches, block clubs, etc.?
- It’s great to collect all these ideas, but how do we actively help the City do something? There is an education element that needs to happen. We don’t understand why the problems have existed for so long. I had no idea the City has “designated spots” for industry. You (the City) started the problem, so what are you going to do about it, and how can we help support?
- Please consider terminology. Can we remove the label, “receiving corridor?”
- Why is it that operations are moving from the North and Lincoln Park to the south side?
- Is there a way to track which policies are on the books and which ones are ignored?
- Why is [Company] getting city contracts? Why are they being rewarded?

Community members also suggested that other city departments be included in this effort, beyond those who participated in the Interdepartmental Work Group:

- OEMC (Office of Emergency Management & Communications). We need an emergency preparedness and response system, especially in Altgeld Gardens where Arcadia Chemical is located. If there was a terrorist attack or other emergency, it could affect residents in a 3-mile radius. How is the City prepared for this? Altgeld residents are the first to be exposed, and the last to be evacuated.
- Fire Department, Chicago Park District, Chicago Public Schools, and Emergency Response groups need to be involved.
- CTA (Chicago Transit Authority) and RTA (Regional Transit Authority). We need safe, reliable transportation. Why aren't there more electric buses, especially on Central, Cicero, Pulaski and Western.
- MWRD (Metropolitan Water Reclamation District). Sewage and flooding problems need to be addressed.

Written Public Comments Received Online During the Comment Period:

As of the date of this document, approximately 60 people had provided comments using the public comment form on the City's website (<https://chicago.gov/cumulativeimpacts>). They responded to a variety of questions, including the ones summarized below.

What makes a community vulnerable to EJ issues?

- **Most commonly listed:**
 - Presence of toxic chemicals (air pollution, lead, outdoor waste piles)
 - Socioeconomic factors (low income, lack of health insurance, unemployment)
- **Followed by:**
 - Presence of facilities with potential to cause harm (industrial corridors, heavy traffic, railyards)
 - Health Factors like age, pre-existing conditions (like asthma, heart disease)

If the recommended policy changes for enforcement, planning and zoning are implemented successfully, how do you feel the changes would impact your neighborhood?

- **Responses from those saying they most likely won't have an impact:**
 - Pollution downtown is largely ignored due to relative wealth of residents.
 - Even if the recommendations are successfully implemented, a very low bar has been set in attempt to solve a very large and complex issue.
 - The changes wouldn't address harmful pollutants originating from 90/94 E (Kennedy) expressway. Need policies to address air pollution from diesel trucks and cars.

- I'm worried they'll just become boxes that officials check off without really doing them.
- Could lead to my neighborhood getting less resources because we're not as poor.
- his question does not inspire confidence. "IF changes are implemented," breeds criticism of government policies.
- Inequality and mistreatment are inherent to the system we live under, so I have little confidence that the policy changes will promote any meaningful change in the positive direction.
- Responses from those saying they most likely won't have an impact:
 - Could bring greater community awareness and autonomy.
 - Could provide equal access to clean air and better health.
 - If the mayor signs an ordinance requiring the following, then it will have a positive impact (especially in Southeast):
 - Require polluters to reduce toxic emissions
 - Prevent dumping and mining
 - Provide funds to monitor, contain and reclaim supersites, brownfields, and scrap and rail yards
 - If successfully implemented, [Company] would be shut down and no longer operating in McKinley Park.
 - They would create a pathway to ensure City is accountability for promoting and investing in EJ communities.
 - These changes could help those with disabilities lives in safe environments. Reforming zoning policies is crucial.
- To be effective and enforceable, the policies need to have:
 - Minimum standards for pollution, safety, and contamination exposure.
 - Random, routine testing of air, water, soil.
 - Restrictions on new industrial expansion or development.
 - Incentives for industry compliance and substantial fines for noncompliance.
 - City willingness to shut down existing polluters like Sims that keep violating the law.
 - City/policy makers working with and including community members, because they have the on-the-ground knowledge.
 - Polluter fines used for neighborhood improvements.
 - Stronger language. "The city is required to CONSIDER environmental, health, and social stressors in decision-making." The word 'consider' is a very convenient loophole to be exploited whenever it's expedient or financially beneficial to people in power.

'Consideration' has no tangible meaning, process, or oversight. It is not ENFORCEABLE.

- The definition and implementation of “review” and “involvement” and “inclusion” is key and cannot be just words on a page of policy recommendations.

Which of the EJ Action Plan strategies are most important to you?

