

Major Top-Level Problems with the Comprehensive Plan Draft: Update

	Problem	Problem type	Explanation	Fixed by June 2025?	Fixed by Sept 2025?	AI Notes
1	No baseline housing/ land-use trend data	CONTEXT	Plans typically baseline with facts and trends as an honest and objective starting point for analysis <i>before</i> attempt at strategies, tactics, or tools. A Plan should not backfill to support a thesis. Every EE45 draft Plan has lacked baseline analysis, most glaringly with respect to housing and land use (historically the heart of a comprehensive plan). Previous plans going back to 1917 discuss why people move to Evanston, who the buyer markets are, how they have changed and might change, what other municipalities are doing, how that relates and compares, where growth has occurred, where growth pressures are likely, attendant transportation needs, cumulative impacts both positive and negative, and similar variables. This one doesn't. Zero data on construction over time, where it has occurred, or what sub-markets have been affected. Making sweeping assertions about housing shortage and solutions, only from the supply side, and proposing drastic overhaul in the name of affordability without even presenting let alone analyzing the growth that has occurred, or assessing impact on rents and prices, makes the entire basic thrust ungrounded in fact.	Mainly NO. Economic section has some attempt.	NO	Plan adds 'Key Metrics' (p.26) but no longitudinal tables on units built/lost by type; housing chapter lacks multi-decade baseline.

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2, 7	No analysis of density pros/cons/costs; Lack of study of density impacts	CONTEXT PREMISES ANALYSIS	Data shows Evanston is already extremely dense, in top 99th or 99.5th percentile of US municipalities in people per sq. mi., among the very densest of cities under 100,000. If, as EE45 presupposes, density leads to affordability, very-dense Evanston should <i>already</i> be affordable and should have gotten <i>more so</i> as we’ve built. But testimony and evidence has been that increased density has correlated with more expensive and a decline in black population . A long body of work, going back to the important original reasons for planning and zoning, documents negative effects of crowding on families, neighboring lot-owners, and the community overall. Density is controversial because many people have lived experience with it, impact of adjacent use is immediately felt, and economic impact is uneven and inequitable.	NO. City in response to my FOIA request said it has never even studied impacts. In fact, the June draft doubled down, citing CMAP projections of up to 111,000.	NO	Vision and land-use sections promote centers/“corridors” and higher-density near transit (pp.32–46) without a balanced cost/benefit analysis; No empirical analysis of impacts on traffic, parking, services, schools, or environment beyond general goals (pp.42–46).
8	Portrays pro-density as public consensus	CONTEXT; PROCESS	This assertion didn’t appear so much in Draft 1, which simply leapt to advocacy for greater density, as in presentations. In subsequent drafts it has been made worse and worse. In reality, this was the result of a highly organized and lobbying campaign. A referendum on “no more high-rises” would probably pass and one on the effective elimination of single-family and two-family zoning would fail.	No. Made worse through unrepresentative “what we heard.” Undermined by analysis of survey data or third-party survey.	NO	Engagement summary lists mixed and conflicting sentiments (pp.13–17), but the plan text continues density-forward posture; no neutral tabulations in-chapter.

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3	Misstates housing diversity/choice	CONTEXT PREMISES	First draft suggested Evanston was a monoculture that needs to be more “diverse” in housing choices. Plan lacked data allowing comparison of what is and what has been, as well as narrative of how that occurred. Actual facts: Evanston has <i>more variety</i> of housing than most suburbs and <i>abnormally high</i> percentages of units in multi-unit buildings, <i>abnormally low % of single-family detached</i> . This resulted, according to the City’s own records, from overzoning desirable land for multi-unit. The May draft acknowledged this in passing in some places but inconsistently continues to harp throughout on needing more “options” and “choices.” In order to make housing choices <i>more</i> diverse we would need to build more SFD which is unlikely/impossible. More multi-unit and more density will make Evanston more <i>monolithic</i>, not more diverse.	PARTLY	PARTLY	Acknowledges varied stock and small units tied to NU (pp.22–25), but still frames 'need to expand choices' broadly (pp.44–46) without inventory-based gap analysis.
4	Dubious growth premise	PREMISES	First draft relied on a solitary CMAP estimate, assuming growth from a current 75,000-77,000 to over 84,000, and thesis was needing to grow to “accommodate” that. But most fits to the growth curve would conclude flat/declining population. Draft had no analysis or explain of past or future growth. Plan did not discuss that growth is a choice, let alone pros and cons.	No. NOW DELETED	N/A	No citywide population growth target; earlier CMAP growth framing appears removed in v4. 'Emerging trends' discuss scenarios instead (pp.27–28).
5	Shallow diagnosis of housing costs	PREMISES	The half page of premises and analysis on p. 89 of Draft 1 as to housing “lack of supply” was at best superficial. Lacked foundation (see ##1 and 2 above), discussion of drivers of demand, or how impactful and enduring pandemic effects might be. No mention of supply chain or construction costs, or interest rates. No mention or analysis of submarkets — no nuance.	No.	NO	Throughout, causes like interest rates, construction costs, NU-driven demand not systematically analyzed.

