

CITY OF CHICAGO DEPARTMENT OF PUBLIC HEALTH

Guidelines for Stakeholder Communications Relating to the Bulk Solid Storage Materials Rulemaking Process

The following are guidelines for conducting any meetings, conversations, discussions, or written dialogue between City Departments, the Mayor’s Office, and various stakeholders (“Stakeholder Communications”) – including businesses interested in the regulations and environmental and other non-profit organizations – where the substance of the communications concerns the Department of Public Health’s (“CDPH”) proposed Bulk Solid Storage Materials Regulations (“Regulations”). Stakeholder Communications do not include written or oral public comments submitted under Chicago Municipal Code Section 2-112-160(b)(6). Stakeholder Communications also do not include the following: (1) communications regarding matters of procedure and practice, such as the format of public comments or the status of the CDPH rulemaking proceeding and (2) citizen inquiries not intended to influence the substance of the final Regulations.

The purpose of Stakeholder Communications shall be to ensure that CDPH receives all pertinent information useful to it as it considers adopting the Regulations and to create the strongest possible administrative record associated with the Regulations. As such, employees of City Departments and the Mayor’s Office may engage in Stakeholder Communications in accordance with the following procedures:

1. The City will make these Guidelines publicly available on CDPH’s website. Prior to any applicable Stakeholder Communications, the City will notify all parties that such communications will occur in accordance with these Guidelines.
2. Stakeholder Communications pursuant to these Guidelines are those communications that occur after the proposed Regulations were noticed to the public but on or before the deadline for receipt of written public comments. No Stakeholder Communications shall occur on or after the day designated as the deadline for receipt of written public comments.
3. All Stakeholder Communications will be logged and documented in writing after they occur. Such logging and documentation should occur as soon as practicably feasible.
4. The following constitutes the required documentation that will be produced for any Stakeholder Communications:
 - a) Date, time that communication began, and time that communication ended;
 - b) Place of Stakeholder Communication (if the communication is written, telephonic, or electronic, that shall be indicated);
 - c) Name and title of all City officials and staff present during the Stakeholder Communications;
 - d) Name, title, and organization or entity represented, if any, of all stakeholders present during the Stakeholder Communications;
 - e) Summary of the substance of the Stakeholder Communications
 - i) While this summary need not be a verbatim transcript of the communications (although it may be if the Stakeholder Communications consist of a written dialogue),

it should not be merely a list of the subjects discussed and must recount in greater detail the communications.

Both the log of activity and the required documentation in 4(a) to 4(e), *supra*, shall be prepared by the City.

5. The City will maintain a log of Stakeholder Communications on CDPH's website. This log will be updated as new Stakeholder Communications occur. The log will consist of a chart listing 4(a) to 4(d) above for each Stakeholder Communication. Upon request, any person can inspect 4(e), the summary of a particular Stakeholder Communication.

6. The documentation specified in (4), *supra*, is considered part of the administrative record that CDPH shall consider if it chooses to adopt its proposed Regulations.

7. In order for oral Stakeholder Communications, whether in-person or telephonic, to be a part of the administrative record considered by CDPH in finalizing the Regulations, such communications must be supplemented with written public comments stating any substantive arguments, questions, or facts and submitted pursuant to Chicago Municipal Code Section 2-112-160(b)(6).