



US Army Corps
of Engineers®

Calumet Harbor & River
Chicago Area Waterway System/Dredged Material
Management Plan and
Integrated Environmental Impact Statement
May 18, 2019 Public Meeting

Comment Form

Date of comment: 08/01/19

First Name: Amalia Last Name: NietoGomez

Organization: Alliance of the SouthEast (ASE)

Street Address: 9204 S Commercial Ave., Ste 301

City: Chicago State: IL Zip Code: 60617

Please see attachment.

All comments will be considered in our study and evaluation process. Please write legibly so your comments can be recorded accurately. Complete this form and drop it in the box provided at the public meeting sign-in table, mail it, or email it to CELRC_Planning_Econ@usace.army.mil on or before ~~July 16, 2019~~

July 2

New date: Aug. 1, 2019



August 1, 2019

US Army Corps of Engineers

Email: CELRC_Planning_Econ@usace.army.mil

Re: Comments Calumet Harbor & River Chicago Area Waterway System/Dredged Material Management Plan and Integrated Environmental Impact Statement

To whom it may concern: United States Army Corp of Engineers

On behalf of the Alliance of the SouthEast (ASE), we are submitted comments regarding the proposed expansion of the Confined Disposal Facility and the Calumet Harbor & River Chicago Area Waterway System/Dredged Material Management Plan and Integrated Environmental Impact Statement.

We recognize that the U.S. Army Corps of Engineers (USACE) has chosen NOT to build a NEW CDF facility on Chicago's southeast side, in the 10th Ward. This was a result of local residents mobilizing and submitting 8500+ comments in opposition to ANY new Confined Disposal Facility on Chicago's southeast side, which is already heavily environmentally overburdened. As a result, Illinois State Senator Durbin ordered an environmental review. Residents were very clear that we do not want more toxic dredgings, especially so close to residential space. We refer the USACE to the comments and signatures submitted in opposition previously, as to why we do not want any more toxic dredgings.

Here are some of our major concerns regarding the proposed expansion:

- **USACE did not include any information on the effects on air quality, which will disproportionately affect minority & low-income communities with vulnerable populations** (including children, pregnant women, elderly, groups with high asthma and cancer rates). The area also has older housing, which does not filter air well (there are older windows and many are not able to afford in-home upgrades to improve inside air quality).
- **Location of toxic dredgings near Chicago's source for drinking water.**

Recommendations

USACE should:

- **Address the disproportionately high & adverse impacts to minority, low-income, & vulnerable populations, & perform additional environmental justice analysis** to ensure review of these impacts to minority, low-income, and vulnerable populations. Populations are already environmentally overburdened, exposed to other contaminants, and have high cancer and asthma rates.
 - Please see attached map: "Cumulative Burden of Environmental Exposures & Population Vulnerability."
 - References on Environmental Burden on Chicago's southeast side:
 - Geertsma, Meleah. "New Map Shows Chicago Needs Environmental Justice Reforms." NRDC. (October 25, 2018). Website accessed: 07/30/18. <https://www.nrdc.org/experts/meleah-geertsma/new-map-shows-chicago-needs-environmental-justice-reforms>
 - Yeo, Sophie. "A Clever New Map Shows which Chicago Neighborhoods are most at risk from Pollution." Pacific Standard. (Jan. 15, 2019) Website accessed: 07/30/19 <https://psmag.com/environment/which-chicago-neighborhoods-are-most-at-risk-from-pollution>
 - **Asthma rates for nearby, impacted community areas:** Chicago's asthma rate for 2017 was 9.1. Comparatively, South Chicago has an asthma rate of 14.4. South Deering has an asthma rate of 20.7. Hegewisch and East Side data were not available. Source: Chicago Health Data. "Asthma: Adults who



have been diagnosed with asthma.” Chicago Health Atlas. Website accessed: 08/01/19.

