

August 17, 2020

US Army Corps of Engineers
ATTN: Planning Branch
231 S. LaSalle St. Suite 1500
Chicago, IL 60604
Email: CELRC_Planning_Econ@usace.army.mil

Re: Comments on the Final 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 final Calumet Harbor & River Chicago Area Waterway System/ Dredged Material Management Plan and Integrated Environmental Impact Statement. We submitted comments a year ago, and many of our concerns remain still the same.

We appreciate the U.S. Army Corps of Engineers endeavors to find beneficial use for some of the dredge material. We also recognize that the U.S. Army Corps of Engineers (USACE) choice to 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, which the USACE has conducted. 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:

- **Location of toxic dredgings near Chicago's source for drinking water, esp. given record high Lake levels and storm surges in the last 2 years.**
 - The current CDF and its proposed expansion sit at the mouth of the Calumet River and Lake Michigan. Lake Michigan is the source of drinking water, not only for the City of Chicago and the state of Illinois, but the Midwest region (including Indiana, Wisconsin, and Michigan).
 - **Lake Michigan has experienced record high lake levels, and storm surges that are eating away at beaches, including Calumet Beach to the south of the CDF and the South Shore neighborhoods to the north.** What is the effect of erosion on the CDF berms- both current and for the proposed expansion?
 - Please see attached article by Mark Konkol, "Could The Calumet Park Beach House Crumble Into Lake Michigan?" Patch. (February 7, 2020) <https://patch.com/illinois/chicago/could-calumet-park-beach-house-crumble-lake-michigan>
 - **USACE was hired to do a lakefront erosion analysis, which was should be included in the EIS.**
 - Moreover, **the EIS should take into account the effect of erosion on the current CDF as well as the proposed expansion, and ensure toxins are not leaching into the region's drinking water.**
 - **USACE should be testing nearby water for highly toxic chemicals, including PCBs, mercury and arsenic.**
 - **USACE should use the Illinois Pollution Control Board's Lake Michigan Basin Water Quality Standards.** Under the Clean Water Act, federal projects are required to meet state standards.
- **USACE does not address issues created by the proposed expansion taking place in an environmental justice community. The proposed expansion will disproportionately affect minority & low-income communities with vulnerable populations** (including children, pregnant women, elderly, and groups with high asthma and cancer rates).
 - One concern is the effects on air quality. 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).



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. This was stated in our previous comments, and additional environmental justice analysis still hasn't taken place.
 - 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.
- **Consider the effect of 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 that were already listed in the EIP. As noted in the aforementioned comments, South Chicago is an environmentally overburdened community area, and while South Chicago is supposed to be included in the revised EIS, there is no adjustment to the analysis performed by USACE. For example, there are 3 senior buildings in South Chicago- the Victory Centre, Villa Guadalupe, and the South Chicago Senior Housing, and seniors are experiencing high death rates due to Covid-19. USACE needs to consider the effects on air quality. 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).
- **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.**
- **Create a plan, with the City of Chicago, for pollution source reduction for the Calumet River, establishing goals and measurable outcomes for source reduction.** The current plan does not set any goals or metrics, and is not currently incorporated into the DMMP or EIS. Research by USACE has identified the chemical signatures of toxins in the river sediment and shown that most of them come from industrial properties along the river. Further study could pinpoint the most significant sources, and corrective action — better management at local industries or protective covering over chemicals stored along the river, for example — could reduce pollutants significantly.
- **Provide the cost analysis of 20-year site compared to alternatives.**
- **Consider alternatives** that do not adversely affect already overburdened communities, and that doesn't impact recreational amenities and natural resources. Hold public discussions on alternatives considered and the detailed analysis.
- **Not consider residential areas for future sites.**
- **Ensure full transparency and community feedback.** There was no public presentation/ response from USACE to concerns outlined in previous hearing.

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 me at 773-221-8908 or amalia@asechicago.org. Thank you for your consideration.

