

July 10, 2026

Commissioner Angela Tovar
Chicago Department of Environment
City of Chicago
2 North LaSalle Street, Suite 970
Chicago, IL 60602

Submitted via email to Envcomments@cityofchicago.org

**Re: Comments on Chicago's 2026 Green Infrastructure Strategy Submitted by the
Flooding and Sewage Coalition**

Dear Commissioner Tovar,

The Flooding and Sewage Coalition (the “Coalition”)¹ respectfully submits the following comments on the May 5th draft² of the City of Chicago’s 2026 Green Infrastructure Strategy³ (the “Draft Strategy”). The Coalition supports the Draft Strategy because it describes benefits, and advances the development, of well-sited, well-maintained green stormwater infrastructure as part of a broader system of stormwater and wastewater solutions that reduce combined sewer overflows (“CSOs”), basement backups, and related stormwater harms. The Coalition also applauds the Draft Strategy for recognizing that “these impacts are disproportionately felt by Black and Brown communities on Chicago’s South and West Sides, where environmental burdens and decades of underinvestment have made it harder to recover from storms.”⁴ The Coalition submits the comments and recommendations herein with the goal of assisting the City in developing a Final Strategy that will deliver efficient, effective, and equitable progress to advance the vital values and policy objectives of the Draft Strategy.

It is important to frame these comments by recognizing that the City is drafting the Strategy, at least in part, in response to a legal requirement. Chicago’s National Pollutant Discharge Elimination System Permit (the “Permit”) requires the City to “update and expand its

¹ Please refer to the signature blocks at the end of this letter for a complete listing of Coalition individual and organizational members. The Coalition represents community organizations and advocates dedicated to advancing environmental justice and protecting vulnerable populations from disproportionate environmental harms related to urban flooding and basement backups. The Coalition’s membership comprises residents and community groups predominantly located in Chicago and surrounding areas. Our mission is to ensure that environmental policies equitably protect all communities, especially those burdened with the highest cumulative impacts related to stormwater flooding.

² *Help Shape Chicago’s Green Infrastructure Strategy*, FRIENDS OF THE CHI. RIVER (Apr. 29, 2026), <https://www.chicagoriver.org/blog/2026/4/help-shape-chicago-s-green-infrastructure-strategy>.

³ City of Chicago, *2026 Green Infrastructure Strategy*, <https://www.chicago.gov/city/en/sites/2026-green-infrastructure-strategy/home.html> (last visited July 2, 2026).

⁴ Draft Strategy, page 6.

2014 Green Stormwater Infrastructure Strategy and establish **initiatives with measurable goals and outcomes through incremental measures that will reduce CSOs, prioritizing sensitive areas and environmental justice [(EJ)] communities.**⁵ The Draft Strategy falls short of this mandate because it is a largely aspirational document that espouses laudable principles but fails to identify “measurable goals and outcomes” and does not establish concrete, actionable “initiatives”⁶ that will definitively “reduce CSOs” while “prioritizing . . . [EJ] communities.”⁷

That said, the Draft Strategy does make important contributions. It acknowledges that Chicago’s stormwater burdens are inequitable⁸ and that maintenance and data gaps have limited prior green infrastructure efforts,⁹ identifies City agencies and sister agencies that affect stormwater outcomes,¹⁰ and recognizes that green infrastructure must be coordinated with gray infrastructure to be responsive to community stormwater priorities.¹¹

The Draft Strategy is a strong starting point, but, as described more fully herein, **the final version should focus on addressing stormwater problems and therefore be re-titled as 2026 Green Stormwater Infrastructure Strategy** (the “Final Strategy” or the “Strategy”). As contemplated by the City’s Permit, the Final Strategy should more directly advance its aspirations for stormwater management with measurable initiatives that: identify responsible agencies and funding sources, establish timelines, and include frameworks for incorporating public input and ensuring accountability. The Strategy must more clearly and consistently answer fundamental questions at both programmatic and site-specific levels: What are the Strategy’s measurable goals? Why were they chosen? Which are most important? How will they be achieved? Who is responsible? By when? How will success be measured? And how will responsible parties be held accountable?¹²

⁵ Ill. Env’t Prot. Agency, *NPDES Permit No. IL0045012*, Special Condition 3, ¶ 14 (issued Mar. 26, 2024) (emphasis added).

⁶ Initiative, CAMBRIDGE DICTIONARY, <https://dictionary.cambridge.org/us/dictionary/english/initiative> (last visited July 6, 2026) (defining “initiative” as “a new plan or process to achieve something or solve a problem”).

⁷ Ill. Env’t Prot. Agency, *NPDES Permit No. IL0045012*, Special Condition 3, ¶ 14 (issued Mar. 26, 2024) (emphasis added).

⁸ See, e.g., Draft Strategy, page 6.

⁹ See Draft Strategy, page 6 (highlighting that “. . . maintenance coordination and consistent data tracking have emerged as major challenges.”).

¹⁰ See, e.g., Draft Strategy, pages 25–26.

¹¹ See, e.g., Draft Strategy, page 12.

¹² See *infra* Part III.14, *Putting it All Together: How DOE can use a Governance Matrix to articulate the Who, What, Where, When, Why, and How of implementing Goals of the Strategy.*, at 36.

I. Overview of the Coalition’s Comments

To help answer these questions, satisfy the requirements of the Permit,¹³ and meaningfully protect communities burdened by stormwater management issues that manifest in CSOs, flooding, and basement backups, the Coalition offers the following recommendations, each elaborated upon in a separate discussion below, so the Final Strategy can build off the Draft Strategy and become an effective implementation plan:

1. Clarify whether and how the Final Strategy legally binds, guides, or coordinates the work of the Department of the Environment, other City agencies, and sister entities;
2. Identify the Primary Purpose of the Strategy and ensure that the Strategy’s Goals advance that purpose; Clearly distinguish Benefits from Co-benefits;
3. The Strategy’s Goals must be Specific, Measurable, Achievable, Relevant, and Time Bound (“SMART”);
4. Situate Green Stormwater Infrastructure more explicitly in a comprehensive Green + Gray Complete Solutions Framework;
5. Distinguish Green Infrastructure (“GI”) from Green Stormwater Infrastructure (“GSI”) and clarify the role of trees in connection with stormwater management;
6. Integrate GSI Review into existing capital workflows;
7. Establish shared design and maintenance standards;
8. Create a Prioritization Index with a scoring methodology that promotes siting decisions that advance the Primary Purpose of the Strategy and avoids reinforcing existing inequities;
9. Ensure that Mapping Tools do not rely on incomplete or misleading data and relate closely to the goals of the Strategy;
10. Explain how existing City policies, ordinances, and agency authorities will be used, coordinated, or revised to support implementation of the Strategy;
11. Comprehensively review available funding and financing options and explore a stormwater fee that centers equity;
12. Clarify the methodologies used to collect community input in developing the Strategy and properly define the purpose of public education on GSI moving forward;
13. Include a clear plan for building sustainable community collaboration structures at the site-specific level;
14. Putting it All Together: How DOE can use a governance matrix to articulate the Who, What, Where, When, Why, and How of implementing Goals of the Strategy.

¹³ Ill. Env’t Prot. Agency, *NPDES Permit No. IL0045012*, Special Condition 3, ¶ 14 (issued Mar. 26, 2024) (the City must “update and expand its 2014 Green Stormwater Infrastructure Strategy and establish initiatives with measurable goals and outcomes through incremental measures that will reduce CSOs, prioritizing sensitive areas and [EJ] communities.”).

Without these improvements, the Final Strategy risks being merely a statement of general support for GSI rather than a functional plan for reducing stormwater flows to the combined sewer system, basement backups, sewer overflows, and inequitable stormwater burdens. As we are dramatically reminded seemingly every day this summer, communities are already suffering from flooding and sewer backups,¹⁴ and they need a Strategy that organizes and propels action to reduce those harms with community-informed¹⁵ green and gray infrastructure investments¹⁶ while efficiently delivering additional solutions to address cumulative impacts¹⁷ that interact with stormwater harms in their daily lives. The Strategy should also specifically acknowledge that the City’s historic record on green infrastructure deployment has not benefitted or protected communities equitably and commit to new processes that explicitly address the existing inequitable landscape upon which the City builds its current efforts on GSI.

The Final Strategy must present a specific plan for leveraging GSI in ways that respond to the unique needs of communities, address flooding and cumulative impacts experienced in the past and expected in the future as climate change causes extreme weather to intensify, and implement residents’ expressed priorities for City investments to meet the needs they identify for themselves. The Coalition acknowledges that these challenges are complicated and that these expectations of the Final Strategy will be difficult to meet. It offers the recommendations herein in the spirit of ongoing co-creation, with the goal of moving our City toward a system of stormwater management that is evermore responsive, effective, and equitable.

II. The Draft Strategy Provides Strong Framing, Acknowledgements, and Context for the City’s Commitments to Community-Centered GSI.

The Coalition appreciates the Department of Environment’s (“DOE”) leadership in preparing a citywide Draft Strategy that generally recognizes green infrastructure as infrastructure requiring investment, maintenance, and a coordinated implementation strategy, rather than as isolated beautification projects. Though it should distinguish green *stormwater* infrastructure from the broader category of “green infrastructure,” as explained further below,¹⁸ the Draft Strategy correctly describes green infrastructure as part of the City’s response to

¹⁴ Draft Strategy, page 6 (noting that “local flooding and sewer backups continue to occur . . . [and] large storm events can cause significant property loss, health impacts, and financial hardship.”).

¹⁵ See *infra* Part III.13, *Include a Clear Plan for Building Sustainable Community Collaboration Structures.*, at 33.

¹⁶ See *infra* Part III.4, *Situate GSI more explicitly in a comprehensive Green + Gray Complete Solutions Framework.*, at 14.

¹⁷ See *infra* Part III.8.B, *Integrating a Cumulative Impacts Framing in the Index’s Impacts Categories*, at 20.

¹⁸ See *infra* Part III.5, *Distinguish Green Stormwater Infrastructure (“GSI”) from Green Infrastructure (“GI”) and clarify the Role of Trees in connection with stormwater management.*, at 16.

flooding, heat, and environmental inequities,¹⁹ and it acknowledges that careful thought is necessary to ensure GSI is sustained and maintained over time.

First, the Draft Strategy identifies the City’s stormwater problem in terms that generally align with community experience. It recognizes that “local flooding and sewer backups continue to occur” and that increasing rainfall intensity reinforces “the need to manage stormwater where it falls and reduce strain on existing infrastructure.”²⁰ It also recognizes that large storms cause “significant property loss, health impacts, and financial hardship” and that those impacts are disproportionately felt by members of EJ communities, including many “Black and Brown communities on Chicago’s South and West Sides.”²¹ That framing is important because it connects green infrastructure to the lived consequences of flooding and basement backups, not merely to abstract stormwater capture. The Coalition’s recommendations outlined below detail ways the City can more affirmatively define what the City considers an “environmental justice community”²² specific to the commitments made in the Draft Strategy, both by reference to relevant existing policies²³ and in the portions of the Draft Strategy relevant to data mapping.²⁴

Second, the Draft Strategy makes important acknowledgements, including recognizing the importance of: developing and implementing sustainable maintenance strategies;²⁵ equity; mapping and site selection; reliable, relevant, and representative data collection; cross-agency coordination; and ongoing community input throughout GSI implementation. It acknowledges that “maintenance coordination and consistent data tracking have emerged as major challenges.”²⁶ It also recognizes that the 2014 Strategy’s implementation has been limited by “fragmented coordination, unclear maintenance responsibilities, insufficient dedicated funding, and inconsistent approaches to equity.”²⁷ Those recognitions are valuable, but they also underscore the need for the Final Strategy to specify goals that directly address the barriers identified in the Draft Strategy by articulating specific, measurable, and time-bound commitments.

