



COOK COUNTY
GOVERNMENT

Cook County Environmental Justice Policy Framework

Department of Environment and
Sustainability

Message from Director of Department of Environment and Sustainability

Greetings,

I am pleased to present the Cook County Department of Environment and Sustainability (DES) Environmental Justice Policy Framework.

The Framework will inform strategy and decision-making in partnership with communities – especially those most impacted by environmental injustices. The Framework originated from the imperative to address historical and present environmental injustices and promote environmental equity throughout Cook County.



DES will evaluate the proposed recommendations in this framework, prioritizing the most impactful initiatives. We look forward to partnering with County as well as local, state and federal agencies, civic institutions, businesses and community members to implement meaningful programs and initiatives throughout Cook County.

This Framework will help to focus efforts on clean air and water, reducing land pollution, protecting public health and safety and economic opportunities. This document will serve as a guide to prepare and strengthen our region to be more resilient to the effects of climate change.

The Framework directly addresses pillars of the Cook County Policy Roadmap. In addition to directly employing important components of the Sustainable Communities pillar, it also supports Healthy, Vital, Safe and Thriving, Connected and Open Communities.

I am grateful to Cook County Board President Toni Preckwinkle for her leadership, vision and support for the critical role environmental justice plays in ensuring equitable outcomes for all County residents.

The Environmental Justice Policy Framework was created by an Internal Working Group, made up of representatives across multiple County departments and agencies, and a Community Advisory Committee, with representatives spanning Cook County. The Framework implementation will be advised by one group comprised of both County and community representatives, who will review and refine it annually.

DES is proud to lead this effort on behalf of the residents of Cook County. We welcome your engagement.

Sincerely,

A handwritten signature in black ink, appearing to read "Suzanne Malec-McKenna".

Suzanne Malec-McKenna, Ph.D.
Director, Department of Environment and Sustainability

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Cook County Land Acknowledgment

Cook County resides on lands that have been home to Indigenous People for thousands of years. The Potawatomi, Ojibwe, Odawa and dozens of Nations, were the custodians and caretakers of this land for centuries before European colonization. Truth and acknowledgment are critical to building understanding and mutual respect across all cultures, traditions and heritages. By making this statement, Cook County recognizes the past wrongdoings as well as present harm upon people, Tribal lands, and governments. We honor the Indigenous people, past and present, and pause to remember the acts of violence, displacement, colonization and removal of the original inhabitants of this land. With this Land Acknowledgment, Cook County commits to learning more about and doing better to support the County's Native and Indigenous residents as we work towards equity for all of Cook County.

I. Executive Summary

A. Purpose

Cook County, through its Offices Under the President (OUP), supports the protection of land, natural resources and all people who reside in, work in or visit Cook County. OUP is committed to advancing environmental justice (EJ), the fair and meaningful treatment of all people regardless of race, class, color, gender, ability and national origin, in all its programs and activities. The purpose of this policy is to redress historical and present injustices and promote environmental equity throughout Cook County by establishing an EJ framework to inform OUP decision-making and centering those most impacted by environmental injustices. It serves as a reminder of the importance of environmental health and well-being for all communities and affirms that all people have a right to clean air, water and land.

The EJ framework that follows is a comprehensive approach to program and policy design and decision-making that will allow for the inclusion of the greatest number of environmental justice considerations in the earliest stages of the decision-making cycle. This framework is designed to foster environmental justice through strategies that address, mitigate and amend past injustices while enabling proactive, community-led solutions for the future.¹ It will ensure environmental equity in the administration of OUP programs and establish a clear set of visions and priorities for OUP staff across departments to promote environmental justice throughout Cook County. The EJ framework sets a standard for accountability through intentional community engagement that centers those most impacted and through transparent reporting.

OUP will attempt to gather available data on environmental and health indicators local to Cook County and performance and participation metrics for OUP programs over the next two to three years and use this environmental justice framework to further develop a robust set of policies and procedures through which OUP will be better equipped to consider impacts to communities.

The EJ policy furthers the goals and vision established in the OUP Racial Equity Policy, Equity Fund Task Force Recommendations² and the Policy Roadmap.³

This policy is intended to be a living document maintained by the Department of Environment and Sustainability (DES) that will be accessed regularly and reviewed annually in the second quarter of each fiscal year and refined as needed.

B. Background

Low-income communities of color have historically borne the brunt of disproportionate environmental harms^{4,5} and lived in the areas with the greatest pollution,⁶ noise and traffic burden.⁷ These environmental injustices have a direct correlation to these communities being redlined⁸ or excluded through racially restricted covenants,⁹ having lower property values, having fewer connections to decision-makers and not having a seat at decision-making tables.¹⁰ This has produced disparate environmental health,¹¹ public health^{12,13} and socioeconomic outcomes for generations.^{14,15}

Chicago is considered the birthplace of the environmental justice movement. Hazel M. Johnson, a Chicago resident who founded the People for Community Recovery (PCR)¹⁶ in 1979 and fought

environmental injustices in her community in Altgeld Gardens, is widely recognized as the mother of the environmental justice movement.¹⁷ After her husband died from cancer, Hazel started to wonder why so many people were dying of cancer as well as being impacted by asthma and other health problems. She learned that her community was surrounded by landfills, an incinerator, underground storage tanks, factories, scrap yards, and many other industrial sites, leading her to coin the term “toxic donut” to refer to her community. PCR was founded to focus on reducing and eliminating environmental hazards in her community. One of PCR’s first wins was getting water and sewer lines installed for a community next to Altgeld Gardens that had been drinking from well water that was contaminated with pollutants.

