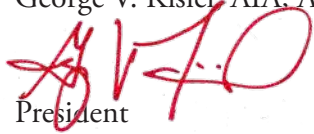


Baxter Site Redevelopment Proposal

Unincorporated Lake County/Deerfield, IL

Evaluation of the proposed development application according to the standards for Zoning map and Text Amendments and Planned Developments contained in the Deerfield II Zoning Ordinance.

By: George V. Kiesel, AIA, AICP



President

Okrent Kiesel Associates, Inc.

Date: June 6, 2023



Subject Property

Introduction

I am a licensed architect and a certified planner. I am a member of the American Institute of Architects, the American Planning Association, and the American Institute of Certified Planners. I am the president and owner of Okrent Kisiel Associates, Inc., where I have been employed for over 40 years. I have been accepted as an expert witness in planning and zoning in the courts of Cook, Lake, Will and DuPage Counties, Illinois and have appeared before numerous planning and administrative review boards throughout the Chicago metro area. My resume is attached as an addendum to this report.

Purpose

The purpose of this report is to state my opinions and conclusions regarding whether the proposed annexation, demolition and redevelopment of the Baxter International Campus currently located in unincorporated Lake Co. IL is consistent with the standards for rezonings and Planned Unit Developments contained in the Deerfield IL zoning ordinance.

All of the opinions and conclusions contained herein are from the perspective of an architect and a planner. The bases of my opinions are contained in this report, based on my review of application materials posted by the Village of Deerfield regarding this matter, the transcript from the Village of Deerfield Plan Commission meeting on May 11, 2023, other documents in my file, discussions with other individuals, and my professional background, qualifications, and experience. Should additional information become available I reserve the right to amend and/or update this report to reflect that additional information.

Opinion

Based on my review and analysis of the data referenced in this report, the sources referenced above, and my professional experience and qualifications, it is my professional opinion that:

- The proposed high volume freight movement industrial use on the subject property is incompatible with the surrounding land use and zoning context.
- The proposed high volume freight movement industrial use on the subject property is inconsistent with the planning documents of both the Village of Deerfield and Lake County Illinois.
- The potential impacts on the surrounding community are significant, especially on more sensitive existing and proximate land uses such as child day care facilities, nursing homes, senior assisted living facilities and residential neighborhoods.
- The subject property is not suited to the proposed high volume freight movement industrial use due to its land use context and single constrained access point.
- While there have been two instances of corporate campus properties in the north suburbs of Chicago being converted to similar industrial uses there have been at least three other instances of similarly situated properties being reused as either office or mixed use conversions.
- The overall effect on the community will be negative given the incompatible land use, inconsistency with comprehensive plan goals and objectives, negative environmental impacts and the demolition of a property worthy of National Register of Historic Places

designation in favor of an out of scale utilitarian structure with no architectural or aesthetic merit.

- The overall effect on the neighborhood will be negative due to the potential increase in traffic and emissions related thereto and the presence of sensitive uses in close proximity to the roadway corridor most affected by car and truck traffic to and from the site.
- The overall effect on adjacent properties will be negative due to the potential increase in light and heavy duty vehicle traffic and congestion at local intersections, increase in emissions, noise, vibration and particulate matter, and increased danger from potential fire, all associated with an incompatible land use given the context.
- The overall negative effect on the community, neighborhood and adjacent properties is not offset by the modest gain in real estate tax, or other projected revenues in the context of the Village of Deerfield's annual revenue streams and overall fiscal health.
- The subject property lacks adequate access for a high volume freight movement industrial use given its single access point shared with a single-family residential subdivision.
- Given the foregoing the proposed development does not meet the criteria for rezoning or for Planned Unit Developments contained in the Village of Deerfield zoning ordinance.

Foreword

This report provides background on the subject property and its physical context in relation to other land uses. It identifies the property's land use, zoning and planning contexts to provide familiarity with the policies, goals and rules that are implicated by this development and the deviations from (and modifications to) those policies, goals and rules that the Village of Deerfield would need to enact if it were to approve this industrial development. Finally, this report analyzes the Applicant's proposal under the standards governing the zoning map and zoning text amendments and Planned Unit Development approvals that Bridge needs to secure in order for this development to be approved.

Background

The Baxter International headquarters property is located on the west side of I-294 (Tri-State Tollway) between Lake Cook Road and Deerfield Road in unincorporated Cook Co., IL. Baxter International (formerly Baxter Travenoll) is a multi-national healthcare company that focuses on products to treat kidney disease, and other chronic and acute medical conditions. The company established its first manufacturing facility in Glenview, IL in the 1930s shortly after its founding in 1931. The 101 acre site was developed in 1972 as a build-to suit corporate headquarters and laboratory facility. The buildings were designed by Chicago office of the world-renowned architectural firm of Skidmore Owings & Merrill. Design partners Bruce Graham and Fazlur Kahn – the same team that produced the Sears Tower and the John Hancock Building – were responsible for its elegant and innovative design.

