

To: Bally's Casino Development Team
From: River Ecology and Governance Task Force Development Review Working Group
Date: 09.13.22

Initiated in late 2019, The River Ecology and Governance Task Force is composed of local government agencies, organizations, and community advocates that collaborate on initiatives to support coordination, management, planning, and stewardship for Chicago's rivers. As part of this Task Force, the group convenes to [review new developments](#) that are proposed in and along Chicago's waterways. This working group reviews projects guided by the [Chicago River Design Guidelines](#) and provides additional feedback on ways the development could be improved to increase the health and vitality of the city's rivers and its riverfront communities. These actionable recommendations are transmitted to City staff through the Department of Planning and Development, who hosts these meetings with development teams.

The River Ecology and Governance Task Force Development Review Working Group appreciates the opportunity to review and provide input on Bally's proposed site amendments to 777 W. Chicago Avenue (the Casino), as presented on September 6th, 2022. The presentation provided Task Force members with an overview of the overall site master plan with a primary focus on open space and programming adjacent to the North Branch of the Chicago River and compliance with the Chicago [River Design Guidelines](#).

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

Context of the proposed development

The Bally's Casino will occupy former industrial land along the North Branch of the Chicago River. The site is large, prominent, and will include a new riverwalk, other river edge improvements, and high-rise mixed-use development. A Chicago casino and entertainment complex represents a significant opportunity to make a bold statement about how new development, recreation, and robust riverine and upland habitats can coexist.

Task Force members acknowledge that the Casino approval and design process is ongoing, and presentations and designs shared to date by the development team do not include final design decisions or detailed site/landscape plans for the river's edge. The development team has made efforts to meet the Chicago River Design Guidelines menu of improvements and the focus given to *Nature, Recreation, and Connectivity* along the river's edge in the preliminary designs thus far is admirable. Following is a *non-exhaustive* list of items for the development team and City staff to consider as they continue to move through the design and approval process for this project. We encourage the team to continue to engage with this Task Force and other community groups moving forward.

Development review working group recommendations:

- **Incorporate additional naturalized landscape treatments**

As proposed, the site plan calls for floating or anchored island wetlands within the river, primarily adjacent to the Riverfront Park, which is only a small portion of the total river edge condition spanning from north to south. The design team should clarify to what extent floating wetlands will be incorporated in the final design and expand their use across the site wherever possible. The Casino site presents an opportunity to combine an urban edge with a naturalized landscape. We recognize that a fully naturally sloped edge may not be feasible, but we encourage the development team to pursue design strategies to decrease the amount of hardscape & other impermeable surfaces. Strategies include installation and expansion of floating islands or fish hotels north along the longer and narrower Casino Riverwalk (similar to the Downtown Riverwalk). This

would require additional coordination with the U.S. Army Corps of Engineers to gauge feasibility and ensure compliance with federal regulations, but the [Wild Mile](#) project located nearby proves that the benefits of a more naturalized and accessible river edge far outweigh the potential costs in terms of impact to the river's navigability, and that regulatory barriers can be overcome.

While the installation of floating wetlands, an emphasis on native plantings, and bird friendly design are important first steps, more attention should be paid to other important ecological considerations such as water quality and increased habitat connectivity. The development team provided a diagram of site connectivity but only between humans. A thoughtful design approach would consider the movement of wildlife and water across the site and provide connectivity between available habitats and green spaces.

- **Review and expand the stormwater management plan to ensure it complies with regulations and does not increase the pollution burden on the Chicago River**

The task force acknowledges that the stormwater management plan for the site is still in process, but we recommend the design team think creatively about best practices to ensure that pollution does not enter the waterway. Although runoff from roofs may be cleaner in theory than runoff from roads or parking surfaces, there is still potential for air pollution to accumulate on surfaces that is then washed off during rain events, and can be harmful to aquatic species if it enters the river untreated.

