

**To: Lakeshore Recycling Systems**  
**From: River Ecology and Governance Task Force Development Review Working Group**  
**Date: 08.19.22**

The River Ecology and Governance Task Force Development Review Working Group appreciates the opportunity to review and provide input on Lakeshore Recycling Systems (LRS) proposed site amendments to 3152 S. California, as presented on August 2, 2022. The presentation provided Task Force members with an overview of the proposed changes, including plans to install a barge dock in the Collateral Channel and install native plantings and maintain pollinator habitat.

Following the development team's presentation, Task Force members had the opportunity to ask questions and provide general feedback. Task Force members then had the opportunity to discuss amongst themselves after the development team was excused from the meeting. The comments in this letter summarize the group's written and verbal input.

### **Context of the proposed development**

Lakeshore Recycling Systems is returning for review by the Department of Planning and Development (DPD) after the deferral of a previous proposal. The Task Force Development Review Working Group provided previous input to LRS on July 20, 2021.

LRS proposes to build a barge dock and loading infrastructure on the southeast edge of the Collateral Channel, which would constitute a river-dependent, critical use on the site, and therefore be exempt from the setback requirement. According to LRS estimates, barge use is expected to offset up to 22 million pounds of CO2 emissions and 1.5 million pounds of particulate emissions yearly. The site is currently in operation and has a functioning stormwater management system. The developer plans to increase native plantings and pollinator habitat on the site and does not plan to create public access at this location. The proposed changes to the site require approval from the Chicago Plan Commission, per the Chicago River Design Guidelines and Air Quality and Zoning Ordinance.

### **Development review working group recommendations**

The remainder of this letter contains project-specific recommendations we would like to see the development team incorporate into the site plan, as well as broader recommendations directed toward the Department of Planning and Development regarding development along the South Branch of the Chicago River and the Sanitary and Ship Canal.

### **Project-Specific Recommendations**

- **Place the barge loading facility on the main canal rather than in the Collateral Channel.**  
We recommend that LRS make every attempt to place the barge dock and loading infrastructure on the main Sanitary and Ship Canal, rather than in the Collateral Channel. One concern is that placing the barge dock inside the Collateral Channel necessitates dredging and disrupting the sediment inside the channel, which is known to be more contaminated than the main channel. Putting barge access in the slip may also limit future improvements (e.g. in-stream wetland, filling the channel) that may be more desirable to the surrounding community if land use patterns change in the coming decades. We encourage LRS to share with DPD any documentation from the US Army Corps of Engineers regarding purported restrictions on barge use in the main canal at this site.

- **Provide additional information and documentation on air quality impact.**

The development team shared estimates for how much truck traffic, CO<sub>2</sub>, diesel fuel, and particulate emissions would be reduced through barge use at the site. We encourage LRS to share additional details about the impact of the proposed expansion, including how many barges are anticipated to come through the site, and at what frequency. We also recommend that LRS provide DPD with baseline truck traffic information, specific traffic reduction targets, and a commitment to reporting on any change in truck traffic volume after the barge facility is in use.

- **Proactively engage around dredging and remediation practices.**

The proposed project requires substantial dredging to create viable barge access. According to a [study by the University of Illinois Chicago](#), the Collateral Channel's sediment has high levels of heavy metals, PAHs, and other contaminants. The dredging and active use of this channel will inevitably release more pollution into the river, which will affect areas beyond this site. These pollutants are known human carcinogens and cause harm to fish and many other organisms that rely on the river ecosystem. Acute exposure, as well as the threat of bioaccumulation throughout the food web, creates the potential to impact the health of nearby residents who fish, boat, and otherwise utilize the river. If the development moves forward, we strongly recommend that LRS use a river-sensitive approach to dredging and remediation that minimizes the harmful impacts of dredging. LRS should proactively share and solicit feedback on their dredging and remediation plan for the Collateral Channel with the Chicago Department of Public Health, local environmental organizations, and residents.

- **Ensure that there is a robust planting plan for the site.**

The Rivers Task Force members are supportive of the plan to expand the native plantings and pollinator habitat on the site. Given that the plants along the river edge have no direct access to the river, this area should be thought of mostly as an upland planting habitat. Special emphasis should be placed on supporting birds, bats, and other pollinators that can easily traverse the gap between land and water. Developing multi-storied tree canopy is a lengthy process, but establishing dense rows of trees and shrubs will help resist weedy species that are seen at the site now, even if no regular landscaping maintenance is performed. Invasive tree species such as Buckthorn and Tree-of-Heaven, as well as aggressive herbaceous species, should be removed immediately and replaced with native alternatives. Care should be taken to include a diversity of species as well as genetic diversity, which means shying away from planting cultivars or other clonal nursery stock. Semi-regular weeding and maintenance is recommended, as invasive seed is prevalent in the area, and could negatively impact the investment in the site's renewal, if not managed.

- **Consider installing riverfront conservation setbacks where barge access is not needed.**

We encourage the developer to incorporate river-edge conservation setbacks wherever barge infrastructure is not prohibitive. While recreational access may not be safe at the site currently, efforts should be made to preserve riverfront land that could become part of a green corridor or trail in the future.

## **Recommendations for the Department of Planning and Development regarding development along the South Branch of the Chicago River and Sanitary & Ship Canal**

- **DPD should prioritize conservation setbacks even when recreation is not possible.**

Some river stakeholders have expressed that recreation at this location, and along the Sanitary and Ship Canal generally, should not be pursued due to health and safety risks posed by existing industrial and commercial uses. Other stakeholders want to prioritize river edge access, regardless of current conditions. Prioritizing conservation setbacks may serve as an avenue for preserving a riverfront corridor that may be used for future recreation if or when industrial conditions change. While it may not be appropriate to pursue recreation at the site right now, it is still important to consider actions that do not preclude recreational access from being incorporated in the future, when safe (i.e. the space to provide recreational access should always be protected when possible, even if a trail can't be safely built at this time).

- **Consider ongoing riverfront and citywide assessments in the area.**

The Department of Planning and Development and Plan Commission should take into account ongoing planning and health assessments happening on the South Branch of the Chicago River and citywide. The Southwest Industrial Corridor process, including the transportation study and freight health metrics study, may provide important information about truck traffic patterns in the area and the potential benefits or burdens of a barge facility. The Department of Public Health's forthcoming citywide air quality assessment and the pending Sims site permit may provide additional insights into environmental burdens and risks along the South Branch.

Thank you for taking the time to present to the River Ecology and Governance Task Force Development Review Working Group. We appreciate the opportunity to provide feedback in the design process. We hope that considering these recommendations will mutually benefit the development team, community residents, and the river itself. We look forward to your responses and collaboration.

Sincerely,

River Ecology Governance Task Force  
Development Review Working Group