

To: Planning & Development Committee (Ald. Wollin, Jean-Baptiste, Wynne, Bernstein, Holmes, Moran, Tisdahl, Rainey, Hansen)

From: The Southeast Evanston Association

Date: November 24, 2008

Re: Revised Downtown Plan as Recommended by Plan Commission

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After careful review of the Revised Downtown Plan recommended by the Plan Commission, and with SEA representatives attending each of the public hearings, the Southeast Evanston Association has the following comments.

The Southeast Evanston Association continues to support the Plan in the specific areas cited in our December 19, 2007 letter to the City. These include, but are not limited to, the creation of additional open public spaces and the inclusion of sustainability building practices in the zoning code.

We are also *encouraged* by the changes in the October 2008 Plan that address some of our 2007 concerns. These included changes are:

- Requiring proposed developments to identify height in feet, not in stories.
- Keeping major streets as one-way thoroughfares.
- Limiting the *maximum* building height, including any approved bonuses, in the Core to 270 feet or approximately 25 stories. We agree that the Core can take on more height than other areas, but believe the 42-story maximum proposed in the 2007 Draft Plan was poorly conceived. We applaud the removal of the Fountain Square block as a separate zone and feel that such a move will go a long way in removing the appearance of spot-zoning a single parcel for the benefit of a single developer.
- Developing *specific* public benefits that developers must meet in order to reach maximum height: as listed in the 2008 Plan, these are measurable, significant and of lasting value to our community's economic development.

However, the Southeast Evanston Association continues to have serious concerns about the plan in four crucial areas.

- **Community and Architectural Review:** The base-height designations in the various zones are "by-right": that is, no public review of a project is required if a proposed building is at, or below, the identified height limit. However, these limits range from 3 to 15 stories. Proposed buildings may have considerable impact on downtown as well as neighbors, yet the plan is vague as to how context or architectural merit is reviewed, and how the City can address related concerns.

The Site Plan and Appearance Review Committee (SPAARC), as currently constituted, does not appear to have authority to require architectural adjustments. There has been discussion in Plan Commission meetings about changing the mission of SPAARC and giving it more authority. We strongly recommend that Plan Commission and community members participate in a more rigorous project review and critique through SPAARC or some other agency. Again, *we do not believe form-based zoning should be a substitute for public involvement in community development.*

- **Transitional Zones:** we continue to be concerned by the inconsistency in the maximum heights, with benefits, for transitional zones: the north edge (A) at 15 stories; the northwest edge (B) at 10 stories, the west edge (C) at 8 stories; the

south edge (D) at 8 stories; the east edge (E) at 10 stories; and the northeast/university edge at 8 stories. While we understand that the north and northwest edges are close to mixed-use areas, and could accommodate more height, we question the 15-story limit for the north edge. It appears that recently-approved projects have served as the model for height and density, rather than the context of the surrounding area.

*The 10-story maximum for the east edge is particularly troubling.* This zone is immediately adjacent to housing *established at 8 stories* and transitions quickly to single-family homes. It is also the zone closest to our public open space and lakeshore area, and should reflect a lower transitional height. The revised map even shows an asterisk for properties at Grove and Davis, which some commissioners recommend limiting to the traditional zone height of 3 stories (5 with benefits). Given these considerations, it's not acceptable for the east edge to accommodate a 10-story maximum.

- **Parking and Land Use:** While we believe that the proposed parking requirements for residential development are within reason, we question the lack of adequate discussion regarding parking for small business and retail development. We continue to believe that Evanston cannot operate under the assumption that residential development alone will solve the current fiscal crisis. The reality is that a *mix* of business, retail and residential uses may ultimately provide a long-lasting solution.

We believe that Evanston should find creative ways to offer incentives to business development in the downtown. Employees and customers of downtown based businesses and professionals use the parking garages, shop, and dine downtown during the day when many of the downtown residents have commuted to jobs elsewhere. We would encourage consideration of decreasing the parking requirements for new *office and professional space* and find ways to encourage employee use of existing garage parking.

- **Bonuses:** There will be ongoing pressure by developers for the Council to make exceptions to design standards for what will be presented as the greater good (i.e., more tax dollars). We believe the Council will need to be vigilant to maintain the *intent* of the Plan that focuses squarely on development bonuses for purposes, as the Plan states, of "sustainable design, high-quality urban design and other features and services that provide significant public benefits and improve the quality of life of downtown residents and visitors."

In conclusion, we feel that the Revised Draft Downtown Plan is a good start. However, much future discussion and revision is needed before such a plan, as a petition for amendment to the zoning ordinance and zoning map, is adopted by the City of Evanston. The changes made today will affect Evanston long after the final plan is approved.