

CHAPTER SEVEN

Environmental Racism in Chicago: A Case Study of the Crawford Coal Plant Implosion and Replacement Plan

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Introduction

Through most of the 20th century, Chicago's role as a transportation and materials-processing hub made it among the worst cities in the United States for air pollution. By the 1990s, Cook County, which Chicago is part of, ranked amongst the bottom 10% for air quality nationally.¹ Today, pressure to implement policies that will improve the environment is becoming increasingly prevalent in Chicago. In 2021, Mayor Lori Lightfoot invested \$188 million in climate and environmental justice programs, the largest investment in Chicago's history. Through initiatives such as the Chicago Climate Action Plan, intentions for 100% renewable energy usage by 2026, and \$46 million earmarked for planting 75,000 trees by 2027, the city is taking major strides in enhancing the environment.² Despite the attention given to environmental improvements, however, underprivileged Black and Brown communities are often not the recipients of the resulting gains. Environmental racism is the "phenomenon of disproportionate exposure to toxic and hazardous waste in low-income minority communities due to the inequality of environmental policymaking and laws."³ Environmental racism in Chicago will be examined through a case study of the botched Crawford Coal Plant Implosion in Little Village, a predominantly low-income Latino neighborhood in the Southwest side of Chicago.

Environmental Racism in Chicago

Southern and Western parts of Chicago have always been disproportionately affected by environmental pollution. The US Environmental Protection Agency's (EPA) 2020 'Air Quality and Health' Report shows that 44% of Latinx communities

¹ King, Katherine E. "Chicago Residents' Perceptions of Air Quality: Objective Pollution, the Built Environment, and Neighborhood Stigma Theory." *Population and Environment*, U.S. National Library of Medicine, Sept. 2015, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4627697/>.

² *Read mayor Lightfoot's 2023 budget speech*. Crain's Chicago Business. (2022, October 3). Retrieved October 31, 2022, from <https://www.chicagobusiness.com/politics/chicago-mayor-lori-lightfoots-2023-budget-speech#:~:text=So%20far%2C%20we%20have%20invested,bold%2C%20equitable%2C%20climate%20goals.>

³ Rasof, Sophie. "Environmental Racism in Chicago." *Environmental Racism in Chicago*, Mar. 2022,

and 25% of Black communities live in areas that are at high risk of respiratory illness due to toxic air quality -- as opposed to 21% of the white population.⁴ According to the EPA, 77% of the toxic substances released into Chicago's air in 2017 were emitted in residences located in these underprivileged communities. High emission areas include largely Black neighborhoods like Englewood and Roseland on the South Side and predominantly Latino neighborhoods like Little Village, Pilsen, and McKinley Park on the West Side.⁵ Chicago's 'Air Quality and Health Report' indicates that the West and South Side of Chicago face disproportionate air pollution second only to regions adjacent to major highways. An unequal distribution of foul air is also seen in residents' own perceptions. A study of 3000 Chicago residents conducted in 2015 showed that while 43.3% of black and 43.5% of Hispanic populations reported their air quality as 'poor/fair' only 27.2% of the white populations did the same.⁶ As income inequality in Chicago continues to rise, the burden of environmental pollution continues to fall on the poor.

Little Village Background

Little Village or 'La Villita' is a predominantly Hispanic neighborhood with a population of 71,000 people and is located in the South Lawndale community. The racial breakdown of the population is 82% Latinx, 14% Black and 4% white, making it Chicago's most densely populated Latino neighborhood.⁷ Little Village is a leading port of entry for Mexican immigrants into the Midwest and the second largest one in Chicago after Pilsen. The community has a median household income of \$31,500 -- approximately half that of Chicago's \$62,100 -- with its bottom 20th quartile averaging just a little over \$15,700.⁸ 24% of the neighborhood's population lives in poverty, compared to 17% in the rest of Chicago. Furthermore, only 14% of the residents have

⁴ *Air Quality and health - chicago*. (2020). Retrieved October 31, 2022, from https://www.chicago.gov/content/dam/city/depts/cdph/statistics_and_reports/Air_Quality_Health_doc_FINALv4.pdf.

⁵ Shelton, Deborah L. "The Repercussions of Environmental Hazards on Chicago Communities." *Crain's Chicago Business*, 12 Oct. 2022, <https://www.chicagobusiness.com/equity/chicago-communities-environmental-justice-battles>.

⁶ King, Katherine E. "Chicago Residents' Perceptions of Air Quality: Objective Pollution, the Built Environment, and Neighborhood Stigma Theory." *Population and Environment*, U.S. National Library of Medicine, Sept. 2015, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4627697/>.

⁷ "Race and Ethnicity in Little Village, Chicago, Illinois (Neighborhood)." *The Demographic Statistical Atlas of the United States - Statistical Atlas*, <https://statisticalatlas.com/neighborhood/Illinois/Chicago/Little-Village/Race-and-Ethnicity>.

