

## DEPARTMENTAL ENVIRONMENTAL JUSTICE ACTION PLAN

**CITY OF CHICAGO'S GOAL:** *Take a whole-government approach to improve and protect the environment, health, and quality of life in environmental justice (EJ) communities through changes to internal policies, processes, practices and/or budgets.*

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**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:

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

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Formalize process for seeking community input in new CDPH rulemaking, building on the approach taken for Bulk Material Rules.	Q4 2023	<i>Planned</i>
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>
<b>Community Input &amp; Response</b>		
<p><b>Community Input:</b>  <i>Summarize community input you received on this strategy. What were the suggestions to change or expand upon your original proposal?</i></p>		
<p><b>Response to Community Input:</b>  <i>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.</i></p>		