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TO: Ms. KATIE JAHNKE-DALE, Esq.
DLA PIPER LLP

FROM: GEORGE V. KISIEL, AIA, AICP
OKRENT KISIEL ASSOCIATES, INC.

RE: CAMIROS REPORT REBUTTAL

CC: FILE

The following addresses issues contained in the report filed by William James, Principal Consultant, Camiros Ltd. Camiros bases their opinions on several assertions that are either false, inaccurate or misleading. The first assertion is that:

“The use of the facility will change from predominantly university/ student activities to predominantly commercial entertainment activities, which represents a deep and fundamental change...”

This is false. The university has and will continue to have around 90 university-sponsored athletic contests on site for the foreseeable future as they have in the past. In addition, Trienens Center and Anderson Hall both serve exclusively university/student activities. Of the additional 60 days of university-or city-sponsored community events and the six public facing concerts authorized by the proposed text amendment, only the six concerts can reasonably be characterized as non-university events. The 60 additional days of university/city-sponsored outdoor events are intended to engage the surrounding residential neighborhoods, activating the athletic campus and transforming the area around the new Ryan Field into resource that is a benefit to the community. These events are likely to be smaller in size and unlikely to cause any significant off-site impacts. The addition of six public-facing concerts which would be similar in impact to existing football games does not “[represent] a deep and fundamental change” from a land use perspective. This small incremental increase in activity on the site is no different than the changes that have occurred on site over the last century or so.

Characterizing the proposal as a transformation to a “Regional Entertainment Complex” as implied here and explicitly referenced later in the report is grossly inaccurate. A regional sports entertainment complex would consist of a range of uses including lodging, restaurants, retail outlets, and other complimentary entertainment uses such as bowling alleys, batting cages or arcades. Examples would be Staples Center in Los Angeles, Deer District in Milwaukee and the Titledown in Green Bay. Those venues qualify as regional entertainment complexes. Not the replacement of an existing stadium on site with the addition of six concerts.

The report goes on to claim...

“The proposed text amendment will permit many more non-university related events, which represents a major intensification of use on the site....”

The text amendment authorizes an additional 60 days of university- sponsored community programming and makes the outdoor plazas available for city-sponsored community events. Those 60 days replace the 35 days (7 events with a maximum 5 day duration) authorized by the existing ordinance, increasing event days by 25. These events will help activate the site during the summer months when the site utilization is low due to the academic year calendar. These are positive contributions to the surrounding residential neighborhoods, and are not the source of negative impacts, nor are they commercial in nature. Again, only six non-university related events are authorized by the proposed text amendment.

The fact of the matter is that the athletic campus, for its size and capacity, is greatly underutilized. This is referenced in the CF Johnson report and referred to several times by NU representatives.

One way to assess levels of activity is to use traffic generation characteristics. ITE publishes such numbers for various land uses and actual attendance numbers can be converted to a similar metric for comparison for the on-site uses. The following analysis provides context.

Attendance at athletic and other currently authorized events on site annually is around 366,000. The chart below summarized the data for the previous year. That generally translates to ± 488,000 vehicle trips assuming an average of 1.5 occupants per vehicle. This assumes 2 trips per attendant

2022 –2023 Season Athletic Campus Attendance			
Sport/Event	Capacity	#Event Days	Actual Attendance
Football	47,330	6	172,180
Men’s Basketball	7,039	22	88,023
Women’s Basketball	7,039	17	24,432
Men’s Wrestling	7,039	5	7,110
Men’s Baseball	600	15	5,158
Women’s Volleyball	7,039	13	16,402
Women’s Softball	1,000	14	8,189
Graduations (Ryan Field)	20,000	2	18,000
Graduations (Welsh-Ryan)	5,000	5	21,020
University-related Indoor	10,000	3	6,095
Temporary Cultural	10,000	0	0
TOTAL		102	366,609

Athletic Campus Trip Generation				
Land Use	Units	ITE ADT Rate	Units	Annual Trips
Trienens	25 Ksf	32.93 ¹	274 ³	225,570
Anderson	35 Ksf	11.01 ²	274 ³	105,586
Events	366 K ^{attend.}	N/A	N/A	488,000 ⁴
TOTAL			819,156	