⁸ "Little Village Today: Enlace Chicago." *Enlace*, <https://www.enlacechicago.org/little-village-today#:~:text=Little%20Village%20is%20the%20principal,American%20and%2037%25%20foreign%20born>.

an education beyond high school, the lowest of any district in Chicago.⁹ Little Village is the third most polluted community in Chicago, trailing only its nearby Southside neighbors, Pilsen and McKinley Park. Lead presence in the air here is currently four times that of the national average, no doubt thanks to the light and heavy industries along the neighboring industrial sector that have been leaking volatile particulate matter into the air since the Industrial Revolution.¹⁰

The Crawford Coal Plant Shutdown

One of the largest polluters in Little Village was the Crawford Generating Station. The coal-fired power plant, formerly located on 3501 South Pulaski Avenue, was built in 1924. The plant was on a 72-acre plot, provided storage for over 300,000 tons of coal, and had a production capacity of 805 MWh.¹¹ It was owned and operated by Midwest Generation, a subsidiary of Edison International (a California Public Utility). The plant was very hazardous, releasing toxic emissions from the smokestacks, which were unofficially nicknamed ‘cloud factories’ by residents. In fact, the 2011 NAACP report ‘Coal Blooded: Putting Profits Before People in Illinois’ ranked Crawford as the highest environmental justice offender in the US, due to its pollution output and proximity to communities of color.¹² According to residents, this pollution especially intensified in the summer and winter months when the plant increased energy production.

A study published by the Harvard School of Public Health found that the Crawford plant, along with the Fisk generating station in Pilsen, were linked to 41 premature deaths, 2800 asthma attacks and 550 emergency room visits in the surrounding communities while they were in operation.¹³ According to the US Environmental Protection Agency (EPA) the Crawford Coal Plant, again along with

⁹ *Little village today: Enlace Chicago*. enlace. (n.d.). Retrieved October 31, 2022, from <https://www.enlacechicago.org/little-village-today>.

¹⁰ Eilbert, Natalie. “Pilsen and Little Village Neighborhoods Have Struggled against Big Industry for Decades.” *Medill Reports Chicago*, 4 Dec. 2020, <https://news.medill.northwestern.edu/chicago/pilsen-and-little-village-neighborhoods-have-struggled-against-big-industry-for-decades/>.

¹¹ Michael Hawthorne and Kristen Mack, "Chicago's 2 coal-fired plants to shut down sooner than expected," *Chicago Tribune*, Feb. 29, 2012.

¹² Patterson, J., Fink, K., & Wasserman, K. (n.d.). *Coal Blooded: Putting Profits Before People*. climateaccess.org. Retrieved October 31, 2022, from <https://climateaccess.org/>. The average annual income in the 3 mile radius surrounding the Crawford site is \$13,097, 48% of Illinois' average, further demonstrating the very vulnerable communities that live in its vicinity.

¹³ “The Dirtiest Plant in Chicago.” *NBC Chicago*, NBC Chicago, 13 Apr. 2010, <https://www.nbcchicago.com/news/local/chicago-politics/the-dirtiest-plant-in-chicago/1870978/>.

Pilsen's Fisk plant, were Chicago's largest sources of industrial heat-trapping carbon dioxide, releasing 4.2 million metric tons in 2010 alone.¹⁴ It is estimated that the Crawford and Fisk plants combined caused \$750 million-\$1 billion in health damages to residents from 2002-2010. This estimate includes deaths, along with nonfatal heart attacks, asthma attacks, and chronic bronchitis.¹⁵

Crawford's harmful effects led to community outrage. Starting in 2009, several grassroots organizations filed petitions urging Crawford to tighten its environmental protection policy and upgrade its outdated pollution-control technology. Widespread public pressure was growing, too: a poll of 600 registered voters conducted in 2011 showed that 72% would support a plan to reduce soot pollution from the plant¹⁶. On February 12, 2012, after many months of negotiation, then-Mayor Rahm Emanuel, with the support of 35 aldermen, determined that Midwest Generation had a week to strategize pollution control plans either through installation of new technology or switching to a less polluting fuel. Midwest Generation ultimately determined that the costs to clean up and upgrade their technology would be excessively high and decided to shut the Crawford plant.

Botched Coal Plant Implosion and Replacement Warehouse

From 2012 through 2014, Midwest Generation decommissioned the coal plant. This process included removal of coal and coal ashes, removal of hazardous substances, and the cleaning and emptying of oil and chemical storage tanks.¹⁷ Following the decommission, Midwest Generation sold the property, and it changed hands again when Hilco Redevelopment Partners purchased the plant in late 2017.¹⁷ Hilco is a real-estate investment redevelopment company founded in 2013. Hilco's plan was to redevelop the plant into a 1 million square foot Target warehouse and distribution center called 'Exchange 55', named after the Interstate 55 highway, 0.3 miles away from the site. After the EPA's approval of Hilco's 'Sampling and Analysis Plan' of demolition, Hilco began demolition of the plant in June 2019. This

¹⁴ Michael Hawthorne, [<http://www.chicagotribune.com/news/local/ct-met-greenhouse-gases-20120122,0,6304228.story>] "Coal plants dominate list of Chicago's biggest polluters," Chicago Tribune, Jan. 22, 2012.

¹⁵ *Coal Plant Shutdown*. LVEJO. (n.d.). Retrieved October 31, 2022, from <http://www.lvejo.org/our-accomplishments/coal-plant-shutdown/#:~:text=Faced%20with%20expensive%20requirements%20to,the%20Crawford%20and%20Fisk%20plants>.

¹⁶ Richart, P. J. (2021, April 26). *Poll: Chicagoans want city to reduce pollution*. Eco. Retrieved October 31, 2022, from <https://ecojusticecollaborative.org/poll-chicagoans-want-city-to-reduce-pollution/>.