Baxter put their campus on the market for sale last spring, eight months after the company indicated that it would reduce its office footprint as more of its employees work from home more frequently in the wake of the COVID-19 global pandemic. The applicant, Bridge Industrial is the contract purchaser of the subject property (contingent on zoning approvals) with plans to demolish the existing campus and redevelop over 1.12 million square feet of cross-dock warehouse/distribution facilities.

Subject Property

The subject property is located in unincorporated Lake Co., IL approximately $\pm 1,300$ feet north of Lake Cook Road and $\pm 2,000$ feet south of Deerfield Road. It has $\pm 1,200$ feet of frontage along Saunders Road with a single point of direct access at the intersection of Saunders Road and Baxter Parkway/Thorngate

Lane. Secondary indirect access is via two intersections with Hawthorne Lane which runs east-west along the north property boundary which intersects Saunders Road at the northwest corner of the subject property. Access to the Tri-State Tollway (I-94) is via a full four-way interchange at Lake Cook Road to the south and a half-interchange (northbound exit/southbound entrance) at Deerfield Road to the north. While there is full four-way interchange for inbound and outbound traffic at 294 (Tri-State), access to and from Edens (I-94) requires use of Deerfield Road to the north or a 4-mile stretch of Lake Cook Road 4 miles east.

The Tri-State Tollway is under the jurisdiction of the Illinois State Toll Highway Authority (ISTHA). It carries five lanes of traffic in each direction with an average daily traffic volume of over 180,000 vehicles in the vicinity of the subject property.

Lake Cook Road is under the jurisdiction of Cook County Highway Department. It carries three lanes of traffic in each direction with an average daily traffic volume of 46,900 vehicles. In addition to the three through lanes in each direction, single right and dual left turn lanes are present at its intersection with Saunders Road.

Deerfield Road is under the jurisdiction of the Lake County Department of Transportation (LCDOT). It carries two lanes of traffic in each direction with an average daily traffic volume of 22,300 vehicles. In addition to the two through lanes, single right and left turn lanes are present at its intersection with Saunders Road.

Saunders Road is also under LCDOT jurisdiction. It carries two lanes in each direction with an average daily traffic volume of 13,800 vehicles. Between Lake Cook Road on the south and Deerfield Road on the north there are three

signalized intersections along Saunders Road: Takeda Parkway/Discover Way; Baxter Parkway/Thorngate Lane; and Parkway North.

The intersection of Saunders Road and Takeda Parkway/Discover Way provides access to the Horizon Pharmaceuticals Campus to the south and Discover Financial Services Corporate Headquarters to the north. The intersection has single left and right turn lanes into both Takeda Parkway and Discover Way with both Takeda Parkway and Discover Way having dual left turns on to Saunders Road with a single thru/right turn lane onto Saunders Road.

The intersection of Saunders Road and Baxter Parkway/Thorngate Lane provides the only direct access point for the subject property and provides the only point of access to the Thorngate single-family residential subdivision. The intersection has two through lanes with single left turn lanes into both Thorngate Lane and Baxter Parkway and a single northbound right turn lane into Baxter Parkway. Baxter Parkway has a single left and a single through/right turn lane onto Saunders Road and Thorngate Lane has a single left, a single right and a single through lane onto Saunders Road.

The intersection of Saunders Road and Parkway North provides access to Parkway North Center Business Park. In addition to the two through lanes on Saunders Road, the “Tee” intersection provides a single left turn lane southbound onto Parkway North as well as a single northbound right turn lane. Parkway North has two left turn lanes and a single right turn lane onto Saunders Road.

The 101 acre subject property is currently improved with ten structures including a large central facilities building that houses an auditorium, training center, medical center, and a

one-thousand seat cafeteria, along with an executive dining room and reception area at grade. The central facilities building is the architectural and planning focus and highlight of the campus. Two parking structures accommodate over 1,400 cars with five office pavilions and an executive office building totaling over 625,000 square feet of office/research space surrounding and screening the utilitarian structures from view.

Land Use Context

The subject property is located in the I-94 Tri-State Tollway Corridor between its intersections with Lake Cook Road (full interchange) and Deerfield Road. (partial interchange).

Adjacent to the south, in the Village of Deerfield, is the Horizon Pharmaceuticals Corporate Campus. Horizon purchased the ±75 acre property in 2020 from Takeda Pharmaceuticals who relocated their corporate offices to Boston after acquiring another company. The Horizon Campus consists of three office building totalling ±650,000 square feet and includes two parking structures and a 112 child day care center (Little Horizons by Bright Horizons) at the north end of the site adjacent to the subject property.

Immediately west across Saunders Road, in the Village of Riverwoods, is Discover Financial Services Corporate Headquarters. The 1.2 million square foot campus. The 80-acre campus boasts a 1.8-mile running trail and outdoor basketball and volleyball courts. Campus buildings are connected via an enclosed, climate-controlled skyway that connects with Discover's Raymond A. Kennedy Pavilion, which houses a 19,000-square-foot fitness center and an 800-seat cafeteria that has floor-to-ceiling windows overlooking a pond. The campus has a full-time

nurse and an on-site pharmacy and drugstore.

