

Public Comment for the December 15, 2021 PZC Meeting regarding the Land Use Master Plan (File# [21-1606](#))

Enclosed are my comments on the August 3, 2021 Draft of the Land Use Master Plan that is on the agenda for the December 15, 2021 Naperville Planning and Zoning Meeting.

The document is generally an improvement over the March 4, 2020 Draft. However, edits and content changes were not made consistently throughout the plan which diminishes its usefulness clarity. These can and should be easily fixed. More serious omissions are:

1. There is a new section concerning city-initiated rezoning for additional density. This section though should apply to developer requested variances for additional density as well. Effectively rezoning by variance is a far more common occurrence than city-initiated rezoning.
2. Missing under the topic of “Sustainability Trends & Best Practices” is the strategy of adaptive reuse.
3. The “Application of the Place Types” largely overlook topics of common space, park space, open space, pedestrian safety, walkability and bikeability.
4. Additional supporting uses were appropriately included in the initial table describing Place Types, but were overlooked in subsequent discussions of supporting uses.
5. The [“Summary of Changes Based on Direction Provided by City Council in January 2021”](#) claims updates were made to the Existing Land Use Map to “distinguish public and private open space”. However, this was not done. Furthermore, existing City owned open space is under the control of the City and has more public options to be preserved than existing privately owned open space.
6. Guiding Principle # 1 in Implementation mischaracterizes the NEST and omits other strategies to ensure a high standard of livability for residents such as encouraging adaptive reuse and pedestrian oriented design.

By page, my specific comments follow.

Preamble:

2nd to last paragraph: The plan was returned to the PZC in December of 2021, not “in the September of 2021”.

Chapter 1 - Introduction:

Page 9, Plan Organization: The Plan Organization does not match the actual document:

- There are six chapters, not five.
- Chapter 4 is actually titled “Land Use Plan”, not “Future Land Use”
- Chapter 5 is actually titled “Application of the Place Types”, not “Place Types In Actions”
- The 6th Chapter on “Implementation” is missing and should be included.

Page 11, 2nd paragraph: This statement was a welcome inclusion to the plan:

“While the guiding principles and best practices outlined in the Land Use Master Plan should be a component of this review, consideration will also be given to community input, the context of the site, natural resources, community character, and other priorities for the City of Naperville.”

Chapter 2 - Community Snapshot:

Page 18 & 19: The [“Summary of Changes Based on Direction Provided by City Council in January 2021”](#) claims updates were made to the Existing Land Use Map to “distinguish public and private open space”. However, this was not done. For example, cemeteries, golf courses, and private parks are shown to be in the same as color as before and the description on page 18 is the same, i.e. “Parks & Open Space - consists of parks, open spaces, forest preserves, and natural areas. Public and private golf courses and cemeteries are included within this designation based upon their use and function.” The existing land use map should distinguish private and public open space and the description updated.

Page 19: The inclusion of Historic District on the map is a welcome addition to the plan.

Chapter 3 - Vision and Guiding Principles:

Page 27, Guiding Principle #1: The 7th bullet item on preservation of neighborhood character and natural areas under Implementation Measures is a welcome addition to the plan.

Page 30, Guiding Principle #4: The references to green spaces and the Historic District in the 1st paragraph are welcome additions. However, to be consistent with the rest of the document, please change the “Naperville Preservation District” to the “Naperville Local Historic District”. The last four bullet items under Implementation Measures relating to preservation of the natural landscape, screening, gather space, impervious areas, and sustainability are welcome additions to the plan.

Page 31, Guiding Principle #5: The last bullet item relating to consulting with the Naperville Environmental Task Force (NEST), Senior Task Force, Accessible Community Task Force, and Advisory Commission on Disabilities regarding land use is a welcome addition to the plan.

Chapter 4 - Land Use Plan:

Page 34: The last sentence, “Details regarding each place type are provided on Page 37, following the Future Land Use Map”, doesn’t make sense. Perhaps what was meant was “Details regarding each place type are provided following the Future Land Use Map on page 37”.

Page 34: The 1st goal on page 8 states the plan excludes land use planning for “Downtown, 5th Avenue, and the North Central College campus”. Yet, page 34 lists the downtown as one of the 7 place types with the inference that it will be further discussed. It would be less confusing and more proper to:

- Change the number of place types from 7 to 6.
- Eliminate the downtown as a place type.
- Add a final sentence reminding the reader that though unique and shown on the map, that the Downtown, 5th Avenue area, and the North Central College campus are covered by other plans.

