BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PROTECT WEST CHICAGO, Petitioner, v. CITY OF WEST CHICAGO, WEST CHICAGO CITY COUNCIL and LAKESHORE RECYCLING SYSTEMS, LLC, Respondents.	)	PCB 23-107 (Third-Party Pollution Control Facility Siting Appeal)
PEOPLE OPPOSING DUPAGE ENVIRONMENTAL RACISM, Petitioner, v. CITY OF WEST CHICAGO and LAKESHORE RECYCLING SYSTEMS, LLC, Respondents.	)	PCB 23-109 (Third-Party Pollution Control Facility Siting Appeal) (Consolidated)

RESPONSE BRIEF OF THE CITY OF WEST CHICAGO AND THE WEST CHICAGO CITY COUNCIL

Now Come the Respondents, the City of West Chicago and the West Chicago City Council ("City Council") (collectively the "City of West Chicago"), by and through their attorneys, Dennis G. Walsh and Daniel Bourgault of Klein, Thorpe and Jenkins, Ltd., and for their Response Brief in the above-captioned matter state as follows:

The Respondents City of West Chicago's and the West Chicago City Council's Initial Post-Hearing Brief addresses the arguments made by the Petitioners with respect to the issues of Jurisdiction, the 1000-foot setback requirement, environmental justice (in which the Petitioners

fail to offer any compelling legal authority to justify a departure from Section 39.2's plain language and the history of local siting cases decided by the Board and the Illinois State courts), and the siting criteria. The City of West Chicago stands on its Initial Post-Hearing Brief and hereby adopts and incorporates herein the arguments made in Lakeshore Recycling Systems, LLC's ("LRS") Post-Hearing Brief and LRS's Response Brief (collectively "LRS's Briefs") with respect to those issues.

The City of West Chicago also addressed in its Initial Post-Hearing Brief the issue of fundamental fairness as it allegedly relates to the single text message that Mayor Pineda sent to Father Josh which Petitioner Protect West Chicago ("PWC") states is its best example of the City Council's pre-adjudication in favor of approving LRS's Application (p. 26 of PWC's opening brief). As noted previously, this was a harmless constituent communication sent well before the LRS Application (the "Application") was filed with the City, and in any event, it is beside the point since the Mayor did not vote. However, the City of West Chicago must now also respond to PWC's other claims relating to fundamental fairness, and the cheap trick it uses in an effort to counter the lack of any facts or direct evidence of any bias, predetermination, or predisposition on the part of the decision-makers.

Knowing full well that the City Staff's opinions and actions are irrelevant and not an issue for the Board to decide, Petitioner PWC reverts to tactic deception as a means to try to persuade the Board that the Aldermen on the City Council, the actual decision-makers here, pre-judged the Application. Apparently, hoping that the Board will not figure it out, PWC does this by disingenuously using the broad phrase "West Chicago officials" and insinuating that the actions taken by the "West Chicago officials" were those of the City Council, when, on the contrary, they were the sole actions of the City Staff. This ruse by PWC is wholly without legal merit and belies

the truth and the reality of the fact that there is NO evidence of actual bias or predetermination on the part of ANY decision-maker.

For example, to bolster its fundamental fairness argument, PWC relies heavily on the City of West Chicago's Freedom of Information Act ("FOIA") Officer's decision to deny the Freedom of Information request filed by Olga Rivera on January 13, 2021. On pg. 27 of its opening brief, PWC argues that "The conduct of West Chicago officials to improperly conceal the opinions of its own expert (Aptim) during the Pre-Filing Application Review process leading to the filing of a FOIA lawsuit, also reveals pre-adjudication in favor of approving LRS's Application and is further evidence of a lack of fundamental fairness." The absurdity of Petitioners' premise is obvious when one considers how FOIA requests are administratively handled by municipal entities such as the City of West Chicago. Under the Illinois Freedom of Information Act, the FOIA Officer(s) is one or more staff persons who are responsible to receive the FOIA requests from the public and to send responses in compliance with the FOIA. In this case, the City of West Chicago Staff member who was the FOIA Officer was Valeria Perez who reported to Michael Guttman, who is also a City Staff member and acts as the City Administrator. Mr. Guttman explained that when the FOIA request from Ms. Rivera came into the City, it was reviewed by the FOIA Officer and for the reasons articulated by Mr. Guttman, it was initially denied by the FOIA Officer at his direction. His testimony in that regard makes it clear that the decision to deny the FOIA request was because of a misunderstanding by City Staff, and it was not made as an effort to conceal anything from the public or for other nefarious reasons. His testimony is found on pgs. 154-156 of the PCB Hearing transcript (Tr.154:7-24;155:1-24;156:1-5):

"Q. Okay. Did the City ever turn over documents responsive to this request?