Third, the Draft Strategy rightly recognizes that green infrastructure alone will not solve every flooding problem. Community feedback summarized in the Draft Strategy states that “one-

¹⁹ See, e.g., Draft Strategy, pages 38–39.

²⁰ Draft Strategy, page 6.

²¹ Draft Strategy, page 6.

²² Draft Strategy, pages 28, 103.

²³ See *infra* Part III.8.B, *Integrating a Cumulative Impacts Framing in the Index’s Impacts Categories*, at 20.

²⁴ See *infra* Part III.9, *Ensure that Mapping Tools do not rely on incomplete or misleading data and relate closely to the goals of the Strategy.*, at 24.

²⁵ See, e.g., Draft Strategy, page 7.

²⁶ Draft Strategy, page 7.

²⁷ Draft Strategy, page 7.

size-fits-all approaches to green infrastructure typologies and funding models do not always address the varied needs across neighborhoods” and that “some areas require gray solutions or hybrid approaches.”²⁸ The recommendations section likewise states that “[g]reen infrastructure on its own won’t address all of Chicago’s stormwater challenges.”²⁹ That is the correct mindset for pursuing a complete solutions framework and should be further emphasized earlier and throughout the Final Strategy. The Coalition looks forward to working with DOE and other City departments to develop and utilize community-informed flood vulnerability mapping to help guide these decisions and ensure that complete stormwater solutions are directed toward the communities and locations facing the greatest stormwater-related harms.

Fourth, the Draft Strategy expresses a commitment to meaningful community engagement moving forward. The Draft Strategy intends to “center the needs and concerns” of those most impacted by urban flooding.³⁰ It also states that “[l]ocal residents are the foremost experts on the issues and priorities of their communities” and that community involvement should occur “across the life cycle of a project, including design.”³¹ Centering community engagement and meaningfully applying community priorities to programmatic and site-specific GSI decision-making is essential. The Coalition recommends several ways the City should operationalize this commitment throughout the Final Strategy.³²

Finally, the Draft Strategy includes useful examples and supplemental materials that contextualize City commitments. The descriptions of Space to Grow,³³ Our Roots Chicago,³⁴ the Climate Infrastructure Fund,³⁵ Philadelphia’s stormwater fee,³⁶ St. Louis’s Project Clear Rainscaping program,³⁷ Milwaukee’s Fresh Coast Green Communities program,³⁸ various mapping tools,³⁹ and example maintenance performance metrics⁴⁰ each provide building blocks for a stronger Final Strategy. The Final Strategy should connect those case studies, mapping

²⁸ Draft Strategy, page 37.

²⁹ Draft Strategy, page 52.

³⁰ Draft Strategy, page 36.

³¹ Draft Strategy, page 42.

³² See *infra* Part III.13, *Include a Clear Plan for Building Sustainable Community Collaboration Structures.*, at 33.

³³ Draft Strategy, page 28.

³⁴ Draft Strategy, page 29.

³⁵ Draft Strategy, page 28.

³⁶ Draft Strategy, page 54.

³⁷ Draft Strategy, page 56.

³⁸ Draft Strategy, page 48.

³⁹ Draft Strategy, pages 64–67.

⁴⁰ Draft Strategy, page 108.

tools, and metrics to specific commitments, explaining how Chicago will implement the relevant lessons from each cited example to further the purpose of the Strategy.⁴¹

The Coalition’s recommendations build on the Draft Strategy’s most important observations and policy commitments by recommending they be made more specific, measurable, and accountable in practice. The Final Strategy should translate recognition of flooding harms, environmental inequity, maintenance challenges, data gaps, interagency coordination needs, community expertise, and the limits of GSI into specific implementation commitments to address these issues. Doing so will help ensure that the City’s promising policy statements result in durable programs and infrastructure investments that reduce flooding and sewer backups, prioritize and promote community self-determination in the communities most affected, and maximize the public benefits of green stormwater infrastructure.

III. Coalition Recommendations

1. Clarify whether and how the Final Strategy legally binds, guides, or coordinates the work of the Department of the Environment, other City agencies, and sister entities.

The Draft Strategy does not address whether or how it binds, guides, or coordinates the work of other city agencies and sister government entities, which is necessary to ensure the Strategy is implementable and enforceable and that those entities are consistently held to shared measures of success. The Strategy’s practical and legal force across City government remains unclear.

The Permit requires the City of Chicago to write the Final Strategy and to include certain features, including measurable goals.⁴² But the Permit does not appear to independently mandate execution of the Strategy’s recommendations. That makes clarity regarding the Final Strategy’s coordination function especially important with respect to prompting citywide action. Even if the Strategy’s substantive recommendations are strengthened, its practical value will remain limited if it does not articulate how and why those recommendations will direct the actions of the other agencies responsible for carrying them out.

The Draft Strategy claims that it “outlines how the City will coordinate across departments.”⁴³ This commitment is further described in multiple places throughout the Strategy, including the “Key Priority: Cross Agency Coordination” priority area and as a “next step” in

⁴¹ See *infra* Part III.2, *Identify the Primary Purpose of the Strategy and ensure that the Strategy’s Goals advance that purpose; Clearly distinguish Benefits from Co-benefits.*, at 8.

⁴² Ill. Env’t Prot. Agency, *NPDES Permit No. IL0045012*, Special Condition 3, ¶ 14 (issued Mar. 26, 2024).

⁴³ Draft Strategy, page 6.

“Moving Forward Together.”⁴⁴ First, the Coalition agrees that it is indispensable to align agencies and City departments on prioritizing, implementing, funding, and maintaining GSI because (1) interdepartmental coordination is necessary to make the Strategy actionable, and (2) development of the Strategy has been led by DOE, and DOE identifies itself as responsible for “[p]rovid[ing] citywide leadership on green stormwater infrastructure by setting strategy [and] *coordinating interdepartmental efforts*.”⁴⁵ At the same time, though, the Draft Strategy, in the “Leadership Capacity” section, suggests that an unnamed responsible entity should “[c]reate a centralized entity within the City that is responsible for *coordinating across multiple City departments* and partner agencies to advance green infrastructure.”⁴⁶ **The Final Strategy must be clear on whether DOE is responsible for this coordination and should clearly describe DOE’s legal authorities and resources to do so.**

While the Coalition applauds DOE’s leadership in producing the Strategy and, potentially, being the lead and coordinating entity for its implementation, DOE may not have the legal authority to implement or require implementation of many of its components. The agencies that control the relevant infrastructure, land, permits, sewers, streets, parks, schools, maintenance, and capital projects may hold the municipal code authority needed to carry out the work.⁴⁷ **The Final Strategy, therefore, must explain how a DOE-led Strategy will be implemented by the City as a whole and especially how accountability for Strategy implementation will be assured as to other departments or sister agencies that hold the actual authority to build, fund, maintain, or permit GSI projects.**

2. Identify the Primary Purpose of the Strategy and ensure that the Strategy’s Goals advance that purpose; Clearly distinguish Benefits from Co-benefits.

A. The Strategy’s Primary Purpose should be: “reducing stormwater-related harms in the communities most burdened by flooding, basement backups, and sewer-system failures through the implementation of GSI and Gray Stormwater infrastructure as part of a complete stormwater solutions framework.”

One of the Draft Strategy’s core structural problems is that it uses terms such as “goals,” “priorities,” “benefits,” and “co-benefits” in ways that are sometimes overlapping or interchangeable.⁴⁸ This makes it difficult to identify the Draft Strategy’s most important

⁴⁴ Draft Strategy pages 50, 70.

⁴⁵ Draft Strategy, page 26.

⁴⁶ Draft Strategy, page 52.

⁴⁷ See, e.g., Draft Strategy, pages 25–26 (identifying “Several city departments and sister agencies [that] interact with green infrastructure . . .”).

⁴⁸ See, e.g., Draft Strategy pages 6–7 (“improvements to air quality, urban heat, and access to natural spaces” identified as “co-benefits” and then as “benefits of [GI]” shortly thereafter); Draft Strategy pages 10–11 (co-benefits are defined as “[a]dditional positive outcomes that go beyond the primary goal of an action, project, or installation.

objectives. It also limits the Draft Strategy’s potential to set a clear, accountable agenda for implementing GSI as a multi-benefit tool to address stormwater and sewer system problems while also mitigating urban heat, improving access to green space, and delivering other co-benefits.

To address this issue, the Final Strategy should begin by identifying one overarching primary purpose (the “Primary Purpose” or the “Purpose”) that all commitments and implementation programs within the Strategy will be oriented toward advancing. The Primary Purpose can be broad and aspirational, but it should clearly state what the Strategy is ultimately intended to accomplish. **The Coalition recommends that the Final Strategy identify the Primary Purpose as “reducing stormwater-related harms in the communities most burdened by flooding, basement backups, and sewer-system failures through the implementation of GSI and gray stormwater infrastructure as part of a complete stormwater solutions framework.”**

From there, the Strategy should identify its goals (the “Strategy’s Goals”). The Strategy’s Goals should directly advance the Primary Purpose by translating the Strategy’s Purpose into concrete implementation commitments. To do so, the Strategy’s Goals should be specific, measurable, achievable, relevant, and time-bound (“SMART”).⁴⁹ Formulating such goals within the Strategy is explored in greater detail in the following recommendation.

For [GI], these include benefits such as heat mitigation, increased access to green space, and habitat creation,” while in the adjacent “What is Green Infrastructure?” box, the identified “[GI] . . . benefits” overlap considerably with the defined co-benefits: “. . . benefits, including reduced flooding, heat mitigation, improved air quality, and expanded access to green space & recreational opportunities.”); Draft Strategy, page 37 (“Air quality and reduced heat” are identified as “priority co-benefits” without elaboration regarding the implications of this “priority” status or sufficient transparency regarding the methodologies used to collect the community input that informed this designation. *See infra* Part III.12, *Clarify the Methodologies used to collect Community Input in developing the Strategy and properly define the purpose of Public Education on GSI moving forward.*, at 31); Draft Strategy, page 64. (identifying where green infrastructure can deliver “important community co-benefits—particularly cooling and improved air quality,” while adding that “Chicagoans identified reduced urban heat and better air quality as top priorities for green infrastructure investments,” possibly insinuating that these priorities may exceed the importance of stormwater benefits. Further confusing matters, the next heading is “[w]here greening provides the greatest benefits,” wherein cooling neighborhoods, improving air quality, and creating more comfortable public spaces are as listed. The “Co-Benefit Opportunity Areas Map” then says it shows where green infrastructure can have the greatest impact while only considering reducing extreme heat and improving air quality.); Draft Strategy, page 107 (the sample prioritization index labels the category “co-benefits,” but then calls the subtotal “Community Benefit Impact.” Further, the total possible score of the “co-benefits” category exceeds the total possible score of the stormwater management categories creating concerns with the relative weighting of these categories. *See infra* Part III.8, *Create a Prioritization Index with a Scoring Methodology that Promotes Siting Decisions that advance the Primary Purpose of the Strategy and Avoids Reinforcing Existing Inequities*, at 19).

⁴⁹ *See infra* Part III.3, *The Strategy’s Goals must be Specific, Measurable, Achievable, Relevant, and Time Bound (SMART)*, at 11.

B. The Final Strategy Should Distinguish GSI Benefits from Co-benefits.

The Draft Strategy identifies “benefits” and “co-benefits” of GSI. The Strategy’s Goals should directly advance its Primary Purpose, and the term “benefits” should be understood as the outcomes that contribute most directly to that advancement. “Co-benefits,” by contrast, should be treated as additional positive effects that may reflect essential community outcomes driven by other City commitments, plans, or policies (e.g., Sustainable Development Plan), but do not demonstrably reduce stormwater flows.