Sincerely,

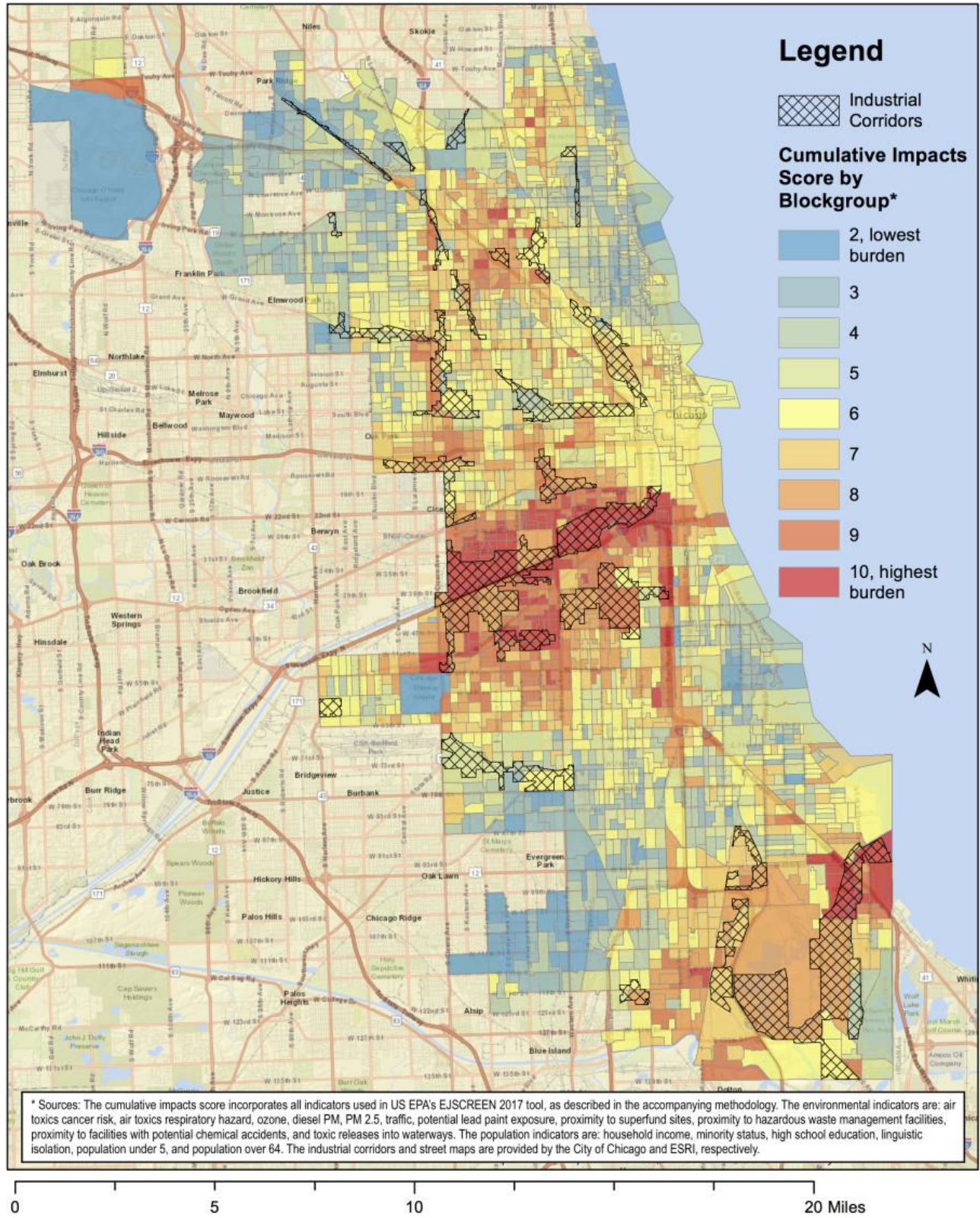
A handwritten signature in black ink, appearing to read 'Amalia NietoGomez', with a long, sweeping underline.