A. We did.

Q. In fact, you turned over like four boxes of documents, didn't you?

A. We did.

Q. Okay. So those existed before this request was made, didn't they?

A. They did.

Q. Did you decide to try to conceal these documents from the public?

A. No.

Q. Okay. Whose decision was it?

A. No one made a decision to conceal the documents from the public.

Q. Then why weren't these documents turned over?

A. The documents were not turned over for two reasons. One, it was an understanding of our staff, myself included, that there's a provision in FOIA that says that draft documents are not included. What I learned later to be is those are draft documents associated with City personnel and not our agents, so we made a mistake. In the second regard, I was not aware that there was written communications between APTIM and Lakeshore until the litigation was filed. I had only thought that they were oral conversations and so I didn't know, and now I've learned my lesson, that I need to go explore further as to what else is out there. So in the one instance, we had bad information, which we have corrected for the future. And in the second instance, I and the rest of my team need to make sure we question our agents as to what documents are out there. At the point and time of the FOIA, I was unaware.

Q. And that's what resulted in a lawsuit being filed by Miss Rivera; is that correct, Exhibit PWC 28?

A. Olga Rivera through her attorney believed that there were documents out there that we had not produced that resulted in the litigation and the production of the documents, some of which was already in the possession of your former co-counsel, but that doesn't matter. We still needed to produce it."

As noted, Ms. Rivera appealed the City Staff's FOIA denial and ultimately prevailed in the FOIA lawsuit. There is no evidence in the Record that the City of West Chicago Staff willfully and intentionally failed to comply with the FOIA request or otherwise acted in bad faith. Instead, it was a misunderstanding on City Staff's part which was resolved by the FOIA appeal, and it had no prejudicial impact on the Petitioners or any other person attending or participating in the City hearing. In fact, PWC used many of those documents received by Ms. Rivera at the City hearing.

Further, there is no doubt the Freedom of Information Act is a separate and distinct law and has an appeal process that is separate and different from the Section 39.2 local siting law and procedures. The two laws have nothing to do with each other, and there is NO evidence in the Record that even a single member of the West Chicago City Council was even aware of the FOIA request, the City Staff's decision, and response to the FOIA request, or the appeal of the City Staff's FOIA decision. It is nothing short of intellectual dishonesty and pure sophistry to suggest that the actions of City Staff, of which the City Council simply had no knowledge, "reveals pre-adjudication in favor of approving LRS's Application and is further evidence of a lack of fundamental fairness."

PWC's theory is equally ridiculous with respect to its effort to conflate the action by City Staff member Tom Dabareiner with that of the "West Chicago officials" who were the decision-makers. In that regard, PWC argues on pg. 27 of its opening brief that "Specifically, the deliberate and intentional decision of West Chicago officials to draft, edit and submit a letter in support of LRS's Application cannot be overstated. Further, West Chicago officials took this action and the specific language included at the direction of LRS. West Chicago officials then placed this opinion on West Chicago letterhead. The conduct is further evidence that West Chicago was clearly in favor of approving LRS's Application." Even if Tom Dabareiner could be considered an "official" of the City of West Chicago, his actions are not those of the City Council and again, there is NO evidence in the Record that demonstrates that the actions taken by Mr. Dabareiner were even known to a single member of the City Council. Neither City Staff nor its consultants was a decision-maker, therefore, they could not have approved the Application before it was filed and their actions, collectively and individually, were not those of the decision-maker.

