

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.

We question why the City felt obligated to exclude the 708 Church Street parcels from the current moratorium on planning projects in downtown. Understanding that the developers had submitted an application prior to the moratorium, the City's legal counsel still advised that the City was not under any formal obligation to allow the application to proceed.

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 re-zoned 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 500-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 162 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?

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.

Public Benefits

Finally, the extensive allowances requested by the 708 Church development team are not justified by the limited public benefits to this project.

1. A smaller building could still provide additional tax revenue without overwhelming neighbors and downtown streets.
2. 218 new luxury condominiums cannot be considered a "diversity of housing stock."
3. LEED certification is a laudable goal, but should not come at the expense of increasing density and radically changing the scale of downtown.
4. While TIF revenue could help renovate Fountain Square, that could also happen with a smaller development. The City does not have plans for Fountain Square at this point, and the developer has stated that they will not directly contribute to the renovation.
5. The contribution of approximately \$900,000 to affordable housing is mandated by ordinance and therefore should not be considered a public benefit. Again, a smaller development could still contribute to affordable housing.
6. Any new tax revenues generated by development on this site won't be available to pay for the increased municipal service costs that may occur until after the TIF expires in 2018.

In summary, apart from profitability, there appears to be little rationale for the height and scale of the proposed 708 Church development. Very few residents agree 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 Plan Commission not approve the plan as currently proposed.