Also in 1979, Dr. Robert Bullard, now known as the father of environmental justice¹⁸, and Linda McKeever Bullard brought to light the fact that most of the waste (> 80%) generated in Houston, Texas, was going to Black communities, while researching a class action lawsuit (Bean v. Southwestern Waste Management Corporation) about the locating of a landfill in a Black community. The case lasted eight years and was the first lawsuit that attempted to use Civil Rights Law and environmental racism to help communities in the fight against polluters.¹⁹ Dr. Bullard has since led the way for conversations, community action and research related to environmental justice and the connections between race and class, vulnerability to pollution and zoning.

Another pivotal moment in the national environmental justice movement is often traced back to Warren County, North Carolina, where, in 1982, a hazardous waste landfill was sited in a poor, rural and predominantly Black community. There were large and lengthy protests with arrests and legal challenges. The landmark study, *Toxic Wastes and Race in the United States*²⁰ utilized data on locations of hazardous waste sites and detailed demographic data to visualize the disparities. However, the residents lost their fight, and toxic waste was put in the landfill. This community advocacy created an additional place to fight for justice, building on the Civil Rights Movement. Chicago (especially south and southeast sides) and Cook County suburbs (such as Cicero in the western suburbs) have a long history of EJ organizing by Black, Latino/a/e, Asian American, Pacific Islander and Native communities, including the Southeast Environmental Task Force, Little Village Environmental Justice Organization, Blacks in Green, Voces Fieles Comunitarias Contra la Opresión and many more. Several communities and organizations have been working to combat environmental racism in public practices across generations.

Due to government’s historical role in creating the conditions that led to environmental injustice, OUP now works toward rectifying past environmental injustices, recognizing current injustices and engaging with communities to create solutions for the future. A beginning step for OUP is to establish an environmental justice policy.

In recent years, the Cook County COVID-19 Response Plan,²¹ the Cook County Equity Fund Taskforce²² and the Cook County Board of Commissioners, by Resolution 23-1092 in Support of Environmental Justice,²³ have called for the development of a Cook County environmental justice policy. To that end, OUP established an internal EJ policy working group, received community input through an EJ survey, held focus group sessions and conducted stakeholder interviews. Recognizing that community members must be centered in the development of this policy, OUP established an Environmental Justice Community Advisory Committee (EJ CAC) to co-develop the EJ policy with OUP staff. The EJ CAC was comprised of the following individuals:

Delia Barajas (Voces Fieles Comunitarias Contra la Opresión), Oliver Ciciora (Southsiders Organized for Unity and Liberation), Aliaa Eldabli (Radiant Vessels Community Services), Jerri Garl (Environmental Justice Evanston), Jersey-Shabazz Hosier (Access Living), Fredia Lindsey (resident of Robbins), Theresa Reyes McNamara (Southwest Environmental Alliance), Daisy Rosa (resident of Rolling Meadows), Gina Roxas (Trickster Cultural Center), Myrna Salgado (Chicago Environmental Justice Network), Apostle Carl White, Jr. (Southland Ministerial Health Network), Angela Xu (resident of Chicago) and Michelle Yates (South Suburbs for Greenspace).

II. Guiding Principles

In developing the EJ policy, the EJ CAC and internal working group were guided by agreed-upon principles outlined below. These same principles will help OUP establish practices and procedures consistent with the intent of the EJ policy.

- **Build on existing EJ standards.** Jemez Principles for Environmental Justice:²⁴ These are 17 principles created by delegates of the First National People of Color Environmental Leadership Summit in 1991 that were integral to defining the EJ movement. Topics include ethical uses of land for a sustainable planet, public policy free from discrimination and bias, protection from nuclear testing and hazardous waste disposal, the right to self-determination (the ability individuals have to make choices on actions that will impact them) and participatory government and decision-making, indigenous rights and treaties, the destructive nature of corporations, social and environmental education, sustainable consumption, cleaning up and rebuilding areas in balance with nature and more.
- **Utilize the role of OUP.** OUP plays a vital role in improving the environment and quality of life for all residents of Cook County. OUP's role in repairing past environmental injustices includes proactively supporting and investing in environmental justice communities. Environmental justice raises awareness of the relationship between the environment and systemic racism and practices of environmental racism.
- **Identify cumulative, generational impacts.** Consider communities impacted by cumulative impacts of environmental injustices that have produced racially disparate public health, environmental health and socioeconomic outcomes for generations.
- **Emphasize Partnerships.** Environmental justice emphasizes community partnership, empowerment and participation by those most impacted by disparate environmental conditions to result in outcomes that rectify past harms.
- **Focus on education and awareness.** For years, institutions have discussed health disparities, racial injustices, urban flooding, industrial harms, wastewater facilities, heat disparities, contaminated land, particulate matter (PM) 2.5 levels and other data. However, grassroots environmental justice groups are often kept out of these conversations. The burden continues to fall on frontline communities and the people who live with these injustices. Environmental justice education for residents, community leaders and business owners is important and necessary and should not rely on residents finding their own information. First-hand accounts and stories should be included in further discussions.