What's more, even if the Aldermen knew that City Staff and Aptim preliminarily reviewed parts of LRS's Application before it was filed with the City, the City Council was not obligated to

adopt any of the City Staff's suggestions. Here, City Staff acted independently and did not participate in the City Council's decision. In fact, in each case, there is NO evidence in the Record that the City Council was even aware of the referenced actions by City Staff or that they were ever revealed to the Aldermen who made the siting location decision. Indeed, there is no evidence in the Record that the City Staff and consultants had ANY contact with the City Council. In fact, Mayor Pineda made it clear that City Staff never provided him or the other members of the City Council with any updates on issues Aptim had identified with the LRS Application. (Tr.115) PWC is well aware that its argument that the Application was preapproved by the decision-makers before it was filed with the City is entirely unsubstantiated and groundless.

PWC also intentionally misrepresents Aptim's role in this process and attempts to convince the Board that Aptim, who was hired to assist City Staff to conduct a pre-filing review of the Application (see Tr.98-102;Tr.169) and later to assist the City Staff and its attorney as one of the participants at the hearing, was actually the City Council's expert. It was not, and PWC knows this because the Petitioner saw Aptim at the table with the City Staff's attorney throughout the entire 7-day City hearing and made reference to Aptim's role throughout the hearing, and it knows full well that Aptim assisted the City Staff in making the recommended siting conditions that were submitted to the Hearing Officer and that were ultimately adopted by the City Council. Aptim did not provide any type of advice or technical assistance to the City Council itself, which was the siting authority, except that as noted, the City Council did agree with the recommendations with respect to the suggested siting conditions, but it only did so through a submittal by Staff Counsel who was assisted by Aptim in that regard.

The absurdity of Petitioners' logic that not having Aptim advising the City Council in the February 27th closed meeting "further smacks of pre-adjudication in favor of LRS's Application"

(see p. 33 of PWC's opening brief), is obvious in that it would have been fundamentally unfair to have the experts of one of the City hearing participants ("City Staff") in the closed session giving counsel to the Aldermen when the City Council was deliberating on the evidence, and in fact, it would have opened up allegations of ex parte communications in or surrounding that closed session. PWC would have welcomed such a blunder on the part of the City Council because it would have given it, instead of an elaborate campaign of disinformation, an actual basis to allege fundamental unfairness in the City's process.

Despite PWC's intense scrutiny of the actions of the City of West Chicago's Staff members, PWC could not produce a single statement, writing, document, or any other form of communication from any of the Aldermen of the City of West Chicago expressing support for or approval of the LRS Application before reviewing all of the evidence at the local siting hearing.

With respect to the issue of the City hearing proceedings being fundamentally unfair, as addressed in the City's Initial Post-Hearing brief, the siting proceedings are not entitled to the same procedural protection as more conventional adjudicatory proceedings, and there is nothing in Illinois caselaw or the decisions or rules of the Illinois Pollution Control Board which require that the City translate the Application into Spanish (Petitioners make no claim that the Application and related documents and materials were not on file and available for public inspection), or to provide a Spanish interpreter at the City hearing. It is interesting to note that People Opposing DuPage Environmental Racism ("PODER"), who argued that in order for the public in West Chicago to engage meaningfully with the information shared during the hearing, English to Spanish translation was needed, did NOTHING for its community organization to offer to provide translation services, but rather just complains that because a translator was not instinctively provided by the Applicant or the City, it is fundamentally unfair. If PODER really believed that its

members and the community needed a translator, it failed in its service to that community because it could have easily provided one or at the very least asked that one be provided. It did neither. In any event, Petitioners offer no statutory or caselaw authority for their position, but even assuming *arguendo,* that there was such a requirement, there is nothing in the Record that demonstrates that the failure to do so prejudiced either of these Petitioner's ability to present their case and argument at the City hearing. In fact, Ms. Alcantar-Garcia testified that she thought the PODER attorney did a good job at the City hearing. (Tr. 83:15-20) In addition, there is no evidence that any member of the public that wished to be present was turned away or who followed the City's procedural rules and wished to present public comment was denied the opportunity to do so. The law is clear that the City may establish its own rules governing conduct of a siting hearing so long as those rules are fundamentally fair and not inconsistent with the Environmental Protection Act ("Act"). See Waste Management of Illinois v. PCB, 175 Ill. App. 3d at 1036, 530 N.E.2d at 692-93. In the instant case, there is no allegation or claim that the City's Siting Ordinance and the rules regarding public comment are inconsistent with the Act or even that they are fundamentally unfair. It is also not disputed that the City Council can put rules in place as to the timeline on which to give the Hearing Officer notice of the request to give oral public comments at the hearing.

