



Little Village Environmental Justice Organization
2445 S. Spaulding Ave. Chicago, IL 60623\

Erin Aleman, Executive Director
Chicago Metropolitan Agency for Planning (CMAP)
233 S Wacker Drive, Suite 800
Chicago IL 60606

Dear Ms. Aleman:

This letter is a direct response to the Chicago Metropolitan Agency for Planning (CMAP)'s Request for Proposal (RFP) NO. 213, "CMAP Freight Studies: Chicago Southwest Communities Truck Abatement Study."

While this is a much-needed study, and we appreciate that CMAP is taking action, we have many concerns about the RFP as it is currently written. We are concerned that the premise of the study takes as a given that more truck-intensive projects will be slated for our communities. A true assessment of truck impacts and abatement strategies should put public health and community welfare first, and so start with the question of whether such projects should be imposed on our communities in the first place – given the heavy cumulative burdens we already face relative to the rest of the city.

The Southwest side of the city experiences a heavy concentration of Trucking, Distribution, and Logistics (TDL) related companies due to its geography relative to transportation infrastructure, e.g. rail yards and railroads, waterways, and major interstate highways. As a result of this concentration, the area experiences a high-volume of semi-truck traffic, which has a major impact on the people who live in these communities.

Since 2016, the Little Village community has seen an increase in truck traffic in our community and across the Southwest side. Due to a lack of semi-truck data in the city, we, the Little Village Environmental Justice Organization (LVEJO), began working with a local Advanced Placement Statistics class at Little Village Lawndale High School (LVLHS) to engage in "Truck Counting," in order to better understand the number of semi-trucks that pass by several major intersections on a hourly and daily basis. Beginning in 2016, LVEJO is now entering its fourth year of engaging in truck counting, and have been able to collect some very valuable data in the process. LVEJO supported the work of the students in the classroom by collecting footage of the targeted intersections, and the students then analyzed the data and provided results. With the help of some incredible young minds, Little Village community members had their gut instinct confirmed, truck traffic in Little Village was on the rise.

In 2018, the City of Chicago answered the community's demand for an Industrial Corridor Modernization Plan (ICMP) process for Little Village to take place. The Department of Planning and Development (DPD) staff continuously heard, throughout this process, about the issue of semi-truck congestion in the neighborhood. Officials from the DPD, however, stated numerous times that one of the key issues they faced when assessing the industrial corridor area was the lack of available data on semi-truck traffic, both in the neighborhood, as well as citywide. DPD and local politicians confirmed that a traffic /truck study for the Southwest side had not been done in over 25 years and acknowledged that massive (TDL) sites were continually being approved on the Southwest side without this crucial information.



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Knowing that semi-truck traffic is an issue in Little Village, in continued support of the community, LVEJO advocated for a truck study to be done in the neighborhood, as well as the entire Southwest side of the city. LVEJO asked the DPD to stop the LVICMP process until a semi-truck study was completed and the full extent of the issue was assessed. At the final working group meeting on December 14th 2018, the Department of Transportation (CDOT) announced that they would be proceeding with a truck study for the 31st Street corridor, one of the busiest streets in the neighborhood. CMAP also participated in some of the working group meetings, and heard LVEJO's advocacy for a semi-truck study.

The work done by the AP Statistics class is the kind of "ground-truthing" that needs to be considered as part of this study, as it is the first of its kind the region. Whoever conducts the Southwest Communities Truck Abatement Study should be required to meet with LVEJO and the community before they begin, in order to best understand the current environmental issues, and the existing "hotspots" of congestion. Considering LVEJO has data that the DPD, the Chicago Department of Transportation (CDOT), as well as CMAP do not have, LVEJO and the community should be considered as much of an expert as any city agency, business/industry representative, consulting firms, and advocacy organizations not based in the Little Village community or the broader Southwest Side.

Additionally, the People for Community Recovery (PCR), Southeast Environmental Task Force (SETF), Blacks in Green (BIG), Southeast Side Coalition to Ban Petcoke (SSCBP), the fellow members of the Chicago Environmental Justice Network (CEJN) alongside LVEJO, should be considered as experts on this issue, as well. The CEJN includes members from the Southwest and Southeast sides of the city, the two areas of the city most impacted by Trucking, Distribution, and Logistics (TDL). It is our communities, and our partners that are the most impacted by heavy-duty trucks in the city. We are intimately familiar with semi-truck impacts in their many forms, and are part of national networks of similar community advocates and their supporters working on diesel-transportation issues. At minimum, if CMAP is to continue forward with this RFP as generally framed, it is critical that the community advocates who have been at the forefront of gauging and raising awareness about truck and distribution system impacts be in the lead in assessing hot spots and developing solutions. We are concerned that the current RFP does not include such a lead role for communities, nor does it include substantive public participation in the study design, metrics, or implementation

While we understand that the movement of goods is crucial to the regional economy, and Chicago's infrastructure makes it the most important inland distribution point in North America, there are significant negative externalities of logistics that are primarily felt by local Latinx and African-American communities. The goal of this Southwest Truck Study should first and foremost be about alleviating the environmental impacts felt by local communities, and should not prioritize infrastructure for semi-trucks. According to the LVICMP, Little Village already has the 2nd-worst air quality for particulate matter in Illinois, and cannot afford to increase the infrastructure for TDL and further exacerbate the environmental health issues in the neighborhood. Industries who pollute communities should not be prioritized in this study. We strongly encourage CMAP to revise the RFP consistent with these concerns, and we are available to discuss how CMAP can move forward in a way that prioritizes communities at the earliest opportunity.



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Sincerely,
Kim Wasserman, Executive Director
Little Village Environmental Justice Organization

Additional Signatories:

Meleah Geertsma, Senior Attorney and Midwest Director, Environmental Justice
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Center for Neighborhood Technology

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