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Meagan Jones
Community Development Department
Planning & Zoning Division
2100 Ridge Avenue
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**RE: Planned Development & Text Amendment Applications
Ryan Field – 1501 Central Street
Written Response to Comments Made at the September 27 Land Use Commission**

Dear Ms. Jones,

In preparation for the October 11, 2023 Land Use Commission hearing, the Northwestern University project team would like to provide written responses to certain comments that were made by members of the public at the September 27, 2023 hearing. Additional information or follow-up can be provided at the October 11 Land Use Commission meeting.

As an initial matter, there seems to be significant confusion about the proposed text amendment and inaccurate information about what is currently permitted. As previously stated, Northwestern is amenable to making modifications to the text amendment, as previously outlined and set forth below, if the Commission desires to include such changes as a condition of approval.

The U2 District *currently* permits “University-sponsored lectures, speakers, musical performances and other cultural events held within an enclosed building provided that attendance is limited to ten thousand (10,000) or less.” The University is not proposing any changes to this existing permitted use.

The proposed text amendment to allow up to 60 days of outdoor programming is intended to allow the University and City to utilize the outdoor plaza spaces for community events. Such events would be limited to 60 *days* total – not 60 events. For example, if there is a two-week winter market, that would account for 14 of those days and, logically, every day of that two-week period would not be at capacity. Additionally, the reference to amplified music for events in the plaza requires a City permit – similar to amplified sound at any other event in the City. The plazas would not be available for rental by other third parties unless approved by the City’s Special Events Committee – again, similar to special events throughout Evanston. This is not only stated expressly in the section authorizing outdoor events on the plaza (“Such events shall not include any outdoor plaza rentals to organizations not affiliated with the University or City.”) but also in the final sentence of the text amendment (“Any uses not outlined herein shall require approval by



Page 2

the City's Special Events Committee.") If the Commission has suggestions for how to better frame the wording about community programming, we are open to discussing those ideas.

Finally, there is no intent to exceed the capacities that have been outlined throughout the public process. To the extent the Land Use Commission would like to change the concert capacity to 28,500 to confirm that maximum capacity, Northwestern would agree to that change, along with the three previously outlined changes in the September 19 written response.

The following are Northwestern's responses to certain other comments and questions received. The team will be available on October 11 to address any others that the Commissioners may have.

Comment: Northwestern is trying to "profit" from holding concerts and create a "for profit entertainment district."

Response: These statements are inaccurate. The new stadium represents a significant investment by Northwestern and the requested text amendment simply allows Northwestern to utilize it for a small number of additional events each year to support operating and capital costs. The revenue generated by events will ultimately be used to promote NU's educational purposes. There will be no revenue or profits distributed to Trustees, University contributors or other individuals. This is similar to numerous other examples of the University generating revenue to support its educational purposes, such as sales of merchandise and food at events, charging parking fees, and charging for other on-campus events, including athletic events.

Additionally, no other venues, hotels, bars or other development are being proposed by Northwestern, clearly distinguishing it from an "entertainment district".

Question: Has Northwestern reached out to the CTA and Metra? Do they have capacity to serve the proposed six additional concerts when there are only 4trains per hour?

Response: Yes, Northwestern has met with the CTA and received the enclosed letter confirming they are committed to working with the University and its consultants to explore operational changes to increase capacity for events at Ryan Field, similar to how they expand service for events at other venues. Specifically, the CTA could stage additional trains at the Linden station, leveraging its train yard to introduce additional trains and provide increased frequency of service for events compared to regular service, while targeting 5 to 6-minute headways (10-12 trains/hour), which is clearly more than 4 trains per hour. Similar discussions have occurred with Metra.

Comment: The proposed stadium and increased traffic will reduce nearby home values.

Response: The CohnReznick Report ("Report") cites three research studies supporting the negative impact of traffic on home values. Those studies rely on sample sizes of 362, 42,083 and 292 homes. This underscores the statistical inadequacy of the same Report's sample size of 41 homes adjacent to Forest Hills.