¹⁷ *Former Crawford Power Plant Site - Hilco Development Partners Chicago*. Illinois.gov. (n.d.). Retrieved October 31, 2022, from <https://www2.illinois.gov/epa/topics/community-relations/sites/hilco/Pages/default.aspx>.

demolition was halted after a worker fell to his death on December 30, 2019, though it resumed in early 2020.¹⁷

On April 11, 2020, to clear land for a new Target warehouse, Hilco imploded the 400-foot smokestack from the Crawford plant.¹⁸ The demolition was a debacle. Many residents received little or no advance notice concerning the implosion. Worse still, the implosion released large masses of dust, asbestos and other particulate matter into the atmosphere, covering the neighboring communities in a thick cloud of dust. Six blocks of houses near the site were coated in plumes of dust following the event and dust was reported to have traveled into homes as far away as East Garfield Park, 4.5 miles from the implosion site.¹⁹ The very dirty air from the implosion was associated with an influx of health problems amongst the residents, including a long-running increase of reported asthma.

In the aftermath of the botched implosion, and much against the wishes of many residents, Hilco began development of their 1.3 million square foot Target warehousing and distribution facility. The Target warehouse was officially opened on August 1, 2021 and now supports over 80 Chicago-area stores in their supply chain. It is currently the largest warehouse in Chicago.²⁰ Hilco even received a \$19.7 million tax break connected to the redevelopment.²¹ While this was a job-creating opportunity for local residents who would receive employment from the facility, many remain unhappy about the further deterioration of air and land quality in the region owing to the large volumes of waste product and diesel released by the warehouse transportation trucks. It is currently estimated that two diesel trucks pass through the Interstate 55 intersection neighboring the warehouse every minute from 7-11 am and one from 3-5pm. The trucks servicing the new warehouse would only add to this count.²²

¹⁸ A video of the implosion can be viewed at https://www.youtube.com/watch?v=UzkFYVsNRFE&t=27s&ab_channel=AlejandroReyes.

¹⁹ Pena, M. (2021, June 9). *Planned explosion covered little village in dust during respiratory pandemic - why did the city let it happen?* Block Club Chicago. Retrieved October 31, 2022, from <https://blockclubchicago.org/2020/04/12/extremely-angry-lightfoot-blames-developer-for-massive-little-village-dust-cloud-alderman-apologizes/>

²⁰ Hernandez, Acacia. "New Target Warehouse in Little Village Draws Environmental Concerns despite Job Creation." *WTTW News*, Aug. 2021, <https://news.wttw.com/2021/08/04/new-target-warehouse-little-village-draws-environmental-concerns-despite-job-creation>.

²¹ Graf, Carly. "Tax Breaks for Hilco, Diesel Trucks for Little Village." *South Side Weekly*, 5 Mar. 2019,

²² Pena, M. (2021, April 29). *Target set to hire 2,000 employees for controversial Little Village Warehouse*. Block Club Chicago. Retrieved October 31, 2022, from <https://blockclubchicago.org/2021/04/29/target-reportedly-set-to-hire-2000-employees-for-controversial-hilco-warehouse/>

The Crawford generating plant, the shocking and severe dust storm stemming from the smokestack implosion, followed by the warehouse redevelopment that greatly increased local truck traffic, all have compromised the Little Village environment, and are suggestive of environmental racism. Four factors can be identified that have led to this environmental negligence towards the Little Village community.

Low Government Intervention in Corporate Exploitation of Community

Seven months before the Little Village smokestack implosion, employees from the Chicago Department of Health warned their supervisor, John Kryl, that proceeding with the planned implosion could cause almost ‘cataclysmic’ harm to Little Village and its neighboring communities. About 7 weeks before the event there was evidence indicating that a massive release of dust from an event like the implosion would be an ‘unavoidable byproduct’.²³ Local inspectors advised the implementation of several major measures to lessen the risks associated with the implosion. These measures included saturating the surrounding area with water in order to repress the release of floating dust and particulate matter. Additionally, collection of weather data including wind direction and speed was strongly encouraged. If the event was determined to direct large amounts of dust towards the Chicago river and residentially populated areas, the implosion was to be postponed.²³ Government officials relayed the inspector’s advice to Hilco consultants.

Despite the message being relayed, strict implementation of risk-reducing measures was not enforced. A summary of the Inspector General Joseph Ferguson’s report detailed the city public health commissioner’s “abdication of responsibility and willful bureaucratic negligence [allowing] the demolition contractor to proceed unchecked with minimal dust mitigation measures, including a failure to soak the ground prior to the implosion.”²³ On the day of the implosion there was also a mild wind blowing towards the Little Village community, which should have been sufficient to postpone the event. Instead, the implosion took place, with debris smothering the neighborhood.²⁴ Even though the necessary precautions were not

²³ Chase, Brett. “Seven Months before Smokestack’s Botched Implosion Smothered Little Village in Dust, Chicago City Inspector Issued Dire Warning.” *Times*, Chicago Sun-Times, 5 Aug. 2022, <https://chicago.suntimes.com/2022/8/5/23292152/hilco-crawford-coal-plant-implosion-warning-john-kryl-dust-cloud-little-village>.