III. Definitions

Cumulative Impacts: The totality of exposures to combinations of chemical and nonchemical stressors and their effects on health, well-being and quality of life outcomes. Cumulative impacts include contemporary exposures to multiple stressors as well as exposures throughout a person's lifetime. They are influenced by the distribution of stressors and encompass both direct and indirect effects to people through impacts on resources and the environment. Cumulative impacts can be considered in the context of individuals, geographically defined communities, or definable population groups. Cumulative impacts characterize the potential state of vulnerability or resilience of a community.²⁵

Environmental justice: The fair treatment and meaningful involvement of all people regardless of race, class, color, gender, ability and national origin ²⁶, with respect to the development, implementation and enforcement of laws, regulations, policies and programs that support a sustainable, healthy and equitable quality of life in the places where they live, work, play, worship and learn.

Environmental Racism: Environmental racism refers to any policy, practice or directive that imposes environmental harm and differentially affects or disadvantages (whether intended or unintended) individuals, groups or communities based on race and other protected classes.

Fair treatment: The concept that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.²⁷

Meaningful involvement: Ensuring that the people impacted by decisions are at the table and that community concerns are considered, responded to and incorporated where possible in the decision-making process by intentionally seeking out and facilitating the involvement of those potentially affected. Ensuring that these voices are not just heard before decisions are made but are also active participants in the planning and development throughout the process.

*Offices Under the President (OUP):*²⁸ Led by the County Board President and the Office of the President (OOP), OUP comprises the six bureaus and 30 departments that serve the residents of Cook County.

Resiliency: The ability of communities to adapt and recover from the impacts of climate change and other environmental challenges, such as temperature extremes, frequent and intense storms or major health hazards.

IV. Initial Action Steps and Timeframe²⁹

To implement the EJ policy, the County will prioritize the following initial action steps:

- A. Continue to convene the EJ working group, expanding to include external partners
- B. Build OUP staffing dedicated to environmental justice, providing capacity and training for current staff
- C. Develop public reporting and engagement processes and timeline
- D. Perform an assessment of OUP programs and policies and provide recommendations

- E. Identify a mapping tool and define EJ communities in Cook County
- F. Identify opportunities to codify environmental justice principles and practices into the County's code

A. Continue to convene the EJ working group, expanding to include external partners:

Initially convened in November 2021 and meeting periodically since then, an internal EJ working group has been engaged in developing the EJ policy with the EJ CAC. The group, led by DES, will continue to meet and include members from the Office of the President (OOP), Bureau of Administration (BOA), Department of Emergency Management and Regional Security (EMRS), Bureau of Finance (BOF), Bureau of Economic Development (BED), Department of Planning and Development (DPD), Building and Zoning (DBZ), Department of Transportation and Highways (DoTH), Justice Advisory Council (JAC), Bureau of Technology (BOT), Department of Public Health (CCDPH), Department of Human Rights and Ethics (DHRE) and others as deemed necessary.

To ensure that community members have a voice and to enhance accountability, OUP will expand the EJ working group to include at least eight but not more than 15 impacted community members and organizations throughout the County, selected through an application process. This builds off the establishment of the EJ CAC, which was created for the specific purpose of co-developing a County EJ policy. These external participants may be eligible for compensation for participation in this group and collaboration with the County in the implementation of the EJ policy.

The EJ working group will meet every other month in the first year, as a large group or in smaller issue-specific cohorts, to strategize ways to implement improvements to County policies and programs to operationalize environmental justice. Members of the working group will be reviewed annually in alignment with the EJ policy review to ensure that participants are still appropriate. The EJ working group will continue for three years and then be assessed to determine need for continuation.

Timeframe: In 2026, the EJ working group will develop an open application and selection process to incorporate external participants. The group will also determine meeting structure, frequency and requirements for participation for future years.

B. Build OUP staffing dedicated to environmental justice, providing capacity and training for current staff:

Because this policy will reach across OUP and require the involvement and cooperation of many bureaus, departments and services, it is essential that the necessary resources are provided to ensure its success. Currently, environmental justice work is being done by various employees in addition to their responsibilities. DES intends to expand its environmental justice training and staffing to implement this policy, support agencies in the assessments of programs and policies, manage the EJ working group, engage with community members, perform analyses and act as a resource for communities and residents. OUP, through DES, will build upon best practices established by partner agencies and environmental justice guidance such as the U.S. Environmental Justice Science, Data and Research Plan.³⁰

Timeframe: Two full-time, dedicated EJ staff were included in the approved 2025 budget.³¹ DES posted positions in 2025, with plans to onboard and train new staff by early 2026.