While there is literature on the impact of high traffic levels on single family home values that



supports the conclusion that there is a negative correlation, those studies are not relevant here for the following reasons:

- These studies only consider areas with sustained high traffic and contrast them with areas where traffic levels are consistently and substantially lower.
- They do not attempt to evaluate areas where the uptick in traffic is infrequent and of short duration which describes this proposal, which is limited to six times per year over the space of a few hours. Furthermore, data from the Illinois Department of Transportation indicate that the subject neighborhood is not a high traffic area.
- The IDOT annual average daily traffic count map for 2022 shows that Central Street east of Green Bay Road carries only 3,250 cars – and this is by far the busiest street bounding the site. A portion of Isabella carries 1,300 cars and the other streets have counts too low to be reported. By way of contrast, Central Street west of Green Bay carries 8,500 cars and the busy areas of Evanston have daily traffic counts exceeding 15,000 cars.

As previously outlined in the Linberger & Company response to the CohnReznick report, the analysis fails to address the relevant standard and, indeed, it is Ms. Linberger's opinion that there is no valid way to statistically forecast the likely value impact on surrounding homes of adding six concerts to the existing programming at Ryan Field. However, as a beginning point, it appears that, despite a long history of large public events at Ryan Field, the nearby homes still sell for premium prices. For example, in reviewing the past 12 months, Ms. Linberger observed the following:

- Over the past 12 months, 24 single family homes have sold within 1,000 feet of the perimeter of the athletic complex. Sixteen were in Evanston and the balance were in Wilmette.
- Eight of them had five bedrooms and the balance were three- and four-bedroom homes. Most were at least 90 years old.
- The median sales price was \$914,000, which was about four percent over the median asking price.
- Eleven homes sold for \$1,000,000 or more and the highest priced home commanded \$1,910,000. Only three homes sold for less than \$725,000.

The proposed concerts would be similar to the existing football games in that they would draw large crowds, create traffic, generate transmissible sound and last for a few hours on six occasions per year. One can always argue that any new development or change in a neighborhood will serve to depress property values, but in Ms. Linberger's experience such concerns are most often alarmist.

Comment: The proposed low frequency sound will cause cardiovascular disease, respiratory impairment and aural pain, psychological responses and other health problems.

Response: These physical responses are the result of long-term, sustained exposure to low



Page 4

frequency sound over a number of years, not the short-term, infrequent exposure that would accompany a mere six concerts per year.

The atmosphere of a concert is exciting, bringing people together. The sound levels generated by the concerts are not dissimilar from the “Evanston Events” highlighted as community assets by Ms. McCarthy at the last Land Use Commission meeting – which included several other concerts, festivals and parades. Indeed, people voluntarily and frequently attend these noise-generating events without the alleged health problems.

Comment: Why are there no complete transportation management, concert operations, construction waste management or truck traffic routing plans at this time? Will there be a peer review of Northwestern’s geotechnical report?

Response: The geotechnical report has been submitted to the City and has been subject to its typical staff review. Northwestern will continue to respond to all comments received from staff and will be subject to ongoing reviews during the permitting process.

With respect to the other items, these operational plans and truck routes will be developed, discussed with City staff and other stakeholders and approved prior to holding the first event at the stadium. This is typical and common practice during zoning approvals – including, most recently, the District 65 expansion approvals in Evanston and similar assembly/institutional uses throughout the Chicagoland area, including Wrigley Field, Navy Pier, the Salt Shed, Union Station and Lurie Children’s Hospital.

Additionally, Northwestern is committed to going a step further with these plans. As outlined in the previously-submitted Letter of Intent, Northwestern is committed to entering into a Memorandum of Understanding with the City that requires all of these plans to be submitted to staff and subject to continued and ongoing updates and community review to address changing circumstances.

