

The Army Corps Wants to Build a 25-foot Tall Toxic Waste Landfill on Chicago's Lakefront: Where is the Public Outrage?

In early 2019 the Chicago District of the Army Corps of Engineers ("Corps") published a Draft *Dredge Management Plan and Environmental Impact Study* ("DDMP/EIS") proposing to *vertically expand* a toxic dredge disposal facility, known as a "confined disposal facility" ("CDF"), on the shore of Lake Michigan at the Calumet River. The existing CDF already concentrates over a million tons of contaminated dredge in a 1984 "in-water" structure that was scheduled to close in 2022, but under this new proposal the Corps would build a 25-foot mountain on top of that structure composed of another million tons of toxic waste. <https://www.lrc.usace.army.mil/Missions/Civil-Works-Projects/Calumet-Harbor-and-River/>

This surprising proposal had been rejected as an option by the Corps for many years. Yet, it appears the Corps is set to finalize this proposal in February -- despite opposition by the Alderman, local residents and organizations, parks advocates, and environmental groups and despite the Lightfoot Administration's focus on neighborhood equity and protecting Chicago's drinking water quality.

What is the a problem? The CDF sits literally in Lake Michigan – the City's water supply. Unlike a properly permitted, lined and monitored modern landfill, the CDF was designed to allow the waters of the Lake to flow in and out of it. The CDF effectively concentrates a million tons of toxic dredge in a sieve at one location directly upstream from Calumet Beach and adjacent to historic Calumet Park and the new Steelworkers Park in the City's 10th Ward – an *environmental justice community* already over-burdened with landfills and polluting industrial operations.

The Corps has provided no evidence that the Pollution Control Board's stringent Lake Michigan Basin water quality standards are being maintained in the vicinity of the CDF or will be met following this expansion. In fact, the Corps initially provided no water quality data to support its DDMP/EIS and simply relied on the cynical assumption that the Southeast Side of Chicago and its lakefront waters are already contaminated.

Ask yourself: Would a toxic landfill be allowed anywhere else on Chicago's Lake Michigan shore? It is clear that the Corps sees the Southeast Side and this already burdened lakefront location as the path of least public and legal resistance to this dirty operation.

This new 25-foot high hill of toxic waste will be permanently perched on the shore and subject to storm surge and rising Lake Michigan waters. What could go wrong? Well, for example:

1. Lake water flowing in and out of the CDF and washing over its steep surface, as well as its drainage, storage and drying operations, are likely to release the PCB's, mercury, lead and other toxic contaminants in the dredge into Lake Michigan – contaminating the City's drinking water and endangering residents using local beaches and harbors.
2. In a worst case, a structural failure of the CDF could be environmentally catastrophic for Lake Michigan and our region.
3. Day-to-day operations at the expanded CDF include air drying of toxic sediment which is likely to result in the release of airborne toxics, including volatilized PCBs, into the local community and adjacent parks.
4. Airborne and waterborne releases from this new mountain of dredge may also endanger birds migrating along the Lake Michigan Flyway and destroy the habitat for the aquatic and terrestrial wildlife that live and breed on the Lake Michigan shore.

To add insult to injury, the lakebed on which the CDF sits is "public trust" land owned by the Chicago Park District which was intended to be returned to the public for park use by 1994. Most Chicagoans believe lakefront land is priceless, yet the Corps DDMP/EIS found this location was the "least cost" option for disposal of this toxic dredge.

This conclusion rests on the Corps placing "zero" cost on the acquisition of this lakefront real estate, although the Corps operations will occupy these public lands for another 20+ years and the mountain of toxic waste the Corps leaves behind will have destroyed the use of this land as a park. Also, the DDMP/EIS assumes no future maintenance costs because the Corps will walk away in 20+ years and leave those costs to its local government "partners", the City and the Chicago Park District.

It is Chicago taxpayers who will be paying in perpetuity for the long-term maintenance, stabilization, monitoring, and prevention of toxic releases from the CDF. Chicago taxpayers will also bear the liability for the CDF's toxic releases and potential catastrophic failure. Chicagoans will be paying for this reckless decision for generations to come --- and all the while the 10th Ward will never regain the public trust park land it was promised in 1984.

With the Corps preparing to release its Final Dredge Management Plan and EIS in just a few weeks, this dangerous decision and its expensive repercussions are about to be quietly foisted on Chicagoans and our Southeast Side communities.

Are the City of Chicago, Chicago Park District and Chicago taxpayers even aware of the risks, costs and liabilities they will assume as a result of this Corps decision?

Our organizations ask: Where is the press? Where is the public debate and scrutiny of this risky proposal?
Where is the outrage?