C. Develop public reporting and engagement processes and timeline: Accountability is key to ensuring that progress is made in the implementation of the County's environmental justice framework. DES, together with the EJ working group, will develop quarterly public progress reports on the work that is being done, using simple, clear and accessible language. A central point of contact will be established for environmental justice input and concerns. This policy is a living document and will be reviewed annually in the second quarter of each fiscal year by the EJ working group and involving input from the public to see what adjustments and updates need to be made. If substantial updates or operational changes are required, OUP will seek to provide those updates publicly by the end of the fourth quarter of the same year. The timeline for reporting and updates may be adjusted based on recommendations from the EJ working group.

Timeframe: The first quarterly report will be released in 2026 and will continue from there. A complete public reporting and engagement process and timeline will be released in 2026.

D. Perform a thorough assessment of OUP programs and policies and provide recommendations: DES EJ staff will develop an assessment template that can be used in collaboration with departments to review current programs and policies throughout OUP to identify actions within the scope of each department's authority to promote environmental justice and engage in efforts to repair past injustices. Staff will look at what gaps exist, what has worked in the past, evaluate previous harms (even if unintended), determine which process or programs may result in disparate outcomes for disadvantaged residents and identify where improvements are needed. These assessments will review program and policy impact across the County and specifically in the soon-to-be designated environmental justice communities³². Additionally, they will be used to develop recommendations that may reduce harm and/or improve environmental, social and health outcomes and will be reported out publicly.

Timeframe: The assessment tools will be developed in 2026, with recommendations from the assessment completed in 2027 and reported publicly, based on guidelines developed by the EJ working group.

E. Identify a mapping tool and define EJ communities in Cook County: An environmental justice mapping tool will help focus engagement efforts and recommendations developed through this process to the communities that have been most impacted by environmental injustices. OUP has not yet determined if a new map will be created or if an existing map or tool, such as the Council on Environmental Quality's Climate and Economic Justice Screening Tool (CJEST),³³ Center for Disease Control and Prevention's Environmental Justice Index,³⁴ IL Environmental Protection Agency's EJ Start,³⁵ will be used. First, OUP will determine what data is available, which data will be utilized and if the tool reflects cumulative burden (how multiple indicators compound to exacerbate negative impacts). For a new mapping tool, potential data points could include quantitative and qualitative data related to air quality, acute and chronic public health, location of existing industrial facilities, quality of life factors, socioeconomic, flooding, tree canopy data, high noise levels and heavy traffic (especially truck routes and train depots). This process will include collaborating with other local jurisdictions and learning from

related efforts, including the City of Chicago's cumulative impact assessment,³⁶ and incorporating a public input component. OUP will work to ensure that the tool is clear for everyday residents. The mapping tool will lead to the development of a shared definition and understanding of "environmental justice communities" in Cook County.

Timeframe: By end of 2027, there will be an official definition and map of environmental justice communities within Cook County.

F. Identify opportunities to codify environmental justice principles and practices into the County's code: The EJ assessment will likely highlight several actionable policies and procedural updates that support environmental justice throughout the County. These will be identified and shared as part of future EJ reports. Until then, one of the initial actions the County may pursue is to codify its commitment to environmental justice, by promulgating definitions and principles in the County's code³⁷ and mandating departmental participation in the assessment process. This will formalize EJ work as an essential piece of County operations. The EJ working group and OUP leadership will identify the appropriate language and location of such additions and recommend inclusion.

Timeframe: By the end of 2027, the EJ team will recommend updates to the Cook County code.

V. Primary Focus Areas for the Framework

Below is a list of primary focus areas where OUP will begin implementing this framework. These focus areas were selected after reviewing input from residents and other community leaders through an EJ survey, focus groups and stakeholder interviews. Each includes immediate steps and future considerations to help guide this work. For each focus area, OUP will determine what it is already doing in this space, what past programs, policies or practices may have resulted in harm to communities, what role OUP could be playing and what more can be done by OUP. It is important to note that some of these steps and considerations will require OUP to focus internally on policies and practices within its control, and some will require OUP to focus externally on how to engage with residents, community organizations and local governments.

As there are so many health intersections with environmental justice issues, OUP will continue to work with the Cook County Health and Hospital System (CCHHS) and CCDPH to ensure that health considerations and available data are taken into account when assessing programs and policies in each of these focus areas. Accessible healthcare is a priority for Cook County; CCHHS cares for everyone in Cook County and continues to deliver integrated health services with dignity and respect, regardless of a patient's ability to pay.

The focus areas are not comprehensive; the policy and framework will be updated annually as described in this policy. The full assessment³⁸ with recommendations will give OUP a more complete view of potential actions.