The Coalition recommends that the Final Strategy define GSI “benefits” as measurable flow reduction outcomes resulting from implementation of GSI that reduce stormwater-related harms in the communities most burdened by flooding, basement backups, and sewer-system failures like CSOs, resulting from system inundation. These benefits would include, among other metrics: increased stormwater capture, reduced stormwater runoff volume, curbed peak flows, or improved water quality. GSI typologies selected through application of the Final Strategy’s Prioritization Index, discussed further below,⁵⁰ should first prioritize the sorts of “benefits” already described as “Stormwater Impacts” in Appendix C.⁵¹ The identified stormwater benefits in the Final Strategy should also include additional metrics – such as tracking basement backup incidence, basement or home flooding, street flooding, and other measures of how stormwater affects community members – particularly where helpful to show how the City is addressing the intersection of stormwater impacts with other social determinants of health or community vulnerabilities. The Final Strategy should pair each identified benefit with corresponding performance metrics, as discussed in greater detail below.

The Coalition recommends that the Final Strategy preserve and apply consistently the definition of “co-benefits” as currently expressed: “additional positive outcomes that go beyond the primary goal of an action, project, or installation,” making co-benefits secondary drivers for the siting and prioritization of GSI.⁵² The Draft Strategy already makes this distinction in Appendix C by GSI typology.⁵³ Co-benefits of GSI also deliver value, but they should support – rather than substitute for or obscure – the Strategy’s primary stormwater-management purpose. As the Draft Strategy recognizes, secondary outcomes of GSI may include reduced urban heat, improved air quality, expanded tree canopy where appropriate, access to safe and usable green space, habitat creation, local workforce development, contractor diversity, public education, community stewardship, and other community-identified benefits.⁵⁴ The Final

⁵⁰ See *infra* Part III.8, *Create a Prioritization Index with a Scoring Methodology that Promotes Siting Decisions that advance the Primary Purpose of the Strategy and Avoids Reinforcing Existing Inequities*, at 19.

⁵¹ Draft Strategy, pages 84–97.

⁵² Draft Strategy, page 10.

⁵³ Draft Strategy, page 84.

⁵⁴ See, e.g., Draft Strategy, page 22.

Strategy should preserve that distinct definition of co-benefit, and include references the City policy, document, ordinance that establishes each co-benefit as a broader City priority, or commitment.

This distinction must also be manifested in the way the Strategy sequences decisions about GSI siting and design. Although laudable that the City has several intersecting climate, heat vulnerability, and sustainability goals that GSI implementation could help achieve, any prioritization schema for GSI in the Final Strategy should be driven first and foremost by the need and site-specific ability to reduce stormwater flows, and weigh benefits associated with stormwater flow reduction and improved water quality before weighing and scoring co-benefits associated with these initiatives. Delivering or maximizing co-benefits should be a priority only *after* a location has been identified as having high stormwater management need and vulnerability.⁵⁵ The Coalition agrees the City should invest in multi-benefit GSI solutions, where feasible, and to efficiently utilize limited City resources. However, if co-benefits are treated as equivalent to benefits, the City risks directing scarce resources toward projects that produce secondary outcomes associated with other City priorities while failing to fully address stormwater impacts. The Final Strategy should therefore make clear that site-selection decisions must be driven first by the opportunity to reduce flooding, basement backups, sewer loads, CSOs, and related stormwater harms in the communities facing the greatest stormwater burdens. The Coalition looks forward to engaging DOE on how the benefits and co-benefits of GSI are expressed as prioritization criteria and consistently quantified to demonstrate measurable reductions in stormwater flows entering the combined system, including through revamping the Prioritization Index included in the Draft Strategy as discussed in Recommendation 8 below.

3. The Strategy's Goals must be Specific, Measurable, Achievable, Relevant, and Time-Bound (SMART).

Each of the Final Strategy's Goals should translate the Strategy's Primary Purpose into concrete implementation commitments.⁵⁶ To create Goals that effectively serve this function, the Final Strategy should articulate Goals using a "SMART" framework:

- **Specific:** A goal should clearly articulate what must be done and by whom. Goals should be specific enough to tell agencies what actions they must take, what outcomes they are responsible for advancing, and how those responsibilities connect to the Strategy's broader implementation framework.

⁵⁵ See *infra* Part III.8, *Create a Prioritization Index with a Scoring Methodology that Promotes Siting Decisions that advance the Primary Purpose of the Strategy and Avoids Reinforcing Existing Inequities*, at 19.

⁵⁶ See *supra* Part III.2.A, *The Strategy's Primary Purpose should be: "reducing stormwater-related harms in the communities most burdened by flooding, basement backups, and sewer-system failures through the implementation of GSI and Gray Stormwater infrastructure as part of a complete stormwater solutions framework."*, at 8.

- **Measurable:** A goal should include observable outcomes, with concrete metrics or indicators that show whether progress is being made. Indeed, the City’s Permit explicitly requires that the Final Strategy include “measurable” goals.⁵⁷ The Draft Strategy acknowledges broadly-recognized performance metrics for GSI – including examples like stormwater capture volume, reduction in impervious area, and sewer-load reduction – which are numeric representations of the benefits of GSI.⁵⁸ What is needed in the Final Strategy, though, is to use those sorts of metrics to assess outcomes of specific GSI efforts in relation to Strategy Goals.
- **Achievable:** A Goal should be demonstrably realistic given existing and prospective authority,⁵⁹ funding,⁶⁰ staff, technology, and time. Where a Goal depends on new sources or modes of funding, interagency coordination, legal authority, or technical capacity, the Strategy should explain those dependencies and present specific, actionable plans to develop or acquire those necessary new resources.
- **Relevant:** A Goal should clearly advance the Primary Purpose of the Strategy, create benefits, and offer potential co-benefits where possible and complementary.⁶¹
- **Time-bound:** Each Goal should include a clear deadline or schedule for completion, implementation, and/or progress review. Time-bound Goals are necessary to establish when action must occur, when progress should be evaluated, and when the City should adjust course if implementation is not producing the intended results.

Specifying SMART Goals will convert an aspirational Draft Strategy into an implementable Final Strategy, establishing clear expectations for City departments and sister agencies. Relevant, measurable, and achievable goals are justifiable: they connect the City’s commitments to community priorities, Permit obligations, and infrastructure needs, while showing that the Goal can produce trackable results within reasonable legal, financial, technical, and administrative constraints.⁶²

⁵⁷ Ill. Env’t Prot. Agency, *NPDES Permit No. IL0045012*, Special Condition 3, ¶ 14 (issued Mar. 26, 2024).

⁵⁸ See, e.g., Draft Strategy, page 82.

⁵⁹ See *infra* Part III.10, *Explain how existing City Policies, Ordinances, and Agency Authorities will be used, coordinated, or revised to support implementation of the Strategy.*, at 26.

⁶⁰ See *infra* Part III.11, *Funding and Financing, Explore a Stormwater Fee that centers Equity.* at 29.

⁶¹ See *supra* Part III.2, *Identify the Primary Purpose of the Strategy and ensure that the Strategy’s Goals advance that purpose; Clearly distinguish Benefits from Co-benefits.*, at 8.

⁶² See *infra* Part III.14, *Putting it All Together: How DOE can use a Governance Matrix to articulate the Who, What, Where, When, Why, and How of implementing Goals of the Strategy.*, at 36.

Indeed, the Strategy’s peer-city case studies provide insights into what SMART GSI goals look like. The Fresh Coast Green Communities case study, for example, states that the program’s goal is to “manage 9 to 12 million gallons with green infrastructure by 2027.”⁶³ The Project Clear case study states that the program has a “goal of \$120 million investment in rainscaping to reduce CSO runoff volume.”⁶⁴ These are useful examples because they are time-bound goals that pertain to specific funding and stormwater outcomes.

By contrast, several of the Draft Strategy’s goals are too general to function as SMART implementation commitments. For example, the “Moving Forward Together” section of the Draft Strategy says the “next steps” for the City are to “[i]dentify sustainable funding sources,” “[c]oordinate and unify effective stewardship across departments,” and “[e]ngage community and advocates in green infrastructure planning.”⁶⁵ **These important next steps are not implementable strategies as written – each should set deadlines, identify responsible agencies, set funding targets, and establish associated reporting requirements.**

These “next steps” are referenced at other points in the Draft Strategy, but those references do not provide the level of information necessary to ensure action and accountability: Appendix I includes a cursory guide to potential funding opportunities.⁶⁶ However, the Draft Strategy does not explain *how* those potential funding opportunities can be unlocked or *when* they could be available. It is unclear whether the City is committing to further investigate the listed programs, treating those programs as an exhaustive set of potential funding sources, or simply naming general opportunities without any corresponding implementation commitment. Similarly, the “Shaping Our Green Infrastructure Future” Section includes takeaways from previous community engagement,⁶⁷ and “Cross Agency Coordination” is mentioned as a priority throughout the document, most notably in the “Key Priority: Cross Agency Coordination” section.⁶⁸ But fundamental details regarding *which* agencies are responsible and what must be done, *how* progress will be measured, and *when* action must occur, remain unclear. The Coalition agrees these are core elements to making the Strategy implementable and provide the recommendations throughout this document as part of our ongoing support to the City to develop actionable plans to address them within the Final Strategy.⁶⁹

⁶³ Draft Strategy, page 48.

⁶⁴ Draft Strategy, page 56.

⁶⁵ Draft Strategy, page 70.

⁶⁶ Draft Strategy, page 110.

⁶⁷ Draft Strategy, page 36–37.

⁶⁸ Draft Strategy, page 50.

⁶⁹ See *infra* Part III.14, *Putting it All Together: How DOE can use a Governance Matrix to articulate the Who, What, Where, When, Why, and How of implementing Goals of the Strategy.*, at 36.

As an example of utilizing the SMART approach, aspirational statements in the Draft Strategy like “Identify sustainable funding sources,” could be reframed as:

By [date], [agency], in consultation with [defined City agencies / sister government entities / community representatives] by [holding # meetings / soliciting comments on a draft / etc.], will publish a publicly available funding plan that identifies [existing, proposed, and potential funding sources] for [GSI planning, construction, and maintenance] and specifies necessary steps to implement each funding source.

Refining the Strategy’s Goals in this way is necessary in light of the Permit’s requirement to “establish initiatives with measurable goals and outcomes through incremental measures that will reduce CSOs, prioritizing sensitive areas and environmental justice communities.”⁷⁰

4. Situate GSI more explicitly in a comprehensive Green + Gray Complete Solutions Framework.

The Coalition appreciates that the Draft Strategy acknowledges the importance of adopting a green and gray complete solutions framework. In the “Green with Gray” section, the Draft Strategy states that gray infrastructure plays “an essential role in stormwater management” and that green infrastructure can “support existing infrastructure.”⁷¹ In the community perspectives section, the Draft Strategy states that “some areas require gray solutions or hybrid approaches” and that green infrastructure investments should be made “in tandem with investment in gray stormwater infrastructure”⁷² The recommendations section is even more direct: “Green infrastructure on its own won’t address all of Chicago’s stormwater challenges.”⁷³ These statements are important and should be retained. The Final Strategy should take the next step and operationalize them.

Once the Strategy is reoriented around a Primary Purpose and SMART Goals that deliver stormwater benefits like reductions in CSOs, flooding, and basement-backups, the City should first use data, mapping, and community knowledge to identify the areas and residents most vulnerable to these impacts before turning to policies that determine how such vulnerability should best be addressed at the site-specific level using both green and gray investments.⁷⁴ In some locations, GSI may be the most effective and cost-efficient intervention. In others, GSI may need to be paired with sewer conveyance improvements, storage, detention, property-level

⁷⁰ Ill. Env’t Prot. Agency, NPDES Permit No. IL0045012, Special Condition 3, ¶ 14 (issued Mar. 26, 2024).

⁷¹ Draft Strategy, page 12.

⁷² Draft Strategy, page 37.

