



March 13, 2023

Chicago Department of Housing
Marisa C. Novara, Commissioner
2 N. LaSalle Street, Suite 600
Chicago, IL 60602

RE: Chicago Department of Housing Request for Information – Residential Housing Decarbonization & Retrofits

On behalf of the Public Health Law Center (“PHLC”) and People for Community Recovery (“PCR”), we appreciate the opportunity to respond to the Chicago Department of Housing Request for Information – Residential Housing Decarbonization & Retrofits (the “RFI”). As noted in the RFI, buildings are responsible for 70% of greenhouse gas emissions. In addition to emitting greenhouse gases that further destabilize the climate, in-home fossil fuel combustion also creates dangerous concentrations of indoor air pollutants like nitrogen dioxide and particulate matter. This is a problem.

As climate change alters our landscapes and weather patterns, people are forced indoors during increasingly frequent and severe storms, heat waves, and droughts. Because of the racist history of U.S. housing policy, the impacts of climate change are disproportionately borne by those with the fewest resources to deal with them, leading to severe health inequities. Chicago’s public housing is a prime example of the disparate and dangerous impacts climate change imposes on disenfranchised communities.

Public housing residents are disproportionately minorities and elderly. According to the National Low Income Housing Coalition, Black, Native American, and Hispanic households are more likely than white households to be extremely low-income renters, defined as renters with incomes at or below the poverty level or 30% of their area median income. These marginalized and low-income communities are on the front lines of these climate and health impacts, yet federal programs often exclude public housing from opportunities to invest in safe, affordable, and decarbonized housing. Therefore, it is imperative that the City of Chicago (the “City”) and other public agencies prioritize energy efficiency and decarbonization resources in an equitable manner that addresses the disproportionate impact climate change has on marginalized and low-income communities living in public and affordable housing.

EXECUTIVE SUMMARY

PCR's mission is to enhance the quality of life of residents affected by environmental pollution. PCR educates the public, advocates for policy and program changes and coordinates services on issues of the environment, education, health, housing, safety, and economic equity. PHLC's Climate Justice Program's overarching goal is to ensure that public housing is equipped to keep residents safe and healthy through increasingly extreme weather events driven by climate change.

In 2022, PHLC, together with PCR and 21 other housing, public, environmental justice, energy and climate organizations filed a [petition](#) calling on the U.S. Department of Housing and Urban Development ("HUD") to reduce environmental health harms through electrification upgrades (the "Petition"). To inform the Petition, PCR and PHLC collectively convened focus groups with public housing residents in Chicago to discuss housing conditions. Through this partnership, residents shared health and environmental impacts of fossil-fuel burning appliances and the need for electrification and weatherization.

Together, PHLC and PCR aim to improve the health and wellbeing of public housing residents in Chicago. Achieving this goal will require eliminating fossil fuel-fired appliances from public and affordable housing and providing residents with functional, affordable heating and cooling. Accordingly, our response to the City's RFI will specifically address equitable decarbonization in public and affordable housing and BIPOC workforce engagement.

2.2.1: RESPONDENT PROFILE

Question 1. Please provide your organization's name and a short statement describing the organization.

People for Community Recovery

PCR was founded in 1979 by Hazel Johnson, known as the mother of the environmental justice movement. Johnson organized for better conditions in Altgeld Gardens, advocated for landmark federal environmental justice legislation, and co-developed the Jemez Principles for Democratic Organizing and the 17 Principles of Environmental Justice, both still used widely in community organizing. Today, PCR continues Hazel's legacy by building power towards equity and community self-determination.

PCR advocates, educates, and organizes on community-identified priorities including environmental justice, safe and affordable housing, economic equity, and community health. PCR is based in Chicago's Riverdale neighborhood. However, its policy advocacy work has shaped legislation that benefits communities across Illinois. PCR's organizing has stopped more landfills from polluting Chicago communities, helped remove asbestos in public housing, and

prevented hundreds of affordable housing units in Chicago from being demolished. Locally, PCR has developed a solar job training program for CHA residents and stopped initial demolition of a historic building in Altgeld Gardens.

The Public Health Law Center

PHLC is a law and policy organization working to advance equitable public health policies. For over 20 years, PHLC has been working to regulate and phase out commercial tobacco products, improve access to healthy food, promote equitable transportation, and foster systemic change that combats the legacy of institutional racism in the United States. In keeping with these goals, PHLC recently expanded its scope of work to include the pursuit of healthy housing, especially for the historically disenfranchised who are now most vulnerable to the devastating impacts of climate change. Programmatic changes are urgently needed to right housing and energy inequities and make public and affordable housing safe for our changing environment.