North of the Discover Financial Services Campus, in the Village of Riverwoods, is King's Kennels, formerly pet boarding facility, now limited to grooming and pet day care. North of King Kennels is the Center for Enriched Living (CEL). CEL provides services and programs for those with developmental disabilities. The 20,000 square foot facility serves over 450 clients annually. North of CEL is Saunders Woods Corporate Center, a 50,000 square foot three-building single story multi-tenant office complex.

Immediately west of the subject property, in the Village of Riverwoods, is the Thorngate single-family residential subdivision. The ± 150 acre property has 305 homes with over 900 residents.

Just north of the intersection of Saunders Road and Thorngate Lane, in unincorporated Lake County, is Chabad of Riverwoods.

Immediately north of the subject property, in the Village of Deerfield, is the Parkway North Center business park. The 85-acre office campus consists of six low-rise office buildings totalling over 1.5 million square feet, an athletic club, a 172 child capacity day care center (Bright Horizons at Parkway North), and a Marriott Hotel. At the north east corner of the campus is Woodview Apartments, a 247 unit residential development home to 365 residents.

South of the intersection of Lake Cook Road and Saunders Road, in the Village of Northbrook, is the Ivy Club of Northbrook, a 65 unit residential townhouse subdivision with over 130 residents.

East of the Ivy Club across Saunders Road, also in the Village of Northbrook, is the three-story

66,000 square foot 4201 Lake Cook Road medical office building. The anchor tenant of that building is the Eating Recovery Center, Northbrook (ERC). The ERC offers full residential, partial hospital, and intensive outpatient treatment for adolescents and children with serious eating disorders. The 36 bed facility occupies the upper two floors of the building.

East of the ERC are several single family homes fronting on Lake Cook Road that are part of a subdivision in formerly unincorporated Lake County (now Northbrook) that predated the construction of the Lake Cook Road interchange.

East of that subdivision is the 147 bed Deerfield Crossing at Northbrook skilled nursing facility. Deerfield Crossing offers short term care for those recovering from hospital stays and long-term care for Alzheimer's and Dementia as well as Hospice and Palliative care.

East of Deerfield Crossing is J. Alexander's Redland Grill Restaurant and Northbrook Inn Memory Care Community, a 69 unit assisted living facility for seniors specializing in Alzheimer's and Dementia care.

East of Northbrook Inn adjacent to the I-94/Lake Cook Road interchange is the 88 unit Northbrook Pointe condominiums. Plans for an additional 35 town home units are planned for the ± 16 acre site.

North of the Deerfield Road/Saunders Road intersection, in the Village of Riverwoods, is a ± 60 unit single-family residential subdivision constructed in the early 1960s. Immediately to the east is the Orphans of the Storm Animal Shelter, the Riverwoods Woodland Preserve Demonstration Center, the Riverwoods Police Department facility and the Linconshire-River-

woods Fire Protection District facility.

Immediately East of these public sector uses, also in the Village of Riverwoods, is the Deerfield Golf Club and the 23 unit single-family residential Oakhurst subdivision.

Across the Tri-State Tollway in the northeast quadrant of the Tri-State/Deerfield Road interchange, in the Village of Deerfield, is the Deerfield School District 109 Charles J. Caruso grades 6 – 8 Middle School with a population of 489 students.

Immediately south of the Caruso Middle School across Deerfield Road is 1717 S. Deerfield Road office building, a ±175,000 square foot four-story multi-tenant office building anchored by the accounting firm of Warady & Davis LLP.

South of the 1717 Deerfield building immediately east across the Tri-State tollway from the subject property is the Tenaqua Swim and Racquet Club a private club with indoor and outdoor facilities on a ±8 acre site.

To the south and east of Tenaqua is a ±250 unit single-family residential subdivision built in the late 1960s with a population of ± 700 residents.

South of this residential subdivision is Walgreens Boots Alliance Corporate Headquarters Campus. The ±40 acre campus is developed with nine buildings, a parking structure, an on-campus daycare facility and is home to over 3,000 employees.

South of Walgreens Campus is the Hyatt Regency Deerfield hotel and the 1650 Lake Cook Road, a multi-tenant, a 5-story 125,000 square foot multi-tenant office building.

South, across Lake Cook Road is Arborlake Centre, a six-story 228,000 square foot multi-

tenant office building, 1755 Lake Cook Road, a State of Illinois office building that houses the Illinois Student Assistance Commission as well as DCFS and Veterans Affairs office. Just east of these two office buildings is Tamarisk Northshore, a 240 unit senior independent living community and Weinberg Community for Senior Living, a ±250 unit assisted living facility. Immediately east of these two senior living facilities is the 240 unit AMLI Deerfield apartments.