Air Pollution	
Immediate Steps	Future Considerations
<ol style="list-style-type: none"> 1. Evaluate what air pollution data is currently being collected by OUP and other relevant agencies. 2. Improve communication to the public about air monitoring program³⁹ and Clean Energy Plan.⁴⁰ Clearly present types of data, how it is being collected and frequency of data collection on OUP website. Share best safety practices and types of legal enforcement that exist. Ensure Spanish translation at a minimum for all data pages. 3. Engage with local, state and federal legislators to build upon and reinforce clean air requirements and regulations, also exploring cumulative impact ordinances. 4. DES will continue to implement Chapter 30 of the Cook County Code, which incorporates various state standards by reference, and will work to increase awareness of existing County air permit requirements, including Certificates of Operation⁴¹ (Chapter 30, Subdivision III) and equipment registration (Chapter 30, Subdivision I). The County will continue to work with the State's Attorney on enforcement initiatives, with the State's Attorney prosecuting citations at Administrative Hearings and representing DES in court. 5. Utilize air pollution data and emissions modeling from the Chicago Metropolitan Agency for Planning (CMAP),⁴² Environmental Protection Agency (EPA)⁴³ and other partners to identify opportunities for County action to meet regional pollution and emissions reduction and further climate action goals. 	<ol style="list-style-type: none"> 1. Identify pathways for OUP to incorporate community-led data collection/monitoring throughout the suburbs and collaborate with City of Chicago on their community air monitoring network. 2. Design policies and programs that support greenhouse gas reductions, conversion from natural gas to electrification, net zero and clean transportation efforts for residents and municipalities, especially suburbs across the County. This may include updating Green Building Standards and offering incentives for participation. 3. Identify additional OUP-led air monitoring and accountability practices which may be incorporated to inform and reduce environmental and public health harms 4. Coordinate with maternal health care providers, pediatricians and other family-focused medical practitioners to monitor health impacts from air pollution and engage impacted community members in identifying areas of concern. 5. Explore opportunities to support building performance standards throughout the County for both commercial and residential properties to reduce negative health impacts on occupants and the environment. Utilize knowledge gathered from the City of Evanston's Healthy Buildings Ordinance⁴⁴ and other local governments who have passed legislation.

Eliminating and Reducing Toxins	
Immediate Steps	Future Considerations
<ol style="list-style-type: none"> 1. Identify OUP-related programs and services available to residents and municipalities that support clean water access (including LeadCare Cook County⁴⁵ and other lead line replacement programs). Prioritize residences, schools and local community resources such as libraries. 2. Clearly present relevant programs and eligibility in multiple forms of media, such as video, on OUP or program websites. Include specific resources for residents (renters and owners), businesses, municipalities and nonprofit organizations. Include Spanish translation at a minimum. 3. Identify funding to continue supporting programs such as CCDPH Lead Poisoning Prevention⁴⁶ and Healthy Homes for Healthy Families⁴⁷ programs that address concerns such as lead and mold and expand opportunities in Household Hazardous Waste disposal for residents to reduce exposure to cleaning chemicals and other household toxins. 4. Continue and expand reach of brownfield redevelopment program⁴⁸ to improve abandoned or under-used industrial and commercial properties, remediate contamination, protect soil health and improve community health and benefits. 5. Build upon success with Businesses Reducing Impact on the Environment (BRITE)⁴⁹ program to provide assessments, technical assistance and funding to reduce toxins released from local businesses and encourage environmentally friendly alternatives. 6. Improve awareness of existing permitting process and requirements for asbestos,⁵⁰ construction and demolition,⁵¹ industrial and commercial Certificates of Operation,⁵² equipment registration and solid waste facilities.⁵³ Increase outreach to businesses and municipalities to improve understanding and participation. 	<ol style="list-style-type: none"> 1. Develop plan for how OUP programs can support public health initiatives to provide resident-facing programming and resources. 2. Explore policies and practices that reduce use of toxins in County operations and limit use of pesticides, herbicides, coal tar and other known toxins in Cook County. 3. Assemble public health resources to address resident-generated questions on environmental hazards from various forms of pollution and toxin exposure. Develop a system to regularly update and share resources. 4. Encourage use and development of green building practices and guidelines that minimize use of toxic substances, conserve water and improve indoor air quality for inhabitants. 5. Develop a map and/or other educational resources that highlight businesses in Cook County that utilize environmentally friendly practices or alternatives.

Water: Access to Clean Drinking Water, Infrastructure and Flooding	
Immediate Steps	Future Considerations
<ol style="list-style-type: none"> 1. Water Infrastructure: Report out on what OUP is currently doing to address infrastructure issues, including stormwater management efforts with DoTH, Metropolitan Water Reclamation District (MWRD) and related projects in Build Up Cook.⁵⁴ 2. Water Infrastructure/Flooding: Create opportunities to listen to residents regarding their biggest water infrastructure issues, respond to concerns in a timely manner and connect them to immediate and long-term resources as appropriate. 3. Water Infrastructure/Flooding: Utilize existing watershed networks and working groups, as well as CMAP's Integrating Equity into Flood Resilience Investments report⁵⁵ for local guidance on most impactful investments. 4. Flooding: Compile and provide public resources⁵⁷ that currently exist to help residents, businesses and municipalities before disasters occur (flooding, water scarcity, drinking water contamination) in addition to resources for recovery after such events. 5. Understanding that much of the flooding in our region is exacerbated by overdevelopment and lack of permeable surfaces, consider land use in programming and policy decisions for new and existing developments. Work with communities to identify areas for improvement through green infrastructure and on-site water capture. 	<ol style="list-style-type: none"> 1. Develop system for OUP departments to collaborate to ensure clean, affordable water access across the County. 2. Explore educational opportunities regarding preventative measures for flooding and response measures for residents. 3. Continue to pursue funding including Community Development Block Grant-Disaster Recovery⁵⁶ and others for water infrastructure improvements, which may include practices that improve soil quality, assessing and removing dams, wetland restoration, expanding hydrology restoration projects, filtering and reducing stormwater runoff, reducing parking lot footprints, installing porous pavers and converting parking lots from asphalt to gravel, restoring eroded areas and stabilizing streambanks, and reducing the impact of and increasing resiliency to increased flooding. 4. Clearly define what services related to water infrastructure, green stormwater infrastructure and flooding support OUP can provide and how to access these services. 5. Continue exploring emerging technology such as Artificial Intelligence (AI) and data centers and what these mean for local water and electricity access and affordability. 6. Partner with residents and organizations to explore Lake Michigan shoreline flooding and overtopping in vulnerable areas as well as supporting protections for Lake Michigan, the Chicago River, Calumet and other waterbodies within the County.