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6	Claims crowding → affordability/ livability	PREMISES	Analyzing drivers of costs of land, especially in a highly developed, already-dense, mature and above-average affluent (yet unequal) inner-ring suburb, that contains a major research university committed to growth, is a complex matter. Evanston's existing zoning is complex because of its already existing density, because that multiplies potential conflicts and makes more likely negative and unfair/undesired impacts on adjacent properties. Draft 1 did not address this or fairly examine how densifying what is already dense and/or desirable results in higher prices. Instead, coupled with zoning, had “solution” of ignoring conflicts and negative impacts by upzoning everything to what is nonconforming.	No. Doubled down.	NO	Narrative implies more supply via upzoning improves affordability, but lacks local price/tenure evidence; no counterfactual tests (pp.44–46, 31–33).
9	No lifecycle/ embodied carbon accounting	ANALYSIS	The greenest building is the one already built. Construction using cement, glass, and/or steel has enormous carbon footprint. Greenhouse gas (GHG) footprint of buildings in CO ₂ e, with respect to both construction and operation, increases with height. Evanston has never calculated this or tracked this for even a single development let alone cumulatively. Failure to consider embodied emissions of construction, or the smaller but impactful impacts of demolition, is self-deception and public deception. Reduction in VMT makes no sense if climate impact of construction won't be recaptured over the tenure of residents. Larger and taller buildings are the bigger culprits.	No.	NO	Climate chapter text references decarbonization and building energy (pp.30–33; metrics p.26) but no embodied carbon or demolition accounting policies.

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10	Weak displacement / gentrification analysis	ANALYSIS	Regional experience as well as that of other college towns is that increasing structure density and population density in Evanston will generally gentrify instead of increasing affordability. Existing residents expressing concern about “affordability” were primarily not talking about future newcomers but about their own ability to live and age in place. Draft #1 had no analysis of this. Draft #2 touched on some of the reasons but completely avoids what density does to land value and so continues to only say “we will study this” and assures, without evidence, that “housing choices” is a solution, which ignores transaction and other costs of moving. What is still needed is real analysis of the causes of gentrification and displacement, what type of development does or does not accelerate that, and what mitigation factors, if any, work. Many here believe that that careful downzoning keeps rents lower by throwing cold water on speculation.	No. Only symbolically.	PARTLY	Mentions gentrification as trend (p.27*) and 'prevent displacement' goal (p.31), but no causal analysis or tested mitigations.
11	Parking assumptions not evidence-based	PREMISES; ANALYSIS	The assumptions in Plan v1 were unsupported and unrealistic. Data to date indicates multi-unit construction isn't getting folks out of cars, and that after building thousands of additional units, the most common way Evanston gets to work is still to drive, alone. Some of these facts are now <i>mentioned</i> but ramifications are ignored, as if that reality will disappear on its own.	No.	Unclear/NO	Transportation goals favor mode shift (pp.30–31; 15–16) but no clear parking policy or empirical basis; no boarding/parking utilization data.
12	Jettisons existing plans (e.g., Central Street)	PROCESS ANALYSIS	Few if any residents urged throwing the carefully crafted, award-winning Central Street Master Plan under the bus, nor was there a widespread public clamor for undoing the Downtown or West Side plans, none of which are ancient history. The neighborhoods have not been been polled or consulted on redeveloping D65 schools or the Civic Center as a stacked subdivision. Evanston is a delicate ecology of many different neighborhoods that developed separately at different times and for different reasons.	No.	NO	Future Land Use Map (p.34) and corridor strategy still supersede prior small-area plans; no reconciliation section referencing CSMP/Downtown/ West Side.

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13	Stealth elimination of R1/R2 via map	PROCESS	Land use map was deceptive when it effectively converted R1 and R2 into what is now R3 or R4, and R3 into what is R4 or greater.	Yes and no, labels were addressed by deleting map entirely. But stealth aspect actually increased.	NO	Future Land Use categories aggregate 'Residential' without clear intensity guardrails; centers/corridors emphasis can up-intensify edges (pp.44–46).
14	Seniors and aging-in-place thinly treated	ANALYSIS	Similar to gentrification. Almost no discussion.	Yes and no. Now mentioned. Misses point with respect to many.	PARTLY	Goals mention senior housing and aging in place (pp.16, 31), but lacks concrete tactics (universal design, tax/fee burdens, moving costs).
15	Selective history of zoning	CONTEXT	<p>Evanston was a pioneer in zoning. The Zoning Analysis underlying the Plan appears to be template criticism of a zoning-overhaul shop ignoring the deep history in Evanston, and the myriad and complex reasons for how zoning developed here and nationally, not just in southern cities. Cherry-picking defies the weight of the historical record. Evanston zoning made town very attractive to many.</p> <p>Also, dismissing the entire existing Zoning Code because of the 1993 date of the total re-write is a logical fallacy, since the Code is constantly revised and tweaked. The “800 rules” are not that hard to understand. Only a fraction of those apply to any specific property or issue.</p>	No.	NO	History section frames inequities (pp.19–21) but omits Evanston’s pioneering zoning rationale and broader national context beyond redlining.