²⁴ Rogers, Phil. “Little Village Residents Slam Lack of Discipline for Smokestack Implosion.” *NBC Chicago*, NBC Chicago, 20 Jan. 2022, <https://www.nbcchicago.com/investigations/little-village-residents-slam-lack-of-discipline-revealed-in-oig-report-on-hilco-smokestack-implosion/2732733/>.

taken, Little Village Alderman Michael Rodriguez, who only learned of the implosion plan a week in advance, indicated that Hilco had met all the City of Chicago requirements for the demolition to be conducted appropriately.²⁵

Following the implosion, Hilco paid \$68,000 for allowing the dust cloud to penetrate the surrounding neighborhood. Additionally, Illinois Attorney General Kwame Raoul, with the support of Alderman Rodriguez, filed a lawsuit against Hilco and their contractors for violating the state's air pollution laws in the smokestack demolition. This suit resulted in an additional payment of \$370,000 to be imposed, going towards Little Village's Community Health and Wellness Program to address asthma, diabetes and hypertension.¹⁷ (This amount of compensation from Hilco to the community is significantly lower than what Hilco has provided in response to lawsuits faced on some of their other similar projects. For example, after the botched demolition of a retired steel building in Maryland in 2015, the company and its partners were required to contribute \$3.375 million to environmental projects in the community, in addition to their \$375,000 fine.²⁶) Environmental coalitions estimate that the value of damages to public health due to the Crawford plant implosion are around \$2 million in the short run and upwards of \$5 million in the long run.¹⁷ While Hilco has agreed to pay the low fines, they have not admitted to any wrongdoing or mismanagement in the outcome of the implosion.

The city government was quick to issue a statement holding Hilco responsible for the implosion, but did not comment on their own involvement with Hilco leading up to the implosion.²⁵ Additionally, Hilco had initially received a \$19.7 million (60% of total) tax break for their warehouse development project from the city to promote 'business sentiment'. When Mayor Lightfoot was asked about the status of the redevelopment tax break, she stated that there was no basis for rescinding the tax subsidy.²⁷ Here, it seems like the Chicago government is more interested in business

²⁵ Pena, M., & Boyle, C. (2020, May 15). *After old Crawford coal plant smokestack blown up, Little Village residents worry about dust during global pandemic*. Block Club Chicago. Retrieved October 31, 2022, from <https://blockclubchicago.org/2020/04/11/old-crawford-coal-plant-smokestack-blown-up-sending-dust-into-little-village-during-global-pandemic/>

²⁶ Wood, P. (2019, June 5). *Former Sparrows Point Mill Owner fined for environmental violations during demolition*. Baltimore Sun. Retrieved October 31, 2022, from <https://www.baltimoresun.com/maryland/baltimore-county/bs-md-co-sparrows-point-fine-20150403-story.html>

²⁷ Morell, C. (2020, April 13). *City won't rescind a tax break for the developer behind a botched little village demolition, mayor says*. WBEZ Chicago. Retrieved October 31, 2022, from <https://www.wbez.org/stories/city-wont-rescind-tax-break-for-developer-behind-little-village-demolition-lightfoot-says/42d5eb5e-9a7d-4bcd-870f-e1910f723216>

development rather than prosecuting environmental wrongdoers. More importantly, the city's disengagement and leniency in imposing regulations could lead to further overexploitation of vulnerable communities by private entities down the road.

The Value Assigned to Little Village Citizen's Lives?

The handling of the implosion seems to show insufficient engagement with, and a lack of empathy towards, the Little Village residents. First, Hilco conducted the implosion during the COVID-19 pandemic. COVID-19 disproportionately affected poorer Black and Brown neighborhoods.²⁸ One in six COVID cases in Chicago were linked to the Cook County Jail, which is located in Little Village.²⁹ During 2020, Little Village's population was already extremely vulnerable and in a severe public health crisis. (In fact, Little Village had over 300 deaths and over 15,000 reported cases of COVID in 2020, making its zip code the leader in confirmed COVID cases in the state of Illinois.) Inexpertly imploding a defunct generating plant's smokestack, and replacing it with a large warehouse that, with its associated trucks, might also be a major neighborhood polluter, -- and doing this in the face of considerable community dissent during this time shows a seeming lack of understanding for vulnerable populations.³⁰

The city of Chicago is not awash in glory over the Little Village redevelopment, either. Mayor Lightfoot and Alderman Rodriguez distanced the city from a role in the pandemic-era implosion, arguing that while the city did not support the implosion, it was ultimately Hilco's decision and that the city was 'taking all the necessary precautions'.¹⁷ Again, a disconnect is suggested between the city's limited involvement and the risk the citizens faced.

After the implosion, environmental activists urged the city to pay for public air monitoring systems and air filtration for residents living near the site of the dust storm. A major petition, signed by over 50,000 people, demanded that the city should use Hilco's \$19,500 fine to fund these environmental initiatives. Furthermore, there was an expectation among many Little Village residents that the city would subsidize

²⁸ *Covid-19 reveals health and economic inequities among Latinos*. COVID-19 Reveals Health and Economic Inequities Among Latinos. (n.d.). Retrieved October 31, 2022, from <https://www.bcbsil.com/newsroom/category/community-health/covid-19-latino-disparities>.