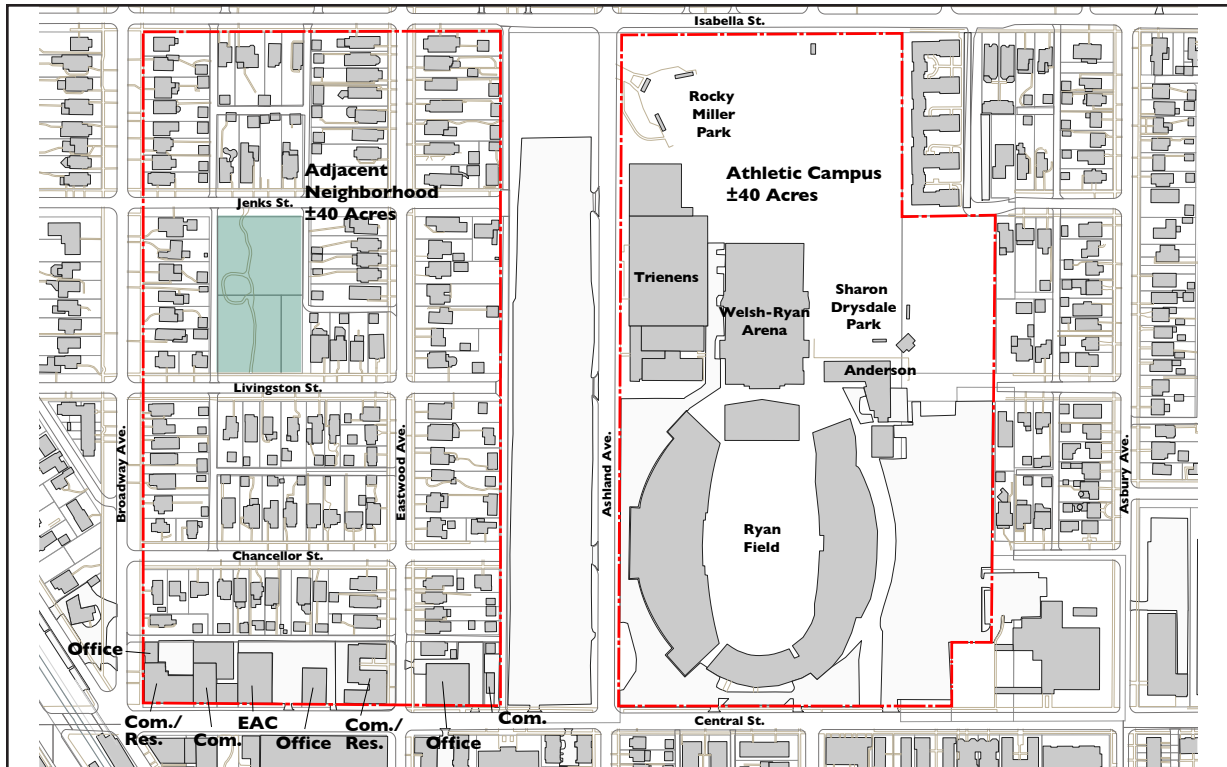
¹ ITE trip generation for Health Club (excluding indoor athletic field area)

² ITE trip generation for General Office ³ Academic year (excludes summer quarter)

⁴ Assumes 2 trips per attendant (arrival + departure) and 1.5 attendants per vehicle

÷ 1.5 attendants per vehicle. This calculation ignores any modal split, but it provides an “apples to apples” view of activity, as indicated by traffic generation on site, compared to other uses occupying a similar area). In addition to the sporting events, activity at Trienens Performance Center and Anderson Hall generates about another ±331,000 trips annually for a total that approaches around 820,000 trips annually on the 40 acre athletic campus.

When we examine the adjacent neighborhood to the west that occupies generally the same area (Central to Isabella between the alley west of Ashland to Broadway) we have 94 single-family dwellings, 48 multi-family units, 9 condo units, ±26k of ground floor commercial, ±16k of office and the ±19k of the Evanston Art Center, traffic generation for those uses according to ITE standards is a little over a million trips annually. The chart on the following page summarizes those numbers.



