## Naperville Area Homeowners Confederation

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City of Naperville 400 S. Eagle St. Naperville, IL 60540

RE: Comments on Naperville Downtown2030 Plan

Dear Mayor, City Council Members and Members of the Downtown Advisory Commission:

Thank you for the opportunity to provide comments on the draft Naperville Downtown2030 plan. This represents the Naperville Area Homeowners Confederation's Board of Directors second submission of comments on the plan, and the comments below should also be read in the context of our earlier comments, which are also attached.

We recognize that the Downtown Advisory Commission (DAC) and the TED Business Group staff members have made some significant revisions in the current version of the plan compared to earlier versions. We are supportive of the new spotlight sections on Downtown Residents (including the better defined map) and Pedestrian Safety Adjacent to School Facilities, although we continue to be concerned the potential impact of development in the North Downtown Special Study Area on adjacent residential uses and Washington Jr. High School. One area we are particularly concerned about in the spotlight statement on the school facilities (page 61) is language that indicates "... the following policy is recommended: Development and redevelopment proposals should not adversely impact pedestrian connections, routes, and environments, particularly as they relate to schools, parks and similar destinations". We believe the plan's language should stand on its own following its ultimate approval by City Council and it should also address vehicular transportation, with the current language eliminated as a recommendation in favor the affirmative statement (as amended to also include vehicular transportation).

Additionally, the language under the Naper School discussion on page 61 about home occupations should be omitted. This is not a unique feature of that area since it is allowed in any residentially zoned area.

While we noted some additions to Section 4.6, Development impacts on the transportation network, we continue to believe that re-development needs to be carefully managed because the downtown cannot

handle the additional traffic that unlimited re-development will bring. In this regard, this section should be strengthened to: a) recognize the current significant transportation challenges existing in the downtown, particularly along the Washington St. thoroughfare and b) increase the emphasis on the need for development/redevelopment proposals that <u>minimize</u> or even reduce the impact on existing overloaded transportation networks.

There is little flexibility to increase vehicular traffic in the downtown; therefore this is a limiting factor on further development. Specifically, the inclusion of a large anchor tenant within the Special Study Area, as discussed in the plan, is likely to result in traffic movement at unmanageable levels. This is exemplified by the plan's inclusion of language about an additional traffic light on Washington St. (page 60). An additional concern about the plan's inclusion of a reference to an additional light on Washington St. is that the plan's purpose should not be to discuss potential traffic solutions, but instead to identify areas that property owners are expected to address in their development/redevelopment proposals. Similarly, the Vision section of the Transportation chapter should be amended to specifically reference challenges associated with moving vehicular traffic through the downtown and the need to minimize further congestion from development/redevelopment proposals.

The plan's allowable building heights continue to be a concern. For the Special Study Area, while we recognize that heights are stepped down from Franklin Ave. north to Douglas Ave. along Washington St., the intensity of development that can occur with 50 or 60 feet, compared to the original 43' proposed in the 5<sup>th</sup> Avenue Study will necessarily also bring a higher level of vehicular uses into an area which is already at gridlock during certain parts of the day. We continue to believe the 43' heights originally proposed are more appropriate for this area, including for the existing multi-family properties located along Douglas, Franklin and Webster.

Additionally, we note that the page 41 reference to additional discussion on height on page 33 seems to be in error, as there is no additional discussion of height in the PUD spotlight, and that the FAR discussion on page 40 is only extended to the downtown core and secondary downtown, without specifically applying it to the Special Study Area. We continue to believe FAR (Floor Area Ratio) should also be applied in the Special Study Area and hope that this exclusion is an inadvertent error. Finally, as the plan is discussed further by both DAC and City Council, we expect that the relationship between traffic, parking, pedestrian safety and height/density of development in the proposed special study area must be specifically debated to arrive at a consensus view of the difficult tradeoffs inherent in balancing development density against the additional traffic it brings.

The plan's discussion of sidewalk widths in the downtown (page 50) utilizes the minimum 5' width required throughout the City. Rather than sanction the minimum allowed width, we recommend that an 8 or 10' minimum be established, unless something narrower is currently in place in the immediately surrounding commercial areas which would make wider sidewalks inappropriate. We do favor the language that states desired widths of up to 12' be accommodated when possible.

Finally, page 25 which lists Opportunity Sites includes the Nichols Library as one such site, presumably because of the currently tabled parking garage proposal. It would enhance user transparency of the

plan if the addresses and current uses of the various opportunity sites were included as a plan appendix, along with a general description of why the property is considered to be an opportunity site and what possible alternative uses are envisioned. While we are specifically concerned about the library site because of the effect of a parking deck at this location on the surrounding residential neighborhood, we believe this level of transparency is necessary for <u>any</u> property listed as an opportunity site and therefore a list in an appendix is warranted.

Thank you again for the opportunity to provide comments on this plan. The plan has many positive aspects, which, together with consideration of the additional points raised in these comments, will make the plan a valuable resource to Naperville residents and property owners, current or future.

Sincerely (and on behalf of the NAHC Board),

Dr. Bob Buckman President

Attachment: Comments on earlier version of the plan