<https://www.chicagohealthatlas.org/indicators/asthma>

- **Cancer death rates for nearby, impacted community areas:** Chicago’s cancer death rate for 2017 was 179.2. Comparatively, South Chicago has a cancer death rate of 229.0. South Deering has a cancer death rate of 220.5. East Side and Hegewisch had cancer death rates of 189.0 and 197.9 respectively. Source: Chicago Health Data. “Cancer deaths: People who died due to cancer.” Chicago Health Atlas. Website accessed: 08/01/19. <https://www.chicagohealthatlas.org/indicators/cancer-deaths>
- **Consider the potential exposure of air-borne toxic material and impact on residents and commit to regular monitoring,** since USACE proposes to air dry highly contaminated material from the Calumet River and Cal-Sag Channel.
- **Commit to appropriate mitigation measures to reduce exposures** below regulatory thresholds.
- **Include South Chicago in the Environmental Impact Statement,** as residents are near to the site, and are in the area immediately affected (within 1 mile radius of the site). South Chicago is closer than some of the other community areas already listed in the EIP. As noted in the aforementioned comments, South Chicago is an environmentally overburdened community area.
- **Pro-actively protect our drinking water.** Given the closeness to Chicago’s source of drinking water, provide explanation on how contaminants and toxic material are managed, to prevent contaminated water from the drainage pond from entering Lake Michigan. The original liner had holes that were covered with a "sand blanket." Best practices recommend 2 liners, surrounded by clay.
- **Provide information on how the addition of more toxic dredged material will affect the aquatic environment,** especially since the original liner had holes that were covered with a "sand blanket." Again, best practices recommend 2 liners, surrounded by clay.
- **Describe your long-term plan after 20 years, when the expanded CDF is filled.**
- **Provide the cost analysis of 20-year site compared to alternatives,** like treatment and sediment reduction. In the presentation, it was mentioned that a cost-analysis was done. However, the details of the cost-benefit analysis and what options were considered were not given.
- **Consider alternatives** that do not adversely affect already overburdened communities, and that doesn't impact recreational amenities and natural resources. Make public the alternatives considered and the detailed analysis.
- **Create a new appendix with all the comments and correspondence received** during the comment period.
- **Not consider residential areas for future sites.**



The Alliance of the SouthEast (ASE) is a multicultural, interfaith, and intergenerational alliance consisting of churches, schools, businesses, and community organizations that prioritize grassroots participation to address the challenges facing the neighborhoods of southeast Chicago. ASE's mission is to build the capacity of leaders, organizers, and associations in order to carry out community and social change.

We urge you to consider the recommendations above. If you have any questions, please contact met at 773-221-8908 or amalia@asechicago.org. Thank you for your consideration.