²⁹ Williams, T., & Ivory, D. (2020, April 8). *Chicago's jail is top U.S. hot spot as virus spreads behind bars*. The New York Times. Retrieved October 31, 2022, from <https://www.nytimes.com/2020/04/08/us/coronavirus-cook-county-jail-chicago.html>.

³⁰ Wire, Sun-Times Media. "Two Years after Botched Implosion, Groups Call for Air Filtration for Little Village Residents." *FOX 32 Chicago*, FOX 32 Chicago, 9 Aug. 2022, <https://www.fox32chicago.com/news/two-years-after-botched-implosion-groups-call-for-air-filtration-for-little-village-residents>.

medical care required by residents due to the implosion, and provide high quality protective masks for the residents to deal with its aftermath.³¹ This expectation was not realized: reports indicate that the city distributed 2-3 disposable masks per household and those too, only to communities directly in the path of the dust cloud.³¹ Furthermore, air filtration or monitoring systems have yet to be installed in the community.

This desultory city action can be contrasted with the manner in which toxic emissions from General Iron's metal recycling plant were dealt with. The plant, located in Lincoln Park on the North Side of Chicago, was found in violation of ordinances controlling dust and odor emissions. General Iron paid a penalty of \$18,000 for the mishandling. City officials used a portion of the fines to purchase two field olfactometers (devices that measure odors) for the site to prevent similar mishaps in the future. In addition to those fines, General Iron spent more than \$300,000 on additional mitigation measures, including \$179,000 for dust mitigation and \$128,000 on explosion prevention measures. General Iron presents an example of an environmental infraction being met with measures that indicate care for the community and a heightened level of gravity. It seems as though the value implicitly assigned to the lives and comforts of Lincoln Park dwellers was somehow higher than that assigned to Little Village residents, even though the Lincoln Parkers were plagued with less severe challenges.³²

Lack of Transparency Between the Government and the Residents

Another significant policy shortcoming is a lack of transparency between the government and the citizens. Prior to the implosion, communication with the Little Village residents was extremely poor. There was no public meeting to broadcast a warning. When Alderman Michael Rodriguez learned about the forthcoming implosion, he asked Hilco to notify residents via letters in English and Spanish. Apart from this Rodriguez was not involved in Hilco's communication nor was there oversight by the government of letters sent by Hilco.

³¹ Wire, S.-T. M. (2022, August 9). *Two years after botched implosion, groups call for air filtration for Little Village residents*. FOX 32 Chicago. Retrieved October 31, 2022, from <https://www.fox32chicago.com/news/two-years-after-botched-implosion-groups-call-for-air-filtration-for-little-village-residents>.

³² Wetli, P. (n.d.). *General Iron to pay \$18K in fines as relocation to southeast side looms*. WTTW News. Retrieved October 31, 2022, from <https://news.wttw.com/2020/11/03/general-iron-pay-18k-fines-relocation-southeast-side-looms>.

A canvassing team led by Hilco dropped flyers at homes in the near vicinity of the site, excluding residents who lived a little further away, but were still affected by the dust from the implosion. These flyers were put through fences and stuck to poles in the neighborhood mere hours before the implosion. Many residents mistook these warnings for junk mail. The implosion notice was also posted on Hilco's project website, though without any encouragement to residents to access the website. According to an informal survey of 100 people by the Little Village Environmental Coalition, 38% of the population was unaware of the planned implosion and said they didn't receive the flyers³³. The morning of the implosion, many unaware residents were hurried off the streets near the smokestack. For many others, the blast served as their only notification. This created a lot of fear and panic during the implosion.

The shortfall in communication and transparency by Hilco and the city government increased the impact of the implosion on residents.³⁴ After the fact, the Chicago government also refused to disclose whether Hilco responded to their email detailing instructions on mitigating the effects of the implosion. This lack of transparency fosters citizen suspicions of the extent of the city's complicity in the demolition, an undermining of trust.

Other post-implosion events also remain cloaked in secrecy. In June 2020, the City Inspector General prepared a report on the implosion. This report contains vital information about air quality after the implosion, noise levels during the implosion, released particulate matter, along with a general evaluation. Though a summary of the report was made public, Mayor Lightfoot's administration has refused to release the report itself, despite community petitions and protests..³⁵ Illinois law permits the withholding of documents unless they contain 'sustained findings' of a 'felony or conduct associated with death. The implosion does seem to be associated with health problems for individuals, and possible even with a fatality: the Chicago Environmental Justice Network has found that the death of an elderly resident was directly linked to the contaminated cloud from the implosion, while several citizens

³³ Pena, Mauricio. "Planned Explosion Covered Little Village in Dust during Respiratory Pandemic - Why Did the City Let It Happen?" *Block Club Chicago*, Block Club Chicago, 9 June 2021, <https://blockclubchicago.org/2020/04/12/extremely-angry-lightfoot-blames-developer-for-massive-little-village-dust-cloud-alderman-apologizes/>.

³⁴ Pena, M. (2021, June 9). *Planned explosion covered little village in dust during respiratory pandemic - why did the city let it happen?* Block Club Chicago. Retrieved October 31, 2022, from <https://blockclubchicago.org/2020/04/12/extremely-angry-lightfoot-blames-developer-for-massive-little-village-dust-cloud-alderman-apologizes/>

³⁵ Cherone, H. (n.d.). *City panel calls for Lightfoot to release full probe of botched smokestack implosion*. WTTW News. Retrieved October 31, 2022, from <https://news.wttw.com/2022/07/15/city-panel-calls-lightfoot-release-full-probe-botched-smokestack-implosion>

claim to have suffered adverse health effects due to the implosion.³⁶ Nonetheless, the city government continues to block the release of the Inspector General's report. This lack of transparency makes it difficult to gauge the extent of damage and helps to sustain a generally hostile relationship between the community and the city government.