Northwestern Athletic Campus and adjacent neighborhood

Adjacent Neighborhood Trip Generation				
Land Use	Units	ITE ADT Rate	Units	Annual Trips
SF Res	94 DU	9.43	365	323,543
Multi-Fam	48 DU	6.74	365	118,085
Comm	26 Ksf	19	365	180,310
EAC	19 Ksf	72.05	365	499,667
Condo	9 DU	4.54	365	14,914
Office	16 Ksf	10.84	261	45,268
TOTAL			1,181,187	

For more context, there is a commercial corridor along Green Bay Road that is also adjacent to the same residential neighborhood. Just the Whole Foods Supermarket at ±40,000 s.f. generates a bit less than 1.5 million trips annually...

This gives us a baseline and background context on the current intensity of use of the athletic Campus and how it compares to an adjacent residential neighborhood. The adjacent neighborhood to the west generates ±360,000 more trips than the current utilization of the athletic campus generates. Using the same 1.5 attendants per vehicle, an additional 270,000 attendees could visit the site before the athletic campus would generate a similar amount of activity annually. While it is noted that the neighborhood traffic is more evenly distributed throughout the year than the event traffic associated with the athletic campus, this analysis, nonetheless provides valuable context for evaluation of the proposal. The report goes on to state:

“Based on a projection of attendance allowed by the proposed text amendment, Camiros projects total attendance for the NU athletic complex post redevelopment at approximately 1.45 million, a 5.5-fold increase.”

This is a misleading metric because it compares actual attendance numbers (which are understated for the athletic campus) with projections based on a high percentage of capacity – particularly for community based events. It also mis-states the impact of the proposed text amendment by including an additional 60 events with a 10,000 capacity. The chart from the Camiros report is reproduced below.

Event	Attendance
Total number of attendees 2022	263,135
Additional Events Permissible Through Text Amendment	
10 Mega Events at Ryan Field (assumes 85% attendance)	297,500
60 Events with 7,500 max capacity (assumes 85% attendance)	382,500
60 Events with 10,000 max capacity (assumes 85% attendance)	510,000
TOTAL	1,453,135

If we look at it as capacity vs. capacity (apples to apples) we get a more accurate picture of the difference. Current capacity for all events currently authorized which includes athletic contests, graduations at Ryan Field, Welsh-Ryan Arena and other events at Welsh Ryan that typically occur over the course of the year along with the 35 days of authorized outside events there is a total capacity of a little over 1.17 million annually under the current U2 ordinance. See the chart below.

Annual Athletic Campus Capacity (Current Ordinance)			
Sport/Event	Capacity	#Events	Total Capacity
Football	47,330	7	331,310
Men's Basketball	7,039	22	154,858
Women's Basketball	7,039	17	119,663
Men's Wrestling	7,039	5	35,195
Men's Baseball	600	15	9,000
Women's Volleyball	7,039	13	91,507
Women's Softball	1,000	14	14,000
Graduations (Ryan Field)	20,000	2	40,000
Graduations (Welsh-Ryan)	5,000	5	25,000
University-related Indoor	10,000	10 ¹	100,000
Temporary Cultural	10,000	35	350,000
TOTAL		134	1,270,533

¹ typical number of events hosted annually

The proposed text amendment adds 25 more outdoor event days (60 max instead of the prior 35) and reduces their capacity by 25% to 7,500 and adds 6 public concerts. The design of Ryan Field reduces capacity to 35,000 per game. The chart below summarizes the impact on capacity of the proposed text amendment. The changes authorized by the proposed text amendment and the re-built Ryan Field accounts for a modest increase in site capacity to about 1.35 million or a 15% increase or a difference of 184,690 attendees. That is simply not a significant increase in intensity of use.