Sincerely,

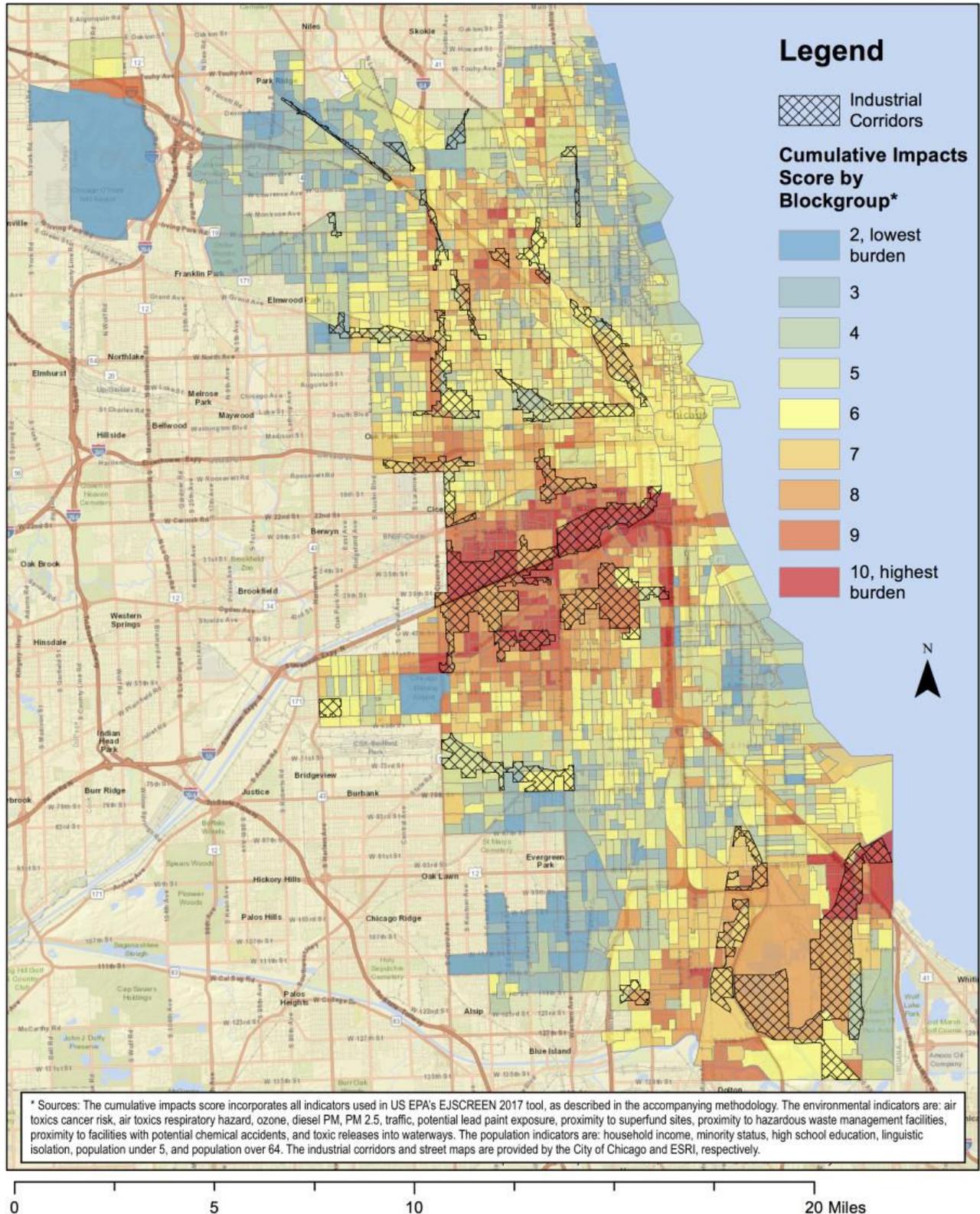
A handwritten signature in blue ink, appearing to read 'Amalia Nieto Gomez', with a long, sweeping underline.

Amalia NietoGomez
Executive Director

Attachments:

- Chicago Map of "Cumulative Burden of Environmental Exposures & Population Vulnerability." Created by National Resource Defense Council. 09/2018
- Chicago Map of "Asthma: Adults who have been diagnosed with asthma" 2015-2017, by community area. Chicago Health Atlas. Website accessed: 08/01/19.
- Chicago Map of "Cancer deaths: People who died due to cancer" 2015-2017, by community area. Chicago Health Atlas. Website accessed: 08/01/19.

Cumulative Burden of Environmental Exposures & Population Vulnerability in Chicago