PHLC works across coalitions of community-based organizations (“CBOs”) to address decarbonization in public and affordable housing, facilitates coalition goals, and provides technical resources including legal and policy assistance.

Question 2. Please describe any relevant experience or expertise that informs your responses.

People for Community Recovery

PCR’s theory of change is based on developing leaders from the most impacted communities and building grassroots power to achieve our goals. Over the last 40 years, PCR has developed strong expertise about the environmental issues facing the far south side of Chicago as well as their intersection with housing justice. As the only public-housing based EJ organization in the City, PCR is in a unique and important position to leverage that knowledge and those connections to strengthen the broader movement by bringing community leaders and experts together to support a broad base of policy and programmatic improvements.

Additionally, local development projects such as the Chicago Transit Authority’s expansion of the L train to our neighborhoods, Altgeld's pending appointment to the national register of historic places, and the Biden administration’s Justice40 initiative will provide opportunities to obtain necessary funds for developing green community infrastructure. PCR is equipped to strategically work in tandem with the City, the Department of Housing and Chicago Housing Authority to leverage these opportunities in support of community goals.

Public Health Law Center

As a law and policy center, PHLC is committed to co-creating healthier, more equitable communities with our partners and allies. To date, PHLC has engaged residents living in public and affordable housing in Chicago regarding electrification and decarbonization. PHLC staff participate in building coalitions with Chicago CBOs committed to environmental justice for the City's most vulnerable populations. Our specialty lies in helping CBOs identify health risks and advocate for policies that make all homes safe for residents.

Outside of Chicago, PHLC assists jurisdictions and government agencies with decarbonization, electrification, and climate resiliency policies that support health equity. In addition to petitioning HUD to advance nationwide electrification and climate resiliency regulations, we were also instrumental in urging HUD to create healthier housing through the Smoke-Free Public Housing rule. Further, we provide legal technical assistance to cities interested in establishing progressive building performance standards.

Finally, we elevate strategies that work, such as the partnership between the New York City Housing Authority ("NYCHA") and WE ACT for Environmental Justice, to encourage efforts that replace fossil-fuel burning, harmful gas stoves with induction stoves in affordable housing.

Question 3. Please describe your geographic area of operation and how many households you serve annually? If you serve Chicago residents, in what Community Areas do you have a presence?

People for Community Recovery

PCR is based in Altgeld Gardens in Chicago's Riverdale neighborhood. Our strongest organizing base includes Chicago communities south of 95th street: Roseland, Pullman, West Pullman, Jeffrey Manor, South Deering, East Chicago, Hegewisch, Golden Gate and Eden Green. Locally, we serve over 6,000 residents annually. However, PCR works to ensure municipal and state level policies benefit all low-income and environmental justice communities across Chicago and Illinois. We bring an important justice lens to coalitions working on city and statewide housing and environmental policy.

PCR's home base of Riverdale is ranked highest on Chicago's hardship index, which is measured by socioeconomic indicators of public health including unemployment, educational attainment, annual income and percentage of households living below the poverty line. Riverdale residents suffer from health disparities including disproportionate rates of cancer and respiratory illness from the legacy of toxic industry and air pollution in the area.

Public Health Law Center

PHLC is based in St. Paul, Minnesota at the Mitchell Hamline School of Law. Our work is national in scope and includes partnerships with Tribal health leaders, federal agencies, state and local governments, and community coalitions working to create healthier communities around the country.

As mentioned, PHLC has specific experience discussing electrification and decarbonization with residents living in public and affordable housing in Chicago. PHLC believes residents themselves are in the best position to shed light on the resources necessary to implement a decarbonization framework that will support health and reduce energy burden.

With this commitment to resident voices and experience, PHLC and PCR coordinated focus groups with public and affordable housing residents in Chicago to discuss housing conditions for the HUD [Petition](#).

Participating residents were Black and ranged from approximately age 20 to 70. Some residents were new arrivals to HUD-assisted housing, but most had been there for at least 10 years and a few families had been residing in public housing for generations. Approximately half of participating residents had children living in their units, while many older residents reported babysitting grandchildren in their units.