Annual Athletic Campus Capacity (After Amendment)			
Sport/Event	Capacity	#Events	Total Capacity
Football	35,000	7	245,000
Men's Basketball	7,039	22	154,858
Women's Basketball	7,039	17	119,663
Men's Wrestling	7,039	5	35,195
Men's Baseball	600	15	9,000
Women's Volleyball	7,039	13	91,507
Women's Softball	1,000	14	14,000
Graduations (Ryan Field)	20,000	2	40,000
Graduations (Welsh-Ryan)	5,000	5	25,000
University-related Indoor	10,000	10 ¹	100,000
University-related Outdoor	7,500	60	450,000
Concerts	28,500	6	171,000
TOTAL		176	1,455,223

¹ typical number of events hosted annually

The report goes on to make the claim that:

“Since its inception as a collegiate athletics complex, the facility has been used almost exclusively for collegiate athletics events and the occasional local school commencement ceremony.”

This is inaccurate. Historic use of the athletic campus includes concerts, lectures and other non-athletic events as well as a Chamber of Commerce-sponsored Home Show and several professional tennis matches.

There was significant discussion of professional sporting events at both Dyche Stadium and McGaw Hall during the 1970s. They involved professional football, tennis, basketball as well as soccer. There was litigation involved and those events never came to fruition.

The Camiros report implies that that there is legal precedent forbidding commercial activity on the athletic campus. The lawsuit cited in the report however never litigated zoning issues or the “City’s right to protect citizens from commercial events” but rather focused on whether the particular issue was ripe for the courts. It established no precedent regarding the use of the athletic campus or the constitutionality of limits put on it by municipal zoning.

Since 1977, there have been significant changes that influence an evaluation of the proposed Ryan Field and attendant text amendment authorizing additional events. Most significant is the fact that Northwestern University has consistently invested in upgrading athletic campus facilities for both the athletes that use them and the spectators that come to watch. Each of these improvements has reduced capacity of the campus’ venues leaving room for additional activity.

The Camiros report goes on to imply that sale of alcohol constitutes a change in character of the area. First of all it ignores the long-standing tradition of tailgating at football games that is part of the neighborhood’s activity pattern on game days. Notwithstanding the foregoing, alcohol sales is not a land use issue but a management and licensing issue. The fact of the matter is that since the 1970s a lot more is understood regarding the implications of serving alcohol at sporting and other events. The combination of sale price, sales cut-off and staff training combine to mitigate issues related to alcohol service. In fact alcohol sales were inaugurated this year at Welsh Ryan Arena with no additional negative impacts and zero reports of incidents.

The report claims that the building mass will be significantly increased. The proposed new Ryan Field occupies generally the same footprint as the existing structure and is taller than the shorter portions of the existing structure and shorter than the taller sections. Generally, the building mass is comparable to the existing structure and satisfies the zoning ordinance requirements for bulk. No relief is requested from the ordinance standards.

With respect to Existing Planning Policies, and consistency with the Evanston Comprehensive Plan, the Camiros report cites several passages from the “Neighborhoods” section of the document:

“Preserving neighborhood character while supporting redevelopment efforts that add to neighborhood desirability. Only redevelopment that adds to the desirability of the neighborhood should be endorsed. This project will not add to the desirability of the neighborhood as a place to live.”

These passages relate to situations where there is a change of use proposed. That’s not the case here. Nonetheless, The addition of the community event days are a positive for the neighborhood and add to the desirability of the neighborhood as do the changes in the proposed site plan that provide additional outdoor open spaces available for public use.

Camiros also cites:

“If the quality, character and appeal of Evanston’s neighborhoods are diminished by redevelopment projects, Evanston will cease to possess the “special character” that is central to the Plan’s Vision Statement.”

The Comprehensive Plan recognizes that there is a diversity in the character of its neighborhoods:

“Evanston’s neighborhoods vary in character. Some are “suburban” in style--single-family homes on quiet tree-lined streets, with or without a nearby neighborhood shopping district. Others are more “urban”--low to mid-rise multi-family housing, higher population density, busier streets, and mixed-use buildings with commercial and residential activities under one roof. This diversity offers dynamic alternatives that many claim to be part of Evanston’s charm...”