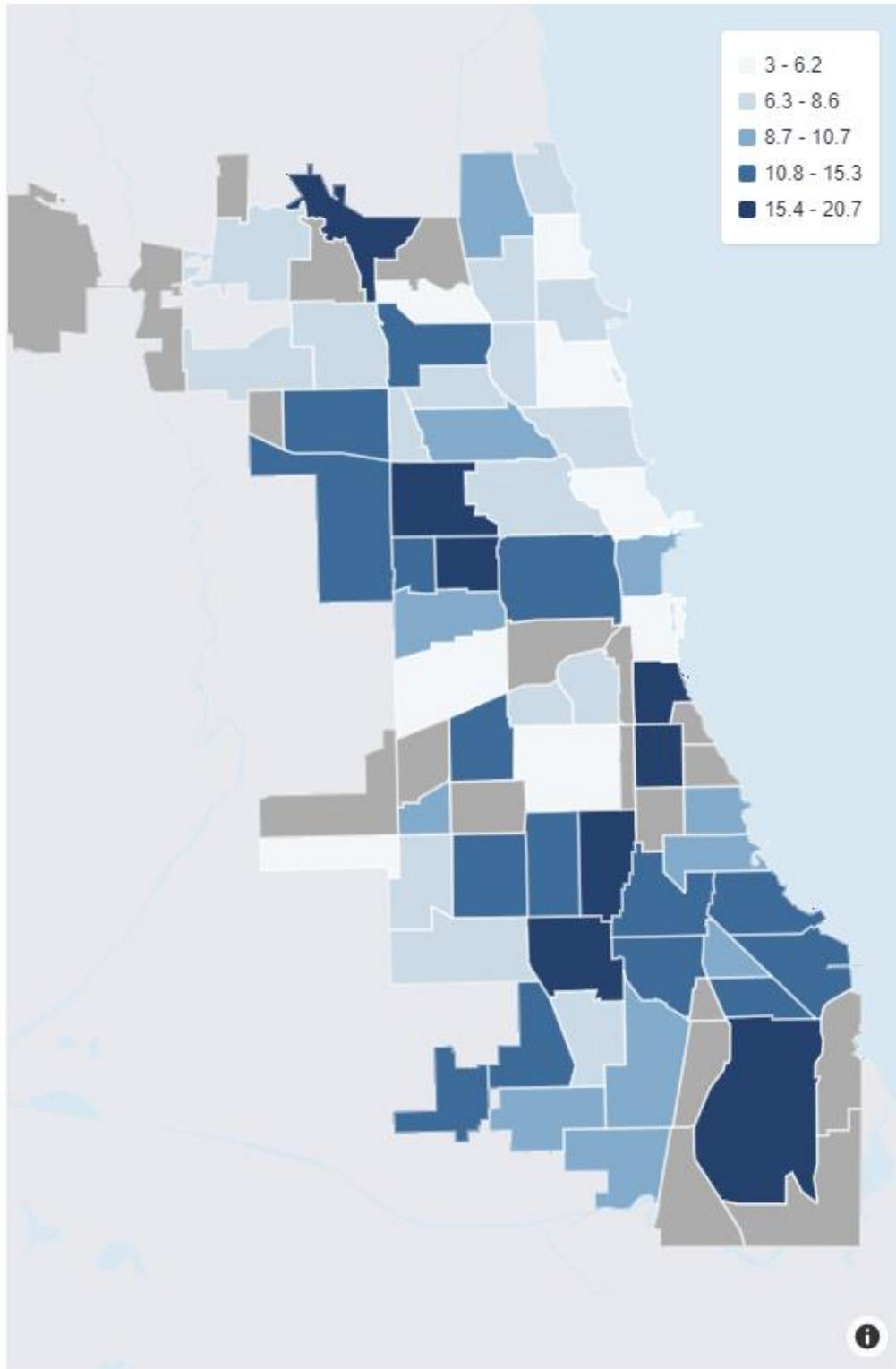
The NRDC's Industrial Corridors and Cumulative Impacts Map for Chicago shows which of the city's neighborhoods are most at risk from pollution. (Photo: Natural Resources Defense Council)

Source: Yeo, Sophie. "A Clever New Map Shows which Chicago Neighborhoods are most at risk from Pollution." Pacific Standard. (Jan. 15, 2019) Website accessed: 07/30/19