⁷³ Draft Strategy, page 52.

⁷⁴ See *infra* Parts III.8.A, at 20; III.9, at 24; and III.13, at 33.

protections, private-property improvements, maintenance improvements, or recovery support to meaningfully address such vulnerabilities. In still other locations, GSI may not be appropriate at all because its effectiveness in and/or desirability for addressing vulnerability to flooding and basement back-ups may be limited due to factors like soil conditions, groundwater constraints, space limitations, contamination concerns, conflicting infrastructure, or the specific nature of the localized flooding problem.

To underscore the need for more than just green infrastructure solutions in communities vulnerable to the impacts of flooding and sewage management impacts, we refer you to the Metropolitan Water Reclamation District of Greater Chicago's ("MWRD") Stormwater Master Planning document, titled "Final Stormwater Master Plan for the Avalon Park, Englewood, Greater Grant Crossing, and South Shore Study Area," completed by Jacobs Engineering on November 30, 2022. A couple of key takeaways from that analysis:

- 1) There are many homes within this study area who do not even have a 1-year level of service;
- 2) Department of Water Management ("DWM") tunnel projects that link to MWRD tunnel projects are necessary to reach a 5 year level of service;⁷⁵
- 3) Areas that are experiencing regional flooding due to trunk sewer conveyance constraints are not likely to be solved or served by green infrastructure improvements, so much so that they were not even considered as part of the study;⁷⁶
- 4) Primary technologies needed to mitigate basement flooding were conveyance improvements (like sewer upsizing, done consistent with DWM's Sewer CIP Program), green infrastructure in the rights of way, and green infrastructure on vacant land parcels;⁷⁷
- 5) Private property improvements and property protections are necessary parts of the mix of potential solutions.⁷⁸

The Final Strategy should explicitly state how City inter-departmental and inter-agency coordination with MWRD will result in a clearly defined and publicly available decision-making process for determining which green and/or gray solutions are most appropriate at a particular location and which entity is responsible for capital planning, funding and financing, implementing, and maintaining these solutions. The Final Strategy

⁷⁵ JACOBS ENG'G, FINAL STORMWATER MASTER PLAN FOR THE AVALON PARK, ENGLEWOOD, GREATER GRAND CROSSING, AND SOUTH SHORE STUDY AREA, at 19 (Nov. 30, 2022) (The Coalition can provide a copy of this document upon request).

⁷⁶ *Id.* at 22.

⁷⁷ *Id.* at 36–37.

⁷⁸ *Id.* at 24.

should also make clear how impacted residents' input will inform this decision-making process at each stage.

5. Distinguish Green *Stormwater* Infrastructure (“GSI”) from Green Infrastructure (“GI”) and clarify the Role of Trees in connection with stormwater management.

The Final Strategy should clarify that green infrastructure and green stormwater infrastructure are related but distinct concepts.⁷⁹ Green infrastructure generally refers to natural or nature-based systems that provide environmental, social, or public-health benefits, such as trees, parks, open space, habitat, or green corridors.⁸⁰ Green stormwater infrastructure is a more specific category of green infrastructure designed to manage stormwater by capturing, absorbing, slowing, filtering, or reducing runoff.⁸¹ The Strategy confusingly defines “green infrastructure” as green *stormwater* infrastructure, by describing GI as “a range of practices and features” that “help capture and slow stormwater” “designed to help absorb and manage stormwater on-site.”⁸² This definition describes “green *stormwater* infrastructure,” and by conflating the two ideas, portions of the Draft Strategy stray from what should be its Primary Purpose. While all GSI may be considered a form of green infrastructure, not all green infrastructure qualifies as GSI unless it is designed or managed to provide a stormwater-management function.

The effect of conflating GI and GSI is seen most directly in the Draft Strategy’s discussion of the role of trees and tree-planting programs. Planting a tree may deliver various environmental and social benefits as a form of GI, but trees have a complex relationship to stormwater management such that tree-planting cannot always be considered GSI in all locations and applications.⁸³ Trees can be important community assets that provide shade, cooling, air-quality, habitat, and neighborhood benefits, but do not, in and of themselves, consistently

⁷⁹ See, e.g., U.S. Env’t Prot. Agency, About Green Infrastructure, <https://www.epa.gov/green-infrastructure/about-green-infrastructure> (last updated Sept. 30, 2025); David Drake, Green Infrastructure: Delivering Quality of Life and Environmental Benefits for Communities, Natural England (Aug. 27, 2024), <https://naturalengland.blog.gov.uk/2024/08/27/green-infrastructure-delivering-quality-of-life-and-environmental-benefits-for-communities/>.

⁸⁰ U.S. ENV’T PROT. AGENCY, TERMINOLOGY OF LOW IMPACT DEVELOPMENT: DISTINGUISHING LID FROM OTHER TECHNIQUES THAT ADDRESS COMMUNITY GROWTH ISSUES (Mar. 2012), <https://www.epa.gov/sites/default/files/2015-09/documents/bbfs2terms.pdf> (“GI has been used outside of a storwater context to describe the creation and networking of natural ecosystems and greenway corridors . . .”).

⁸¹ U.S. ENV’T PROT. AGENCY, TERMINOLOGY OF LOW IMPACT DEVELOPMENT: DISTINGUISHING LID FROM OTHER TECHNIQUES THAT ADDRESS COMMUNITY GROWTH ISSUES (Mar. 2012), <https://www.epa.gov/sites/default/files/2015-09/documents/bbfs2terms.pdf> (“[GSI] emphasizes approaches . . . to specifically control and manage stormwater runoff . . .”).

⁸² Draft Strategy, page 10.

⁸³ Giacomo Marrazzo & Anita Raimondi, *The Role of Urban Trees as Nature-Based Solutions for Stormwater Runoff Control*, 103 URB. FORESTRY & URB. GREENING 128598 (2025), <https://doi.org/10.1016/j.ufug.2024.128598>.

capture, slow, or manage stormwater as a standalone practice.⁸⁴ Deep in the appendices, the Draft Strategy does recognize this by describing the “Street Tree” GI typology as of “low” impact in terms of stormwater quality and reduced stormwater runoff volume.⁸⁵

Nonetheless, the body of the Draft Strategy states that “Chicago’s tree canopy is one of the City’s most effective and multifaceted forms of green infrastructure” and that a “single mature tree can absorb up to 3,000 gallons of water each year”⁸⁶ It also states that “[s]treet trees are living public infrastructure that manage stormwater, reduce flooding, and protect water quality.”⁸⁷ These statements may overstate the site-specific stormwater role of ordinary tree planting if tree planting is not done in the context of broader GSI typologies like Green Streets or Constructed Wetlands, and are not paired with design standards, maintenance requirements, and realistic performance assumptions.

Moreover, there are significant limitations of trees when viewed as stormwater infrastructure, particularly during high flow or large storm events,⁸⁸ and in areas with clay soil,⁸⁹ which are characteristic of low-lying neighborhoods on the South and West Sides of the City. And tree planting can also inadvertently exacerbate flooding and basement backup issues where trees affect drainage patterns, foliage clogs drains or gutters, or roots cause underground pipe failures.⁹⁰ When storms knock down branches or fell entire trees, that debris itself can hamper or damage other stormwater infrastructure features. If GSI is to be applied to address flooding, basement backups, and lessen stormwater burdens, trees cannot be universally considered appropriate solutions, particularly when not planted in the context of established GSI typologies.⁹¹

⁸⁴ *Id.*

⁸⁵ Draft Strategy, page 96.

⁸⁶ Draft Strategy, page 29.

⁸⁷ Draft Strategy, page 67.

⁸⁸ See William R. Selbig et al., *Quantifying the Stormwater Runoff Volume Reduction Benefits of Urban Street Tree Canopy*, 806 Sci. Total Env’t 151296, 151296, 151300–01 (2022) (finding that street-tree canopy reduced runoff volume but did not increase peak-discharge control, and observing “diminished capacity for canopy interception for larger storms”).

⁸⁹ U.S. Env’t Prot. Agency, Stormwater Trees Technical Memorandum 4 (2016) (noting that clay-rich and compacted soils affect tree performance and that compacted soils may prevent water from seeping into soils).

⁹⁰ See Sewer Backup, CITY OF FORT WAYNE, <https://www.cityoffortwayne.in.gov/632/Sewer-Backup> (last visited July 8, 2026) (“Tree roots [can] become entangled in sewer lines, thus clogging pipes and causing sewer backups.”); See also Prevent Street Flooding and Stream Pollution, VILLAGE OF ALLOUEZ (Apr. 2, 2019), <https://www.villageofallouezwi.gov/2019/04/prevent-street-flooding-and-stream-pollution/> (“Storm drains can become clogged with excess leaves, tree branches and trash, which can lead to storm drain back-ups that flood streets, your yard and possibly your basement!”).

⁹¹ Giacomo Marrazzo & Anita Raimondi, *The Role of Urban Trees as Nature-Based Solutions for Stormwater Runoff Control*, 103 URB. FORESTRY & URB. GREENING 128598 (2025), <https://doi.org/10.1016/j.ufug.2024.128598>.

Therefore, the Final Strategy should distinguish between trees planted as part of a designed stormwater BMP designed and maintained to provide measurable stormwater retention, detention, or infiltration functions. Trees planted primarily for heat, air-quality, canopy, habitat, or neighborhood co-benefits should not be counted as GSI where they are not demonstrably contributing to meeting measurable stormwater goals aimed at the Strategy's Primary Purpose. Additionally, residents should have more voice in whether and how trees are implemented around their homes, given the potential negative impacts of trees on stormwater management. Engagement with residents should clearly articulate the documented benefits of tree plantings, and where trees are most appropriate in alignment with documented soil types and a safe distance from sewer infrastructure.

6. Integrate GSI Review into Existing Capital Workflows.

The Strategy should outline how GSI review will be implemented into existing capital workflows of various City agencies. The Draft Strategy recommends that the City “Opportunistically Implement Green Infrastructure as Part of Proposed Infrastructure Improvements” and use priorities from its mapping section to guide new projects.⁹² It also notes that CDOT’s Complete Streets program creates opportunities to integrate green infrastructure into roadway redesigns and capital projects.⁹³ These are important observations that should be the basis of changing the way the City does business in general, to center sustainability in standard decision-making processes, rather than separating environmental objectives of infrastructure projects from transportation, safety or development objectives that are driving individual City agencies to undertake projects.

The Final Strategy should therefore require – across all relevant City departments – early green-gray opportunity review for capital projects involving streets, alleys, sidewalks, rights-of-way, sewer or drinking water system work, public buildings, parks, schools, vacant land, streetscapes, and other public infrastructure in priority areas. This goal should be supported by an actionable plan to develop for each relevant City agency specific reforms of existing project development and planning processes to integrate and prioritize GSI. If a planned capital project in a high-priority area does not include GSI or another stormwater intervention, these processes should require the responsible agency to publicly document why GSI was infeasible, inappropriate, less effective than another solution, or deferred to a different project.

⁹² Draft Strategy, page 52.

⁹³ Draft Strategy, page 27.

7. Establish Shared Design and Maintenance Standards.

The Draft Strategy notes that the City should set “clear standards”⁹⁴ for GSI maintenance and “develop shared project planning, design, maintenance, and asset management standards across the City of Chicago.”⁹⁵ These important recognitions should be translated into action.

The Strategy should state as a SMART Goal how the City will develop and implement such shared GSI design and maintenance standards so that different City agencies and other entities installing and maintaining GSI deploy common GSI technologies consistently. This is especially important because GSI may be installed by different City departments, sister agencies, private developers, community organizations, contractors, schools, parks, and other land-controlling entities. Without shared standards, similar projects may produce inconsistent stormwater benefits, maintenance burdens, accessibility outcomes, and community impacts. Projecting and measuring stormwater benefits and co-benefits of GSI installations is far easier if consistent standards are applied, which can also relieve some active, in situ monitoring needs, as well, and enable economies of scale for maintenance costs and burdens.

