

TO: US Army Corps of Engineers
DATE: May 6, 2020
RE: Comments on the *Bubbly Creek, South Branch of the Chicago River, Illinois Integrated Ecosystem Restoration Feasibility Report and Environmental Assessment*

The Active Transportation Alliance, Metropolitan Planning Council, and South Branch Park Advisory Council are active supporters of the City of Chicago's efforts to advance *Our Great Rivers*, a unifying and forward-looking vision for all three of Chicago's rivers. Released in 2016, this vision was articulated by thousands of community stakeholders through an unprecedented input process and describes the action steps needed to make the river system more inviting, living and productive. All three of our organizations have advanced projects and policies aligned with the vision's goals and are pleased to see efforts on behalf of the City of Chicago and the US Army Corps of Engineers (USACE) to restore the vitality of Bubbly Creek.

We collectively support the recommendations of the Final Report for the Bubbly Creek Ecosystem Restoration Feasibility Study as they align closely with *Our Great Rivers* and prioritize the restoration of Bubbly Creek's instream and upland habitats in a way that minimizes environmental harm to surrounding residents and communities. More than 1.4 million people live within five miles of Bubbly Creek, and this presents a significant opportunity for residents and visitors to take advantage of new green space and recreational opportunities in and near the water. There are nearby parks, including Canal Origins and Park No. 571, which already experience a number of visitors daily. Future plans for improved community connections and additional assets like expanded trails will surely increase the number of daily visitors who can enjoy these spaces. The rehabilitation of Bubbly Creek will add to the area's social and ecological amenities, providing many advantages for both residents and wildlife.

In conducting this assessment, USACE's consideration of different alternatives and its review of the costs and benefits for each of the scenarios was appreciated. Alternative three, which was selected, is one of the more robust plans and provides for minimal disturbance of historically contaminated sediments, while simultaneously embarking on substrate restoration, removal of invasive species and riparian planting to provide more diverse and high quality habitat to support healthy plant and animal communities. Bubbly Creek does not function well ecologically and lacks native aquatic vegetation essential for fish, insect and bird habitats. Alternative three will restore the historic backwater condition and provide places for wildlife to live, allowing its structure and function to return to a more natural condition.

The Feasibility Study also calls for post-construction monitoring and maintenance for the first five years of the project. This seems prudent to ensure that the continued performance of the initial investment is supported. There is also a continued maintenance cost required by the project to be borne by the City of Chicago. It is our hope that this monetary amount can be sustained during the first 10 years leading to ecological succession and beyond. We hope that the proper structures and budgets are in place at the City of Chicago to allow for this.

Our three organizations are very supportive of the Bubbly Creek Ecosystem Feasibility Study and selection of Alternative three. We look forward to the implementation phase of this study, and hope we can provide support as it moves forward.

Sincerely,



Active Transportation Alliance



Metropolitan Planning Council



South Branch PAC