Zoning Context

The subject property is located in unincorporated Lake County at the southwestern boundary of Deerfield, the southeastern boundary of Riverwoods, IL and the northeastern corner of Northbrook. It is adjacent to both the Village of Deerfield, IL and the Village of Riverwoods, IL. According to Lake County Zoning, the west and northern perimeters of the site are zoned GO-General Office (±34 acres) with the southeastern portion zoned LI-Limited Industrial (±67 acres). The Lake County Unified Development Ordinance (UDO) describes the GO-General Office District as follows:

The GO, General Office District is primarily intended to accommodate office, office park, and research park development generally adjacent to primary highways. Standards that apply to development in the GO District ensure that development is visually attractive and well-buffered from abutting roadways and residential areas. The GO District is appropriate for application to areas that have been developed with office and research park uses. It may also be used to accommodate new development proposals that are or can be served by infrastructure. The GO District is intended to implement the Regional Framework Plan's "Office/Research" future land use designation.

The UDO describes the LI-Limited Industrial District as follows:

The LI, Limited Industrial District is primarily intended to accommodate low-intensity industrial uses. It is intended to be used to accommodate existing low-intensity industrial uses. It may, however, also be used to accommodate new development proposals in areas that are or can be adequately served by infrastructure. The LI District is intended to implement the Regional Framework Plan's "Industrial" future land use designation.

Adjacent to the north and south of the subject property two large areas – the 75 acre Horizon Campus and the 85 acre Parkway North Center business park – are subject to the Village of Deerfield I-1 zoning. The Village of Deerfield Zoning Ordinance describes the I-1 District as follows:

The I-1 Office, Research, Restricted Industrial District is intended to provide for development of office buildings, research facilities, training centers, and restricted industrial parks in suitable areas appropriately located with respect to traffic flow and developed on relatively large lots with landscaped setbacks, high performance standards and bulk regulations that will protect the environmental quality of this predominantly residential community.

To the west and south of the subject property is the 80 acre Discover Financial Services Campus subject to the Village of Riverwoods, IL O&R-1 zoning district. The O&R-1 District purpose is delineated as follows:

The purpose of the O and R1 office district one is to govern the location and development of low intensity office research uses in various parts of the village. The area and bulk requirements of this article are intended to permit low intensity office and research in such a way as to enhance and protect the woodland character of the village. The district is intended as a transitional district providing a buffer between residential districts and the following major streets: Lake-

Cook Road, Milwaukee Avenue, Deerfield Road and Saunders Road.

To the west and north of the subject property is the ±150 acre Thorngate single-family residential subdivision is subject to the Riverwoods, IL R1-PUD zoning classification. The R1 classification is a single family residential district and allows community homes, home occupations (as an accessory use) and single-family detached dwellings on lots of 42,000 square feet or larger.

Immediately adjacent to the west of the subject property the ±8 acre area that is developed with King's Kennel and the Center for Enriched Living is subject to the Riverwoods, IL R1 zoning district.

The parcel of land also adjacent to the west of the subject property, north of the Center for Enhanced Living that is developed with Saunders Woods Corporate Center is subject to Riverwoods, IL O&RC zoning district. The purpose of the O&RC district is as follows:

The purpose of the office and research compatible district (referred to herein as the O and R/C district) is to govern the location and development of low intensity lodging and office special uses for certain properties at the periphery of the village with frontage on Lake Cook Road or on the portion of Saunders Road south of Deerfield Road.

The land south of Lake Cook Road west of the intersection of Lake Cook Road and Saunders Road that is developed with the Ivy Club of Northbrook is in the Village of Northbrook, IL and subject to its R6 zoning classification. The purpose of Northbrook's R6 zoning district is as follows:

The R-6 District provides for single family detached and townhouse-type dwellings, and is intended to function as a transition between single family detached neighborhoods and other, less restrictive, zoning districts.

East of Saunders Road, south of Lake Cook Road is a mix of Northbrook O2-Limited Office and R3 Single-family Residential zoning, Unincorporated Cook County single family residential zoning, Northbrook IB-Institutional Building zoning and Northbrook MFRC-Multi-family residential/Commercial zoning. The 4201 Lake Cook Road medical office building is located in the Northbrook O2 district. The purpose of the Northbrook O2 district is as follows:

The O-2 Limited Office District is designed to provide for the needs of business and professional offices and related business uses requiring a limited amount of space and moderate intensity of pedestrian and vehicular traffic movements

The single family homes to the east are zoned Village of Northbrook R3. The single family residential district in Northbrook serve the following purpose:

Six zoning districts are provided for single family residential development.... Taken together, the six single family districts blend, in combination with the multiple family districts in Article IV, to provide a broad range of opportunity for the development and preservation of housing responsive to diverse demand.

The 147 bed Deerfield Crossing at Northbrook skilled nursing facility is zoned IB-Institutional Building district. The purpose of the IB district is as follows:

The Institutional Buildings District is established to accommodate existing and future public buildings and buildings having purposes and impacts similar to public buildings. By creation of this special district, it is the intent of this Code to avoid the problems inherent in treating such buildings as permitted or special permit uses in zoning districts characterized by uses and structures bearing no similarity to public and institutional uses and buildings.