8. Create a Prioritization Index with a scoring methodology that promotes siting decisions that advance the Primary Purpose of the Strategy and avoids reinforcing existing inequities.

The Strategy’s proposed Sample Prioritization Index in Appendix F⁹⁶ lacks the detail necessary to guide implementation, is methodologically inconsistent with the Primary Purpose of the Strategy, and creates the risk of reinforcing existing inequities. If informed by documented community needs, including a Prioritization Index as part of the Final Strategy could be an effective mechanism to harmonize site-specific GSI decision-making across City entities and ensure that broad policy aspirations of the Strategy are carried through to the level of individual GSI installations.

Methodologically, the Primary Purpose should be the principal driver of where the City sites stormwater interventions. The Draft Strategy suggests that the Prioritization Index will be, essentially, a third step: first, “potential site[s] considered for the implementation of green infrastructure” will be identified; and second, such sites will “undergo an initial feasibility screening” that would appear to focus on whether GSI is appropriate at a location by looking at drainage and soil conditions, for example.⁹⁷ **Initially, the Final Strategy needs to specifically articulate that first step of how “potential sites” for GSI will be identified by reference to metrics that reflect the Primary Purpose so as to locate places with the greatest flooding,**

⁹⁴ Draft Strategy, page 9.

⁹⁵ Draft Strategy, page 52.

⁹⁶ Draft Strategy, page 107.

⁹⁷ Draft Strategy, page 106.

basement-backup, CSOs burdens and related vulnerabilities. Identifying such locations must incorporate community input because community members have direct knowledge of where flooding occurs and how people move through and use neighborhood spaces.

Next, a revised Prioritization Index, that includes community input and is redesigned as suggested below, should then be used to also address what the Draft Strategy currently views as the earlier “initial feasibility screening” in order to implement a complete green + gray solution at each particular identified location. Once a location of need is initially identified, hyper-local community voice and planning should shape that next stage of decision-making and then choices made to develop the site-specific solution. At that point, the Strategy’s secondary goals and applicable GSI co-benefits can guide how particular GSI is designed, prioritized, and maintained in that place. Community members know what co-benefits would make a project meaningful beyond stormwater retention. This should also guide project design to maximize co-benefits that best reflect the community’s wants and needs. Community preferences related to shade, green space, air quality, habitat, education, workforce opportunities, accessibility, and neighborhood use should shape the form of the project, but that must be considered after a separate, community-informed threshold inquiry into *where* a project that addresses stormwater needs should be located.

A. Underlying Data Required for the Prioritization Index to Center EJ Community Needs

After the Prioritization Index is reframed as a means to consider what GSI or other stormwater interventions are needed to address an identified site-specific stormwater problem, the data informing the Index still must be refined. Most notably, the Index does not include data inputs related to environmental justice status, community vulnerabilities, known flooding burdens (beyond 311 call data, which is addressed below), history of basement-backups, sewer-capacity constraints or bottlenecks, cumulative environmental impacts, or proximity to sensitive areas as scoring criteria. Stormwater runoff volume and rate attenuation are certainly relevant to compare potential interventions, but they do not substitute for an equity- and need-based prioritization factor. The omitted considerations are a serious problem. **Under the Permit, the Strategy must prioritize sensitive areas and environmental justice communities, so the Prioritization Index should include EJ-related metrics to directly score or clearly incorporate those characteristics in the development and prioritization of specific GSI or other stormwater investments.** Recommendation 9 below includes specific recommendations for data sources, principally the Coalition’s data mapping tool that is in development, which include data that captures equity and vulnerability characteristics in a geospatial format that could be used in site identification and prioritization.

B. Integrating a Cumulative Impacts Framing in the Index’s Impacts Categories

As stated previously, the Coalition appreciates the Draft Strategy’s reference to cumulative impacts⁹⁸ disproportionately impacting some communities more than others as necessary to contextualize the full impacts of flooding and sewer infrastructure inequities as experienced by Chicagoans. “Findings from Chicago’s Cumulative Impact Assessment show that the negative impacts of high-intensity heat, poor air quality, and other environmental issues are disproportionately felt by Black and Brown communities on the South and West Sides of the City.”⁹⁹ The Strategy continues by noting that this “unequal burden is an essential factor to consider when assessing the role and benefits of future green infrastructure in our city.” The Draft Strategy also references the City’s Chicago EJ Index,¹⁰⁰ and environmental equity principles adopted as values that the City is applying to the Draft Strategy, which means GSI prioritization should be, “[e]quity-focused - [and] consider who benefits and who is burdened by proposed solutions and how issues may disproportionately burden communities.”¹⁰¹ The Draft Strategy importantly acknowledges that, “[f]or neighborhoods already dealing with other health, social, and environmental stressors, those consequences [of urban flooding] can be particularly devastating.”¹⁰²

With these recognitions and commitments in mind, it is unclear whether the Prioritization Index will include relevant criteria aligned with these expressed intentions and values. First, although there are several references to existing indices (e.g., Chicago EJ Index), pending tools that will inform project siting based on flooding vulnerability¹⁰³ and the Greater Chicago Watershed Alliance Natural Solutions Tool,¹⁰⁴ it is unclear how or whether these flooding and community vulnerability factors will be incorporated into the Prioritization Index, applied in sequence (i.e., before or after the Index), or be utilized as additional screening separate from the Index to prioritize EJ communities facing cumulative impacts across environmental, social, and health indicators. The Coalition appreciates the City’s acknowledgement of these tools, and recognizes the Draft Strategy was prepared before some of these tools are completed. **That said, the Coalition recommends the City include in the Final Strategy a placeholder “Impact Category” for flooding and basement backup stormwater impacts,” with factors arising**

⁹⁸ Hazel Johnson Cumulative Impacts Ordinance, SO2025-0016697, § 1 (Chi. City Council Nov. 3, 2025) (proposed amendment to CHI., ILL., MUN. CODE § 2-31-020) (defining “Cumulative impacts” as “the total impacts on the health, well-being, and quality of life of a community or population that arise from the environmental burdens, health conditions, and social stressors, as well as the interactions between those stressors, that exist in their area.”).

⁹⁹ Draft Strategy, page 22.

¹⁰⁰ Draft Strategy, page 39.

¹⁰¹ Draft Strategy, page 42.

¹⁰² The community advisory committee that participated in the drafting of this comment expressed their understanding of cumulative impacts as: “the effects of many problems adding up over time. Things like flooding, pollution, and poor infrastructure can work together to make life more difficult for people in a community.”

¹⁰³ Draft Strategy, page 66 (including the Coalition’s Flooding and Sewage Vulnerability Tool).

¹⁰⁴ Draft Strategy, page 104.

from the pending tools mentioned, to manifest an emphasis on prioritizing areas most vulnerable to flooding and basement backups. The City should commit to working with the Coalition and other stakeholders to determine how those criteria from the listed tools best fit within the City’s decision-making frameworks once the tools are completed.

The Flooding and Sewage Vulnerability Index uses a cumulative impacts framework to identify communities that would be highly impacted by flooding, have a history of flooding, and have physical characteristics that make it more prone to flooding. Attached to this comment is a table providing the vulnerability score for each census tract in the City. Subject to further discussion and development with the City, this score could be used as part of the “Impact Category” scoring in the Prioritization Index, for example, with a score of more than 7 as considered high, 4-7 as moderate, and less than 4 as low. This sub-score could then also be paired with the DWM’s flood risk ratings and modeling that comes from underlying sewer network data – see Recommendation 9 for more details – and another score to consider naturally sensitive areas – potentially from the Natural Solutions Tool – as part of the “Impact Category” of the Prioritization Index.

As an overarching matter, the Prioritization Index “impact categories” are applied as individually scored elements that are then “scaled.” The intention of a cumulative impacts review is to weigh the compounding impacts of many overlapping and interacting exposures and conditions. By grouping Criteria and assigning independent scaled scores to different categories, that cumulative layering can be lost and scores may inaccurately obscure where communities are facing cumulative challenges that the GSI Strategy can and should help address. Cumulative vulnerability analyses discussed in this section are necessary to more accurately and fully understand where communities experience greater cumulative impacts burdens and, therefore, where resources and coordinated responses are necessary. The Coalition encourages the City to produce with the Final Strategy much clearer guidance on how such a Prioritization Index will address cumulative impacts overlaying one another, including how that will manifest in scoring. This is further emphasized in subsection D below.

C. Factors that Could Exacerbate Inequities

Beyond omitting EJ-related factors, the current Index’s feasibility categories may actually reinforce existing inequities if not carefully constrained. Projects in communities with more resourced institutions, more available, uncontaminated land, higher rates of development and/or redevelopment, better-resourced property owners, and more capacity for long-term maintenance may score higher, even if those communities have less urgent flooding or environmental justice needs.¹⁰⁵ Conversely, communities experiencing the greatest cumulative burdens may score

¹⁰⁵ Draft Strategy, page 107 (See the “Maintenance Feasibility” and “Scalability” impact categories criteria lists, which emphasize “willingness” and “capacity of landowners to provide long-term maintenance,” and “exemplifies a project type that matches a high proportion of project opportunities.”).

lower because land ownership is fragmented, institutions are under-resourced, maintenance capacity is limited, or permitting and implementation issues are more complex. A good example would be repurposing a brownfield for GSI and community use – that sort of project might deliver large stormwater retention benefits, say if the brownfield were a large parcel, and have potential for remarkable co-benefits and community self-determination, but may not be replicable and would be unlikely to involve simple permitting or have a “lower level of regulatory requirements.” **In reworking the Prioritization Index, the Final Strategy should ensure its criteria and the mechanics of its application will not reward places where projects are easiest while deprioritizing places where investment is most needed.**

D. Transparency and Functionality of the Prioritization Index

The Sample Prioritization Index also lacks enough detail to guide implementation, ensure equity, or allow the public to evaluate how projects will be selected. Although the Index assigns each criterion a score of 1, 2, or 3, it does not explain what those scores mean, who will assign them, what evidence will be used, or how scoring decisions will be documented. For example, the Index asks whether a project has “potential to improve air quality,” “potential to reduce urban heat,” or “potential for positive public visibility,” but it does not define how that potential will be measured, whether qualitative or quantitative evidence will be required, or whether community input will control, inform, or merely supplement the score. **When the Index is redesigned to align methodologically with the Primary Purpose of the Strategy, it should also be redesigned so its scores are unambiguous in meaning and not arbitrary in nature.**

Relatedly, the Index gives implicit weight to some categories without explaining or justifying that weighting. The co-benefits impact category has a possible subtotal of 6–18, while water quality has a possible subtotal of only 1–3 and water quantity only 2–6. As a result, the total score may be driven more by general co-benefits, and alignment with other plans than by direct stormwater-management need or flood-reduction impact. If the purpose of the Strategy is to reduce CSOs, flooding, basement backups, and stormwater burdens in sensitive areas and environmental justice communities, then the scoring framework should give substantial and explicit weight to those primary goals. **The Final Strategy should correct this disconnect between score weighting and the Primary Purpose and explain why each category receives its assigned weight.**

Finally, to be truly operational and direct GSI decision-making across City entities, **the Strategy must explain how the final Index score will affect decision-making by stating who, i.e. which entity, will calculate each score, what data sources will be used, how community-submitted evidence will be considered, how conflicts between data sources will be resolved, how scoring decisions will be reviewed, and how and when the final results will be made public.** It is unclear whether a higher total score means a project will be funded first, placed in a pipeline for further review, prioritized only within a particular category of projects (say of a particular GSI typology or projects being administered by a particular department), or merely

treated as one factor among others. The Strategy should explain whether there are minimum scores for project advancement, whether certain categories are mandatory, whether low scores can be overridden, and who has authority to make those decisions. Specifically, the Index should identify whether any factors operate as “no-go” criteria and what happens if they do. Some listed factors, such as implementation feasibility, permitting simplicity, landowner willingness, maintenance capacity, and replacement cost, may determine whether a project can realistically proceed. But the Index does not explain whether low feasibility or maintenance scores make a project infeasible, require redesign, trigger additional City support, or send the site down another stormwater-solution pathway.