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.
- Chicago Map of "Chronic Disease Rates." Created by Juan Martin Luna Nunez. 04/28/2020.
- Konkol. Mark. "Could The Calumet Park Beach House Crumble Into Lake Michigan?" Patch. (February 7, 2020) <https://patch.com/illinois/chicago/could-calumet-park-beach-house-crumble-lake-michigan>

Cumulative Burden of Environmental Exposures & Population Vulnerability in Chicago



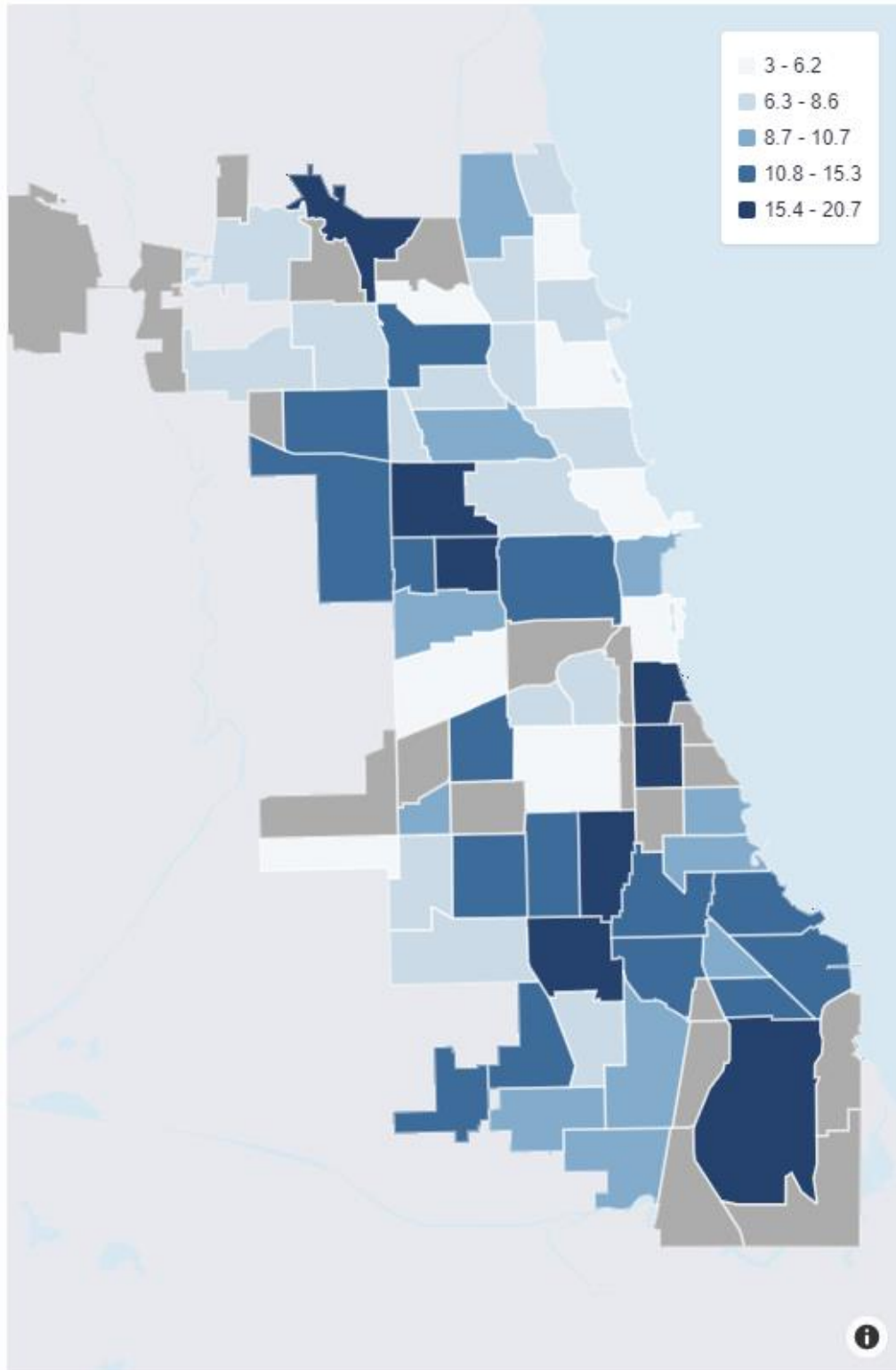
The NRDC's Industrial Corridors and Cumulative Impacts Map for Chicago shows which of the city's neighborhoods are most at risk from pollution. (Photo: Natural Resources Defense Council)