East of Deerfield Crossing including J. Alexander's Redland Grill Restaurant, Northbrook Inn Memory Care Community and the Northbrook Pointe condominiums are all zoned MFRC in Northbrook. The purpose of that district is as follows:

The Multiple Family Residential and Commercial District (MFRC) is intended to provide greater interaction between residential, retail, entertainment and other related uses, allowing environments that expand the range of living, entertaining and business opportunities within the Village while not adversely impacting nearby residential areas

North of Deerfield Road, west of its intersection with Saunders Road is in the Village of Riverwoods and is zoned R-1 Residential. The two municipal uses (Police and Fire Protection District facilities are special uses in the Riverwoods R-1 district.

East of Saunders Road North of Deerfield Road, the Deerfield Golf Course development is zoned R4-County Club Residential.

The southeast corner of Deerfield Road and Saunders Road is zoned B-1 in Riverwoods and is developed with a Mobil gas station/convenience mart, Ray's Auto Service and Car Wash and Cafe 'd Oro restaurant.

South of Deerfield Road at the southwest quadrant of the Deerfield Road/ Tri-State Tollway is subject to R5 Deerfield zoning and is developed with the 247 unit Woodview Apartments and a single-family home. The R5 zoning district is described as follows:

The R-5 General Residence District is intended to provide for a suburban environment of medium-high density residential development utilizing single-family, two-family and multiple-family dwelling structures.

East of the Tri-State Tollway north of Deer-

field Road is zoned P-1-Public Lands and is developed with the ±500 student Caruso Middle School.

South of the Tri-State Tollway and south of Deerfield Road the site that is developed with the 1717 Deerfield Road office building is subject to Deerfield I-1 zoning. South of the 1717 Deerfield Road building, the Tenaqua Club is subject to the Deerfield R1 zoning. South and east of Tenaqua, the single-family residential subdivisions are zoned Deerfield R2 and R3.

The Walgreens Campus is in the Village of Deerfield and zoned I-1 as are the office buildings, hotels and senior housing developments south of Lake Cook Road.

Proposal

According to narrative provided by the Applicant, Bridge Industrial:

“Bridge proposes to annex the property to Deerfield and rezone the site for industrial and recreational use. The intent is to demolish all existing structures and redevelop the property as a state-of-the-art business park that will attract new users to the area. The three-building plan includes an 896,700 square foot, speculative, industrial building, a 228,450 square foot, speculative, multi-tenant, industrial building and a 156,600 square foot recreational facility with a full size indoor soccer field, an indoor youth baseball field and 6 outdoor pickleball courts. The two industrial buildings would be able to accommodate a variety of uses including warehouse, distribution, assembly, and light manufacturing.”

During the applicant’s presentation on May 11, 2023 the applicant removed the 156,000 square foot recreational facility and instead, proposes to dedicate land for use by the Deerfield Park District for outdoor play fields and pickleball courts.

The applicant has described its proposal as a cross dock warehouse facility requiring 24/7 truck access for operation. Current plans include 227 loading docks, 258 trailer parking spaces and 707 employee parking spaces.

The applicant has stated this is a speculative development with no current tenants. While the applicant describes the proposed development as a “business park” “designed to attract corporate tenants” it does not include any business uses other than high volume freight movement industrial uses and is more accurately described as an industrial park.

Planning Context

The subject property is located in unincorporated Lake County, IL. It is currently under the jurisdiction of the Lake County Regional Framework Plan. Upon annexation into the Village of Deerfield, Deerfield's Comprehensive Plan will also be considered as a guiding document. This, however, does not diminish the relevance of the Lake County Regional Framework Plan. In addition to the adopted regional and municipal comprehensive plans, the property is subject to a boundary agreement between the Village of Northbrook and the Village of Deerfield concerning annexation and land use. The following highlights the relevant components of each of these planning documents.

LAKE COUNTY REGIONAL FRAMEWORK PLAN

The Lake County Regional Framework Plan was prepared under the authority of three separate state statutes, covering regional planning, land resource management and local planning technical assistance. The document represents the best efforts at consensus and coordinated planning of the region which affects every local municipality. According to the Regional Framework Plan Overview:

From the beginning, the central goal was to work in cooperation with elected officials, local and regional agencies and the county's residents to ensure that the plan reflected their ideas, visions and concerns.

The Lake County Regional Framework Plan emphasizes the importance of having a coordinated comprehensive and cohesive planning document to guide future land use decisions.

Many towns in Lake County have grown to the point that decisions about land use and development made by one can impact the quality of life of its neighbors. Without a shared understanding of the plans of Lake County's 52 municipalities and 18 townships,

we may find ourselves working at cross purposes.

It is important to note that this is the exact condition at hand where a potential significant change in land use policy by one municipality may have widespread effects.

The Lake County Regional Framework Plan (LCRFP) was adopted in 2004 with periodic updates in 2005, 2007, 2008 and most recently in 2014 adding a "Sustainability Chapter" to the document. Given the context of the proposed development plan, relevant chapters of the LCRFP include those addressing Economy and Employment (Chapter 3); Land Use (Chapter 9); Community Character (Chapter 10); and the Lake County Sustainability Chapter –Amendment to Lake County Regional Framework Plan.