In particular, given the City’s regulatory authority to mandate, constrain or incentivize stormwater management on private developments through existing or revised requirements in the Stormwater Management Ordinance and Sustainable Development Policy, **the Final Strategy should state specifically whether and how the City intends for this Prioritization Index to be used by private developers.**

Without this information, the Index does not create a transparent prioritization framework; it simply creates a scoring exercise with uncertain consequences. **As such, the Strategy should require that each project score be accompanied by a simple, written explanation sufficient for residents to understand why a project was selected, rejected, deferred, redesigned, or referred for a different stormwater intervention.** Without those safeguards, the Prioritization Index risks obscuring, rather than improving, decision-making.

9. Ensure that Mapping Tools do not rely on incomplete or misleading data and relate closely to the goals of the Strategy.

The Final Strategy should explain how mapping tools and data sources will be used to identify priority areas, select projects, and evaluate whether the City is achieving the Strategy’s Goals. Mapping should not function as a general background exercise or a collection of loosely related data layers. Instead, maps and mapping tools should be anchored directly in the Strategy’s Primary Purpose, utilizing data sources that measure attainment of its Goals. If the Primary Purpose is to reduce flooding, basement backups, CSO impacts, and related stormwater harms in high-burden communities, then the City’s mapping tools should identify where those harms are most severe, where cumulative impacts makes communities most vulnerable to those harms, where GSI is technically suitable, where gray or hybrid infrastructure may be necessary, and where community-identified co-benefits should shape project design.

The Strategy should explain how the City will layer and compare the various mapping tools it currently simply lists: the Environmental Justice Index, the FSC Flooding and Sewage Vulnerability Index, MPC/TNC’s “Right Infrastructure, Right Place” work, the Natural Solutions Tool, co-benefit maps, flood data, sewer data, and other community-vetted tools. Each tool may answer a different question. Some tools may identify environmental justice or cumulative-burden

concerns; others may identify stormwater vulnerability, sewer-capacity constraints, GSI suitability, heat impacts, air-quality concerns, land ownership, or opportunities for co-benefits. **The Final Strategy should explain what each tool is used for, what each tool cannot show, and how the City will combine these tools into a transparent decision-making process. Crucially, none of these tools include DWM’s actual sewer maps, which is an absolutely critical layer of information to support data mapping that will advance the Strategy’s Primary Purpose.**

Beyond clearly stating how mapping will be used to implement the Strategy, it should also explain how maps and data informed development of the Strategy itself. If the City concludes that certain communities, watersheds, sewersheds, or project types should be prioritized, the Strategy should explain the data that supports that conclusion. If the City relies on a map to identify GSI opportunity areas – i.e. to perform the initial step of identifying locations of need for stormwater interventions, discussed in the preceding recommendation – the Strategy should explain whether those areas are also places with flooding need, environmental justice burdens, sewer-system stress, or community-identified priorities. Conversely, if the data shows that a community has severe flooding or cumulative burdens but limited GSI suitability, the Strategy should explain how the analyses it describes will connect to other City programs that *can* provide the stormwater relief necessary at such a location.¹⁰⁶ In other words, **the Strategy should explain how mapping can be helpful to trigger consideration of gray infrastructure, sewer improvements, storage, property-level protections, or maintenance interventions, where necessary to deliver complete stormwater solutions.**

The Final Strategy should also explain how conflicts between data sources will be resolved. For example, one tool may identify an area as highly vulnerable to flooding, while another may show limited GSI suitability because of soil, groundwater, land-use, or infrastructure constraints. Similarly, data reflecting formal public complaints may show relatively few flooding reports in a community, while residents and community organizations may identify repeated basement backups, street flooding, or drainage failures. The Strategy should describe who will review these conflicts, what evidence will be considered, how community knowledge will be incorporated into the mapping that is used to guide decisions, and how final decisions will be documented. Conflicting data should not be used as a reason for inaction; it should prompt closer review, community engagement, and identification of appropriate stormwater solutions.

The City should also avoid overreliance on 311 complaints, insurance claims, or other formal reporting mechanisms. These data sources may be useful, but they are incomplete and may undercount flooding in environmental justice communities. Residents may underreport flooding because of language barriers, lack of time, distrust of government, fear of landlord

¹⁰⁶ See *supra* Part III.4, *Situate GSI more explicitly in a comprehensive Green + Gray Complete Solutions Framework.*, at 14.

retaliation, fear of immigration-related consequences, lack of insurance, prior experiences of nonresponse, or uncertainty about whether reporting will lead to assistance. Though recent analysis by Coalition member Center for Neighborhood Technology (“CNT”) has shown an increase in 311 usage among people in vulnerable communities in recent years, even recent news reporting and conversations with community members have highlighted that many flooded neighbors are avoiding calls to 311.¹⁰⁷ Insurance data may also understate flooding in communities where residents are uninsured, underinsured, renting, unable to afford claim filing, or reluctant to risk premium increases. This is compounded with the difficulty of accessing private insurance data. The most recently accessible data that CNT has access to is over 10 years old, and we know that the insurance landscape has changed dramatically in the past 3 years based on conversations with community members.

Overall, given the relative underdevelopment of the Draft Strategy’s discussion of these tools, **the Coalition recommends that the Final Strategy include a Goal related to coordination with stakeholders, including community groups and the Coalition, on a going-forward basis to refine how these mapping tools are applied, overlaid, and weighted within the context of the specific programs and decision-making processes identified in the Strategy.**

10. Explain how existing City policies, ordinances, and agency authorities will be used, coordinated, or revised to support implementation of the Strategy.

The Final Strategy should more fully explain how each of the existing City policies, ordinances, and agency authorities will be used, coordinated, or revised to support implementation of the programs and goals described in the Strategy.¹⁰⁸ These explanations are necessary foundations for the Final Strategy to actually coordinate actions under those authorities across City entities and should be reflected in the “Authority to Act” sections of the matrix described in Recommendation 14 below.

The Draft Strategy does well to identify many of the agencies that have a role in green infrastructure deployment.¹⁰⁹ It states that “many city agencies, partners, sister agencies, and external stakeholders play an important role in driving green infrastructure development, design, construction, maintenance, and research.”¹¹⁰ The added context identifying: “DWM, 2FM,

¹⁰⁷ Kyra Senese, *Chicagoans Grapple with Flooding as Rain Tempers Fourth of July Festivities*, CHI. SUN-TIMES (July 4, 2026), <https://chicago.suntimes.com/weather/2026/07/04/chicagoans-grapple-with-flooding-as-rain-tempers-fourth-of-july-festivities> (quoting residents explaining why they do not typically call 311).

¹⁰⁸ See *infra* Part III.14, *Putting it All Together: How DOE can use a Governance Matrix to articulate the Who, What, Where, When, Why, and How of implementing Goals of the Strategy.*, at 36.

¹⁰⁹ Draft Strategy, page 25–26.

¹¹⁰ Draft Strategy, page 25.

CDOT, DSS BOF, and DPD as directly involved in design, construction, or maintenance;”¹¹¹ DOB as the enforcer of the “City’s Stormwater Ordinance to implement green infrastructure on public and private properties;”¹¹² DPD as “promoting green infrastructure through the Sustainable Development Policy” and as the administrator of the Landscape Ordinance;¹¹³ and DOE as an advocate “for green infrastructure within the city, facilitating coordination, and cross-departmental strategy;”¹¹⁴ is also a good starting point for clearly identifying agency responsibilities under the Final Strategy.

However, simply establishing this foundation is insufficient to ensure full implementation by each agency of the Goals and decision-making principles of the Strategy through each agency’s individual municipal code-based authorities and discretion and their existing and potential funding sources. The Strategy currently notes several times over that inter-departmental and inter-agency coordination need improvement, in some iteration.¹¹⁵ The Coalition identifies overlapping jurisdiction as a recurring barrier to successful long-term GSI implementation because it can constrain support and muddy responsibility, and recommends developing a governmental culture of collaboration and shared responsibility. Disentangling these jurisdictional overlaps to make meaningful progress toward inter- and intra-agency coordination requires clear articulation of each entities’ role, responsibilities, powers, and constraints. Accordingly, **the Final Strategy must more clearly articulate roles, authority gaps and jurisdictional overlaps, which could be done through a table that reflects the following: agency, role/responsibilities for GSI, underlying authority and/or policy driver for that agency (e.g. NPDES permit), and sources of funding for that agency’s GSI work.**¹¹⁶

For each legal authority, the Strategy should identify the projects covered, performance standards, review processes, enforcement mechanisms, maintenance obligations, inspection processes, and public reporting requirements. For example, the Stormwater Ordinance applies to new development and significant redevelopment over specified sizes or meeting other criteria. Coalition members have noted that some older, primarily communities of color do not have the space for or pace of proposed new developments as other areas of the City. Thus, citywide inequities can be perpetuated in the GSI investment context where certain parts of the City see lower levels of investment in redevelopment. At the same

¹¹¹ Draft Strategy, page 25.

¹¹² Draft Strategy, page 25.

¹¹³ Draft Strategy, page 25–26.

¹¹⁴ Draft Strategy, page 25.

¹¹⁵ See, e.g., Draft Strategy, page 7 (“ongoing challenges including fragmented coordination, unclear maintenance responsibilities, insufficient dedicated funding, and inconsistent approaches to equity have underscored the need for a more unified and sustainable approach.”).

¹¹⁶ See *infra* Part III.14, *Putting it All Together: How DOE can use a Governance Matrix to articulate the Who, What, Where, When, Why, and How of implementing Goals of the Strategy.*, at 36.

time, planned developments in parts of the City that have more sluggish markets can be hindered by requirements that developers shoulder GSI responsibilities if they alter the economics or complexity of developments. This can inhibit the amount of affordable housing offered as part of such developments (as affordable housing is often reduced to make the project budget “pencil-out”) and also is another way of undercutting the overall viability of investment within parts of the City that are already facing interrelated and compounding harms of disinvestment and flooding. Without a clearer understanding of how key policies, ordinances, and agency authorities can be used, coordinated, or revised to support implementation, the potential utility of these authorities will not be maximized and structural inequities baked into these legal authorities will remain unseen and unaddressed.

Where existing legal or funding constraints limit what the City or a responsible agency can do, the Strategy should identify those constraints clearly and explain how they will affect implementation. Amendments to those authorities necessary to better advance GSI should be explicitly and specifically identified.

A helpful example from the Draft Strategy pertains to the Landscape Ordinance, which “does not encourage/require stormwater capture in conjunction with landscaping.”¹¹⁷ The Final Strategy should take this observation further into action, and describe the limitations of the ordinance, including the underlying authorities driving the focus on landscape aesthetics and reducing heat, noise and air pollution, which apply only to specific types of development and redevelopment, or repairs.¹¹⁸ Compliance with the Landscape Ordinance is managed through DPD, including through its broader powers and role under the Zoning Ordinance, but planting standards are managed by the Department of Streets and Sanitation’s Bureau of Forestry (at least in public rights-of-way). Amending the Landscape Ordinance to require stormwater capture within landscaping decisions would thus require amending the City’s Zoning Ordinance,¹¹⁹ and coordinating stormwater expertise from other City departments with both the DPD and DSS. The Strategy should say so and, even better, specify potential amended ordinance language.

