



DEPARTMENT OF PUBLIC HEALTH  
CITY OF CHICAGO

**Via Electronic Mail**

March 17, 20218

Dear Colleagues,

Thank you for your March 8<sup>th</sup> letter about the ongoing process to evaluate a large recycling facility permit application submitted by Southside Recycling to the Chicago Department of Public Health (CDPH). The Department knows many of you as organizations and individuals, and we deeply value your expertise as public health and community leaders. You have stood with us on initiatives centered on addressing health and racial inequities – from increasing access to mental and behavioral health services, to ending the HIV epidemic and reducing maternal and infant mortality, to ensuring equitable access to testing and vaccinations as we continue our fight against COVID-19. When CDPH has called upon you to lend your voices and resources to important causes, you have shown up.

This was never more evident than with the creation of *Healthy Chicago 2.0* and, most recently, *Healthy Chicago 2025*. We worked in partnership with you and with communities to produce these seminal community health improvement plans, which challenge partners across sectors to tackle the root causes of health. Our plans identify structural racism as a primary driver of the 8.8-year life expectancy gap between Black and white people in our city, and of life expectancy declines for our Latinx population. They point to necessary changes to policies, systems, and environments to promote optimal health and well-being for all Chicagoans. *Healthy Chicago 2025* also speaks to the importance of the change process; community members must have power in the decisions that affect their lives.

In your letter, you question whether CDPH's consideration of a permit for Southside Recycling to operate in a vulnerable community is consistent with our commitments to health and racial equity. The answer truly depends on an accurate assessment of environmental impact. That is why we have refined our review of the pending application to focus on the cumulative impact of the proposed recycling operations.

More specifically, earlier this week, the Chicago Department of Public Health (CDPH) paused our review of the permit application for Southside Recycling to request additional information from the company, consistent with applicable rules and guidelines. We did so because we recognize that this recycling facility is a matter of significant concern for many community members and CDPH takes seriously the issues you and others raised regarding the permit application. CDPH has evaluated the company's materials and reviewed the many comments we received from Southeast Side community members, environmental organizations and public health partners.

Through this process, we identified questions about the relationship between the proposed facility and other adjacent, co-owned, and functionally integrated businesses, as well as the cumulative impact those businesses have on the surrounding community. We are requesting additional data and materials from Southside

Recycling to further inform our consideration of their permit application. You can read our letter to the company [here](#).

We are meeting with representatives from Southside Recycling tomorrow, March 18<sup>th</sup> to discuss the information that is required for their application. After that meeting, we will post a list of our requests on our [website](#). Likewise, we will post any and all materials the company provides in response. CDPH will then decide whether to issue a draft permit, which, if issued, would be further subject to a 30-day public comment period.

But your letter goes beyond a concern about this particular permit application. You raise a racial equity argument that the City should not allow industries with the potential to pollute to relocate from more affluent, predominantly white communities to areas where residents are more vulnerable to the effects of pollution. You rightly assert that CDPH must also exercise the power of our department – and our local public health system – to advance new policies that do more to protect Chicago’s most vulnerable communities. This includes addressing underlying issues related to zoning, land use, and community development beyond our direct control.

CDPH will continue to raise our public health voice, not only by adopting strong rules that guide our department’s work, but also to advocate for a public health approach to decision-making at the City level. Here are a few of the ways we are living that commitment:

- We published an [Air Quality and Health](#) report that uses data on air quality, health conditions, and social factors to identify areas that should be prioritized for enhanced environmental controls and protections. CDPH is already using this approach to guide our own inspection and enforcement activities. We are working with other City departments and agencies to help them make decisions about everything from designing truck routes to deciding where trees are planted.
- We are working with Microsoft Research to improve real-time, local air monitoring data availability in Chicago by installing about 100 air quality sensors on bus shelters this spring. CDPH is planning to make this data publicly available for stakeholders and community members.
- We stand in support of the Mayor’s air quality and zoning ordinance, which requires additional review and public involvement before zoning approval for new industrial facilities in Planned Manufacturing Districts. We encourage you to join us in advocating for this important policy change.
- We have promulgated strong rules to protect residents from impacts from facilities that handle petcoke and manganese. We will be seeking public input on new rules to establish permitting and operating standards for rock crushing facilities and new standards for air pollution control permits to ensure protections for surrounding communities.
- We support further efforts to better understand and mitigate pollution burden on Chicago communities, including a cumulative impact assessment and standing up the City’s first Environmental Equity Working Group to allow for deeper engagement with advocates and community groups.
- We have proposed to conduct a health and racial equity impact assessment of the zoning and land use policies as part of *We Will Chicago*, the City’s multi-year, citywide planning initiative.



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On behalf of CDPH, thank you for the input that you have provided on the Southside Recycling permit application so far – and for invoking *Healthy Chicago 2025* to ensure that CDPH and the City are accountable to our health and racial equity commitments. At the same time, we recognize that the issues at play here are much larger than a single facility, or even a community. They get at the heart of what kind of city we all want Chicago to be.

CDPH stands ready to work with you, our local public health system, other government agencies, and the community on policy changes that are necessary to realize the *Healthy Chicago 2025* vision: A city where all people and all communities have power, are free from oppression and are strengthened by equitable access to resources, environments and opportunities that promote optimal health and well-being.

Sincerely,

Allison Arwady, M.D., M.P.H.  
Commissioner