With respect to Economy and Employment potentially relevant passages include the following Goals and Policies:

3.1 Goal: *Well-balanced communities as defined by a community's desired mix of residential and commercial development, open space, local access to good jobs, and low unemployment.*

3.1.1 Policy: *Attract an employment mix consisting of retail, office/research, restaurants and entertainment venues, manufacturing, and warehouse and distribution enterprises, in a manner consistent with local planning objectives and this Regional Framework Plan.*

3.1.2 Policy: *Provide a balance of business opportunities to reflect local factors of the area and individual sites, and recognize regional, community, and neighborhood commercial opportunities.*

3.2 Goal: *Efficient utilization of existing and new infrastructure, in a manner consistent with local planning objectives and this Regional Framework Plan.*

3.2.1 Policy: *Designate land use on the Future*

Land Use Map to accommodate potential business development and redevelopment that provides a variety of job opportunities and enhance the local sales and property tax base, in a manner consistent with local planning objectives and this Regional Framework Plan.

3.2.2 Policy: *Direct commercial and light industrial uses to locations in close proximity to arterial roadways and served by necessary public services, in a manner consistent with local planning objectives and this Regional Framework Plan.*

While the Goal of achieving “well balanced communities” and policies related thereto includes mention of “warehouse and distribution enterprises” of note is the highlighted language indicating a need to be consistent with both the LCRFP’s other objectives (including land use), and local municipal planning objectives. Similarly, policies relating to the goal of “efficient utilization of existing and new infrastructure” mention enhancement of “tax base” and directing “light industrial uses to locations in close proximity to arterial roadways and served by necessary public services” carry the same caveat of consistency with the LCRFP’s other objectives as well as local planning initiatives.

With respect to Land Use the subject property is designated under the Office Research category of future land use on the LCRFP Future Land Use Map updated in 2010. Sites designated for industrial development are shown concentrated further north between US 41 and the Tri-State Tollway north of Route 176, west between Milwaukee Ave.(U.S. 45) and the Union Pacific freight rail tracks north of Deerfield Road and south of Half Day Road, and northwest near the intersection of Route 176 and U.S. 45.

With respect to Community Character potentially relevant passages include the following

goals and policies:

10.5 Goal: *Designate Future Land Uses to obtain the desired blend of agricultural, residential, commercial, industrial uses, natural space, and transportation corridors.*

10.5.1 Policy: *Create smooth transitions between uses such as industrial and residential areas and between low density and high density development.*

10.5.3 Policy: *Promote land uses in unincorporated Lake County that reflect the character of surrounding communities*

These goals and policies focus on consideration of, and compatibility with, existing character of surrounding communities.

VILLAGE OF DEERFIELD COMPREHENSIVE PLAN
Deerfield’s Comprehensive Plan was adopted in 2004. Annexation into the Village of Deerfield makes their comprehensive plan the most relevant document. The applicant’s proposed change in land use would have significant repercussions throughout out the document. **Wholesale changes in policy regarding land use – like the one contemplated by this proposal – requires considerable study and analysis. Without that care in planning when considering amendments to the document, the Village’s Comprehensive Plan risks becoming a rubber stamp for ad-hoc land use decisions that can have wide-ranging long term impacts.**

The Comprehensive Plan’s Chapter 3: Policy Plans contain the goals and objectives as well as the related policies regarding the future vision for the Village. Relevant sections include those discussing Future Land Use, Annexation, and Economic Development.

Regarding Land Use, the Village’s Future Land

Use Map indicates the subject property as:

Office/Research - Areas intended to accommodate various types of office uses.

Goals, objectives and policies regarding land use are stated below:

Goal: Guide future growth within Deerfield's Planning Jurisdiction so that public facilities and amenities can be effectively and economically provided, and that such growth does not adversely change the village.

Objective: Carefully consider proposals for development or redevelopment of development sites.

Policy: Consider approval of development and redevelopment plans when the uses and structures proposed have been planned so that they will be suitable for the area in which they are to be located and they are not a substantial adverse impact to surrounding properties.

Policy: Consider approval of development or redevelopment proposals when the Village is satisfied that parking demand and the traffic generated by the project will not cause undue burdens to surrounding properties or the Village as a whole.

Regarding unincorporated areas near municipal boundaries the Village's Comprehensive Plan establishes the following goal, objective and policy regarding the subject property:

Goal: Influence development in those unincorporated areas within one and one-half miles of the Village limits.

Objective: Limit and mitigate the potential adverse impacts of development or redevelopment of unincorporated property within Deerfield's planning jurisdiction.

Policy: Encourage continued office use of the Baxter North parcel.

Regarding annexation of properties the Village's Comprehensive Plan establishes the following goal, objective and policies re-

garding the subject property:

Goal: Seek to annex unincorporated properties only if their annexation is in the best interests of the Village and they can be adequately and conveniently supplied with services without excessive burden in cost or quality of service to the remainder of the Village.