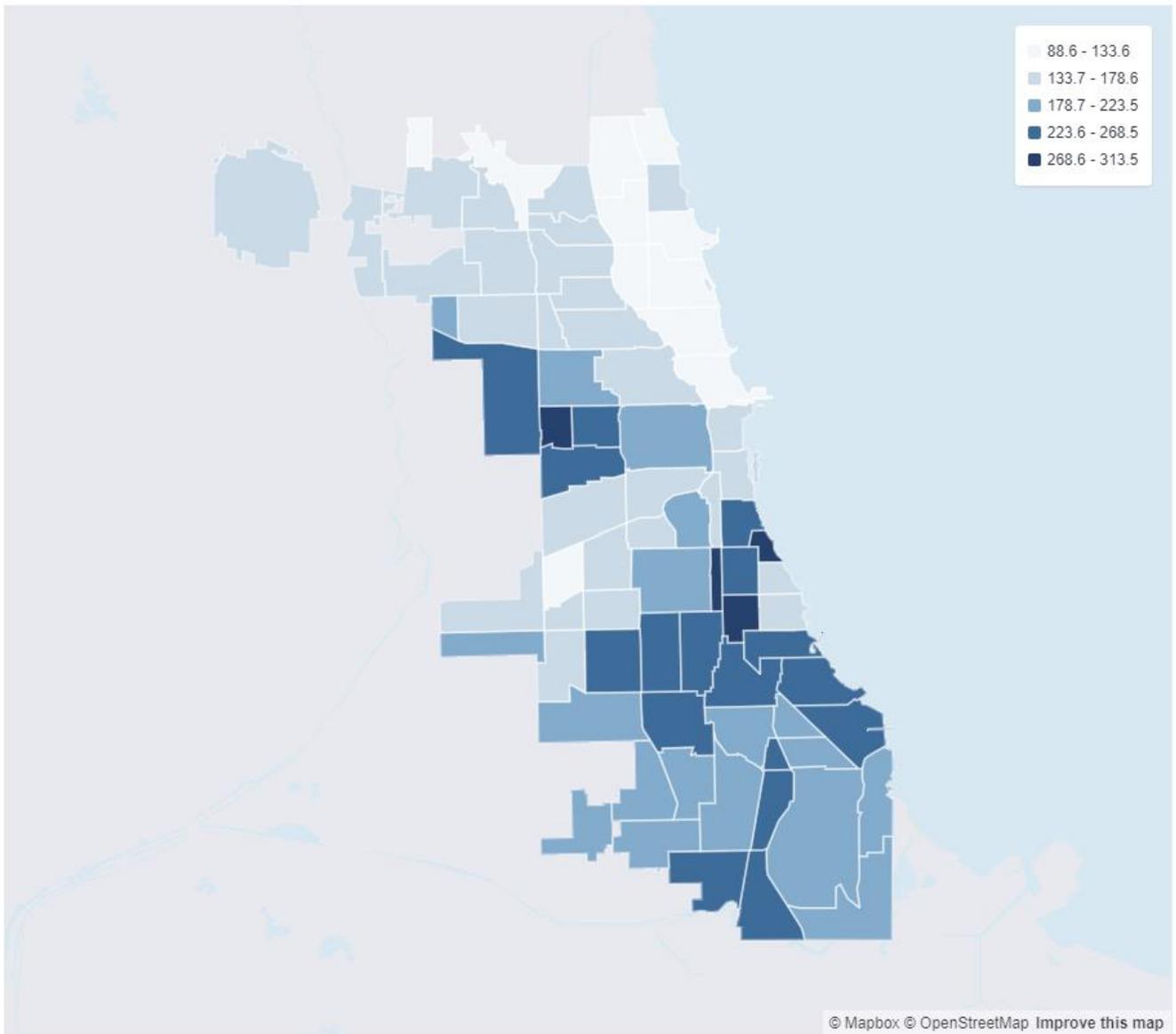
<https://psmag.com/environment/which-chicago-neighborhoods-are-most-at-risk-from-pollution>

Asthma

ADULTS WHO HAVE BEEN DIAGNOSED WITH ASTHMA, 2015-2017



Source: Chicago Health Data. "Asthma: Adults who have been diagnosed with asthma." Chicago Health Atlas.
Website accessed: 08/01/19. <https://www.chicagohealthatlas.org/indicators/asthma>



Source: Chicago Health Data. "Cancer deaths: People who died due to cancer." Chicago Health Atlas. Website accessed: 08/01/19. <https://www.chicagohealthatlas.org/indicators/cancer-deaths>