



**To: Commissioner Allison Arwady, Chicago Department of Public Health
333 S State St. Room 200, Chicago IL 60604**
Cc: Angela Tovar, Chief Sustainability Officer
**Re: Large Recycling Facility Permit Application, General III, LLC,
11600 S. Burley Avenue, Chicago IL**

January 14, 2021

Dear Commissioner Arwady,

Thank you for the opportunity to provide comments on Gill, LLC's ("Gill") request to begin operations at a recycling facility at 11600 S. Burley Avenue in Chicago. The Metropolitan Planning Council is a nonprofit planning, policy, and advocacy organization with over 85 years of experience developing solutions to complex regional and citywide challenges. We have a longstanding interest in racially equitable development policies and thriving, healthy rivers. As we consider the inequitable and inadequate planning embedded in this proposal, we urge the Chicago Department of Public Health (CDPH) to deny Gill's permit request.

This relocation epitomizes institutional environmental racism, whether intentional or not. It goes against the stated commitments of the City of Chicago to protect both human health and the quality of our natural resources in Southeast Chicago, and risks more exposure to pollutants for a community already unduly burdened in this regard.

Compounding environmental exposures already burden communities of color in the Calumet Industrial Corridor. This relocation would layer yet another source of toxic heavy metals, particle pollution and other industrial pollutants on top of the overlapping health threats that already exist near the proposed site in the Calumet Industrial Corridor (the concerning materials are detailed in the comments submitted by the Southeast Environmental Task Force). Southeast side residents are already experiencing poor air quality and contaminated soil, and research conducted by the Calumet Connect shows that compared to citywide averages and most other industrial corridors in Chicago, there are higher rates of Chronic Obstructive Pulmonary Disease (COPD) and heart disease within this corridor. Approval of this relocation and the risk it carries for exposure to pollutants would stand in opposition to the CDPH's stated goal to increase the life expectancy of Chicago's Black and Brown populations by improving air quality, reducing exposure to pollution, and evaluating cumulative impacts of pollution (Healthy Chicago 2025). Furthermore, this relocation would remove operations that produce industrial pollutants from an affluent, majority White neighborhood and place them in a lower-income, majority Latino and Black neighborhood, continuing a pattern of environmental racism in Chicago which repeatedly shifts risk toward already overburdened communities to make space for improvements elsewhere.

Duty of the Chicago Department of Public Health to ensure safety. It is the legal duty of the CDPH to enforce environmental rules, and the public's health and safety. Gill's recent and ongoing record of noncompliance must be considered, and the CDPH's first obligation should be to prevent further harm. The CDPH's oversight and inspection processes did not adequately prevent and correct violations in Lincoln Park (as evidenced by inspection reports of issues that continued into November and December 2020). The same processes cannot be expected to prevent the likelihood of future violations simply because of a relocation to the Southeast side.

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Serious improvement to oversight and regulation are needed to ensure safety. In addition, we urge the CDPH to exercise their legal ability to institute more strict environmental standards than the Illinois Environmental Protection Agency (as detailed in the statement submitted by Northwestern's Environmental Law Clinic on behalf of the Coalition to Ban Petcoke). Since neither meaningful improvements to CDPH's capacity for oversight nor tighter standards are in place, we are gravely concerned that a new facility would operate without sufficient oversight to ensure environmental and public health compliance, regardless of any potential upgrades to facilities that may be proposed.

Undermines long-term industrial planning in Chicago. The City of Chicago has embarked upon an Industrial Corridor Modernization process, in which the Department of Planning and Development is reviewing and sometimes modifying existing land uses within its industrial corridors. Some corridor reviews, such as along the North Branch of the Chicago River (2017), have been completed while others, such as along the Calumet River, have not even begun. At best, it is premature to relocate an industrial facility of this magnitude given that this Corridor's planning process is slated to begin in 2021. At worst, relocating this project would have an outsized influence on any future planning efforts, incentivizing other businesses to similarly move to the Southeast Side, and preventing a fair assessment of the corridor as well as its relationship to the other industrial corridors and the city as a whole. This facility should not be considered for relocation until a planning process—one that squarely centers community stakeholders, human health, and both environmental and economic justice—has been completed.

Inconsistent with our collective vision for Chicago's rivers and riverfront communities. The proposal is inconsistent with Chicago's vision for healthy, thriving rivers, as documented in *Our Great Rivers*. Among other goals, the vision encourages river-adjacent land uses that address environmental impacts to humans and the river ecosystem itself. Overland and stormwater runoff have been identified by the US Army Corps of Engineers as major sources of dredge material in the Calumet River (the toxic sediment that is routinely removed from the river to ensure the waterway remains navigable). The CDPH has noted the gradation of the riverfront portion of the site and requested additional information from GIII about any planned barge use and discharge from this site running into the Calumet River. Metals operations along the Calumet already produce noxious odors, and the application for GIII also falls short on how the facility will identify and mitigate such odors. Riverfront industrial users must protect the quality of the waterway and habitat it would sit along, as well as ensure that other uses of the waterways, like recreation, are not hindered by its operations; it is unclear how the applicant plans to do this.

Approving GIII's permit will place another source of environmental pollutants in a mostly Latinx and Black community already burdened by serious health threats. It is inconsistent with the duties and commitments of the City to protect the public's health and safety, as well as our natural resources. It continues an unjust pattern of environmental racism and undermines our future aspirations for economically and environmentally sound planning across Chicago.

Please contact the Metropolitan Planning Council with any questions regarding this statement.

Sincerely,



Chloe Gurin-Sands
Manager, Health Equity & Planning
Metropolitan Planning Council



Christina Harris
Director, Land Use & Planning
Metropolitan Planning Council