False Promises and Under Delivery

With respect to site redevelopment, both Hilco and the government made promises to Little Village residents that ultimately were not kept. When the new warehouse was announced, concerned residents were given one reassurance: Hilco would strive to make the new facility more environmentally friendly. These efforts would include the installation of solar panels, LED lighting and charging stations for electric vehicles along with planting 700 trees in the area. Most importantly, the project promised to replace a large portion of the warehouse's diesel-fueled fleet with electric trucks.³⁷ Electric vehicles can drastically reduce air pollution of substances like NO_x, PM_{2.5} and other particulate matter while also cutting noise pollution as opposed to conventional trucks. While 20% of the fleet parking spots developed were for electric vehicles, it was later established that Target 'does not have solid plans' to implement an electric fleet but would look into it. As a result of this vague and unfulfilled promise, the facility is not as environmentally attractive as residents were led to believe it would be.³⁸

Furthermore, the warehouse originally promised that it would hire local workers, providing 2000 jobs for the community, a significant economic boost. Many residents currently have long commutes to their workplaces, while receiving low wages and virtually no health benefits. A job at the warehouse facility would improve all of these conditions: decrease commutes, provide employee health insurance plans, and pay a minimum wage of \$18/hr as an operator. However, in August 2021 Target

³⁶ Ferguson, J. (2022, August 15). *Chicago needs to clear the air in little village over the Hilco implosion*. Chicago Tribune. Retrieved October 31, 2022, from <https://www.chicagotribune.com/opinion/commentary/ct-opinion-chicago-hilco-little-village-transparency-inspector-general-20220815-rl7v5ozr5afzo2wscqwkpvq4-story.html>

³⁷ Henderson, A. (2021, June 21). *Electric Trucks won't deliver environmental justice, say warehouse neighbors*. Energy News Network. Retrieved November 1, 2022, from <https://energynews.us/2021/06/14/electric-trucks-wont-deliver-environmental-justice-say-neighbors-of-chicago-warehouse-site/>

³⁸ Pena, M. (2021, September 1). *Target Building Truck Storage Facility near little village warehouse - but won't answer public's questions about it*. Block Club Chicago. Retrieved November 1, 2022, from <https://blockclubchicago.org/2021/09/01/target-building-truck-storage-facility-near-little-village-warehouse-but-wont-answer-publics-questions-about-it/>

revealed at their community meeting that out of the 700 employees they had hired to date, only 112 of those were from the Little Village zip code of 60623 -- about 16% of the employees. This local hiring is much lower than the 35% that Target had promised and the 50% that advocacy groups had been demanding.

To act on their promise of local employment, Target partnered with Central States SER and Instituto del Progreso Latino, workforce development organizations for Latin Americans, to host two job fairs during the first week of August 2021. City Bureau attended one of the fairs, and after speaking with a number of prospective applicants, found that they were dismayed with the lack of engagement during the event. The general experience seemed to be that the event was like that of an ‘application fair’ where attendants were given instructions on how to fill out the online application form. These instructions often offered no new information. More importantly for the applicants, many qualified potential employees never heard back after applying.³⁹ To test whether the application process was biased, a City Bureau reporter applied for the position at the career fair; the reporter possessed no warehouse operation experience, but received an employment offer within a week, without any interviews. A senior distributor at Target claimed that the career fair was very successful and led to a lot of new hires, though he refrained from disclosing the actual numbers. Again, it seems that an under delivery on promises leads to a lack of trust between private entities and already overburdened communities.³⁸

The Crawford Generating Station site has been an environmental problem for Little Village for years. First, the coal-burning plant itself created severe local hazards. Neighborhood pressure eventually led to the plant’s closure. The plant sat dormant for 12 years prior to the bungled implosion. During this period of dormancy, there were many proposals for new, and cleaner, uses of the land, including an 850,000 square feet greenhouse, a hub for street food vendors, and a solar-powered generating facility to replace the coal-powered plant.⁴⁰ These land uses would reduce local pollution and increase environmentally protected areas. . In comparison, residents of the North side of Chicago seem to do better at having their preferences met when it comes to land use within their neighborhoods: the North side has four times as many community spaces (including parks, monuments, and tourist attractions) than the

³⁹ Younan, A. (2021, November 11). *Activists demand half of target warehouse jobs go to Little Village residents*. South Side Weekly. Retrieved November 1, 2022, from <https://southsideweekly.com/activists-demand-half-of-target-warehouse-jobs-go-to-little-village-residents/>.

⁴⁰ Lydersen, K. (2021, February 15). *Chicago coal plant site to become logistics hub; local leaders furious*. Energy News Network. Retrieved November 1, 2022, from <https://energynews.us/2018/02/12/chicago-coal-plant-site-to-become-logistics-hub-local-leaders-furious/>.