Climate Resiliency	
Immediate Steps	Future Considerations
<ol style="list-style-type: none"> 1. Create an inventory of all climate resiliency programming and initiatives across OUP, including Climate Resiliency Planning for Communities.⁵⁸ 2. Develop an internal working group with representatives from DES, EMRS, DoTH, BAM and BED to create a climate resiliency plan with timelines of project completion and intentional community engagement. 3. Develop standard messaging for residents about climate threats, including increased high heat days, storm events, resiliency projects, disaster preparation and adaptation efforts. 4. Identify best method to push out emergency and resiliency messaging to community members on a consistent basis. This may include social media, radio announcements, text messaging and/or community networking with community organizations or places of worship, etc. 5. Compile and provide public resources that currently exist to help residents, businesses and municipalities before disasters occur (extreme temperature events, increased storms) in addition to resources for recovery after such events. 6. Continue collaboration between CCHHS, EMRS and local municipalities to support residents during extreme temperature events through resource-sharing, cooling/warming centers and advanced communication. 	<ol style="list-style-type: none"> 1. Determine process for how OUP prioritizes resiliency measures in projects it funds. 2. Continue to pursue funding opportunities to support resiliency efforts. This may include programs such as supporting resilience hubs, improving or maintaining green spaces, expanding access to health care, providing opportunities to participate in energy efficiency or renewable energy upgrades, improving resilient building strategies and workplace heat standards and strengthening policies that protect renters. 3. Determine how a County Climate Resiliency plan will work with and integrate into the County's Multi-Jurisdictional Hazard Mitigation Plan.⁵⁹ 4. Advance strategies to support early years providers and education systems in ensuring safe, healthy, reliable and high-quality services to children and families in a changing climate. 5. Coordinate with CCHHS on messaging about available health services to all Cook County residents during and after climate emergencies.

Access to Healthy Food	
Immediate Steps	Future Considerations
<ol style="list-style-type: none"> 1. Continue to advance implementation of Cook County Good Food Purchasing Program (GFPP)⁶⁰ across County's procuring departments (Cook County Health, Juvenile Temporary Detention Center and Cook County Sheriff's Office) and other County anchor institutions such as higher education institutions and healthcare systems to serve/sell local, healthy, sustainable food that aligns with GFPP values. 2. Continue to increase investments in local food producers and businesses, including MBEs/WBEs and other small businesses, that align with GFPP values (local, healthy, sustainable, fair and humane) to provide local, healthy and culturally responsive fresh foods to food insecure communities. 3. Assess impact/progress of County Ordinance 22-5345⁶² (passed in Nov 2022), which created a Class 7d property tax incentive to spur and supports the establishment or expansion of grocery stores in food deserts. 4. Support implementation and expansion of Food is Medicine⁶⁷ programs across suburban Cook County. 5. Support promotion and use of Metro Chicago 211⁶⁸ to connect suburban Cook residents to resources, including community food access sites. 6. Continue the OUP's gap analysis of urban agriculture within Cook County. 	<ol style="list-style-type: none"> 1. Support expansion of participation in federal nutrition assistance programs (National School Lunch Program, Supplemental Nutrition Assistance Program (SNAP), Women, Infants, and Children (WIC), Child and Adult Care Food Program (CACFP)) and other food security programs like Food is Medicine programming and medically-tailored meals. Leverage the CMS 1115 waiver⁶¹ which states can use to deliver and pay for health care services in Medicaid and the Children's Health Insurance Program (CHIP). 2. Identify and advance policy solutions to gaps/barriers identified through OUP's gap analysis of urban agriculture that improve access to community farms, and healthy and culturally important foods. 3. Support increases in funding levels/reimbursement for school meal programs (National School Lunch Program,⁶³ Breakfast After the Bell⁶⁴ and Healthy School Meals for All⁶⁵) and federal nutrition assistance programs (SNAP, WIC)⁶⁶.