Page 35, 1st sentence: The the number of “additional designations” is misstated. There are three, not two, i.e. “Parks & Open Space”, “Institutional”, and the “Naperville Local Historic District”.

Page 35, 2nd paragraph under “Parks & Open Space”: The addition of this paragraph distinguishing private parks, golf courses and country clubs from public open space is welcome. However, City owned open space such as portions of the Riverwalk, Central Park, Burlington Square Park, and the R. Ory Community Garden Plots are leased to the Naperville Park District. While it is true that the City has no obligation to maintain the Riverwalk, for example, as open space, the City should be more willing to maintain such leased properties as open space than say a private developer who wishes to redevelop the Naperville Country Club. A statement clarifying the distinction between City and Private property in terms of redevelopment should be made.

Page 36: The section on the Naperville Local Historic District is a welcome addition to this plan.

Page 37: Please check the municipal boundaries for both incorporated and unincorporated Naperville. For example, according to the DuPage County Parcel Viewer, PIN 0434308005 at 2255 Monarch Drive is incorporated into Warrenville. Some other examples that may seem off are some properties around Ridge Rd in Lisle and east of the DuPage River in Wheatland Township.

Page 38: The 1st column is titled “Place Type & Other Designations” and yet the Naperville Historic District is not mentioned even though it referred to under “Other Designations” on page 35. The “Downtown” is mentioned, although it is not covered by this plan, nor is the 5th Ave or North Central College area. “Institutional”, and “Parks & Open Space” are mentioned though the text is largely repetitive to what is said on page 35 and 36. It would be less confusing and more proper to:

- Change the 1st column to simply be “Place Type”.
- Eliminate the rows for “Downtown”, “Institutional”, and “Parks & Open Space”.

Page 39: The inclusion of Parks & Open Space to the supporting uses for all place types is a welcome addition to the plan. The inclusion of ADUs, Schools and Home-based businesses as options where appropriate are welcome as well.

Page 40 - 43: “Parks & Open Space” needs to be added as a supporting use for Residential Neighborhoods in both the description under “Land Use” and in the list of “Supporting Uses”. It should be mentioned under “Planning Context” and “Key Considerations for all Residential Neighborhoods” as well. This will make the discussion consistent with the intent of the table on page 39.

Page 44: The notions that “New development is expected to include inviting community gathering spaces, as well as preserve natural areas” and that “Density can also be used as a tool to preserve natural areas and promote walkability while still accommodating market demand for additional housing” are welcome additions to the plan.

Page 44 & 45: The heading on page 44 is limited to “Rezoning for Additional Density” and text of the 1st paragraph is limited to “City-initiated” rezonings. All of the points raised on these pages need to be applied when granting variances to achieve additional density as requested by developers. It would be more proper to:

- Change the heading on page 44 to be “Additional Density through Variance or Rezoning”
- Reword the 1st paragraph on page 44 to state:
“The Land Use Master Plan does not recommend any City-initiated rezonings. However, adopting guidelines that promote a mix of housing types and allow increased densities will ensure the City can accommodate a range of housing options with varying levels of affordability to respond to changing market preferences.”
- Change the 1st sentence of the 3rd paragraph to read:
“While this plan does not recommend any changes to the future land use designation of existing residential neighborhoods, requests for rezoning and variances may still be made by property owners or developers.”
- Change the heading on page 45 to “Rezoning and Variance Considerations”
- Change the 1st sentence on page 45 to read:
“Rezoning and variances for increased density is most appropriate in the following locations, subject to the compatibility, context, fit, and impact considerations detailed in this chapter:”

Page 47 - 62: To be consistent with the table on page 39, “Parks & Open Space” needs to be added as a supporting use for Neighborhood Centers, City Corridors, Regional Centers, and Employment Centers in the sections on “Character Description”, “Land Use”, and “Planning Context”.

Chapter 5 - Application of the Place Types

Page 66: A discussion of supporting uses such as “Parks & Open Space” and “Home-Based Businesses” for Residential Neighborhoods needs to be added to be consistent with the intent of the table on page 39 and to be consistent with the mention of supporting uses for the other places types discussed in Chapter 5.

Page 67: Considerations for sufficient common areas, park space, and open space should be added to the expectations for redevelopment at Spring Avenue.

Page 69, Neighborhood Center Summary: To be consistent with the table on page 39, “Parks & Open Space” needs to be added list of supporting uses.