South Side.⁴¹ Despite years of community protest, the Target warehouse was built without resident input – the administration of Mayor Rahm Emanuel gave permission for a warehouse on the Crawford site. Alderman Rodriguez was not responsible for approving the Target warehouse, though he has expressed positive sentiment towards the job creation it would bring. Rodriguez was able to come to an agreement with Hilco prohibiting large diesel trucks from using the neighborhood streets, only entering through the adjacent highways.⁴² This prohibition was a small relief for community members, though the ban is more effective in theory than in practice.

An Implosion Gone Right: Indiantown Cogeneration Plant Comparative Case Study

Not all demolitions and redevelopments have to be highly controversial. To get a better understanding of a successful implosion that received community support we can examine the 2021 case of the Indiantown (Florida) Cogeneration Plant implosion. The plant was owned by Florida Power & Light (FPL) and located in Indiantown in Martin County, Florida. FPL is Florida's largest electricity producer, serving a majority of the Atlantic Coast and Gulf Coast south of Tampa Bay. The plant had been built in 1995 and used as an energy supplier for over 20 years. The implosion brought down a 495-foot chimney stack, along with a lengthy coal shoot, in about eight seconds (video link [here](#)).⁴³ The old site will be replaced with a \$100 million solar energy plant.⁴⁴ The destruction and redevelopment process in Indiantown has not been as controversial despite redevelopment trajectory that parallels that in Little Village. Why?

Community Consideration in Replacement Plan: A large reason the Crawford redevelopment did not garner local support was because the residents were unhappy with the environmentally problematic replacement. While the residents wanted a

⁴¹ Theodos, B., & Hangen, E. (2022, October 27). *Data and evidence to advance upward mobility and equity: Urban Institute*. Data and evidence to advance upward mobility and equity | Urban Institute. Retrieved November 1, 2022, from <https://www.urban.org/>.

⁴² Pena, M. (2021, July 28). *As target warehouse opens on Little Village Hilco site, alderman celebrates new jobs - while activists vow to keep fighting*. Block Club Chicago. Retrieved November 1, 2022, from <https://blockclubchicago.org/2021/07/28/as-target-warehouse-opens-on-little-village-hilco-site-alderman-celebrates-new-jobs-while-activists-vow-to-keep-fighting/>

⁴³ MiamiHerald. (2021, June 19). *Watch Florida Power & light implode its coal-fired power plant in Indiantown*. YouTube. Retrieved November 1, 2022, from https://www.youtube.com/watch?v=FUvoFhvkcho&ab_channel=MiamiHerald

⁴⁴ Ruiz, L. (2021, June 17). *FPL blows up its last coal-fired power plant; announces plans for its newest Solar Center*. Treasure Coast. Retrieved November 1, 2022, from <https://www.tcpalm.com/story/news/2021/06/16/fpl-implodes-indiantown-last-coal-plant-170-pounds-explosives/7658846002/>

facility that would benefit the community in an environmentally respectful way — such as a greenhouse, a hub for street food vendors, or a solar farm -- they received a massive Target warehouse instead. In contrast, the Indiantown Coal Plant was replaced with a \$100 million solar facility, one with 300,000 panels on a 500-acre site. The electricity generated from this site will power 15,000 homes with green energy, enough for the entire town of Indiantown along with some additional neighborhoods. The plant, once completed, is also expected to generate \$200,000 to \$300,000 in tax revenue per year, which can be reinvested into the communities – a nice complement to the \$100 million to \$150 million in savings from switching to clean energy over the next 9 years.⁴⁵ Thus, an alternative that was beneficial both economically and environmentally in the long-run replaced the old generating plant, leading to strong community support.

Transparent Communication and Efficient Process of Execution: Residents were disappointed with the lack of clear communication connected to the Little Village implosion. Notification was insufficient and intended safety precautions were not explained. In contrast, communication was executed more clearly in the Indiantown implosion. Journalists and news agencies were allowed onto the site for news reporting in the pre-implosion period. Engineers were hired to clean up the site according to EPA standards before the demolition and they disclosed exactly how the implosion would take place, including details on the location and quantities of explosives to be used. News of the implosion was broadcast on television and radio stations in the weeks leading up to the implosion, in addition to the posting of flyers locally.⁴⁶ In the case of Little Village’s implosion, details on the implosion process have yet to be disclosed. The Indiantown transparency seemed to build trust with the community and the aftermath of the implosion did not bring with it a slew of complaints.

⁴⁵ Ruiz, L. (2022, August 15). *FPL to build solar-energy center just outside Indiantown; fourth in Western Martin County*. Treasure Coast. Retrieved November 1, 2022, from <https://www.tcpalm.com/story/news/2022/08/15/fpl-build-fourth-solar-energy-center-western-martin-county/10251688002/>

⁴⁶ Eppinger, K. (2021, June 16). *FPL's last coal-powered plant imploded*. WPTV News Channel 5 West Palm. Retrieved November 1, 2022, from <https://www.wptv.com/news/region-martin-county/indiantown/fpl-plant-implosion>

Quick and Efficient Implosion Response: Little Village's Crawford coal plant was shut in 2012, following years of community protests against the plant. The implosion took place eight years later and the blast was botched. As in Little Village, protests centering on health and environmental issues also contributed to the closing of the Indiantown coal plant; however, the Florida process was much smoother. FPL acquired the plant in 2017 and immediately reduced the operating scale for the next two years -- after which it stopped generating power completely. By the time the plant had shut down there were already plans to utilize the land for a renewable energy development project.⁴³ The Indiantown plant was formally closed on January 1, 2021, demolished in June of 2021, and construction of the renewable energy facility started by the end of the same year. Further, many of the materials from the demolition process are being recycled (before the land completely clears in 2023).⁴⁷ Thus the Indiantown implosion demonstrated an efficiency and accountability that were lacking in the Crawford plant implosion, smoothing the transition from the old, outdated facility to the new (and greener) one.