Community Engagement	
Immediate Steps	Future Considerations
<ol style="list-style-type: none"> 1. Evaluate the OUP's current language access policy,⁶⁹ using resources such as Illinois Environmental Protection Agency Language Access Plan.⁷⁰ Ensure Spanish translation at a minimum for all program guides. 2. Review and map out OUP public-facing programs to understand how information currently gets to County residents. 3. Review how OUP currently seeks input on projects, programs and policies from community members. Cook County resident engagement will be informed by the Illinois Environmental Protection Agency (IL EPA) EJ enforcement strategies.⁷¹ 4. Review how youth are currently being engaged for input on OUP programs and policies and identify opportunities for further engagement. 5. Incorporate accessibility features, such as image descriptions, when making reports and social media posts. 6. Clearly identify OUP jurisdiction for practices and programs that impact environmental justice concerns such as zoning, road maintenance and transit updates. 	<ol style="list-style-type: none"> 1. Develop a community engagement strategy and accompanying policies for OUP that incorporates receiving and responding to public input and how community members can have increased input on OUP program and policy development. 2. Explore how OUP can create educational resources that are appropriate for multiple audiences and do not all require internet access. 3. Collaborate with Cook County digital equity⁷² work. Identify ways to better engage and integrate municipal leaders in EJ work, including addressing EJ solutions and communicating opportunities for building community transparency around EJ issues and technical assistance. 4. Establish norms and internal processes that encourage youth and family-focused participation and compensation for residents and community organizations. Align with the childcare needs and working hours of parents and caregivers and include compensation for lived expertise where appropriate. 5. Build upon existing tools (environmental complaint portal⁷³, phone number and email address) to collect, track and respond to public environmental justice complaints.

Transit/Transportation	
Immediate Steps	Future Considerations
<ol style="list-style-type: none"> 1. Implement the recommendations in the 2023 Cook County Bike Plan⁷⁴ and Cook County Transit Plan.⁷⁵ 2. Continue to invest in the Chicago Region Environmental and Transportation Efficiency (CREATE) program⁷⁷ (a public-private partnership that works to improve the way passengers and goods move over rail) to minimize air emissions and noise pollution from idling trains. 3. Review composition of project advisory committees and outreach strategies to maximize participation and represent community diversity. 4. Participate fully in current legislative effort to adequately fund, improve access to and expand the regional transit system. Include opportunities to establish or extend bus lines into communities without existing access. 5. Continue to implement Stormwater Management Project Implementation Program,⁷⁹ specifically in areas vulnerable to urban flooding to build climate resiliency within Cook County communities. 	<ol style="list-style-type: none"> 1. Use Connecting Cook County Long-Range Transportation Plan⁷⁶ update scheduled for 2027 to help identify additional specific action steps for EJ policy. 2. Study and implement truck routes. Continue to implement Cook County Freight Plan, including study of truck routes, to minimize EJ impacts related to noise and air pollution from goods movement. 3. Work with local and state transportation agencies to identify high-pollution areas and reduce negative health impacts. 4. Participate with CMAP and other stakeholders in cataloging climate risks on county roadways and identifying needed investments through the Transportation Resilience Improvement Plan.⁷⁸ 5. Implement the Cook County Safety Action Plan, which addresses the fact that traffic fatalities and serious injuries disproportionately happen in underserved communities. 6. Continue to work on Chloride Reduction Initiative for snow and ice control measures on County roadways.

Lack of Trees/Green Space	
Immediate Steps	Future Considerations
<ol style="list-style-type: none"> 1. Launch community tree planting program, which prioritizes communities that need support in protecting existing trees and expanding their tree canopy. Identify areas where concrete and other impermeable surfaces can be removed and replaced with trees and native plants. 2. Report on efforts OUP has already taken in maintaining and increasing tree canopies both at County facilities and within municipalities. 3. Engage residents, community organizations, municipal leaders and other stakeholders to best support high priority communities with native ecosystem restoration, natural areas protection, tree-planting and de-paving programs. 4. Continue to engage municipalities through brownfield redevelopment and neighborhood revitalization programs⁸¹ to explore opportunities for expanded green space. 5. Continue FPCC expansion efforts, including implementation of the Land Acquisition Plan and Southeast Cook County Land Acquisition Plan.⁸² 	<ol style="list-style-type: none"> 1. Continue to pursue funding opportunities to support tree preservation, tree planting and tree maintenance programs where appropriate. 2. Better share overlap and opportunities in access to green space afforded through partnerships with Cook County Land Bank and Forest Preserves of Cook County. 3. Increase access to family-focused and climate-resilient outdoor spaces, and encourage participation in programs such as Conservation@Home Program.⁸⁰ 4. Improve and expand upon collaboration with Forest Preserves of Cook County related to green space, tree preservation, tree planting and tree maintenance programs. 5. Review research highlighting the correlation between well-maintained green spaces and crime, and identify paths for connection with Justice Advisory Council efforts.