Furthermore, the Hearing Officer's decisions on the evidence were correct, and any misstep was at most a harmless error without any showing of prejudice to these Petitioners. Both Petitioners offer a convoluted legal argument as to why the concept of environmental justice was required, as a matter of law, to have been a part of the evidence in this siting location hearing, but the Hearing Officer was correct in his ruling that it is irrelevant. The fact of the matter is that neither Illinois common law nor Illinois statutory law imposes a specific or general duty or requirement to consider a broad concept of this nature. If the Illinois General Assembly wanted to make

"environmental justice" a consideration in local siting hearings, it certainly knows how to enact laws specifically detailing the nature of that requirement. In fact, although the Illinois Legislature has enacted an Environmental Justice Act, it has not incorporated ANY environmental concepts or mandates into the Environmental Protection Act, and the Board should decline to indulge the Petitioners' suggestion that it did so by implication.

The Hearing Officer's rulings with respect to the testimony and proposed submittals of Ms. Alcantar-Garcia was also correct in that there was no legitimate scientific basis for her testimony, and she did not have the expertise to provide any substantive analysis regarding compliance or non-compliance with any of the nine siting criteria.

Simply put, at the City hearing, the Petitioners and members of the public were given a full and fair opportunity to present any evidence, testimony, or objections. Applying the clearly erroneous standard in this case, and after a review of the entire Record, the Board cannot be left with the definite and firm conviction that a mistake has been committed. See, AFM Messenger Service, Inc. v. Department of Employment Security, 198 Ill. 2d 380, 395 (2001). The Petitioners have no valid argument that the public hearing conducted by the City of West Chicago was fundamentally unfair.

Moreover, Petitioners have not and cannot point to any evidence that the process the City Council used after the conclusion of the City hearing to make its siting location decision was fundamentally unfair. Instead, PWC advances the novel theory that the Illinois Pollution Control Board has the authority to entertain allegations of violations of the Illinois Open Meetings Act. It does not. As the Pollution Control Board teaches in Citizens Opposed to Additional Landfills v. Greater Egypt Environmental Complex, PCB 97-233, Nov. 6, 1997: " The Board does not have the statutory authority to enforce the Open Meetings Act (5 ILCS 10/1 (1996)), and therefore, any

such allegation does not, in and of itself, establish a violation of fundamental fairness. Rather, the relevant question is whether the local proceeding was fundamentally unfair...". Issues relating to alleged violations of the Open Meetings Act ("OMA") are left for the Illinois Attorney General's Office and/or the Illinois courts to review. Here, PWC had sufficient advance notice that the City Council was intending to go into closed session to deliberate on the Application and the evidence presented at the City hearing, and it could have easily filed a lawsuit for an injunction in an effort to prevent the City from doing so, if it truly believed that the action of the City Council was not legal. It made no objection to the closed session or took any action to try and prevent it, but instead filed a complaint after the fact with the Illinois Attorney General's office for an alleged OMA violation by the City and is attempting to use that OMA process as a red herring in this siting appeal. PWC did not file an injunction or take any other measures because it knew it would not prevail, and it also knows that the reason that the Illinois Attorney General's office is completely ignoring its OMA complaint without taking any action whatsoever on it, is because that complaint too is frivolous and wholly without legal merit. The Illinois Open Meetings Act makes it clear that the City Council may meet in closed session to review the evidence received in the City hearing on the Application. 5 ILCS 120/2 (c)(4). There is no question that it is a quasi-adjudicative body as defined by the OMA, 5 ILCS 120/2 (d), and a closed meeting held by the City Council standing alone does not violate the principles of fundamental fairness for the purposes of Section 39.2. See Citizens Opposed to Additional Landfills v. Greater Egypt Environmental Complex, PCB 97-233, Nov. 6, 1997.