Another example is the Draft Strategy’s discussion of the Sustainable Development Policy as “a departmental policy that uses a point-based system” for certain publicly supported or approved projects and notes that it “could be strengthened by explicitly mentioning green infrastructure” and incorporating point-scoring opportunities for covered projects based on GSI deployment.¹²⁰ The Draft Strategy states that “an updated Strategy Menu within the Chicago Sustainable Development Policy has the potential to better prioritize green infrastructure” and

¹¹⁷ Draft Strategy, page 30.

¹¹⁸ *Chicago Landscape Ordinance FAQ*, CITY OF CHI., https://www.chicago.gov/city/en/depts/dcd/supp_info/chicago_landscapordinancefaq.html (last visited July 8, 2026).

¹¹⁹ CHI., ILL., ZONING ORDINANCE ch. 17-11 (2026).

¹²⁰ Draft Strategy, page 30.

that, during the next update, the City should consider “awarding higher point values to more green infrastructure-friendly approaches”¹²¹ That is a good idea, but the Final Strategy should clarify whether the Sustainable Development Policy is mandatory, which projects it applies to, what level of compliance is required, who reviews compliance, what happens if a project does not comply, and how outcomes are reported. If compliance is voluntary or if points can be earned through non-stormwater measures, the Strategy should explain how the policy will produce measurable stormwater outcomes rather than simply encouraging better design in the abstract.

The Final Strategy should convert these important policy observations into actionable proposals for specific reforms. **And, the same level of specificity and action-orientation is needed for the Final Strategy’s discussion of potential needs to expand or revise the Stormwater Management Ordinance, Complete Streets, and City departmental capital workflows.**

The need to specifically describe and plan to implement necessary reform to legal authorities is particularly important to overcome barriers to adequately supporting GSI maintenance needs. **Across the Strategy, if the City believes that a particular federal grant, ordinance, intergovernmental agreement, or agency authority limits its ability to fund long-term maintenance, the Strategy should say so expressly.** That transparency is necessary so the public can understand which implementation barriers are legal, financial, administrative, or policy-based, how the City intends to address them, and whether additional legislative, budgetary, or interagency action is needed.

11. Comprehensively Review Available Funding and Financing Options and Explore a Stormwater Fee that centers Equity.

The Draft Strategy names the need for stable, consistent, and dedicated funding for GSI. Addressing this need is vitally important; however, the opportunities listed for sustainable funding are incomplete, and omit key funding options like Illinois EPA’s State Revolving Fund Water Pollution Control Loan Program, which includes set aside funds for green infrastructure projects.¹²² **For each funding program listed in a final, more comprehensive version of Appendix I, the City should lay out how it will pursue or create the opportunity as a SMART goal.** This would include identifying the responsible City department or agency associated with that funding source, the roles of other departments in securing and disbursing (or approving) that funding, and the associated external decision-makers that control or influence funding decisions.

¹²¹ Draft Strategy, page 51.

¹²² Draft Strategy, page 110–111; ILL. ENV’T PROT. AGENCY, *CLEAN WATER STATE REVOLVING FUND GREEN PROJECT RESERVE QUICK REFERENCE GUIDE EXAMPLES SUMMARY* (June 7, 2010), <https://epa.illinois.gov/content/dam/soi/en/web/epa/documents/water/financial-assistance/publications/wpclp-green-project-reserve.pdf>.

The Final Strategy should also make clear which funding sources could fund operations and maintenance of stormwater projects, as this is a common limitation of grant and loan programs, several of which are included in the Draft Strategy as potential funding options. The Draft Strategy also identifies other potential limitations of funding sources based on which projects qualify, for example, however, the Coalition recommends the City consider opportunities to engage funding authorities controlling potential grant or loan programs to explore flexibility that may apply to complete solutions in Chicago without discounting those funding programs outright. This sort of problem solving is only possible, however, if constraints are clearly and specifically enumerated and explored.¹²³

The Draft Strategy emphasizes exploring a Stormwater Fee as a key commitment. Although the Coalition recognizes the need for sustainable and consistent funding for GSI and gray stormwater implementation and maintenance, it is imperative that any stormwater fee explored by the City be equitably designed and administered. Stormwater fees to implement GSI can exacerbate existing inequities in low-income neighborhoods.¹²⁴ Any ultimate fee structure must consider past harms and lack of investment that have resulted in disproportionate impacts and must do so through a cumulative impacts framework. For example, stormwater fees may be designed with different relationships to questions of property titles and taxes – a fee should not exacerbate or be mechanistically connect to well-known inequities in those systems. If the City pursues a stormwater fee to fund this work, impacted communities should have voice in how the fee is designed, applied, and collected, and in identifying priorities for how collected funds are spent. **The Final Strategy should outline how impacted community members will be included in exploring a stormwater fee and in the governance and decision-making for any resulting fee proposal, as well as inform project siting utilizing these funds.**

There are examples elsewhere that may be instructive. Advocates in New Orleans have advocated for a co-governance model through the Water Justice Fund. Their community-informed report, “The Water Justice Fund Policy Recommendations: A New Approach to Stormwater Management for the City of New Orleans,” outlines recommendations for a stormwater fee based on structural, social, and procedural justice. The fee, as described in the report, would fund both green and gray infrastructure (including maintenance), supplement flood insurance programs, establish a transparent process for calculating and utilizing fee revenue, with involvement and oversight from a “Community Advisory Committee” composed of local community experts, similar to Flood Protection Authorities created there after Hurricane Katrina.¹²⁵ To be clear, the Coalition does not endorse any one approach to a stormwater fee as

¹²³ Draft Strategy, page 51.

¹²⁴ Minkyu Park et al., *Socially Vulnerable People and Stormwater Infrastructure: A Geospatial Exploration of the Equitable Distribution of Gray and Green Infrastructure in Washington D.C.*, 150 CITIES 105010 (2024), <https://doi.org/10.1016/j.cities.2024.105010>.

¹²⁵ THE WATER COLLABORATIVE OF GREATER NEW ORLEANS, *THE WATER JUSTICE FUND—POLICY RECOMMENDATIONS: A NEW APPROACH TO STORMWATER MANAGEMENT FOR THE CITY OF NEW*

immediately applicable to Chicago, however, we encourage the City to look at fee models based in co-governance and involve community-based organizations at the outset of a fee structure discussion to ensure community experience, expertise, and priorities are the foundation of any such fee.

In exploring a stormwater fee or any other funding mechanism, the City must also recognize that residents experiencing chronic flooding, basement backups and stormwater emergencies already pay sewer rates that fund the City’s capital planning budget for sewer system projects, while also paying to remediate these impacts to their homes. A stormwater fee would layer on top of sewer rates that are already unaffordably high for many low-income residents – some of whom reside in flood and basement back-up vulnerable areas of the City. Additionally, lower-income households have less capacity to retrofit their homes – stormwater fees often include incentives for residents to reduce their fee by decreasing impervious area, installing rain gardens, disconnecting downspouts, and the like. Lastly, while the Philadelphia example¹²⁶ cited in the Draft Strategy is helpful, it is unclear from a “flat fee” approach whether investments from the fee would be distributed “equally” rather than “equitably.” “Equal” distributions could result in communities facing disproportionate stormwater burdens paying the same fee and the resulting services primarily benefitting communities with more modern, and higher capacity services without chronic flooding and basement backups.

12. Clarify the methodologies used to collect community input in developing the Strategy and properly define the purpose of public education on GSI moving forward.

The Strategy espouses strong community engagement principles. It states that “[c]ommunity input is a key step” and that “[l]ocal residents are the foremost experts” on their communities’ issues and priorities.¹²⁷ It recommends integrating community priorities into prioritization models, budgeting for engagement needs, including compensation for community participants, following up, and attending established community meetings.¹²⁸ It also says the City should establish a “consistent, proactive approach” to engaging residents in planning, design, and stewardship.¹²⁹ **The Coalition applauds these principles and recommends that the Final Strategy specifically explain how these commitments will be implemented.**

With respect to the community input that informed the Draft Strategy, the document states that engagement included interviews, steering committee meetings, pop-ups, roundtables,

ORLEANS (2024), https://914700f1-c8b5-4321-97b8-c24fee102b5e.filesusr.com/ugd/258408_ddb367e6c6f043abb070c805250dafa6.pdf.

¹²⁶ Draft Strategy pages 53–54.

¹²⁷ Draft Strategy, page 42.

¹²⁸ Draft Strategy, page 42.

¹²⁹ Draft Strategy, page 71.

and public meetings.¹³⁰ To ensure that this input is as representative and meaningful as possible and so the public can see how their input is reflected in the City’s priorities, **the Final Strategy should provide greater transparency about the engagement methodology used to develop the Draft Strategy, including who was consulted, what communities were reached, what methods were used, what feedback was received, how that feedback changed the Strategy, and which concerns remain unresolved.**

The Draft Strategy omits the “Engagement supplemental materials” document which the Draft Strategy states is on the City’s website and should summarize key engagement approaches the City employed to collect community input on stormwater priorities. **These materials should be made publicly available prior to the publication of a Final Strategy.**

The “Community Perspectives” section of the Draft Strategy pools input from across multiple groups and spaces, including Chicago’s Heat Resilience Policy and Programs Community Survey, which ranked priority locations for GSI. These community perspectives are pivotal for understanding the priority co-benefits of GSI, but should be considered in the context from which this input was gathered. For example, the Coalition appreciates the City’s public engagement efforts around the Heat Vulnerability Index; however, **the Final Strategy should differentiate and emphasize community member priorities for addressing stormwater impacts first and foremost, which included reducing flooding and addressing basement back-ups from other urban heat and green space factors.**¹³¹ This is further discussed in Recommendation 2 on defining “benefits” and “co-benefits” consistently.¹³²

Additionally, the “Community Perspectives” summary of public input includes quotes from City departmental staff, and the following statement on key takeaways driving the Strategy: “The following key takeaways summarize conversations with community advocates, residents, nonprofit organizations, neighborhood groups, and *City and sister agency staff working on green infrastructure.*”¹³³ **The Final Strategy should articulate which input on stormwater priorities represents public input, and which comes from agency input.** Agency staff perspective is certainly immensely valuable, but it must not be represented as community feedback on priorities of either stormwater solutions to address flooding and basement backups or the co-benefits of GSI on reducing urban heat and providing greenspace.

Moving forward, the Draft Strategy recommends that the City “offer Diverse Opportunities for Public Involvement” by ensuring “equitable decision-making processes” through engagement “early, often, and throughout project prioritization, design, implementation, and the establishment period.” It also recommends considering partnerships to support

¹³⁰ Draft Strategy, page 36.

¹³¹ Draft Strategy, page 38.

¹³² See *supra* Part III.2., *The Final Strategy Should Distinguish GSI Benefits from Co-benefits.*, at 10.

¹³³ Draft Strategy, page 36 (emphasis added).

engagement, build public support, and directly partner with community members through mechanisms such as sewershed advisory boards or citizen science projects.¹³⁴ Similarly, the Draft Strategy rightfully commits to “community-led processes [as] the foundation of equity,” emphasizing the importance of including public involvement in the full life cycle of stormwater projects.¹³⁵

The Final Strategy should create a formal, ongoing process through which residents and community organizations can submit flooding data, maintenance concerns, project ideas, and complaints. For the Strategy to be sustainable and community-centered, the City should commit to mechanisms that allow community members to provide data, expertise, and lived experience that shape when and where stormwater solutions are implemented. That process should explain how community-submitted information will be validated, weighted, mapped, and used in project prioritization, while also protecting sensitive resident information. Specifically, while the Coalition fully supports the City’s intentions to “integrate community priorities as driving criteria into prioritization models,” this representation is unclear in the sample Prioritization Index.¹³⁶ As described in the particular context of other recommendations herein, community co-creation of specific GSI installations must be integrated into decision-making structures laid out in the Strategy. And while the Coalition agrees that public education and engagement on stormwater management are beneficial, **the Final Strategy should go further by establishing formal mechanisms for community participation in City GSI decision-making, such as through the creation of a dedicated board or other means.**

The Strategy must also be clear that community co-governance and using experiential data from residents to inform project prioritization is separate from general education and outreach about the benefits of GSI. Public education should be accurate about what GSI can and cannot do. Residents should receive clear information about the circumstances in which GSI may reduce flooding, the circumstances in which it may not, maintenance necessary for long-term performance, and the role of gray infrastructure or property-level protections where GSI is insufficient. It is important that community education not overstate the value of particular types of green infrastructure by making broad overgeneralized claims about its stormwater retention efficacy, or by failing to include relevant contextual factors that influence effectiveness.¹³⁷

¹³⁴ Draft Strategy, page 59.