Page 70: Considerations for sufficient common area, parkspace, and open space should be added to the expectations for development at Plank Road & Naper Boulevard. That area is particularly devoid of Neighborhood Park parks.

Page 72, City Corridor Summary: To be consistent with the table on page 39, “Parks & Open Space” needs to be added list of supporting uses.

Page 73: Pedestrian safety, walkability and bikeability are key considerations for and around the 75th Street & Wehrli Road development.

Page 74 & 76: To be consistent with the table on page 39, “Parks & Open Space” needs to be added list of supporting uses for Urban Centers and Regional Centers.

Chapter 6 - Implementation

Page 80, Guiding Principle #1: The 4th bullet that references to the Naperville Environment and Sustainability Task Force (NEST) is a welcome addition to the plan. However:

- NEST was not “recognized by the City Council in 2019 with a mission to create and maintain the most resilient, livable, economically, socially and environmentally thriving community possible.” Instead, their

[5/21/2019 report to City Council](#) states their mission as:

“The Naperville Environment & Sustainability Task Force was established to assist, inform, and advice administrative and elected officials of the City in identifying and prioritizing sustainability initiatives for the community in order to ensure a high standard of livability, achieve sustainable management of natural resources, and maintain economic prosperity.”

- NEST’s “[Sustainable Naperville 2036](#)” [report released on 08/09/2021](#) is primarily focused on “recommended objectives and strategic actions to strategically reduce greenhouse gas (GHG) emission pollution to help achieve global targets”.
- The grammar does not fit with the other previous bullet items.
- Other strategies to “ensure housing is diverse, responsive to community needs, and accessible to everybody” such as encouraging adaptive reuse and pedestrian oriented design are neglected.

Thus, it would be more accurate and appropriate to split this 4th bullet item into two items that state:

- Recommendations from the Naperville Environment and Sustainability Task Force (NEST) that impact land use and have been endorsed by City Council.
- Techniques used in the case studies under “Trends & Best Practices” cited in the Appendix that ensure a high standard of livability for all residents such as encouraging adaptive reuse, areas for self-sustaining community gardens, and pedestrian oriented design.

Page 80, Guiding Principle #3: Please adjust the spacing so that the entire 4th bullet fits onto page 80.

Page 81, Guiding Principle #4: The addition of the last 4 bullet items relating to landscaping/trees, preservation of the natural landscape, and encouraging the creation of gather spaces, accessible recreation, and natural areas are welcome additions to the plan.

Page 81, Guiding Principle #5: The addition of the last bullet item relating discussions with the Naperville Environmental Task Force, Senior Task Force, Accessible Community Task Force, and Advisory Commission on Disabilities is a welcome addition to the plan. The bullet could be expanded to include future City Council endorsed task forces, commissions, and committees.

Appendix

Page 92: The inclusion of the Chicago Tree Initiative is a welcome addition to the plan. Missing though under the topic of “Sustainability Trends & Best Practices” is the strategy of Adaptive Reuse. Not only is adaptive reuse environmentally sound and cost effective, but its deployment helps maintain neighborhood character. Several of the “Housing Trends & Best Practices” case studies are great examples of adaptive reuse. Adaptive reuse was also mentioned on page 28 under guiding principle #2, page 30 under guiding principle #4, and under key considerations on page 55. But, it is not referenced at all in Chapter 6 under implementation or called out in the Appendix. Under “Sustainability Trends & Best Practices”, a discussion of the advantages of adaptive reuse is exceptionally warranted. A great current project to add under “Sustainability Trends & Best Practices” is [Cristo Rey St. Martin College Prep](#). It won a 2021 Landmarks Illinois Richard H. Driehaus Foundation Preservation Award for adaptive reuse of a vacant Kmart store (a non-historic building) and the project symbolized “an expanded definition of preservation where no building is overlooked for its reuse potential and where inclusion, equity and environmental sustainability are prioritized”. For some articles and other examples as to why adaptive reuse is such a great sustainability trend, please see:

- [Climate Action through Design](#): The Adaptive Reuse Revolution for an article that discusses reuse strategies.
- Studio GWA in Rockford has a great article called [Adaptive Reuse: Rooted in Sustainability, many projects repurposing old buildings including the Garrison School Lofts in Rockford, Company 251 in Aurora, and The Standard in Rockford.](#) (They also understand [Historic Tax Credits.](#))
- The Preservation Leadership Forum has a plethora of articles on [Preservation & Sustainability.](#)

Thank you for your consideration,

Marilyn L. Schweitzer
Naperville Resident