

Southeast Evanston Association (SEA) Statement on Proposed 708 Church Street Project

The Southeast Evanston Association is opposed to the current proposal for the 49-story high-rise at 708 Church Street. That opposition is based on the impact of the building on downtown at a time when new planning standards are being developed; the extensive zoning changes that are required to accommodate the building's height and scale; and the lack of public benefits associated with the project.

Planning

The 708 Church development team agrees with, and even emphasizes, the fact that its project *would change the heart of downtown*. We don't believe that a project of this magnitude should proceed independently from the current, publicly-supported downtown planning process.

If the 708 Church planning is allowed to proceed, the development team should still be required to coordinate its final concept and design with the findings of any future publicly-approved downtown plan. Given the extensive exceptions that are requested, the community has every right to expect that the development team should be willing to do so. Otherwise, the project will impose a private vision for downtown onto a community undergoing a process for developing a common vision.

Zoning

The 708 Church development team requests extensive zoning changes and allowances to accommodate this project. The existing property is to be rezoned from D2 (downtown retail core) to D3 (downtown core development): this changes zoning restrictions from 83' in height (including parking) and a maximum 4 FAR to 125' in height (including parking) and a maximum 8 FAR. The development team also requests an additional 398 feet beyond what they might gain by the re-zoning allowance, for a total of more than 500 feet in building height, and an extension to 218 dwelling units and an FAR of 15.77. In other words, the proposed project is fundamentally based on the team's desire to sell 218 dwelling units on land that was never envisioned to support such density.

The development team argues that the cost of construction determines the cost of units required to make a project profitable; that a certain level of amenities is required to justify the cost of the units; and that a certain number of units are required to support the amenities. This is almost a circular argument. We suggest that, if the site itself does not allow for development of a profitable number of units except by going far outside development allowances, then it is not appropriate for the requested use and design.

The inappropriate scale is further demonstrated by comparing existing downtown buildings and their relation to the size of their site. Based on the City's zoning files, the proposed FAR of 15.77 is *triple* that of other downtown buildings:

- Sherman Plaza has an FAR of 4.66;
- Church Street Station has an FAR of 5.03;
- Optima Views at 1720 Maple has an FAR of 5.5.

The tallest buildings would themselves be overshadowed by the proposed 523-foot structure:

- Sherman Plaza at 236',
- Optima Views at Maple at 259' and
- Park Evanston at 218'

Parking is also an issue. Although the development team is requesting far more units than zoning allows, they request an allowance for 125 fewer parking spaces than the 396 required, with the argument that the Sherman Plaza parking garage is available to handle overflow. We question the strategy of using another structure to provide parking spaces for any new development. What would be the impact on other commercial use or special event use of the Sherman Plaza garage? Why is it appropriate to share parking amenities, but not the other amenities that are the basis for requiring such density?

Traffic Concerns. In addition, the development team plans to provide only 2 long loading berths for the entire property, as opposed to 3 short loading berths for residential and 2 for retail/office use. Reduced loading spaces could have a considerable impact on city streets, if trucks have to wait outside, and relying on building operations to prevent this is not adequate. Most buildings of this type separate retail/office and residential use and we believe this development should do so as well. We also have a concern about the impact of 600 daily trips generated by the building.

Public Benefits

Finally, the extensive allowances requested by the 708 Church development team are not justified by the limited public benefits of this project. We will use the developer's own list of Public Benefits.

1. **Increase of TIF funds.** While there may be an increase in TIF funds, we question the \$25-30 million revenue figure that the developer says will accrue to the City. We believe that the funds would be much lower based on the start date and final occupancy and assessment of the building. We would encourage the City to review the actual revenues during the lengthy development and construction of Sherman Plaza. Based on the Sherman Plaza comparison, we believe that the property would not contribute to the TIF or contribute at a significantly lower rate. ANY development on this site would contribute to the TIF while it exists. We would also point out the fact that any taxes generated during the duration of the TIF cannot be used to fund City services that new residents would be using such as fire and police services.
2. **Preservation of the historic Hahn building.** While we strongly believe the Hahn building should be preserved, the truth of the matter is that it is already protected as an Evanston Landmark. When examined closely, the developer's proposed plan to rehabilitate and re-tenant the building is more of a benefit to the developer's bottom line than to Evanston. In addition to requesting a *minimum* of \$3 million in TIF funds from the City – actually decreasing the amount they claim to generate – the developer has made plans to remove existing businesses from the building during renovation and re-tenant the building at higher rents. The developer has also built a 10 percent profit for themselves into this alleged public benefit.
3. **Affordable Housing Contribution.** We do not believe that a contribution mandated by City Ordinance should be counted as a Public Benefit and certainly does not outweigh the potentially negative impacts of the building. If the developer were to increase the contribution or, better yet, provide affordable housing on site it could be considered a Public Benefit.
4. **Silver LEED Certification.** LEED certification is a laudable goal, but should not come at the expense of increasing density and radically changing the scale of downtown. It should be noted that Silver is the second lowest LEED certification available.
5. **Enhancement of the retail core.** We seriously question how the developer can claim enhancement of the retail core when the

amount of retail space will be less than half of what currently exists. The developer claims that the new residents of the building will significantly increase sales revenue to the City. However, the current businesses and their clients may contribute as much or more in sales to the downtown area during the day – when business is slower – than the approximately 300 new residents would. We would also point out that office and retail uses are taxed at a much higher rate than residential.

6. **Opportunity to Re-Develop Fountain Square.** We do not believe that this can be included as a Public Benefit. The developer has clearly stated that it is up to the City if they want to use the generated TIF funds to renovate Fountain Square. If the City decides to do this, the developer has maintained that they want to give input and possibly a “meaningful” contribution. The fact that the City has just appropriated \$400,000 in TIF funds for an initial renovation further erodes claiming this as a benefit.

7. **Architectural Quality.** We do not believe the architecture of this particular project creates a pleasing environment as stipulated in the zoning ordinance.

In summary, we do not believe that any of the stated Public Benefits rise to the standard of being substantial enough to outweigh the potential negative impacts of developing such a building.

In conclusion, apart from profitability for the developer, there appears to be little rationale for the height and scale of the proposed 708 Church development. Very few residents have voiced agreement that the design is “contextual” and “respects” the Hahn Building, or is sensitive to expressed concerns about building character, the pedestrian experience, parking, the effects of wind and shadows, and the lack of specificity on future retail tenants. We respectfully request that the Planning & Development Committee not approve the plan as currently proposed.