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

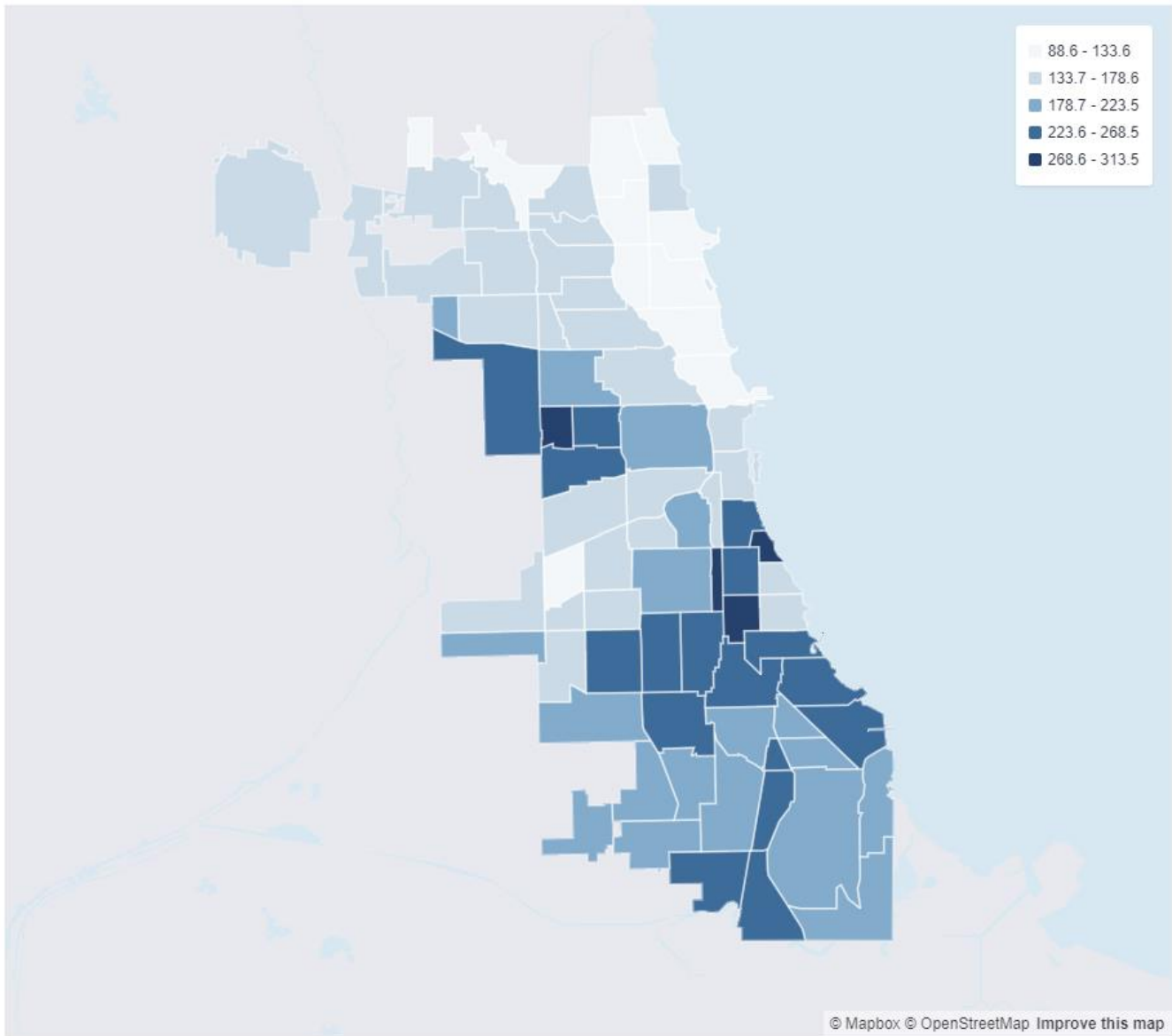
ADULTS WHO HAVE BEEN DIAGNOSED WITH ASTHMA, 2015-2017