During the focus group participating residents reported many condition issues that impact health and wellness. Nearly 100 percent of participating residents reported using their gas stoves for supplemental heat. Functioning kitchen ventilation was relatively rare, causing residents to feel anxious about oven fumes while cooking and using the stove for supplemental heat. Generally, the residents most sensitive to indoor pollution and extreme temperatures have asthma or other respiratory illnesses or live with someone who does. The focus group reflected the disproportionately high levels of asthma and respiratory disease among Black communities, with a few residents reporting elevated symptoms in the winter when they spend most of their time indoors.

Finally, PHLC asked residents whether they would be interested in electrifying their homes. The results were overwhelmingly in favor of electrification. Electrification and decarbonization is an urgent health and environmental need in Chicago's affordable and public housing. The residents and CBOs know this better than anyone.

Question 4. Please describe the energy retrofit work you have completed including technology, impact, total number of buildings and units (specifying building type), and geographic location of retrofits.

Although PHLC and PCR do not specifically perform energy retrofits, both organizations play a critical role in the decarbonization community.

People or Community Recovery

PCR has worked for several years to support far south side residents in finding careers in the clean energy and retrofit workforce. PCR partnered with the International Brotherhood of Electrical Workers in 2017 and 2018 to recruit trainees for solar job training and developed a comprehensive solar job training curriculum for Chicago Housing Authority (“CHA”) with the intent to help public housing and low-income residents access the benefits of Illinois’ growing clean energy economy. PCR is also a leader in advocating for equitable energy efficiency and decarbonization retrofits, including through the Illinois Clean Jobs Coalition (ICJC), Illinois Energy Efficiency for All (IL EEFA), and the Midwest Building Decarbonization Coalition (MWBDC). Through IL EEFA, PCR has directly been a part of energy efficiency plan negotiations with Illinois utilities, to expand energy efficiency and electrification programs for low-income and low-income multifamily households. This work has included advocating for best practices when serving low-income households, such as a one-stop shop approach, addressing health and safety issues, targeted budgets and program design, as well as a focus on building envelope measures (air sealing and insulation).

Public Health Law Center

Through coalition building and partnerships with energy experts, PHLC connects technical resources to responsible agencies and impacted communities. A critical example of this work is in its 2022 Petition to HUD to reduce environmental health harms through electrification upgrades in public housing.

Prior to submitting the Petition, PHLC spent nearly a year engaging stakeholders in energy, climate, environmental justice, housing, and public health spaces to create regulatory proposals addressing significant public health risks and economic burdens associated with indoor air pollution, fossil fuel-fired appliances, and climate change. Moreover, PHLC coordinated focus groups with public and affordable housing residents in Chicago to discuss housing conditions and related health and wellness impacts.

Following the stakeholder and resident engagement, PHLC identified seven categories of regulatory proposals in the Petition. While these proposals are specific to HUD, their consideration and implementation will benefit local Public Housing Authorities throughout the country in addressing electrification and decarbonization:

- (1) revive the Green Physical Needs Assessment (“Green PNA”) rule requiring PHAs to generate forward-looking planning documents that identify modifications necessary to prepare for and mitigate against climate-related health risks. A PNA tool systematically reviews all of the major physical components of a property to develop a long-term plan for addressing the costs of replacement of the components as they wear out. These tools help property owners prioritize work to be done with limited resources;
- (2) implement an in-kind replacement ban on fossil fuel-fired appliances in some HUD-assisted properties;
- (3) update the applicable physical condition standards to reflect the significant public health risks posed by indoor combustion of fossil fuels, as well as by extreme temperature exposure;
- (4) revise utility allowances to save residents money by accounting for increased electrification, weatherization, and energy efficiency efforts. A utility allowance enables participating residents to pay typical costs for utilities and services paid by energy-conserving households occupying units of similar size and type in the same locality;
- (5) require that PHAs assist residents in reducing in-home health hazards and to advocate for resident throughout the planning process;
- (6) revise several of HUD’s grant programs to support beneficial electrification and climate-preparedness; and
- (7) edit the guidance for the Rental Assistance Demonstration (“RAD”) to ensure climate-related risks are addressed in converted properties as well. RAD allows public housing agencies to leverage public and private debt and equity in order to reinvest in the public housing stock.

PHLC’s community-based facilitation, regulatory knowledge, as well as legal resource management provide a critical technical and practical framework for addressing decarbonization in public and affordable housing.

2.2.2 TECHNICAL RECOMMENDATIONS - Licensing, permitting, building codes, and workforce

13. What experience do you have with BIPOC workforce engagement, training and/or utilization? How would you develop a program to include meaningful and sustainable participation from BIPOC tradespeople and emerging trades businesses? Are there partner organizations that you work with? Please be specific.

