

**To: Department of Planning and Development**  
**From: River Ecology and Governance Task Force Development Review Working Group**  
**Date: 09.21.21**

At the end of July, the Department of Planning and Development (DPD) hosted a development review working group meeting of the River Ecology and Governance Task Force to: 1) discuss a barge loading expansion at an existing solid waste recycling facility (Lakeshore Recycling) and; 2) discuss the review process for existing waste process facilities along Chicago's waterways.

Following the Lakeshore Recycling team's presentation there was a 'Q & A' 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 feedback including written responses and verbal input from meeting participants. These comments are organized into two sections:

Section 1: Lakeshore Recycling Expansion Proposal on the South Branch of the Chicago River  
Section 2: Administrative Review Process Recommendations for Existing Waste Processing Facilities

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## **Section 1: Lakeshore Recycling Expansion Proposal on the South Branch of the Chicago River**

Lakeshore Recycling requests to add a barge docking and loading facility along the Collateral Channel adjacent to the South Branch of the Chicago River. The Lakeshore Recycling proposal is seeking an amendment to the existing PD #874 which requires an administrative review process with DPD. Ultimately, DPD denied this proposal for a number of reasons; the docking facility would encroach on the landscape buffer that was required in the PD, it would conflict with potential future recreational activities, and it did not align with the vision proposed in [Our Great Rivers](#) for new trail and open spaces along Collateral Channel. This proposal had been initially denied by DPD, and it was presented to the Task Force to seek additional guidance and input on that decision to inform the next steps in the process. It was also presented as an example for a larger discussion about the administrative process for reviewing changes to waste processing facilities along Chicago's waterways.

The [Chicago River Design Guidelines](#) menu of improvements includes criteria related to Nature, Recreation, and Connectivity. With these criteria in mind, development review working group members had differing feedback and perspectives. Some, not all, members would be in favor of Lakeshore Recycling's expansion in a limited capacity, *with a number of conditions*. These conditions include:

- *Community Impacts*: The development team should quantify the community impacts of Lakeshore's proposed expansion. If expansion will reduce truck traffic, how can this be quantified? Will Lakeshore enter an agreement with specific traffic reduction goals? Will barge traffic increase? If so, by how much? What effects will barge traffic have on recreational boating and the ecology in this portion of the Channel/Canal?
- *Environmental and Community Tradeoffs*: If River Edge Design Guideline requirements cannot be met, is there a mechanism for remediation beyond the immediate shoreline? Examples of potential community or environmental mitigation in this case may include building and maintaining the greenway section inboard of the site, or implementing robust ecological restoration elsewhere on the site. Any mitigation mechanisms should be presented to community members and river stakeholders for feedback prior to approval.

- *River Edge Setback:* Some community stakeholders have expressed that recreation in this location is not a priority at this time, while other stakeholders value expanded river edge access. Deprioritizing recreation and transportation in order to prioritize pollution remediation is valid and must be considered, but this should not preclude preserving the right of way corridor so that it may still be used in the future if conditions change. It is important to take actions that do not produce future gaps in a connected river corridor greenway network.
- *Long Term Planning:* Any expansion or revision to the existing PD should be part of an overall long term plan for the Collateral Channel. Lakeshore Recycling is one of numerous operators and site owners along the channel, and no change to the land uses can be considered in a vacuum. For example, does CDOT have plans for the barge dock at its maintenance facility to the north, when was the last time that dock was used? Could the Channel be capped up to a point near the planned Lakeshore dock to provide remediation and a public amenity in the future?

Related to the bullet points listed above, Task Force members expressed the potential for this site to meet a number of the [Chicago River Design Guidelines](#) menu of improvements criteria. The following is a list of criteria highlighted by individual task force members as potential improvements for this site. It should be noted that there were mixed sentiments about the guidelines and many of the criteria listed below were not necessarily included in the majority of responses.