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>

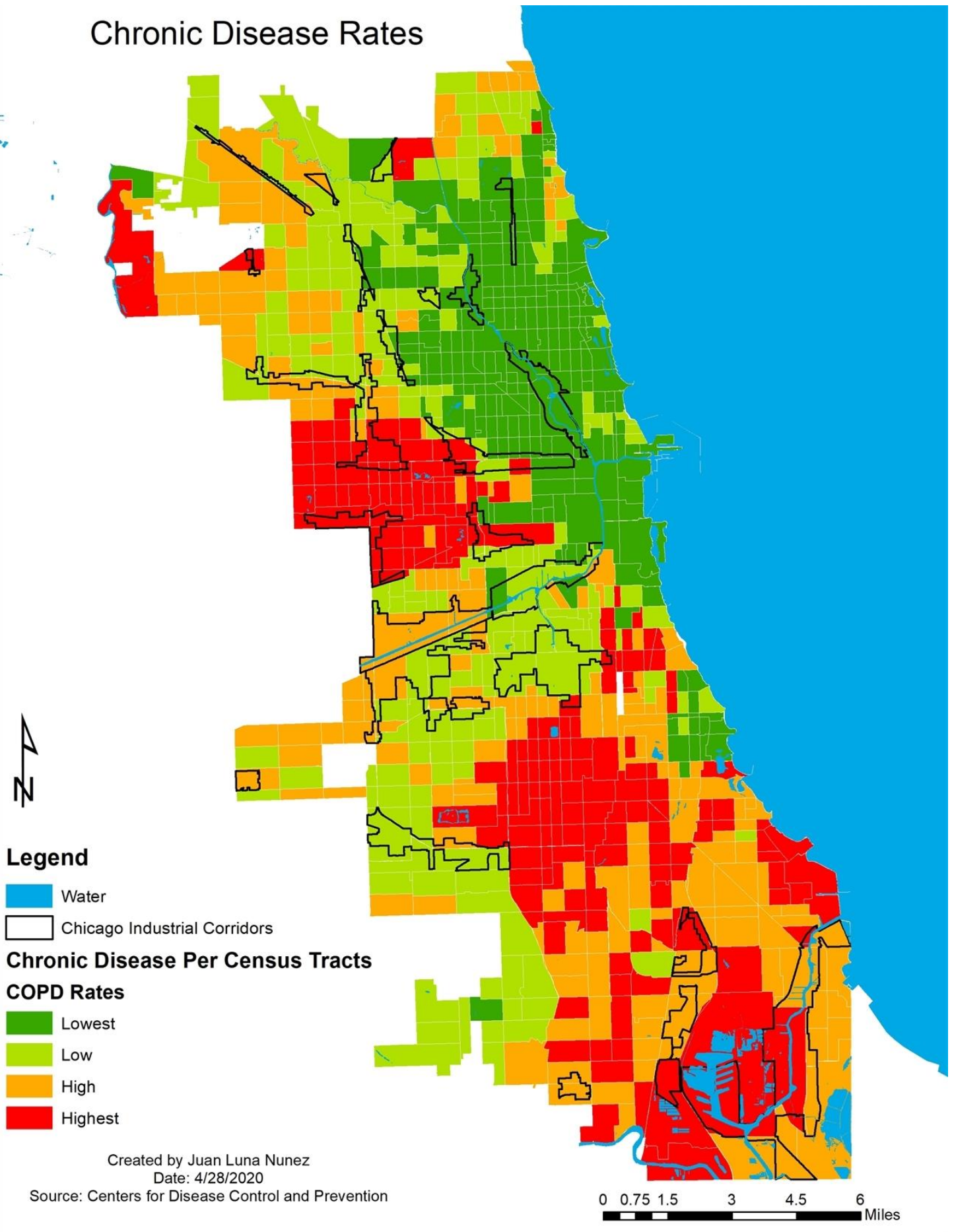
Cancer deaths

PEOPLE WHO DIED DUE TO CANCER



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>

Chronic Disease Rates





[Politics & Government](#)

Could The Calumet Park Beach House Crumble Into Lake Michigan?

City and state officials want Federal Emergency Management Agency to declare Chicago's lakefront a disaster zone, fund erosion protection.

By [Mark Konkol, Patch Staff](#)

Feb 7, 2020 6:18 pm CT



Could the Calumet Park beach house, built in 1962 by the Artistic Stone Company for \$213,000, crumble into Lake Michigan? (Mark Konkol)

EAST SIDE — On Friday, Mayor Lori Lightfoot, flanked by Lt. Gov. Juliana Stratton and U.S. Sen. Dick Durbin, called for the Federal Emergency Management Agency to declare the city's lakefront a national disaster area.

Lake Michigan has gobbled beaches in Rogers Park, devoured lakefront paths near Hyde Park and crumbled sea walls near lakefront high-rises in South Shore. City officials estimate that the combination of powerful winter storms and record-breaking lake levels have already caused more than \$25 million in damage, a burden too big for the City of Big shoulders alone.

"While the City has worked extensively, over the past few months to respond to the damage and to secure the infrastructure and beaches along our lake front - it is clear that this is a challenge we can't solve alone. ... We have declared disaster status to ensure Chicago receives the supports needed for addressing the scope of this issue for the long term," Lightfoot said. "We remain committed to working with all stakeholders at the state and federal level in order to protect and preserve this vital piece of Chicago's landscape."