Objective: Augment the local tax base and control the development and use of land.

Policy: Actively pursue annexation of the Baxter and Takeda property.

Policy: Ensure that property annexed to the Village is compatible with adjacent uses.

With respect to Economic Development the Village's Comprehensive Plan speaks specifically about Office and Limited Industrial Areas:

Goal: Maintain and upgrade existing office and limited industrial uses.

Objective: Limit industrial uses within the Village.

Policy: Limit the expansion of any existing industrial uses and the establishment of any new industrial uses in the Village.

Objective: Encourage the highest standards of architectural and landscape design and maintenance, and encourage only those developments thoughtfully designed with respect to traffic generation, traffic patterns, and topographical and drainage conditions.

Policy: Require adequate and attractive buffering between office and industrial areas and nearby residential areas.

Policy: Enforce strict performance standards in all office and industrial areas.

Policy: Permit only such development as will conform to the standards of density and small scale of development in the community.

Policy: Require adequate and attractive screening,

landscaping, and green areas in and around parking lots; when appropriate, permit some required parking spaces to be converted to landscape areas.

Policy: *Limit new office and industrial development to those uses which will not overburden existing community facilities, or to those willing to pay for the expansion of such facilities.*

LAKE COOK ROAD CORRIDOR AGREEMENT

Finally, in 1995 the Village of Deerfield, IL and the Village of Northbrook, IL executed an intergovernmental agreement titled the *Lake Cook Road Corridor Agreement* regarding annexation and development of unincorporated parcels of land near their borders along Lake Cook Road.. The subject property is one of those parcels. The agreement states the following about the subject property described as Baxter North in the document:

G. Baxter North Parcel.

1. Annexation.

Northbrook shall not object to the voluntary or involuntary annexation by Deerfield of all or any portion of the Baxter North Parcel. Northbrook shall neither voluntarily nor involuntarily annex all or any portion of the Baxter North Parcel, nor shall Northbrook provide or offer to provide Municipal Services to all or any portion of the Baxter North Parcel.

2. Development Upon Annexation by Deerfield. Upon annexation,

Deerfield shall not permit any use, development, redevelopment, or expansion of all or any portion of the Baxter North Parcel that is inconsistent with the office use of the height, type and intensity of that which exists on the Baxter North Parcel as of the Effective Date of this Agreement

3. Development in Other Circumstances.

In the event that an owner or other party with an interest in all or any portion of the Baxter North

Parcel seeks to use, develop, redevelop, or expand all or any portion of such Parcel in unincorporated Lake County or in a municipality other than Deerfield in a manner inconsistent with the terms and conditions set forth in Paragraph 3G2 of this Agreement, both Northbrook and Deerfield shall take all necessary actions to register objections to such use, development, redevelopment, or expansion with the governmental agencies and officials with jurisdiction thereof and shall cooperate with each other in pursuing such objections. Neither Northbrook nor Deerfield shall, directly or indirectly, take any action, including specifically, but without limitation, the provision of Municipal Services to all or any portion of the Baxter North Parcel, to support or allow any use, development, redevelopment, or expansion of the Baxter North Parcel that is in any manner inconsistent with the terms and conditions set forth in Paragraph 3G2 of this Agreement, except as may be provided as of the date of this Agreement in that certain Water Agreement dated as of February 4, 1985 (“Water Agreement”) and to which Deerfield and an affiliate of Baxter are parties.

The applicant proposes a land use change that runs contrary to significant land use policies reflected in the Lake County Regional Framework Plan, Village of Deerfield Comprehensive Plan, and the Lake Cook Road Corridor Agreement. The proposed “warehouse and distribution facility with motor freight warehouse” use and the ±1.2 million square feet of building proposed will have significant lands use impacts that demand a thorough review.

Analysis

The following is a discussion of the applicant's proposal in relation to the land use, zoning, and planning contexts discussed above. It focuses on portions of the project description, consultant reports and assertions regarding findings of fact for approval of zoning map and text amendments, and Planned Unit Developments submitted by the applicant.

Project Description:

The applicant's project description makes the following statement regarding the existing development on the site:

The 101-acre site is currently improved with a series of office buildings totaling 645,688 square feet. Baxter International developed the campus in 1972 as their corporate headquarters but given the age and functional obsolescence of the buildings, they are in the process of relocating to a to be determined, newer, more functional facility.

The implication in the above description of the existing campus suggests the reason for relocation of Baxter's headquarters has something to do with the "age and obsolescence" of the structures implying that adaptive reuse is not a viable option. The fact of the matter is that Baxter is relocating due to an increase in employees working from home and a resulting desire to simply reduce its footprint.¹ The notion that the only option for the subject property is demolition and redevelopment with industrial uses is false. Immediately adjacent to the south the former Takeda corporate campus was purchased, renovated and reused as corporate campus for Horizon Pharmaceuticals after Takeda relocated to Boston due to acquisition and consolidation activities. Similarly, the former McDonald's Oak Brook corporate campus was purchased and reused as multi-tenant office campus that is now home to the corporate headquarters for Ace Hardware's 1,100 employees. Another example of

adaptive reuse of a corporate headquarters campus is the Bell Works Chicagoland development which repurposes the former Ameritech Campus in Hoffman Estates as a "Metrohub" with conversion of a portion of the office spaces to commercial and entertainment uses with added residential development.