PCR has worked for several years to support far south side residents in finding careers in the clean energy workforce. We partnered with the International Brotherhood of Electrical Workers in 2017 and 2018 to recruit trainees for solar job training cohorts established after the passage of the Future Energy Jobs Act. PCR staff worked with trainees to provide feedback on ways to improve the programs including implementing wraparound services such as childcare and transportation stipends, providing more one-on-one tutoring support, ensuring cultural competence among trainers, establishing stronger outreach practices in BIPOC communities, and incorporating pre-training skills building to set up trainees for success and clarify expectations. Many of these recommendations informed language in the Climate and Equitable Jobs Act being implemented now. PCR also completed a contract with the Chicago Housing Authority in which we developed a comprehensive solar job training curriculum for CHA with the intent to help public housing and low-income residents access the benefits of Illinois' growing clean energy economy. As CHA explores options for building a solar array system in Chicago, this curriculum can be leveraged to ensure residents are ready and able to join the teams that will build and maintain the system.

A program that includes meaningful and sustainable participation from BIPOC tradespeople and emerging trades businesses must meet people where they are by leveraging local outreach networks and community organizations engaged in this work. On the Southside this includes People for Community Recovery and Blacks in Green. To ensure success, training and support for emerging businesses and tradespeople should include ongoing support and mentoring after the conclusion of any formal training programs. This has been a missing piece in many Illinois training programs.

2.2.3 PROGRAM DEVELOPMENT - Program Design.

Question 17. Please describe any household targeting including any relevant criteria like income, housing type, geographic location, etc. Please specify community areas or neighborhoods if appropriate.

Fossil fuel infrastructure is a major health and economic equity issue placing a disproportionate impact on public and affordable housing residents. Any decarbonization efforts must target low-income and public housing and the neighborhoods serving those residents.

Climate change-induced extreme weather events and epidemics are forcing people to spend more time in their homes. Mounting research shows that combustion of fossil fuels in public housing appliances emit hazardous air pollutants, making homes unsafe and increasing financial burdens on public housing residents. Additionally, public-housing residents are often kept from accessing programs and services that would increase the energy efficiency and overall safety of their homes. Most energy efficiency programs, grants and funding streams target homeowners or are provided through tax credits that only benefit people with incomes

high enough to have tax liability. Consequently, citizens who are most vulnerable to—and least responsible for—the negative impacts of climate change are left to shoulder onerous energy bills in residences that do not offer adequate protection from the dangers of the modern environment.

The RFI notes that the City is committed to a 62% overall reduction in GHG emissions by 2040. While the City embraces energy efficiency, electrification, and renewable energy it has also highlighted the need to center equity, “developing the social capital and resources to support these initiatives through a strategy that lowers economic burdens on residents and businesses, reduces energy insecurity for communities of color, and uses an equity lens to assess the cost and impact of these strategies.”

As further noted in the RFI, public and affordable housing residents are disproportionately impacted by energy cost burdens, adding that a household is considered energy burdened when they spend more than 6% of their gross monthly income on energy and severely energy burdened when they spend more than 10% of their income. In Chicago, 22% of households experienced high or severe energy burden and are predominately located in the City’s west, south, and far south communities, home to many Black and Latinx residents.

Redlining and environmental racism cause these residents to experience more industrial pollution than whiter, more affluent communities. Redlining and regulations, including zoning and planning, will also target marginalized communities as sacrifice neighborhoods, allowing polluting activities and industries to accumulate in less desirable areas of the city.

The Federal Government has recognized these gross disparities and the need to specifically target funds to marginalized communities with its Justice40 Initiative. Justice40 commits 40 percent of certain Federal investments to disadvantaged communities that are overburdened by pollution. Such investments will support critical decarbonization efforts in the City’s historically underserved neighborhoods allowing the City to prioritize these communities.

While it is critical to prioritize public and affordable housing in deploying decarbonization efforts, coalition and capacity-building are essential to ensure: (1) resident experiences are addressed; and (2) resident participation and autonomy of program benefits. To that end, in targeting high-need and impacted neighborhoods, the City should engage and partner with CBOs to build energy efficiency capacity awareness and deploy resources that facilitate energy efficiency and decarbonization measures. Such engagement and partnership in prioritized neighborhoods will aggregate impact and decarbonization results.

Question 18. Please describe any reference programs that may provide a model for using these funds.

