

## **Exhibit B**

Pursuant to the enclosed Petition for Zoning Variance, petitioner, Napleton Investment Partnership, L.P., an Illinois limited liability partnership, is requesting a parking variance from the City of Naperville Zoning Ordinance (the "Title") to allow for a new restaurant tenant at the Tower Crossing Shopping Center ("Center"). In response to Exhibit B of the Petition for Zoning Variance Standards, petitioner states the following:

- 1) The variance is in harmony with the general purpose and intent of the Title and adopted comprehensive master plan. As many of the residents in the City of Naperville are aware, the Center underwent a significant remodel a few years back. That remodel has opened a renewed interest in the Center by several potential tenants, one of which is a sit-down restaurant. In order to welcome new business at the Center and to continue to support Naperville's strong economic environment, this variance is required. Also, the exterior layout and building footprint at the Center will not change and therefore the master plan is not affected.
- 2) Strict enforcement of the Title would result in practical difficulties or impose exceptional hardships due to special and unusual conditions which are not generally found on other properties in the same zoning district. The Property is a vibrant, multi-tenant shopping center in a prime location of the city. To not allow the variance will keep multiple suites of the Property vacant thereby harming the economic health of the city and financial stability of the owner. Leaving spaces at the Tower Crossing Shopping Center vacant is doing a disservice to all residents of the city that frequent the Center.
- 3) The variance, if granted, will not alter the essential character of the neighborhood and will not be a substantial detriment to the adjacent property. According to the Gewalt Hamilton Associates, Inc. Traffic and Parking Analysis dated May 30, 2023 (a copy of which is attached hereto for reference), the amount of site-generated traffic is expected to have minimal effects on the operations of the external street network and the anticipated peak parking demand is expected to be accommodated within the available parking supply. Also, the other sit-down restaurant at the Center, Honey-Jam Café, is open until mid-afternoon every day, while this new restaurant will not open until 11am so the traffic and parking from both restaurants will only overlap for a few hours each day. A new restaurant will bring excitement to the neighborhood and an additional meeting spot for families, businesses and visitors.