



DEPARTMENT OF PUBLIC HEALTH  
CITY OF CHICAGO

## CDPH GUIDANCE FOR SUBMITTING EFFECTIVE PUBLIC COMMENTS

### Overview

The Chicago Department of Public Health (CDPH) values public input on regulatory actions, such as proposed rules and permit applications for consequential facilities.\* When responding to a CDPH solicitation for written comments, please keep the following guidance in mind.

Comments that express simple support or disagreement with a regulatory action provide general feedback to CDPH. However, a comment that is constructive and provides information that clearly communicates and supports its claims is more likely to have an impact on CDPH decision-making.

These tips are meant to help the public prepare and submit comments that have an impact and help inform CDPH's decision-making process.

### Summary

- Read and understand the regulatory document you are commenting on.
- Be concise but support your claims.
- Base your justification on sound reasoning, scientific evidence, and/or how you will be impacted.
- There is no minimum or maximum length for an effective comment.
- The comment process is not a vote— one well supported comment is often more influential than a thousand form letters. Generally, identical form letters are not the most effective communication and are considered one comment for purposes of impacting CDPH decision-making.
- Learn about proposed regulatory actions and submit comments through CDPH's online comment form, posted on CDPH's [community information webpage](#).

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\* For additional information about public engagement during the permitting process for "consequential facilities," see [CDPH Guidelines Regarding Permitting Process for Consequential Large Recycling Facilities, Reprocessable Construction/Demolition Material Facilities, and Waste Handling Facilities](#).

## Detailed Recommendations

1. Comment periods close at 11:59 p.m. central time on the date comments are due—begin preparing your comment well before the deadline.
2. Clearly identify the issues within the regulatory action on which you are commenting. If you are commenting on a particular word, phrase or sentence, provide the page number and/or paragraph number, as applicable.
3. If a proposed rule or permit raises many issues, do not feel obligated to comment on every issue – select those issues that concern and affect you the most and/or you understand the best.
4. Be concise but support your claims. Explain your views as clearly as possible, avoiding the use of profanity or personal threats. Comments containing threatening language or profanity will be rejected without notice from CDPH.
5. Although CDPH receives and appreciates all sincere comments, constructive comments (either positive or negative) are the most likely to have an influence.
6. If you disagree with a proposed action, feel free to suggest an alternative (including not regulating at all) and include an explanation and/or analysis of how the alternative might meet the same objective or be more effective.
7. The comment process is not a vote. Through the public comment process, CDPH seeks to consider all ideas for the protection of the public, so when crafting a comment, it is important that you adequately explain the reasoning behind your position.
8. Identify credentials and experience that may distinguish your comments from others. If you are commenting in an area in which you have relevant personal or professional experience (i.e., scientist, attorney, local resident, business owner, etc.), say so.
9. CDPH reviewers look for sound science and reasoning in the comments they receive. When possible, support your comment with substantive data, facts, and/or expert opinions. You may also provide personal experience in your comment, as may be appropriate. By supporting your arguments well, you are more likely to influence the department’s decision-making.
10. Consider including examples of how the proposed rule would impact you negatively or positively.
11. As applicable, include the pros and cons and trade-offs of your position and explain them. Your position could consider other points of view and respond to them with facts and sound reasoning.
12. If you are uploading more than one attachment to the comment web form, it is recommend that you use the following file titles:
  - Attachment1\_<insert title of document>
  - Attachment2\_<insert title of document>

- Attachment3\_<insert title of document>

This standardized file naming convention will help department reviewers distinguish your submitted attachments and aid in the comment review process.

13. Keep a copy of your comment in a separate file – this practice helps ensure that you will not lose your comment if you have a problem submitting it using the CDPH online comment form.

## **Posted Comments**

Comments submitted to CDPH, including any personal information that is in the body of the submission, will be processed by CDPH and posted to [CDPH's website](#). If you wish to remain anonymous, do not include any personal information in the comment field of the online submission form.

At times, CDPH may choose not to post a submitted comment. Reasons for not posting the comment can include:

- The comment is part of a mass submission campaign or is a duplicate.
- The comment is incomplete.
- The comment is not related to the proposed action.
- The comment has been identified as spam.
- The comment contains Personally Identifiable Information (PII) data.
- The comment contains profanity or other inappropriate language.
- The submitter requested the comment not be posted.

## **Form Letters**

Organizations often encourage their members to submit form letters designed to address issues common to their membership. Organizations, including industry associations, labor unions, and conservation groups, sometimes use form letters to voice their opposition or support of a proposed permit or rulemaking. Many in the public mistakenly believe that their submitted form letter constitutes a "vote" regarding the issues concerning them. Although public support or opposition may help guide important public policies, agencies make determinations for a proposed action based on sound reasoning and scientific evidence rather than a majority of votes. A single, well-supported comment may carry more weight than a thousand form letters.

**Disclaimer:** This document is intended to serve as a guide; it is not intended and should not be considered as legal advice. Please seek counsel from a lawyer if you have legal questions or concerns.