

Richard L. Mastone Jr.

Environmental Justice Alliance of Greater SE Chicago

Public Comment on Proposed Petcoke Regs

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St. Simeon Serbian Orthodox Church

"The Environmental Justice Alliance of Greater SE Chicago was established in 2011 in response to the practice of locating polluting industry in the communities of the Southeast side. Our mission is to:

- *Create a strong alliance between communities of the Southeast side of Chicago to combat the rising tide of environmental injustices.*
- *Address issues stemming from environmental injustices which negatively impact our communities.*
- *To engage residents, businesses and political leaders in improving environmental qualities and social justice within our communities.*
- *To promote and encourage sustainable development in an effort to initiate a "Green" Economy on Chicago's Southeast side.*
- *In 2013, the EJ Alliance unveiled its "Environmental Justice Principles" for SE Chicago.*

We have deduced that the proposed regulations in their current state fall short in many ways in protecting the health, welfare & safety of the residents and families of Chicago's Southeast side:

- *The EJ Alliance continues to be alarmed by the existing and cumulative negative health impact of Coal, Petcoke & Metcoke dust in our community.*
- *We do not believe that the City's Health Dept. has the adequate resources to monitor & enforce these regulations; this would be better assigned to the Dept. of Environment if it still existed.*
- *We are very concerned by the sole autonomy, authority & discretion being entrusted to the Commissioner of the Dept. of Health.*
- *There is no language which addresses Particulates such as PM 2.5 which impacts respiratory health.*

- *The regulations do not call for ANY public review or oversight.*
- *It does not spell out ANY penalties or fines for infractions.*
- *It does not call for a Health Assessment by the Agency for Toxic Substance & Disease Registry of CDC. Sen. Durbin, Cong. Kelly & the EJAlliance have each requested a petition for this assessment.*
- *The regulations fail to address a greater comprehensive Environmental Protection & Environmental Justice Plan for all of the residents of the City of Chicago.*

Suppression of these materials have failed miserably in the past, we do not believe that enclosure ensures adequate protection, therefore, the only remedy to ensure complete and total protection of our residents & our families is immediate and total removal of these materials from our community. Thank you.

Southeast Chicago Environmental Justice Principles

Greater Southeast Chicago has the potential to be a hub for post-industrial innovation and community based revival for a new industrial revolution that includes clean energy and green jobs. This document acts as a follow up to the Calumet Area Land Use Plan, Millennium Reserve Vision, and Calumet Area Vision, while integrating principles of environmental justice developed by USEPA. **We call on local elected officials, community leaders and business partners to be educated on the fundamentals of environmental justice and advocate for sustainable development in our community based on the following principles:**

ENVIRONMENTAL

- **Anticipation and preventions of potential environmental degradation:** The response of the past—"react and cure"—has proved to be economically, socially and environmentally expensive. We have had to fix problems after they occur through pollution control and regulation. We need to shift to a philosophy which "anticipates and prevents" environmental degradation at the planning stages of our development projects (USEPA Principles of Sustainability).
- **Respect for nature and the rights of future generations:** Our economy depends not only on the continued flow of resources but also on the protection and enhancement of ecosystems and habitats. The decision-making process must consider not only today's needs, but the needs of future generations by ensuring that a long enough horizon is used in the evaluation process (USEPA Principles of Sustainability).
- **Maximize conservation and develop local renewable resources:** Maximize the use of conservation technology and practices, reduce the use of non-renewable resources, and develop local renewable energy, water and material resources while also promoting energy and resource efficiency.
- **Protect, preserve and restore the natural environment:** Acknowledge that undisturbed natural beauty enriches and that the natural environment is basic for a healthy world, a healthy economy and a healthy society.
- **Healthy communities:** Clean development will keep our air, land and water clean while creating local family-sustaining jobs and economic prosperity through organized labor, job training programs and community partnerships.

JUSTICE (per U.S. Executive Order 12898)

- **Integrate considerations of economic development with environmental justice:** Executive Order 12898 defines Environmental Justice as: *"The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic groups should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies."*
- **Low income communities and communities of color:** Low income communities and communities of color suffer disproportionately from the effects of dirty industry; we have an obligation to reduce the harm caused by industry, especially in these communities.
- **Economic opportunity for community residents and local businesses:** Residents should have the right to obtain jobs and contracts from the industry that resides in their community and local businesses should prosper.

ALLIANCE

- **Community Participation:** Decisions about industry should be transparent and *require* community participation in the decision making process. Community members have a right to be partners in decisions about industry in their community.
- **Equitable benefits:** Any industry entering this area must negotiate a community benefits agreement with the community. A community benefits agreement, or CBA, is a private contract between a developer and a community coalition that sets forth the benefits that the community will receive from the development. Common benefits include living wages, local hiring and training programs, affordable housing, environmental remediation, and funds for community programs. CBAs ensure that development is equitable and benefits *all* members of the community, eventually contributing to stronger local economies, livable neighborhoods, and increased public participation in the planning process.