- *Nature:* New naturalized shoreline, aquatic wildlife habitats, robust upland habitats, large riverfront park, stormwater management best practices, and increased setback.
- *Recreation:* Access to water docking facilities, riverfront outlook, new recreational areas, support amenities (e.g. public restrooms, facilities that support recreation). Task force members had conflicting input on recreation improvements at this site. Some members felt there was potential for improvements listed above, while others felt this site was not viable for recreation at all due to its location in a heavily industrial area and high pollution/remediation requirements.
- *Connectivity:* Enhanced connections to street and transportation, cantilevered & floating walkway, increased accessibility, interpretive signage, and public art & lighting. As with recreation, there was disagreement among task force members for the feasibility of connectivity at this site.

## Section 2:

### Administrative Review Process Recommendations for Existing Waste Processing Facilities

The primary question that DPD asked the Task Force was:

*How should waste facilities be handled across the river system, so that the process is the same regardless of where a development is within the river system or the specific details of the proposal?*

The recommendations from the working group can be organized into the following major takeaways:

#### ***Stakeholders should be identified and involved as early in the process as possible.***

Stakeholders and residents can and should play a vital role in providing input to DPD planners during the administrative review process. Community members can provide valuable feedback from their experiences living in close proximity to industrial sites and the impacts on their daily lives. Stakeholders can give their input on what should be taken into account (ie, local jobs, training opportunities, health, and environmental impacts, impact on the local economy, and overall cumulative impact to the community). Stakeholders and residents can lift up concerns, ideas for industrial developments and potential future uses, and ways harms can be mitigated.

There should be a clear and repeatable process for who identifies stakeholders, how they are identified, and a strategy for maximizing the number of stakeholders and their opportunity to provide input.

***Cumulative impacts should be considered whenever new industrial facilities or expansions of existing facilities are proposed.***

In addition to the environmental and health impacts of a single development, the cumulative impacts -- the total, layered environmental & health impacts of the industrial zone as a whole -- should be reassessed every time a new facility or expansion is proposed. The City should set criteria for a total threshold for negative impacts (e.g. pollution, air quality) that an industrial corridor or PMD as a whole must not exceed.

***Environmental and health impacts to communities beyond the boundaries of a specific parcel or site should be considered and mitigated.***

The degree to which DPD and other City departments can mandate the mitigation of negative environmental & health impacts should be clearly defined. Mitigation of harms should be heavily considered when discussing expansion of existing waste processing or industrial facilities. Waste Facilities should have to maintain traffic reduction, rodent control, and air quality agreements in partnership with the local community. Waste hauling methods, schedules, lighting, local hiring, and training considerations should be developed with the input from surrounding community residents.

***Consistency and transparency must be embedded in the process. Review procedures, community outreach, and other process steps should be well defined and applied to all reviews.***

For example, Environmental Justice (EJ) considerations should be embedded in the administrative review process. Designations of EJ communities by city and state agencies should trigger additional considerations and requirements in the application process. The ability for the impacted community to request an appeal to a planning decision/approval, the right for the city to ask for mitigation reduction, and deny permits on these grounds should also be clearly defined. Community meetings should be required with multiple opportunities not only for meaningful input from community members and stakeholders during the planning process, but also for that input to be incorporated into the proposed expansion or development. *Notifications should be posted earlier and with as much clarity as possible to allow for input and comments from community members and stakeholders.* The process for submitting feedback and comments should be clear, accessible to community residents, and consistent across all reviews.

***The concepts of land clean-up, pollution removal, avoidance of polluted run-off, remediation, and land restoration should be separated from the discussion of public access.***

State and federal programs and plans should be incorporated into the administrative review process and prioritized, such as the ongoing PAS study being conducted by the US Army Corps of Engineers. Prior to consideration of public access for specific sites (which remains integral in planning for Chicago's waterways) the larger questions of remediation, land and habitat restoration, and long term land use should be considered.

***Ultimately, DPD needs to engage communities and stakeholders in creating (and following) a broader holistic plan for industrial corridor planning.***

There needs to be a more holistic approach to how industrial corridors are planned moving forward, in order to require the inclusion of potential impacts to local human health and the environment in all future applications. This would be more beneficial, comprehensive, and consistent than individual PD reviews, which can become bogged down in comparing proposed adjustments to the original goals of the existing PD.

Thank you,  
River Ecology Governance Task Force  
Development Review Working Group