To: Transport Properties Development Team
From: River Ecology and Governance Task Force Development Review Working Group
Date: 06.30.22

The River Ecology and Governance Task Force Development Review Working Group appreciates the opportunity to review and provide input on the Transport Properties 106th St. development as presented on June 14, 2022. The presentation provided Task Force members with an overview of the proposal including the site's industrial history, plans to remediate and manage stormwater on the site, and the future anticipated use of truck and barge storage. The development team also shared how the site plans are consistent with the Calumet Design Guidelines.

Following the development team's presentation there was a 'Question & Answer' session that allowed Task Force members to highlight specific areas of the plan, ask clarifying questions, and provide general feedback. The following comments are representative of the group's input and include written and verbal responses from meeting participants.

General context of Transport Properties development on the Calumet River

The Department of Planning and Development (DPD) has begun its preliminary review of the proposed development. The Task Force members acknowledge that Transport Properties' proposed use, truck and barge storage, are currently authorized in the PMD and that additional zoning approvals are not required.

Transport Properties proposes to develop the 106th St. site into a truck and barge storage location. The development team plans to remediate the site by removing and replacing contaminated soil. Due to the challenging nature of this vacant industrial site, remediation is unlikely to happen without the developer's investment, and is important to reducing any risk the property poses in its current state. A majority of the site will become an asphalt parking lot with an estimated capacity of 640 trucks. The North edge of the site, along the slip, will be used to store up to 14 barges, constituting a river-dependent use. Along the East edge of the site, along the Calumet River, the developer will maintain a 30-foot setback and naturalized slopes down to the river edge, as required.

Development review working group recommendations

The Development Review Working Group urges DPD and the development team to begin community engagement for this site. Residents of South Deering and East Side should be consulted about the designs for the site and its proposed use. In particular, the focus should be on engaging residents living less than a half-mile away from the site, along 103rd St., S. Commercial Ave, 104th St., S. Torrence Ave, and 105th St. During outreach, special attention should be paid to pedestrian safety, fishing and birding, river access, and cumulative community health impacts.

The remainder of the letter is divided into two sections. The first focuses on project-specific recommendations we would like to see the development team incorporate into its site planning, the second section provides more expansive recommendations for development along the Calumet River.

Project-Specific Recommendations

- **Exceed Calumet Design Guidelines to create pedestrian connectivity and public riverfront access**
  We encourage Transport Properties to exceed the Calumet Design Guidelines and consider using a portion of the site for a publicly accessible green space, with a safe pedestrian connection to 106th St. Public riverfront space has been identified as a community need. Including this would be of great benefit to surrounding residents, and could facilitate positive community engagement and demonstrate the development team's intentions to be a good neighbor. Additional considerations such as routine trash and floatable collection (on land and in river) and planting shade-providing trees along 106th, could bring value to the neighborhood beyond remediation.

- **Improve stormwater management, especially in the context of climate change**
  Special care should be taken to meet stormwater management best practices and limit runoff into the river. We appreciate the inclusion of the stormwater storage areas swales and basins, but given the site will have an extensive impervious paved parking area adjacent to the Calumet River, we believe that more can be done to improve the quality of the water prior to entering the river. These measures could include filtering devices in the stormwater swales to capture oils, floatable trash, and other potential waterborne pollutants and reducing the overall rate that water flows into the waterway. Climate change has resulted in more intense storm events occurring more frequently (for the past 3 years record rainfall events have occured), so we therefore recommend that stormwater storage is designed for rate control, instead of only volume control. This is especially important given that the asphalt parking lot is not porous and will have significant amounts of polluted runoff.

- **Prioritize water quality in materials usage and site maintenance**
  Special care should be taken to meet best practices and limit runoff into the river. Asphalt sealcoats that contain Polycyclic Aromatic Hydrocarbons (PAHs) are a big concern as many cause cancer, mutations, birth defects, or death in wildlife. At a minimum, the owners should ensure that non- or less-toxic versions of asphalt sealant are used for the parking lot. Other paving options would be preferred. Road salt runoff and vehicle cleaning solutions are also a concern because they contribute to chloride pollution. Use road salt best management practices (BMPs) to reduce their drainage into the river.

- **Ensure that there is a robust planting plan**
  On-site planting design should include Illinois native species only (excluding cultivars and other nursery stock with low genetic diversity), and ideally would feature a multi-storied tree canopy, shrubs, and a diverse set of herbaceous plants. This will ensure that the river edge is desirable for many types of birds, pollinators, and other wildlife, and will provide a framework for connective habitat zones along this section of the river. It is especially important to include trees along 106th street and the development team should also consider incorporating them within the stormwater storage sections. Since this section of the river is directly connected to Lake Michigan, a naturalized riverbank should feature a mix of submerged and emergent species with deep roots that will help hold the shoreline together, and protect from seiches and other severe hydrologic forces. Upland species should also be included as the bank rises from the typical river/flood level, which will further provide diversified habitat and stability up-slope.

Recommendations for development along the Calumet River

- **Update the Calumet Design Guidelines**
  We strongly recommend that DPD revises the Calumet Design Guidelines with an eye toward creating a healthier, more resilient, and more accessible river corridor for community members. The current Calumet Design Guidelines, issued in 2004, do not propose or require provisions for any public riverfront access or connectivity with existing access points. Recent and ongoing community-driven planning efforts such as the Calumet Connect Partnership, Friends of the Parks' work at Steelworkers park and beyond, and UIC Great Cities Institute 100th St. project have identified safe public riverfront access as a priority. In addition, the public access improvements outlined in the Port District's Master Plan, as well as recent improvements to marshes in the area (e.g. Hegewisch Marsh), highlight the growing interest in the transformation of the Calumet area.

- **Reconsider the types of industrial land uses allowed along the Calumet River**
  Planning for a future where safe and healthy riverfront access is possible will require making changes now to the types of industrial uses that are allowed along the Calumet River. DPD should continue to allow for true river-dependent uses, but more holistically and stringently assess the environmental, economic, and health benefits or burdens that various non-river-dependent uses will bring to the community and the river itself.

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 and look forward to the ongoing coordination as the project moves on to future phases. We hope that implementing the above recommendations can be mutually beneficial for the development team, community residents, and the river itself. We welcome the opportunity for feedback, offer our services in the future, and look forward to your responses and collaboration.

Sincerely,

River Ecology Governance Task Force
Development Review Working Group