- ALL of them must be fully implemented by each respective city department, to really make a difference.
- The planning department’s community engagement strategy for planned developments
- The department of public health making data available, and tools such as real-time air-dispersion modeling to identify pollution sources impacting local air quality
- The department of transportation’s Equitable Transit-Oriented Development strategy; making public transit clean, safe and accessible; addressing air quality and noise from traffic. Truck fleet electrification.
- Data sharing from all departments. People need to know what’s happening in their community.
- Air quality ordinance requirements and monitoring.
- Aerial tree planting.
- Strong and resilient vegetative barriers to air and noise pollution.
- Expanded residential organic collection and waste diversion.
- Stormwater management and Tunnel and Reservoir Plan (TARP) extension. Reduction in flood risk reduces weather related stress and negative health impacts associated with flooded basements.
- Cleaning the north branch of the river, adding many trees along Lawrence, and expanding park space.
- Many said “too difficult” or “too much to read.”

How well do the EJ Action Plans meet the City's shared EJ Goal?

- Somewhat meets: 48% (29)
- Fully meets: ~25% (15)
- Barely/minimally meets: ~15% (9)
- Doesn't meet: ~10% (6)
- No response: ~.02% (1)

What needs to be improved for the EJ Action Plans to better meet the goal?

- Stronger commitment to stop systematically moving industry into poorer and less white neighborhoods.
- Restore the Illinois HB4093, "Environmental Justice Act", to protect the health & safety of all citizens irrespective of race, ethnicity, and socioeconomic factors.
- Allocate funding, staffing, and other resources to achieve the goals.
- Listen and stop ignoring people and groups on the Southwest side.
- Improve community engagement overall.
- Incentivize communities to share their input and feedback on City plans, projects, policies.
- Make them easy to understand, with easy mechanisms in place for reporting non-compliance so residents can take part in the improvements.
- Work to make environmental issues better for everyone, not just Black and Latino residents.
- Reduce car-centric transportation and infrastructure. Enhance pedestrian and biking facilities.
- The expansion of shared use mobility in EJ neighborhoods is a nice idea, but it does not address that they are already cost prohibitive for a lot of people.
- Create (or better enforce) noise pollution policy from all vehicles including motorcycles.
- Set deadlines and penalties for missed targets.
- More enforcement of regulations and removal of words like CDPH "will/should consider." Instead, use "must comply" with. Lack of enforcement leads to rule breaking.
- Roll things out swiftly, to address effects of climate change right now.
- Put focus on always improving and never settling for "just okay."
- More could be done on the DPD side
 - Require CBAs from planned developments
 - Use industrial funds for more than just vegetation

- Shut down DPD's River Ecology and Governance Task Force! That ADVISORY group is made up of corporate people who do not have transparent or accountable processes within their own companies.
- Add specific strategies for the long-term development and health of our urban canopy (increase # of trees across the city, and ensure appropriate care).
- Consider the small things that can be done to improve daily life, like more public trash cans.
- Need more community education. Many are misinformed about the benefits of tree planting. Many have robust gardens and don't know lead levels are unsafe for planting.
- Need more specific information on how the community will benefit.
- Need a clear plan of which nonprofits, agencies and organizations will handle the funds to beautify neighborhoods.
- Need to clarify how the departments will work together.
- Need to reinstate the Department of Environment. It is unbelievable and unconscionable that the 3rd largest city in the United States does not have an Environment Department.

Other, general comments from the online written survey:

- "I strongly oppose community advisory organizations taking over decision making. Local community-based advocates are usually representing their EJ related Corporation. They are beholden to their corporate boards and missions. They do not represent the public, cannot be held accountable and in many cases have a conflict of interest. Organizations drive policies that benefit themselves first and foremost. Corporations should not have any more say over what happens in the community than a resident. The Alder is accountable for representing the public interest. We need protocols that elevate resident voice and decision making, not just corporate interests. The City should have a process for accepting public feedback on environmental issues - not just feedback from an advisory board. Existing and new City appointed advisory boards should have processes for public feedback, transparency and accountability to the communities impacted! Public Officials do your job and stop handing it off to your political supporters!!!"
- "I would love to have more community input in these processes, though I do worry about NIMBY-like folks and folks who don't believe these implementations are necessary. Maybe it would be possible to specify different community input events so that they aren't open forums for people to complain and hold up the process for necessary change. A lot of extremely positive environmental work will be an annoyance for some businesses, drivers, and some landlords."
- "These EJ Action Plans are a lot to read and the print is small. Do you have slides or a video or a presentation?"
- "I'm gonna be honest: giving people a 52 page document to review is absolutely a horrible way to conduct engagement. It's not fully clear where or what the strategies are."
- "There needs to be attention paid to the impact of landscaping companies using industrial gas-powered leaf blowers. Many cities are moving toward electric leaf blowers and Chicago needs to do the same."

