

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: Chicago Department of Buildings & Department of Public Health

Department Scope and Authorities:

The Chicago Department of Buildings (DOB) and Chicago Department of Public Health (CDPH) have specific rules and requirements for complex demolitions, as set forth in Section 14A-2-202 of the Municipal Code of Chicago.

Environmental Justice Strategy: Implement and continue to improve new process for environmentally complex demolitions, which includes strong provisions for public participation.

On April 11, 2020, the implosion of the smokestack on the site of the former Crawford Generating Station by Hilco Redevelopment Partners and their subcontractors led to significant dust emission in the surrounding Little Village community. Since that time, community organizations have called upon the City of Chicago to advance policies and strengthen systems to ensure that communities are better protected from threats to the environment and public health presented by demolitions.

Of the hundreds of demolitions conducted across the City each year, a small number are considered environmentally complex demolitions. In this case, CDPH has developed a special process to carefully review potential impacts to the environment and public health before any work begins. This process includes the following steps:

1. **Understanding Risk:** When a CDPH demolition reviewer determines that a proposed demolition will occur on a former industrial site or other potentially environmentally complex location, CDPH contacts the applicant to learn more about the site. Based on the discussion, the City may request to schedule a pre-demolition inspection in addition to the required DOB pre-demolition inspection.
2. **Pre-Demolition Inspection:** CDPH conducts a pre-demolition inspection to determine if the demolition is environmentally complex based on the level of risk it presents. Inspectors look for and document:
 - Site's proximity to residents
 - Size of the structure(s) considered for demolition
 - Smoke stack heights and locations, if applicable
 - Asbestos, universal or hazardous waste
 - Underground storage tanks
 - Refrigerants
 - Remaining material or equipment from previous operations

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- Any other environmental or public health threats that may be present

3. **Controlling Risk:** For environmentally complex demolitions, CDPH works with the applicant on a demolition plan, including a Dust Mitigation Plan and other measures that minimize impacts to the environment and public health. CDPH consults with the Illinois Environmental Protection Agency (IEPA) on plans as needed. CDPH may request corrections prior to the demolition, including cleanup, sampling of residual manufacturing materials, removal of equipment or other measures that reduce the building to a clean, empty shell. Demolition plans are paused if any issues constitute Code violations. Sign-off of the demolition may be withheld until the corrections are made and verified by a follow-up inspection.
4. **Community Notification:** If an environmentally complex demolition represents a heightened level of potential risk, CDPH works with the appropriate aldermen to provide notice to the surrounding community. When applicable, CDPH may hold a community meeting, email community organizations, distribute flyers and/or post demolition plans on its website.
5. **Demolition and Oversight:** Following sign-off on the demolition plans, the demolition will take place, in accordance with the DOB demolition permit. As needed, a CDPH inspector may return to the site during the active demolition period to make sure the demolition plans are being followed.

DOB and CDPH will work with organizations representing EJ Neighborhoods to update and improve its process for environmentally complex demolitions, including community notification practices.

Supporting Department(s): N/A

Impact Measures:

- # of complex demolitions in EJ Neighborhoods categorized as environmentally complex demolitions
- # of community meetings held in EJ Neighborhoods on environmentally complex demolitions
- Community satisfaction with engagement activities conducted in EJ Neighborhoods in connection with environmentally complex demolitions

Related Department Investments & Prior Commitments:

In 2021, the City Council passed measures further regulating demolitions by implosion. The measures added a new Chapter 2-30 entitled “Multiagency Regulation of Implosions” and a new Section 15-4-311 providing for additional requirements for license to use explosives for demolition of buildings/structures. Among other things, the new sections required certain commissioners to propose rules regulating the use of explosives for the demolition of buildings or other structures.

| | Timeline | Status |
|---|----------|----------------------------|
| Draft, publish, and implement new process for environmentally complex demolitions. | Q4 2022 | Complete |
| Conduct community notification for environmentally complex demolitions as required by the new process, with a focus on engagement of EJ Neighborhood organizations. | Q4 2022 | Ongoing, as projects arise |
| Seek input from the EEWG and other EJ Neighborhood organizations on community notification practices and continue to refine as needed. | Q4 2023 | Planned |

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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.