Many elements of the transportation management plan will be similar to the operational logistics currently employed for football games at Ryan Field, including manual control of intersections/traffic signals by police and traffic control personnel; parking restrictions along Central Street and other locations to provide additional capacity, drop-off/pick-up activity, flexibility at intersections, and room for cars to pull over and yield to approaching emergency response vehicles; temporary conversion of certain streets (e.g., Ashland Avenue) to one-way to facilitate shuttle access/loading/staging, organize parking lot access lanes, and restrict access to parking from other streets (such as Isabella Street). Examples of some plan elements that will differ from the current football game logistics include signage and controls at each side street to restrict event parking access to and within the surrounding neighborhoods, expanded shuttle loading zones along Ashland Avenue (approximately 1,300 feet of frontage is available between Central Street and Isabella Street, accommodating up to 52 buses at once using a staggered loading configuration in two lanes), variable message sign boards installed on approach routes to better direct traffic to parking options, and improved Uber/taxi pick-up at multiple locations.

Comment: Access to North Shore Hospital will be impaired by the proposed additional events.



Response: Enclosed is a summary of Northwestern's current operations for large events on the athletics campus, including its unified command operations center. Further, it is our understanding that the unfortunate situation regarding the ambulance that could not access the Hospital occurred in 1997, which is before Northwestern had this unified command in place.

From observations conducted by Kimley Horn during football pre-game and post-game periods, ambulances and emergency response vehicles have been observed traveling down Central Street with little issue. Two key elements of the plan help to facilitate this. First, on-street parking is restricted along Central Street before, during, and after games. This helps to provide room for cars to pull over and yield right-of-way to approaching emergency response vehicles. Second, police controlling intersections along Central Street are able to keep traffic moving through the intersection in the direction of the emergency response vehicle, keep pedestrians at the corners, and communicate with officers at downstream intersections to let them know such a vehicle is approaching. During events themselves, traffic conditions along Central Street exhibit little event-related traffic and have not been observed to cause disruption to emergency response access.

Emergency response access is important for North Shore Hospital. However, the hospital's offer to use up to 700 parking spaces in its garages for concert events suggests that event traffic conditions have generally not caused a significant impact on emergency access for past larger-attendance events.

Comment: There have been comments that the City's economic impact study only indicates \$200,000 in additional revenue from the proposed stadium rebuild and six concerts. Additionally, several individuals have mentioned that Northwestern has not released the details of the Tripp Umbach study.

Response: Northwestern has posted its economic impact study and all supporting materials. Additionally, the \$200,000 figure represents a misunderstanding of the study – The \$2.5 million outlined in the study is *additional* revenue generated, not overall.

Comment: There is not enough parking capacity and the stadium will monopolize existing parking.

Response: Currently and historically, football games include a significant volume of parking in the surrounding neighborhoods on residential streets, in private garages/driveways, and on residential lawns. Based on discussions in the last year with neighborhood residents, feedback was provided to avoid using neighborhood streets and residential properties for concert parking so that residents can park on streets when they come home and to avoid people circulating around the neighborhoods while searching for parking when children might be out riding bikes/playing in the evening. In response, the plan includes restricting event parking in the surrounding neighborhoods. As a result, replacement parking is planned on the University's campus and in Downtown Evanston.

SP+, who manages the City's public garages along with other facilities, identified approximately 2,800-2,850 parking spaces within publicly-accessible Downtown parking structures that are typically available/unoccupied during weeknights and Saturday nights in summer months when concerts are expected to be hosted. Approximately 2/3 of spaces in these garages are currently



unused at those times. When possible, taking advantage of underutilized parking is a best practice to avoid overbuilding of parking garages and surface lots, particularly for relatively infrequent events when parking would often otherwise sit empty. The remaining capacity within these garages would still be used by other businesses/restaurants in the area in addition to use of on-street parking and other surface lots/garages.