Knowing that roundabout argument is fallacious, PWC next alleges that since the City Council went into closed session to deliberate the evidence and that since "no action and no vote had been taken" during that closed meeting the City Council must have predetermined the

Application ahead of time (see p. 33 of PWC's opening brief). The disingenuousness of PWC becomes even more transparent in that its opening brief is strategically self-contradicting on this point. In addition to pg. 33 as set forth above, on pg. 11 of its opening brief, PWC states that "there is no dispute that during the February 27, 2023 closed session, the City Council did not vote or make any determination as to the sufficiency of the Application, nor that West Chicago's City Council made any findings of fact to support a decision on the Application". Yet, on pg. 32 of the same brief, PWC purposively countermands those same facts but comes to the same exact conclusion, arguing that: "The February 27, 2023, decision of the West Chicago City Council to approve, in a private closed session, LRS's Application further reveals that there was pre-adjudication in favor of approving LRS's Application and is evidence of a lack of fundamental fairness". So, using two sets of completely opposite and contradictory "alternative facts," PWC manages to reach the same conclusion, that is: because the City Council took no action in its closed session on February 27th, it must have predetermined the Application and because the City Counsel made a decision in the closed session on February 27th to approve the Application, it reveals that there was a predetermination to approve the Application.

In any event, what is unmistakable is that PWC has demonstrated its complete lack of understanding as to how municipal governments operate. As noted above, although it is clear that the City Council can go into closed session to deliberate and review the evidence, the Open Meetings Act states that no final action may be taken at a closed meeting. 5 ILCS 120/2 (e). As such, and in compliance with the OMA, the City Council of West Chicago went into closed session to consider the evidence and met with its attorney in closed session to give him direction as to what final action the City Council intended to take with respect to the Application when it came out of the closed session portion of the meeting, and also so that the Board's attorney could draft

the appropriate ordinance setting forth in writing the City Council's determinative reasoning for that decision. On February 28, 2023, consistent with the law, the City Council reconvened the meeting and took final action in open forum as required by the OMA. At that open part of the meeting, the City Council also provided its written decision in the form of an ordinance setting forth in detail its determinative reasoning.

The legislative body of a city is its city council who acts collectively as a whole through a majority vote on a matter. Although the passage of an ordinance is by roll call with the names of each Alderman who voted for or against the ordinance recorded as "yea" or "nay" votes, there is nothing in the law that requires (nor does it ever happen), that the individual personal opinions of aldermen with respect to the subject matter of an ordinance, are set forth within it. The West Chicago City Council is a political body comprised of elected officeholders. As with many political bodies, the West Chicago City Council is comprised of people who from time to time disagree on issues that come before the Council. An ordinance is an enactment of the corporate authorities as a whole, and in this case, the West Chicago City Council set forth within Ordinance 23-0006 the City Council's determinative reasoning for its siting location decision on the LRS Application in extensive detail. Consistent with normal legislative enactments (and different from court decisions where dissents are sometimes a part of the published opinion), none of the individual Aldermen's personal opinions on the evidence were set forth within the Ordinance, and it is silly to suggest that since the Aldermen's individual thoughts on the siting criteria were not specifically set forth within Ordinance No. 23-0006 itself, that is "further telling of pre-adjudication" on the part of this legislative body (see p. 33 of PWC's opening brief).

The Board should also reject Petitioner PODER's claim that a participant in the City hearing, such as the Applicant, does not have a right to submit written public comment after the

close of the hearing. It does, and PODER knows this because it filed its own written public comment at the close of the evidence. Besides, the filing of the written public comment by LRS did not prejudice the Petitioners by denying them an opportunity to respond to it. Neither Section 39.2 of the Act, nor the City's Siting Ordinance create a right to respond to a public comment. Additionally, parties cannot cross-examine those who submit written comments. Southwest Energy Corporation v. Illinois Pollution Control Board, 275 Ill. App. 3d 84, 93, 655 N.E.2d 304, 310 (4th Dist. 1995). Therefore, the Petitioners did not have a right to respond to the public comment, or cross-examine the authors, and in any event, as noted by the Hearing Officer in pg. 3 of his Report of Hearing Officer Recommended Findings of Fact and Recommended Conditions of Approval, he did not rely "upon the public comment filed by the Applicant in reaching [his] findings of fact and conclusions of law" and as such, it could not have introduced prejudice to the point of rendering an entire proceeding fundamentally unfair.