Reliable Company with Positive Track Record: When FPL undertook the Indiantown solar project they already had prior experience with successfully decommissioning and removing coal plants and with building solar facilities. In August 2018, for instance, FPL successfully imploded the Cedar Bay Generating Plant in Jacksonville. FPL currently owns 41 solar centers in Florida; it is the largest solar generator in the state. The new Indiantown solar center will be FPL's third in western Martin County alone. Currently, FPL is over 40% of the way through its 30-by-30 plan to put 30 million solar panels in the state of Florida by the year 2030.⁴³ This history of successful plant implosions and solar center developments in the transition to clean energy is reassuring.

Hilco's track record does not seem as impressive. In fact, in July of 2020, shortly after the Crawford implosion, Hilco conducted another troubled implosion, this one at the Hudson Generating Station in New Jersey. Here, unnotified residents were terrified that the early morning sound and dust emanated from a bomb,

⁴⁷ *FPL Newsroom*. Florida Power & Light Company (FPL): FPL Newsroom. (n.d.). Retrieved November 1, 2022, from <https://newsroom.fpl.com/2016-06-20-FPL-announces-plans-to-buy-and-phase-out-another-coal-fired-power-plant-saving-customers-millions-of-dollars-and-preventing-millions-of-tons-of-carbon-emissions>.

something like 9/11. Hilco might have some work to do to reassure local residents prior to their next implosion.⁴⁸

Policy Implications

Crawford's botched smokestack implosion is an example of a preventable tragedy caused by negligence, rather than a random mishap. The determinants of the Little Village tragedy and the environmental racism that it represents can be utilized to improve public policies and lessen the prevalence of this racism.

The preparatory process for the implosion was insufficiently rigorous, even rather casual. The implosion was not adequately regulated and residents were notified in a hasty and ineffective manner. Environmental impacts of development processes in the South and West side should receive more oversight to prevent similar fiascos. The existing permit system can be extended for this purpose. This written contract should contain detailed environmental measures that the corporation should follow along with quantitative metrics to determine compliance. In the case of Crawford or similar implosions, a minimum number of gallons of water, for instance, to be spread around the site of implosion, could be a term in the permit. The permit should be approved by the Department of Buildings and the Bureau of Environmental Health and Safety Management. These city organizations should also be legally obliged to oversee the implementation, with regular reporting to the city government and local Alderman. Stricter permitting ensures that, as in the Indiantown implosion, specialists are responsible for overseeing progress and ensuring that projects that are environmentally harmful are either reevaluated or halted.

The fines for the botched implosion were quite low compared to the damage that it caused to the environment, and also low relative to fines for other construction transgressions. Such leniency shown to projects polluting vulnerable communities is a characteristic of environmental racism. Low fines do not provide the private sector with enough incentive to expend sufficient resources to rein in their harmful behavior. A schedule of fines could even be included in permits. These fines should be high enough that under most circumstances the firm will choose to comply with the permit requirements rather than pay the fine. Making the fines public information ensures

⁴⁸ Pena, M. (2021, April 2). *3 months after little village dust disaster, Hilco implosion terrifies New Jersey Neighbors: 'what they did was unconscionably wrong'*. Block Club Chicago. Retrieved November 1, 2022, from <https://blockclubchicago.org/2020/09/01/3-months-after-little-village-dust-disaster-hilco-implosion-terrifies-new-jersey-neighbors-what-they-did-was-unconscionably-wrong/>.

that the developers are aware beforehand of the implications of inadequate performance, and that the public sees the extent to which their interests are protected in the permit process.

Currently, environmental harms are concentrated in the South and West sides of Chicago. Perfect equality is not achievable, but at least every neighborhood should meet high environmental quality standards. Maximum emission limits within neighborhoods can be set, and monitoring equipment including olfactometers and PPM calculators should be installed throughout the city. The neighborhood-specific regulations ensure that areas that already suffer from concentrated pollution can be protected against new, high polluting projects. Data on current emission levels in each neighborhood should be publicly available.

For new private development projects in predominantly lower income neighborhoods, monthly meetings between the private entity and community members should be facilitated by the government. Most of Hilco's communication with community members was indirect, channeled through the Alderman. This separation allowed Hilco to avoid disclosing the specifics of their plan, and possibly even contributed to deflecting accountability for their actions. Mandatory monthly meetings involving elected community leaders, grassroot organizations, residents, and the private developers can ensure full transparency and the airing of public concerns. The meetings themselves can be recorded and made publicly available, making it harder for developers to ignore public commitments. Such transparency will help build trust between developers and the underrepresented Chicago communities affected by their projects.

Conclusion

The Hilco implosion was a preventable disaster that occurred for a variety of reasons that suggest a lack of consideration for underprivileged communities. With better legislation, improved safety protocols, transparency, and community involvement, the implosion could have been conducted in a manner that was much safer. Chicago communities deserve these improvements.

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