The adjacent neighborhood’s “special character” in this instance is existing vintage housing stock, its proximity to transit, shopping, ETHS, the Lakefront, healthcare resources and the NU athletic campus. None of that is changing. The addition of the community event days are a positive for the neighborhood in terms of livability as are the changes in the proposed site plan that provide additional outdoor open spaces available for public use.

Of the current number of event days, at least 40 are high attendance events (Football, Men’s Basketball, some Women’s basketball or volleyball games and graduations). All of these events are uses permitted in the U2 District. All of these events have impacts that, if they were experienced on a regular and consistent basis year-round, would be seen as incompatible with residential land uses. These events, their seasonal frequencies, and the adjacency of the residential neighborhoods to these activities at the athletic campus are part of the existing land use character of those residential neighborhoods. Again, the redevelopment of Ryan Field does not constitute a significant change in character, nor does the addition of six additional high attendance events.

The Camiros report views the proposal through the narrow lens of neighborhood impacts as if to imply that *any additional impact* caused by the proposed text amendment or Ryan Field redevelopment renders it inconsistent with the standards for approval contained in the Evanston Zoning Ordinance. If this were the case, no development or redevelopment could be approved under the standards. The fact of the matter is that all land uses have some impact. The question is whether those impacts are undue and whether those impacts are offset by some other benefit.

Again, the most relevant passages in the Comprehensive Plan relate to balancing the needs of significant institutions with the impacts on the adjacent neighborhoods. As testified to earlier, that balance is met with the site design and proposed community programming, the reduced capacity of Ryan Field, the limited number of proposed concert events, the proposed MOU outlined in Northwestern's submitted LOI and the very significant financial indirect and direct benefits of the proposal that are well documented.

With respect to the provisions of the Evanston Zoning Ordinance the Camiros Report infers that the U-2 District standards are inadequate to regulate the proposed development and the modest increase in utilization. It ignores the impact and utility of the proposed Memorandum of Understanding (MOU). The proposed amendment along with the proposed MOU adequately handle regulation of the proposed uses on the site and any management issues that may arise.

Finally, the report talks about project impacts such as intensification of activity, which, as discussed earlier, is modest, and would not be out of character given the existing pattern of development. It talks about parking and traffic impacts being inconsistent with a residential area. The fact of the matter is that the traffic impacts occur infrequently.

These impacts are well known and well managed by existing practices for similar events such as football games with greater attendance capacity. Proposed restrictions on parking for concerts mitigate any impacts on parking in the adjacent neighborhood during those six events.

With respect to noise impacts, the modest SPLs outside of the venue and the de minimus duration of exposure over the course of a year pose no danger to the surrounding residential neighborhoods. Noise propagation from concerts will be seen as undesirable by some and a benefit by others. All in all, the noise impacts represent a limited duration inconvenience to the surrounding residential neighborhoods and do not rise to the level of having a negative impact on health, safety or welfare.

Finally, with respect to property values, Camiros cites the Cohn Reznick Report which at its outset admits that it does not analyze the subject property. It tries to draw a conclusion based on a completely different venue and context (Forest Hills NY) that has an incomparable frequency of events at ± 30 per year compared to six.

Furthermore, the attributes that impact the desirability of housing in adjacent neighborhoods, such as the existing vintage housing stock, its proximity to transit, shopping, ETHS, the Lakefront, healthcare resources and yes, for some, the NU athletic campus – remain unchanged.

In addition, Northwestern's economic impact consultant, found that, according to research published in the Journal of Sports Economics, there is evidence that the construction of a new facility or renovation of an existing facility increases property values. It found that the closer a house is to the stadium, the more property values are positively impacted.

This is also evident in a property value map of Evanston, broken out by city council districts. Ward 7, where Ryan Field is located, maintains the city's highest average residential property value.

The report submitted by expert MAI appraiser Mary Linberger corroborates this finding, stating that there is no evidence that the existing operations of Ryan Field have depressed the values of nearby homes and there is no logical argument to support the notion that adding six more events over the span of a year to a venue that is already offering similar activities will result in a loss of value for surrounding homes.

Given all this, I disagree with the basis and the conclusions set forth in the Camiros report regarding the proposed redevelopment of Ryan Field and the text amendment authorizing additional community events and public facing concerts.