Members of a siting authority enjoy a presumption "that they have made their decision in a fair and objective manner." See, Peoria Disposal Co., 385 Ill. App. 3d at 796. This presumption may only be overcome if the Petitioners' present "clear and convincing evidence" of a violation of principles of fundamental fairness. Id. This evidence must be specific and show actual bias or prejudgment. Stop the Mega-Dump v. the County Board of DeKalb County, 2012 IL App (2d) 110579, (2012). "Mere expressions of public sentiment are not sufficient for a showing of prejudice." Fox Moraine, 2011 IL App (2d) 100017, ¶61. A Petitioner must instead show that "a disinterested observer might conclude that [the siting authority] had in some measure adjudged the facts as well as the law of the case in advance of hearing it." E&E Hauling, Inc. v. PCB, 116 Ill. App. 3d 586, 598, 451 N.E.2d 555 (1983). These cases make it clear that the burden for proving a violation of fundamental fairness is high and cannot be satisfied based on speculative "evidence"

or "mere expressions of public sentiment" regarding a pollution control facility. Here, the Petitioners have failed to meet their burden.

Wherefore, the Respondents, the City of West Chicago and the West Chicago City Council, pray that this honorable Board affirm the decision of the City Council of the City of West Chicago regarding the matter of the Application of Lakeshore Recycling Systems, LLC., for siting approval for the proposed solid waste transfer station to be located in the City of West Chicago, DuPage County, Illinois.

On behalf of the **CITY OF WEST CHICAGO**
and the **WEST CHICAGO CITY COUNCIL**

By: _____
One of their Attorneys

Dennis G. Walsh
Daniel W. Bourgault
Klein, Thorpe and Jenkins, Ltd.
15010 S. Ravinia – Suite 10
Orland Park, Illinois 60462
dgwalsh@ktjlaw.com
dwbourgault@ktjlaw.com
(708) 349-3888

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NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on December 6, 2023, the City of West Chicago and the West Chicago City Council electronically filed with the Office of the Clerk of the Illinois Pollution Control Board **RESPONSE BRIEF OF THE CITY OF WEST CHICAGO AND THE WEST CHICAGO CITY COUNCIL**, a copy of which is served upon you.

Respectfully submitted,

CITY OF WEST CHICAGO and
WEST CHICAGO CITY COUNCIL,
Respondents

By: _____
One of Respondents' Attorneys

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Dennis G. Walsh
Daniel W. Bourgault
Klein, Thorpe and Jenkins, Ltd.
15010 S. Ravinia – Suite 10
Orland Park, Illinois 60462
dgwalsh@ktjlaw.com
dwbourgault@ktjlaw.com
(708) 349-3888

AFFIDAVIT OF SERVICE

I, the undersigned, on oath state that I have served this **Notice of Filing and Response Brief of the City of West Chicago and the West Chicago City Council** upon the following persons via email transmittal from 15010 S. Ravinia – Suite 10, Orland Park, Illinois 60462, on the 6th day of December, 2023.

Attorney for Respondents
City of West Chicago and
West Chicago City Council

SERVICE LIST

Ricardo Meza
Meza Law
542 S. Dearborn, 10th Floor
Chicago, IL 60605
rmeza@meza.law

Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
60 E. Van Buren St., Suite 630
Chicago, IL 60605
Brad.Halloran@illinois.gov

Robert A. Weinstock, Director
Environmental Advocacy Center
Northwestern Pritzker School of Law
375 E. Chicago Avenue
Chicago, IL 60611
Robert.weinstock@law.northwestern.edu

George Mueller
Attorney at Law
1S123 Gardener Way
Winfield, IL 60190
George@muelleranderson.com

Karen Donnelly
Attorney at Law
501 State Street
Ottawa, IL 61350
Donnellylaw501@gmail.com