



April 15, 2022

Allison Laff, AICP
Deputy Director
Planning & Development – TED Business Group
City of Naperville
400 S. Eagle Street
Naperville, Illinois 60540

Re: Voluntary Affordable Housing Program

Dear Ms. Laff:

The Naperville Park District is in receipt of information regarding a proposed Voluntary Affordable Housing Program that will be presented to the Planning and Zoning Commission later this month. While the Park District is supportive wholeheartedly of inclusion initiatives, we have reservations about the proposal to automatically grant, as of right, reductions in impact fees for parks (aka land-cash fees) as incentives, especially as any such discount on providing recreational space will be compounded by the increased density such a program will bring.

We propose a different approach. We suggest extending the tailored, case-by-case manner in which the Park District and City have worked together previously with developers to address park donation reductions for assisted living facilities, memory care facilities, and senior housing. The Park District and City recognized that a reduction for those residential developments may be appropriate due to the nature of the park and recreational services those residents would require, the recreational and open space facilities within those developments that served those residents' unique needs, and the consequential decrease in the impact those new residents would have on existing services and amenities. The goal was to preserve or enhance the standard of quality of life for both the residents of the development and the community at large by tailoring the discount to fit the specific circumstances and location. By all accounts, it has been very successful in achieving the intended goal.

With respect to dedicated affordable housing within residential development, we must recognize that the residents will exist across all age groups and that they will hopefully enjoy all the services and amenities of the Park District. In fact, families who need affordable housing are more likely to require park district services and need access to low-cost or no-cost amenities as limited discretionary income would impede them from joining private fitness and club sports teams. In other words, they will bring a full impact to park and recreation services and facilities. Nevertheless, incentivizing affordable housing is part of enhancing the overall quality of life for the community. How we balance absorbing the impact of these new residents with enhancing the community's quality of life through more affordable housing should not be resolved by a one-size-fits-all approach—especially as much of the residential redevelopment going forward will be in-fill or the overhaul of existing developments. We need to be thoughtful and nuanced in our approach to each new development.

The tailored, case-by-case basis of evaluation has worked well. For example, with respect to housing for seniors where overall cost of the units was a concern, the Park District and developer worked together to find an affordable contribution of in-kind improvements (in that case, improved pedestrian connections and paths) that served the mission of the Park District and fulfilled the goal of the City's ordinance concerning impacts. Had there been a program where the developer simply received a cash discount, the residents and the community would not have received the improved pathway system that benefits us all.



Naperville Park District™

Promoting healthy lives, minds and community

Naperville ranks as one of the best places to live in the country – parks and open space are a major contributing factor. The Naperville Park District performs Community Interest and Opinion Surveys every three to five years. Results with each survey show consistently Naperville residents place high value in and expect high quality services of its parks and recreation offerings. We would like to serve future residents so they have the same expectations, which will be harder to reach if the Land Cash Dedication Ordinance allows for automatic reductions without any consideration of the specific needs of the residents in the development, their neighbors, or the community.

We would be happy to assist the City with the drafting of the revisions to the City's Ordinances so that both the incentives and the process are clear. We suggest language similar to the "Credit for Private Open Spaces and Recreation Areas" provisions found at paragraph 1.3 of Section 7-3-5 of the Code of Ordinances with a paragraph similar to 4.4 or 4.5 of the same section that is devoted to affordable housing. The "Credit" provided would be for meeting the affordable housing goals and the appeal processes would be the same.

We are available for any questions and look forward to working together to ensure we're building an inclusive community that has access to world class parks and recreation.

Sincerely,

Brad Wilson
Executive Director

Cc: Naperville Park District Board of Commissioners
Derke Price, Legal Counsel
Doug Krieger, City Manager