While the disappearance of beaches in Rogers Park, devoured lakefront paths near Hyde Park and damages sea walls have gotten the most attention, city and Chicago Park District officials are still trying to determine the extent of erosion damage and which sections of the lakeshore that are at risk.

The Calumet Park Beach House, built to open in 1962 by Artistic Stone Company for \$213,000, has taken a beating this winter.

Drone video, shot in August as part of the park district's shoreline assessment and strategic plan, shows that lake levels at Calumet Park Beach had already reached the beach house steps. Only sandy corners of the beach remained above the water line.



Video: <https://youtu.be/9bMoJgWmzJ8>

On Friday morning, Chicago's southernmost beach near the Indiana border was completely underwater.

Metal railings and the concrete patio near the concession stands were covered in ice.

A wooden platform attached to the beach house steps, heavy with ice, leaned toward the lake.

A section of lakefront path near the beach house had succumbed to sink holes created when waves washed away sandy soil beneath the concrete sidewalk.



Video: <https://youtu.be/XGoAUqQGTwg>

Could the Calumet Park beach house face a similar fate?

A park district spokesman didn't have a clear answer on Friday.

Park district crews and contractors are currently assessing which sections of the shoreline need the most urgent attention, he said, and Calumet Beach is part of that effort.

Source: <https://patch.com/illinois/chicago/could-calumet-park-beach-house-crumble-lake-michigan>