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16	Selective history of Evanston	CONTEXT	Plans, particularly in Evanston, whose sense of exceptionalism is a matter of documented history as well as its brand, typically have an in-depth discussion of what shaped the municipality and why, and the ramifications for both desirability and feasibility of change, with deep respect to history and residents' lived experience. Such discussion is conspicuous by omission here. The Plan lacks the sensitivity and empathy of past Plans and reads more like a party platform plank or prescription plan written by strangers, technocrats, or AI.	No.	PARTLY	Adds more history and ward descriptions (pp.35–40), yet still light on how past planning choices shaped today's desirability and constraints.
17	Mass-transit assertions lack data	PREMISES ANALYSIS	This is similar to the parking requirements issue. The Plan has virtually no data at all, let alone narrative description of system evolution and use, the recent let alone historical data on amount of service, boardings and disembarkments, and who is using what transit lines for what. The Plan has no realistic discussion or projections of future system growth, decline, or capacity. All of these are needed to inform real decisionmaking that makes reduction in personal vehicle use and reliance on mass transit key elements. Especially considering the current dire straits of mass transit in Chicago, the likely lack of support from the federal government, and a state government with its own fiscal problems, this is irresponsible	No.	NO	No boarding trends or service frequency projections; commute mode share noted (p.24), but policy rests on hoped-for improvements (pp.15–16, 30–31).

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18	No tabulation of engagement data	PROCESS ANALYSIS	The failure to include real tabulation of raw data demonstrates (a) why the release of the Plan was grossly premature and (b) that the data didn't really matter.	Partial.	PARTLY. Bar charts use odd format for percentages; demographic categories blurred because respondents could choose more than one	Provides counts and some demographics for surveys and events (pp.4-12), but no release of raw tabulations or crosstabs inside the plan.
19	No fiscal scenarios	PREMISES ANALYSIS	The flow of free money from the Biden Administration is over. The federal government will be hostile to a sanctuary city in a blue state. Evanston has announced that it has a structural deficit. The capacity of the City to raise taxes has to be account for the likelihood that District 65 may also continue to raise taxes. The rosy pictures of the Plan all need to be squared against fiscal reality. At least possible different scenarios need to be discussed. However, none of this exists in the first draft.	No.	NO	No discussion of structural deficit, debt capacity, or school tax interplay; Implementation chapter preview lacks scenario modeling (pp.2-3 mention only cadence).

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20	Process fairness/skew problems	PROCESS	<p>Multiple procedural problems affecting content and fairness were laid out in my January memo. It is undeniable that this has been a unique and different planning process for Evanston. The mayor's messaging stresses collaboration, but there is consistent skew in every aspect from initial input to outreach to data collection to data release through narrative and rollout. It is exhausting to residents and a reason why this has become so contentious.</p> <p>I cautioned in January that any new draft absolutely must not be "a brief that simply doubles down on previous product only with more ammunition, but must meaningfully show attention to the considerable resident input (and even outrage)." However, subsequent drafts doubled down by up-fronting density and all its codewords even more.</p>	Not really.	Unclear as to sme / No	PDF shows color-tracked edits by bodies (p.1) and long engagement list (pp.4–12), but fairness claims require external evidence; not resolvable from text alone.

A consensus Plan is still possible but requires additional public process providing meaningful opportunity for review and input, as well as for complete and thorough vetting by the Plan Commission successor, the LUC. To aid in its development, the LUC should both convene the committees it contemplated in early 2022, and commission a resident advisory committee directed to hold public sessions and work on the plan in collaboration with staff and with periodic report to the LUC. That would free staff to collect the data to which staff has far better access than residents, while allowing for real input from a resident population that is far more conversant with Evanston history and neighborhood detail.

Within the community is sufficient expertise to develop a reviewable Plan draft, working off the structure though not necessarily the content, for revision as directed by the LUC and then forwarding to the Council. Note that particular Code sections have ever been identified as deficient, simply a blanket assertion that it's "too hard to understand," so an entire zoning code rewrite is likely unwarranted.

Jeff Smith
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