The team should provide more detailed drawings of specific stormwater management strategies and green infrastructure that will be used on the site, specifically how the planting areas will slow and filter run-off before its released into the river as well as how those systems will comply with Department of Water Management requirements.

- **Improve public space accessibility and balance passive and active uses**

An often overlooked aspect of public space accessibility is the community's perception of how welcoming, inviting, and inclusive the spaces are. Design decisions that may lead to public spaces that are only 'public' in name should be avoided. The development team should carefully consider how public spaces throughout the site interface with one another; the Riverfront Park with the Casino Riverwalk, the Casino Riverwalk with the existing bike and pedestrian infrastructure, and public circulation with private or programmed spaces that may restrict access. The development team should ask the question *'How would a member of the public, who is not visiting the entertainment complex, or does not live or work in the adjacent buildings, visit and benefit from the public spaces?'*

The scale of this site provides an opportunity to balance passive and active uses, and avoid over commercialization / privatization of the riverfront. One strategy for addressing these concerns would be to create additional circulation flow diagrams that consider how different users will move through each site and where active uses can give way to passive ones.

More specifically, the presentation exhibits show bike access to the new Jefferson Street, but additional clarity is needed about how a cyclist or pedestrian accessing the riverwalk from the adjacent major streets would arrive. Strategies such as bike wheeling ramps or runnels, streetside wayfinding, and other elements will be important for the user experience. Special attention from the design team and from City officials should be paid to the long term potential of this segment of the riverwalk in a city wide active recreation network. While runners and cyclists may not be primary users at the time of completion, integration into future segments will make this an important part of the city network.

- **Additional feedback regarding site design**

- Artificial light sources should be placed deliberately, and a lighting plan should be incorporated to ensure lights are on only when absolutely necessary. For indoor lighting, steps should be taken to reduce output during times of low need, and LED lights that filter out blue and white wavelengths (which wildlife are most sensitive to) should be incorporated into the lighting design. Outdoor lighting could include shades or other covers that ensure that light is only directed to required surfaces for safety and accessibility and is not cast into the sky or onto the river.

The proposed conditions for the Casino's east wall and roof leave much unrealized potential in terms of place-making, heat island reduction, air quality, and stormwater quantity/quality control. For example, the east wall could potentially support a design treatment that celebrates the Casino's unique river edge context with a living/green wall, or a mural. The task force recommends special consideration be given to such a prominent design opportunity and that the reviewing agencies collaborate with the design team and other stakeholders to think creatively about this space.

- A green roof atop the large Casino/Theater building would provide energy use reduction, stormwater filtration/collection, micro habitats for pollinators, and other benefits and should be incorporated into the design to provide compliance with the Chicago River Design Guidelines, Sustainable Development Policy, and other city requirements.
- The presentation highlighted how and where bird friendly design was being incorporated in the proposal, acknowledging the importance of the river for migrating birds. The 'forest area' includes dense, and multi-layered planting suitable for bird habitat. The team should consider expanding these strategies to other areas on the site, especially the narrower, more heavily hardscaped Casino Riverwalk.
- There are a number of existing mature trees located throughout the site. To the extent possible, those trees should be maintained and preserved with no harm during the construction process. If trees do need to be removed from site, then they should be compensated for as part of the overall site planting design. There should be no net loss of current onsite vegetation.

We acknowledge how early the Bally's Chicago team is in their site design and consideration of how the Casino development would interface with the Chicago River. The Task Force applauds them for ongoing engagement with river focused groups and their holistic approach to incorporating many aspects of the River Design Guidelines. We believe that implementing the above recommendations can be mutually beneficial for the development team, community residents, and the river itself. Along with the recommendations above, it is important for City officials not to overlook the possibility of over privatization of the river edge and long term management of privately owned public space during the approval process.

Thank you for taking the time to present to the River Ecology and Governance Task Force Development Review Working Group. We welcome the opportunity for feedback, offer our services in the future, and look forward to your responses.

Sincerely,

River Ecology Governance Task Force
Development Review Working Group