Recycling, Composting and Circular Economy Solutions	
Immediate Steps	Future Considerations
<ol style="list-style-type: none"> 1. Continue to implement the Cook County Solid Waste Management Plan⁸³ with input from community members and industry leaders. 2. Expand curbside recycling, hard-to-recycle material collection, including e-waste and food diversion initiatives such as the Center for Hard to Recycle Materials (CHaRM)⁸⁴ in suburban Cook County. 3. Open permanent Household Hazardous Waste (HHW) facility in south suburbs. 4. Encourage municipalities to utilize tools such as Recycle Coach⁸⁵ to improve waste diversion throughout Cook County. 5. Identify additional opportunities to reduce waste and improve circularity in County operations, including continuation of food waste composting pilot in County offices and County's salvage and surplus equipment and materials donation programs.⁸⁶ 6. Continue partnership with Illinois Environmental Protection Agency via delegation agreement to inspect certain State-permitted waste facilities and enforce state permits. 	<ol style="list-style-type: none"> 1. Identify opportunities to support the development of a south suburban solid waste agency. Provide technical support to facilitate its launch. 2. Engage state legislators in topics such as extended producer responsibility, product stewardship, the large event facility recycling and composting law. 3. Support business initiatives that reduce waste and encourage diversion and circular economy practices. 4. Continue to engage with local regional partners, including the City of Chicago and surrounding Counties to improve and expand waste diversion opportunities.

Economic Development/Jobs	
Immediate Steps	Future Considerations
<ol style="list-style-type: none"> 1. Catalog what is being done within OUP to support green jobs, with a particular focus on those being previously incentivized by the Infrastructure, Investment and Jobs Act (Bipartisan Infrastructure Law)⁸⁷ and Inflation Reduction Act⁸⁸ investments in clean energy solutions and infrastructure. 2. Continue efforts in the Small Business Source,⁸⁹ Businesses Reducing Impact on the Environment (BRITE)⁹⁰ and Solar Collaborative to grow small businesses that address clean energy needs, pollution prevention and decarbonization, with a focus on business owners from historically excluded communities. 3. Assess OUP ability to promote environmental justice goals in existing economic development review processes as well as in grant programs. 4. Identify sites at risk of large-scale industrial development in unincorporated Cook County and assess opportunities to improve EJ outcomes. Assess OUP role in facilitating or supporting large scale industrial development, and identify opportunities to include requirements, limitations, etc. that would improve EJ outcomes. 5. Engage in green building through architecture, engineering, and construction and related fields to grow career opportunities that promote equity in the built environment. 6. Recognizing the importance of safe, affordable housing for all residents, OUP will continue support and identify opportunities, such as the Veteran Home Repair Program,⁹² that allow residents to improve health and safety of their homes. OUP will also work to prevent loss of housing through emergency rental assistance and identify opportunities to create additional affordable housing opportunities, together with the Housing Authority of Cook County and Illinois Development Authority. 	<ol style="list-style-type: none"> 1. Ensure engagement between BED and DES on green jobs initiatives and grants, existing or new applications, to improve alignment with EJ outcomes. 2. Continue to actively pursue funding opportunities to implement workforce, small business and sector goals to expand the OUP's support of clean energy and create green jobs. 3. Review County procurement policies to identify methods that can help create better opportunities for local firms to participate. Explore cooperative purchasing agreements for major goods that offset costs in low-income areas. 4. Leverage opportunities in Illinois Climate and Equitable Jobs Act (CEJA)⁹¹. 5. Continue exploring opportunities to reduce residential energy burden by engaging residents with existing incentive offerings through ComEd and Nicor, as well as investments in other efforts that reduce utility bills costs for residents.

VI. Future Action Steps

In addition to the initial action steps outlined in Section IV and exploration of the future considerations in Section V, Cook County will identify additional ways to build upon and improve opportunities to increase transparency and accountability, develop and clearly share a process for community engagement and feedback and evaluate enforcement and accountability measures to offer areas for improvement. Additionally, the County will identify funding opportunities to invest in EJ efforts and allow communities to successfully implement various EJ solutions. The County is committed to outlining a consistent process for reviewing this policy and its related efforts and sharing updates and barriers to completion with the public.

VII. Responsibilities

DES is responsible for implementing this framework, supported by OOP. As part of this implementation, DES is responsible for convening the EJ working group, supporting OUP departments and bureaus in performing the assessments of programs and policies and serving as lead for public reporting and accountability associated with this policy.

Departments listed in this policy will participate in the internal EJ working group. It is anticipated that many departments in OUP will actively participate in EJ policy implementation and assessment. Department heads or designees are responsible for performing the assessment of department programs and policies as laid out in this policy, with support from DES EJ staff. Department heads or designees are also responsible for submitting assessment data to DES in a timely manner as directed by DES.

VIII. Short-term Timeline

The short-term timeline for implementing the County's EJ policy is:

- Hire dedicated DES staff who specialize in EJ - 2025
- Establish working group with external partners - 2026
- Identify methods for internal and external education and involvement in EJ policy implementation - 2026
- Begin the assessment of department programs and policies - 2026
- Release first public quarterly report - 2026
- Release initial department program and policy assessment recommendation report - 2027
- Recommend updates to the County code - 2027

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³ Cook County Policy Roadmap, last accessed September 2025: <https://www.cookcountyiil.gov/service/policy-roadmap>

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