To address harsh energy inequities, PHLC believes it is critical to provide an accessible and approachable body of energy efficiency and decarbonization resources to public and affordable housing residents. As stated throughout this response, low-income housing residents are experiencing significant health impacts from the poor indoor-air quality created by fossil-fuel appliances, including gas stoves. Gas stoves expose residents to air pollutants like nitrogen dioxide and carbon monoxide, intensifying respiratory conditions like asthma. Thus, while low-income housing residents and marginalized communities are already experiencing economic challenges, these are exasperated by the significant health impacts of living with fossil-fuel driven polluting appliances and rising energy costs. PHLC recommends that the City emulate programs that phase out fossil-fuel burning appliances while also sequencing weatherization (i.e. removing indoor air quality hazards like gas stoves before sealing building envelopes).

The WE ACT for Environmental Justice (“WE ACT”) pilot [*Out of Gas, In with Justice*](#) is a model for engaging residents and transitioning from fossil fuel appliances. WE ACT is a CBO based in New York City that engages and educates public and affordable housing residents on energy efficiency and decarbonization. WE ACT’s mission is to “build healthy communities by ensuring that people of color and/or low-income residents participate meaningfully in the creation of sound and fair environmental health and protection policies and practices.”

WE ACT’s pilot program replaced gas stoves with induction stoves in 20 affordable housing homes—specifically targeting households where a family member has asthma—and monitored the changes in indoor air quality. In addition to removing the gas stoves, WE ACT engaged residents with education campaigns on the function and use of the new induction stoves. WE ACT also partnered with the Association for Energy Affordability to assist with participant recruitment, electrical upgrades, and stove installation in participating apartments.

WE ACT partnered with the NYCHA in this effort, with a shared commitment toward building decarbonization capacity and improving conditions for residents. NYCHA is the City’s largest landlord and as stated by WE ACT’s *Out of Gas, In with Justice* recently released report:

NYCHA has the opportunity to set precedent in equitable decarbonization for residential buildings across the city. In 2021, NYCHA released their ambitious goal to reduce greenhouse gas emissions 80 percent by 2050 in compliance with Local Law 97. To achieve this goal within its existing housing stock, NYCHA needs to complete deep energy retrofits, which includes tackling health and safety concerns and deferred maintenance in buildings, and replacing gas appliances with electric ones.

Successful decarbonization efforts require authentic partnership among all stakeholders, including governing agencies, such as PHAs, CBOs, such as WE ACT, and most significantly, the residents.

WE ACT's pilot program and NYCHA's decarbonization targets recognize the need for sequencing and prioritizing energy retrofits. In underinvested, marginalized neighborhoods, affordable-housing stock often needs significant repair. Structural deficiencies and health and safety issues may prevent electrification and delay or even prohibit weatherization assistance programs. The City will need to sequence their decarbonization efforts to consider the whole building envelope and cost-effectiveness. Cost-effectiveness considers the cost savings over time. When calculating cost-effectiveness, the City and PHA should consider the social costs of greenhouse gases¹ as well as health-related and generational costs. It is paramount to understand the impact of sequencing because weatherizing a housing unit with a gas stove and poor ventilation will exasperate poor indoor-air quality and related illnesses such as asthma. By outfitting a unit with clean appliances and ventilation, then weatherizing, and finally installing energy efficient systems, units will recognize the dual benefits of decarbonization and improved indoor air quality.

Finally, any program addressing the complexity of energy, decarbonization, climate impacts and housing stock should invest in a single source point of resources and deliverables. Housing retrofit resources, especially those that target affordable housing needs, are best served by "one-stop shops" that address project scope and initiation, contractor engagement, funding options and financing resources as well as quality management. Through IL EEFA, PCR has advocated for best practices when serving low-income households, such as the [one-stop shop](#) approach. Such resources should include financial advising tools capable of advising CBOs and building providers about which funds are best used for a given project to maximize all available grants, rebates, and private assistance. Chicago's "one-stop-shop" should also ensure landlords and tenants have access to utility metering data necessary to establish on-bill financing and allow residents to access utility bill assistance, energy efficiency and decarbonization rebates and incentives.

In sum, we appreciate the City and DOH's commitment to decarbonization and retrofits to address climate change and energy efficiency. Any program development and deployment will maximize its return when prioritizing marginalized communities with a holistic approach in replacing fossil-fuel burning appliances, ensuring indoor air quality, and weatherization. Community engagement and leveraging Federal funds will further ensure success for both residents and the City's climate goals.