¹³⁵ Draft Strategy, page 42.

¹³⁶ See *supra* Part III.8, *Create a Prioritization Index with a Scoring Methodology that Promotes Siting Decisions that advance the Primary Purpose of the Strategy and Avoids Reinforcing Existing Inequities*, at 19.

¹³⁷ See *supra* Part III.5, *Distinguish Green Stormwater Infrastructure (“GSI”) from Green Infrastructure (“GI”) and clarify the Role of Trees in connection with stormwater management.*, at 16.

13. Include a clear plan for building sustainable community collaboration structures at the site-specific level.

The Strategy should include a clear plan for building sustainable collaboration structures with community-based organizations and site-level stewards.

A. The Strategy should require collaborative design for any project that depends on community use or community stewardship.

The Strategy should require collaborative design for any project that depends on community use or community stewardship. Community members have direct knowledge of where flooding occurs, how people move through and use neighborhood spaces, how community members view particular sites or locations, and what co-benefits would make a project meaningful beyond stormwater retention. This input should be a driving factor in the identification of specific locations where stormwater interventions are needed, in project selection in the Prioritization Index, and in project design. Collaboration should begin at site identification and project conception and continue through design, construction, activation, establishment, and ongoing maintenance – not only after installation when maintenance burdens have already been assigned.

B. Recognize and Support the Community Role in Maintaining GSI.

Community stewardship can be essential to the long-term success of green stormwater infrastructure, particularly for larger community-facing stormwater landscapes. But the Strategy should not treat uncompensated or unsupported community labor as a substitute for public responsibility. **If community groups, nonprofits, schools, churches, local institutions, or individual residents are expected to help implement, activate, monitor, or maintain assets that the City counts toward Strategy Goals, that role must be clearly defined, adequately funded, and supported in a context-conscious fashion.**

Community stewards often perform the everyday work that keeps stormwater landscapes useful, visible, welcoming, and functional between cycles of more technical maintenance. The Coalition identifies tasks such as trash pickup, pruning, tree care, community programming, and seasonal rituals as part of ongoing community stewardship. These everyday, community-engaged tasks are not a replacement for the technical stewardship green infrastructure needs. If the latter is not consistently provided, community stewardship usually diminishes. Although community stewardship is not a replacement for technical stewardship, it is also not incidental or trivial. Without this work, projects may lose stormwater functionality, become visually unappealing or unused, and underdeliver on their promised stormwater and community benefits.

The Strategy should therefore require maintenance plans and project budgets to identify whether community stewardship is expected, what tasks community stewards will perform, how they will be compensated and otherwise supported, and how that work will interact with professional maintenance.

The Coalition emphasizes that government must remain responsible for larger-scale maintenance necessary to ensure functionality. Technical maintenance may include inspections, sediment removal, major pruning or thinning, prescribed burns where appropriate, repair of retention systems, maintenance of tanks or subsurface infrastructure, fence repair, structural repairs, and performance monitoring. The City should not count a project toward Strategy goals unless there is a clear plan for both routine stewardship and technical maintenance.

To make collaboration workable, **the Strategy should establish concrete support structures for community stewards.** Those supports should include funding or stipends where appropriate; training; equipment; facilitated access to City water services; technical assistance; insurance or liability support; clear maintenance protocols; emergency contacts; and a designated governmental point of contact with the authority to resolve problems. **The Coalition specifically recommends financially supporting community stewardship, budgeting for the true cost of keeping stormwater landscapes functional, installing or funding water access, and creating clear long-term stewardship contracts.** For larger or more complex projects, the City should use written stewardship agreements or contracts that define each party's responsibilities, funding, reporting obligations, and escalation procedures. Those agreements should be revisited after the first 12 to 18 months of operation to determine whether the stewardship plan is feasible, whether funding is sufficient, whether maintenance responsibilities are clear, and whether changes are needed.

C. Consider creating a “bridge entity” to facilitate community participation in GSI installation and maintenance.

A third-party intermediary may also help make shared stewardship more sustainable. **The Coalition recommends considering an entity that can serve as a bridge across community and government and identifies NeighborSpace as one model that could be replicated for green stormwater infrastructure.** A NeighborSpace-like model, or a similar dedicated stormwater stewardship intermediary, could help coordinate technical assistance, support stewardship agreements, help administer funding, provide training, connect sites with professional maintenance, and help ensure continuity when agency staff or community leadership changes. But any intermediary must supplement, not replace, government responsibility. The City should not use a third-party structure to offload public infrastructure obligations onto nonprofits or residents without adequate funding, authority, and accountability.

Finally, the Strategy should connect collaboration structures to measurable implementation. Government should hold responsibility for monitoring GSI efficacy, including gallons stored and impacts on flow, because that is a specialized role government must play. Community partners can provide valuable site-level knowledge and observations, but the City should not shift technical monitoring or regulatory compliance onto community stewards. A sustainable collaboration model should make community participation easier, better supported,

and more effective – not make public infrastructure dependent on unpaid labor, unclear authority, or informal goodwill.

In sum, the Final Strategy should overtly recognize and commit to compensate community groups for their role maintaining GSI, including how their contributions help the City meet Strategy goals, and achieve measurable outcomes. Notably, the Draft Strategy makes contradictory statements both recognizing the City’s current over-reliance on community groups to maintain GSI and generally committing to “provid[ing] localized support to communities” to increase their capacity to design, review, and steward GSI installations. This, however, does not go far enough to articulate a commitment to address this issue. The Final Strategy should consider a “both-and” approach: *both* taking ownership of GSI design, implementation and maintenance thereby reducing reliance on community groups, *and* creating, coordinating with, and supporting an entity or entities that would serve as a bridge between community institutions and government agencies to support stormwater stewardship at multiple levels.

14. Putting it All Together: How DOE can use a Governance Matrix to articulate the Who, What, Where, When, Why, and How of implementing Goals of the Strategy.

The Draft Strategy identifies DOE as responsible for “facilitating coordination and cross departmental strategy,”¹³⁸ and the Coalition recommends that DOE do so through a structured implementation framework. Even if coordinating responsibility is ultimately shifted to a different centralized entity, as the Draft Strategy contemplates,¹³⁹ the Final Strategy should, at a minimum, establish the framework as to how the ultimate coordinating entity will create expectations, accountability, and supportive systems for coordinated decision-making across city agencies.

To that end, the Final Strategy should include a governance and implementation matrix that provides a systematic way for every implementing agency to identify its Goals and necessary implementation and governance elements. Ideally, the Final Strategy would include completed versions of this matrix for multiple goals assigned to different responsible agencies. At minimum, the Final Strategy should explain when and how DOE, or another designated coordinating entity, will complete the following matrix or a similar structured responsibility-assignment template for each Goal of the Strategy.

¹³⁸ Draft Strategy, page 25.

¹³⁹ Draft Strategy, page 52.

Governance and Implementation Matrix:
Who, What, Where, When, Why, and How will the Strategy's Goals be implemented?

Implementation / Governance Element	Customizable Formulation
Goal (What)	[Goal ¹⁴⁰ & Desired Primary Benefit ¹⁴¹] + [Expected Co-benefits]
Siting Prioritization (Where/Why)	[Describe identification of locations of need and application of the Prioritization Index ¹⁴² within specific program or policy] ¹⁴³
Lead Agency / Supporting Agencies / Bridge entity: (Who)	[Lead Agency] + [Supporting Agencies] + [Bridge Entity] ¹⁴⁴
Authority to Act (Who/How)	[Existing Scope of Agency Authority] ¹⁴⁵ + [Opportunities to Expand Authority]
Funding Pathway (How)	[Estimate of Necessary Funding] + [Existing Funding Sources and Amount Available] + [Proposed Funding Sources and Pathway to Acquisition] ¹⁴⁶
Implementation Actions (What/How/Who)	[Recommended Steps to Achieve the Goal] + [Community or other stakeholder involvement]
Metrics for Measuring Progress (Why/What)	[Metrics] + [Justification for Metrics] + [Context for Metrics] ¹⁴⁷
Maintenance Plan (Who, What, Where, when, why, how)	[Identify responsible entities] + [Identify funding] + [Insert reference to relevant maintenance standards] ¹⁴⁸
Recommended Accountability Measures (How/When)	[Reporting, whether periodic, after major storms, by project milestone, or other schedule] + [Corrective action planning] + [Any required agency sign-offs, budget reporting, public progress reporting, council oversight, interagency review, maintenance enforcement, etc.]
Public Transparency / Community Oversight (Why)	[Community advisory body, public meetings, open data, neighborhood-level involvement, community review of progress, or other oversight structure] ¹⁴⁹

¹⁴⁰ See *supra* Part III.3, *The Strategy's Goals must be Specific, Measurable, Achievable, Relevant, and Time Bound (SMART)*., at 11.

¹⁴¹ See *supra* Part III.2.B, *The Final Strategy Should Distinguish GSI Benefits from Co-benefits*., at 10.

¹⁴² See *supra* Part III.8, *Create a Prioritization Index with a Scoring Methodology that Promotes Siting Decisions that advance the Primary Purpose of the Strategy and Avoids Reinforcing Existing Inequities*, at 19.

¹⁴³ See *supra* Part III.9, *Ensure that Mapping Tools do not rely on incomplete or misleading data and relate closely to the goals of the Strategy*. at 24.

¹⁴⁴ See *supra* Part III.13, *Include a Clear Plan for Building Sustainable Community Collaboration Structures*. at 33.

¹⁴⁵ See *supra* Part III.10, *Explain how existing City Policies, Ordinances, and Agency Authorities will be used, coordinated, or revised to support implementation of the Strategy*., at 26.

¹⁴⁶ See *supra* Part III.11, *Funding and Financing, Explore a Stormwater Fee that centers Equity*., at 29.

¹⁴⁷ See *supra* Part III.3, *The Strategy's Goals must be Specific, Measurable, Achievable, Relevant, and Time Bound (SMART)*., at 11.

¹⁴⁸ Maintenance is a distinct process that extends beyond implementation and should have its own comprehensive matrix identifying goals, responsible entities, legal authority, funding pathways, maintenance actions, performance metrics, and accountability and reporting mechanisms.

¹⁴⁹ See *supra* Part III.13, *Include a Clear Plan for Building Sustainable Community Collaboration Structures*., at 33.

This matrix proposal is intended to provide a mechanism to synthesize many of the recommendations that precede it. If the Final Strategy refines its focus around a Primary Purpose, it will then be able to articulate specific SMART Goals that advance that Primary Purpose and can be operationalized by coordinated departments operating through well-understood authorities using existing and intentionally expanded resources with real community co-creation.

The undersigned Coalition deeply appreciates the effort and insight that DOE has applied to creating the Draft Strategy and applauds the draft for its scope, research basis, and statements of policy priorities. We hope that the recommendations above assist DOE in developing and then implementing a GSI Strategy with maximal impact for the most stormwater-impacted communities. The Coalition stands ready to meet with the City or provide additional information or explanation related to these comments and we welcome all opportunities to collaborate on these issues with the City moving forward.

Respectfully submitted,

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