

Metropolitan Planning Council

Illinois EPA
Attn: Jeff Guy, Hearing Officer
PO Box 19276
1021 North Grand Avenue Springfield, IL 62794-9276

June 12, 2020

RE: Comments on Proposed Draft Construction Permit to GIII, LLC

Dear Mr. Guy,

Thank you for the opportunity to provide comments on GIII, LLC's ("GIII") request to construct a recycling facility at 11600 S. Burley Avenue in Chicago. The Metropolitan Planning Council has a longstanding interest in healthy, thriving rivers and racially equitable development policies. **As we consider the environmental racism and poor planning embedded in this proposal, we urge the Illinois EPA to deny GIII's construction permit.**

The most important reason to deny this permit is because it **epitomizes institutional environmental racism**. Racist outcomes do not require racist intent. We do not know the intent behind the permit request, nor of the reviewers, and we are not claiming to. But based on the following three components, we are confident of the outcome.

- **Racially unjust siting.** Put frankly: GIII is proposing to relocate a harmful industrial use from a wealthier, whiter part of the city to one that has more black and brown residents. Again, racist outcomes do not require racist intent. The outcome of this relocation is to remove a health hazard from an affluent white neighborhood and place it in a lower-income Latinx neighborhood. Institutional racism, intentionally or not, produces outcomes that chronically favor or disfavor racial groups. That is exactly what a permit for this would do. This is most assuredly a racist outcome.
- **Compounding health hazards already exist for low-income communities of color in the Calumet Industrial Corridor, and would be worsened by this.** This relocation would layer yet another health hazard on top of the overlapping health threats that already exist near the proposed site. The site is located within the Calumet Industrial Corridor and the greater Calumet region, where multiple industries contribute to poor air quality. Compared to citywide averages and most other industrial corridors in Chicago, there are higher rates of chronic obstructive pulmonary disease and heart disease within this corridor, signaling existing negative health impacts. Some of these compounding health effects are spelled out in additional detail in a letter submitted to your office by NRDC and signed by groups throughout the state (including MPC). Residents of the Southeast Side should not be asked to bear yet another health burden.
- **Insufficient participatory process.** The public outreach process undertaken was insufficient, meaning that a Latinx community was effectively left out of the decision-making process. The insufficiencies of that process - for instance, outreach meetings held in only in English, a language which many residents of the community do not speak - have been documented in the aforementioned letter submitted to your office.

In addition to - and in many ways because of - the environmental racism embedded in this relocation proposal, it also represents **poor land-use planning**.

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- **Inconsistent with vision for rivers.** The proposal is inconsistent with Chicago’s documented vision for healthy, thriving rivers, as document in *Our Great Rivers*. Among other goals, that plan envisions river-adjacent land uses that address environmental impacts. These uses must create ecologically focused and inviting places for both humans and wildlife. It is unclear that this facility will abide by these values and provide riverfront access as well as habitat. These goals also champion the need for more robust stakeholder engagement to improve land use planning and policies, something that did not occur with selecting the location of this facility.
- **Undermines long-term industrial planning in Chicago.** The City of Chicago has embarked upon a process of Industrial Corridor Modernization, reviewing and potentially modifying existing land uses within its industrial corridors. Some corridors, such as along the North Branch of the Chicago River, are complete, while others, such as the Calumet River, are not. At best, it is premature to relocate an industrial facility of this magnitude given that this planning process has not yet occurred. 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. This plant should not be relocated until a planning process is allowed to occur.

Bad planning like this will only beget worse planning. This and other relocations must stop until there can be a thorough, thoughtful, participatory planning process for the whole of the City, which should mitigate the risk of cost-driven, but racially unjust, moves such as this.

There are additional reasons to deny this permit application. For example, GIII’s proposed relocation would undermine the Clean Water Act’s “national goal” to achieve, “wherever attainable,” water quality which provides “for recreation in and on the water.” The facility would introduce new odors to the Calumet, further impeding recreational goals. Having personally led close to a dozen educational boat tours of the corridor – the smell is already noxious, and will be made worse by this. Additionally, because of the location of this site on the lakeward side of the O’Brien Lock, we are concerned that discharges and other runoff could pose a risk to both the ecosystem of Lake Michigan and the millions of people who rely on it for drinking water. To date we have not seen that risk assessed, which we would welcome.

We encourage GIII to explore alternatives to relocation; it cannot be allowed to do so at the expense of the health of black and brown communities. However, we also strongly encourage General Iron, the State of Illinois and the City of Chicago to vastly improve environmental performance of its current North Branch location, as well as oversight and performance.

Thank you for the opportunity to weigh in on this development. We welcome the opportunity to speak with you more about why this proposal should not be allowed to proceed and how IEPA can interrupt this cycle of racially unjust industrial siting.

Sincerely,



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