It should also be noted that North Shore Hospital has offered the use of 700 parking spaces for concert events at Ryan Field. These spaces are within walking distance of the stadium and would reduce the need for parking Downtown and the number of shuttle buses used.

Additionally, private entrepreneurial parking opportunities from nearby businesses/properties will likely be available (Evanston Art Center is one proximate example that sells spaces during football games). These lots are not counted in the parking planning, but collectively would further reduce needs for parking Downtown and associated shuttles.

Comment: Traffic conditions during a basketball game at Welsh-Ryan Arena in February 2023 (shown in a video on September 27) resulted in congestion suggesting that traffic for larger concerts events cannot be managed.

Response: This condition has not been consistent with historical experience on Isabella Street. However, after this event presented in the video occurred, parking restrictions were put in place along Isabella Street and additional focus was paid to avoid similar traffic concerns if they were to arise in subsequent games. Additionally, off-duty Wilmette Police officers were added to assist the Evanston officers in that area (similar to football games). Furthermore, since basketball parking is more transactional than football (sales are made to some attendees as they arrive) we changed the configuration of our parking attendants to improve the flow into the lots and reduce traffic back up on the street. As mentioned, we did not have a recurrence of the condition shown in the video, including at the next home basketball game (a sellout event vs. Penn State on March 1, 2023).

Additionally, it should be noted that the conditions depicted in the video are not representative of the traffic controls in place for larger-attendance football games (and as similarly proposed for concert events). Specifically, during these pre-event conditions, Ashland Avenue is temporarily converted to a one-way northbound street and traffic is not able to access Ryan Field parking lots from Isabella Street. As a result, the Isabella Street/Ashland Avenue intersection functions more simply with less traffic trying to access parking and no turns from Isabella Street to Ashland Avenue.

Question: What temporary sound mitigation efforts is Northwestern committing to?

Response: There are currently 18 possible mitigation options being analyzed, such as acoustical curtain panels and all weather sound panels, and Northwestern is committed to selecting one or more with a minimum 20 dba reduction. The reason that the specific mitigation strategy is not available at this time is because we would need full construction drawings in order to finalize the strategy, which is premature at this point in the process.



Page 7

Comment: Performers will not comply with the sound or curfew regulations.

Response: All contracts with performers/concert promoters will have a technology rider that outlines local regulations. Contrary to the comments made, the venue itself is who is fined for violations, not the performer. Therefore, the property owner would be responsible for any violation of applicable regulations and, as a result, Northwestern will have a strong vested interest in compliance with all sound and curfew requirements.

Comment: Concert load-in/load-out will take longer than the 2-3 days previously outlined.

Response: The time lapse video shown on September 27 was from a Rammstein concert at Dresden Stadium. Dresden Stadium is a 1922 stadium designed with no loading docks, requiring several (6-8) semi-trucks parking on the field unloading directly to the stage. The load in for a mega-concert such as this example, and the observed logistical challenges of Dresden Stadium, requires significant field protection due to the trucks driving and parking on the field. This type of operation is drastically different from Ryan Field which has been designed with subsurface loading docks.

Further, Rammstein most recently played in the Chicagoland area at Soldier Field in September 2022 – demonstrating that it is not the type of act that would perform at Ryan Field. The size of the show production needed at this Rammstein performance classifies as a mega-concert, not the type of event that would likely play at the New Ryan Field.

Comment: Council has “never” allowed for concerts in the U2 District.

Response: This is incorrect. In 2019, the (then) Plan Commission and City Council permitted concerts in the U2 District on a temporary basis. Due to COVID, the University never had the opportunity to hold a concert prior to this text amendment’s sunset.

Additionally, enclosed are an updated response to the September 27 Arup reply to WJHW’s rebuttal related to the sound study and a response to the Camiros report and testimony.

Please contact me with any questions or comments.

Very truly yours,

DLA Piper LLP (US)

A handwritten signature in blue ink that reads 'Katherine C. Jahnke Dale'.

Katherine C. Jahnke Dale

Enclosures