- “This is an absurd waste of taxpayer money that will cost Chicago jobs. This is not Cleveland in the 1970s. Fix the carjacking problem.”
- “We need green jobs, not [Company].”
- “Often times, the financial and practical considerations of development and industry are thought of as separate from environmental and health concerns but they are all related to the quality of life in neighborhood communities and the larger city.”
- “This whole assessment looks great, but if the City isn’t going to do something about polluters like Sims that keep operating then what’s the point? This whole thing looks like a show to me and other people I have talked to.”
- “Change at the city level happens slowly, but climate change does not give us the luxury of time. These changes need to be implemented quickly. Communities are already suffering with those impact the most are those least able to afford the outcomes.”
- “We also need to stop adding more lanes to our highways. Why are there highways going through the middle of the city?”
- “There absolutely needs to be conversation and action around how invasive/noxious plants and trees are dealt with, and by whom. Specifically....is Metra responsible for the state of the embankments on either side of their railroad tracks?”
- “Make beaches accessible for all”
- “I’m happy to see these issues taken seriously within city government and look forward to following how it is going!”
- “Go door to door with this survey in the impact areas. Post this information on local news everyday 10 times a Day. Broadcast on Radio, Share at High Schools and Colleges, Work place and Hospitals.”
- “Please make sure any community engagement is fully accessible. Countless times, I cannot speak out because the meetings are not physically accessible.”
- “Extend the deadline for comments from July 31st to August 15th or 31st to at least cover the timeframe of the community engagement meetings.”

Comments received from the business community during meetings held on July 13 and 27, 2023:

- The City needs to have a clear industrial policy and better define what “green” and “sustainable” business means.
- I’ve connected with a group of people in various areas and we developed this definition: “a green/sustainable job is supportive of an environmentally sustainable economy. More specifically, a low-carbon economy that mitigates environmental and climate risks. Green jobs are also expected to pay living or prevailing wages and provide a quality of life that protects workers from abuses or exploitation. Green jobs are fair jobs. And, they must be verifiably protective of the health of employees, employers, and local populations.”
- Poor planning and lack of protection for Planned Manufacturing Districts has created

conflicting industrial and residential uses, and a concentration of industry in areas with environmental justice concerns.

- Permitting is a problem. It's very difficult because of all the restrictions.
- Existing businesses (especially small operators) need support and incentives to help minimize impacts to local communities. The current conversation seems to focus on attracting new business, which excludes existing businesses.
- Industry should be recognized as playing a critical role in providing job opportunity and economic growth, including for communities with environmental justice concerns – and this is good for health.
- Industry should be recognized for existing efforts to prevent or minimize environmental and health impacts.
- Additional regulations may discourage new businesses from coming to Chicago; at minimum, rules should be clear and consistently applied, and departments should be coordinating better to help businesses navigate City processes.
- There are some strong examples of businesses voluntarily creating community benefits; however, formal community benefits agreements are not commonly used.
- There is potential to leverage real estate tax incentives and grant-funded programs, to advance environmental justice goals.
- Consider how federal, state, and other programs (such as the "6B program") can be used to assist and provide incentives to local businesses to make requested changes.
- Chicago is a high tax area and any improvements to the 6B program would help.
- Tax credits for making energy efficiency improvements could help.
- Companies want to provide community benefits but don't want to cause problems with Alders or city departments. It gets complicated.
- Need to remove barriers and silos. Have a person or department that acts as an advocate, to help walk us through the process – for example, answer questions regarding a particular building purchase.
- Define the Air Quality Zoning Ordinance. It's so unclear that no one knows what to do. We've talked with many environmental consultants that don't understand it. The requirements are constantly changing, similar to EJ concepts in general.
- We need better notification before zoning changes. We're not notified until decisions are already made. It would be helpful to be able to "weigh in" before decisions are made.
- When putting policies in place, consider whether they are helping or harming, and impacts to the cost of doing business in Chicago.
- Need to clarify the process for rezoning and classifying properties, and whether the industrial corridor fund can be used for environmental improvements.
- Need to view businesses as assets to the community, even if there are negative things

that come along with it. Some industries, like asphalt, need to be centrally located because transport must happen in a limited amount of time.

- The city created the current problem as residential areas started to encroach on industry. Consider the city's role in creating the problem.
- Urged that the City use "reliable" data and "standard processes confirmed by experts" when developing recommendations to address cumulative impacts
- Need clear definitions, guidelines and regulations (for example, solid definitions of terms like "green industry," "sustainable" and "environmental justice"). "Green industry" is difficult to define. I think of [Company] as part of green industry because they recycle.
- There needs to be a policy that supports more industry on the north side.
- Air monitors need to distinguish between dust, dirt, and other things. The southeast side of Chicago does not presently have the most polluted air in the City.
- Have any licensed environmental hygienists been involved in the City's process to collect and analyze data? Hygienists have an unbiased standard that they are required to abide by, in order to protect their license. Without that, it's like having an audit done without a Certified Public Accountant.
- Who has the responsibility of overseeing "green practices" – the City? Industry? Or a third party?