Both of these examples are properties with excellent architecture, lushly landscaped site plans with extensive water features and locations adjacent to affluent residential communities. These are the same conditions present for the subject property.

The project description indicates the existing zoning of the property in unincorporated Lake County:

The property is currently zoned LI Limited Industrial and GO-General Office by Lake County.

In the applicant's testimony they imply that the proposed use is permitted by the existing zoning on the property. The text amendment for the proposed use is for "warehouse and distribution facility with motor freight warehouse use". Approximately 2/3 of the site is zoned LI-Limited Industrial (± 67 acres) and lists warehousing and freight movement as a permitted use. It is not clear whether Lake County officials would interpret "warehouse and distribution facility with motor freight warehouse" as being a permitted use in the LI District. The possibility of the building being used as a high cube sorting fulfillment center – similar to an Amazon facility – which is a relatively new and highly impactful use due to their typical size and traffic generation characteristics, may cause Lake County to classify the proposed use as not permitted in the LI District and more appropriate for the II-Intensive Industrial District. The remaining ± 34 acres is zoned GO-General Office where warehousing and freight movement are not listed as permitted or conditional uses thus clearly proscribing the

proposed use on one third of subject property.

In order to entitle the proposed plan under Lake County jurisdiction, regardless of the interpretation of the proposed use, the applicant would need to apply for a zoning map amendment according to the procedures in Lake County and would have to undergo a *Site Capacity*, *Site Plan Review*, and *Natural Resource Protection* evaluation due to the size of the site and proposed development.

The applicant goes on to describe the proposal as follows:

Bridge proposes to annex the property to Deerfield and rezone the site for industrial and recreational use. The intent is to demolish all existing structures and redevelop the property as a state-of-the-art business park that will attract new users to the area. The three-building plan includes an 896,700 square foot, speculative, industrial building, a 228,450 square foot, speculative, multi-tenant, industrial building and a 156,600 square foot recreational facility with a full size indoor soccer field, an indoor youth baseball field and 6 outdoor pickleball courts. The two industrial buildings would be able to accommodate a variety of uses including warehouse, distribution, assembly, and light manufacturing. The recreational facility would be designed such that it could be converted to industrial use in the future if need be. The Deerfield Park District has expressed a high level of interest in leasing the recreational facility, which has been designed to meet their needs. All three buildings would be available for use 24 hours a day, seven days a week.

The applicant testified that the Deerfield Park District was unable to afford the cost and maintenance of an indoor facility as proposed, so the application was amended to include only the two industrial buildings with a commitment to “donate land” to the Deerfield Park District for outdoor facilities. The revised site plan shows outdoor athletic fields for soccer and baseball/softball and a 1,176 square foot structure for

storage and rest rooms along with 144 parking spaces on approximately on ± 8.76 acres.

Market Analysis, Feasibility Report & Statement of Proposed Financing:

The applicant cites office market data from CBRE for the 3rd Quarter of 2022 and industrial market data from Jones Lang LaSalle from the 4th Quarter of 2022 . The applicant, through its testimony and selective market trend data, asserts that the suburban Chicago office market is weak and the industrial market is strong. On this basis the applicant asserts that its proposal is a highest and best use for the property. The evidence of current market trends in favor of industrial uses is not as favorable or as conclusive as applicant asserts. Moreover, reuse of some or all of the existing property remains feasible.

It should be noted that the statistics quoted in the report are for the overall Chicago Suburban Markets and are not specific to the North Suburban Market or nearby office properties. Certainly, the effects of COVID-19 and the move to hybrid home/office work arrangements have eroded demand for office space in general. However, reports from the 4th Quarter of 2022 and the 1st Quarter of 2023 for the office market from Jones Lang LaSalle, Colliers and Bradford Allen paint a less bleak picture. From the Jones Lang LaSalle Q1 2023 Suburban Office Market Report:

The Chicago suburbs started the new year with -82,160 s.f. of net absorption. Much like the rest of the nation, amenitized Class A office space continues to outperform in the suburban market. This quarter, Class A office contributed +91,000 s.f. of net absorption, accounting for most of the positive absorption realized in Q1. Conversely, all the forward momentum generated by higher quality office assets this quarter was offset by

Class B and C office product, which realized a combined -173,000 s.f. of net absorption.

This observation indicates that not all office properties in the Chicago Suburban Market are performing as poorly as the general statistic implies. JLL goes on to state:

Absorption was driven by rightsizing tenants consolidating their space in order to bring employees together while shedding under-utilized office space ... However, not all rightsizing tenants are choosing to decrease their office space. This quarter's largest positive absorption driver was Consumers Credit Union's move into 140,000 s.f. at their newly-purchased Lake Forest HQ at Class A property 300 N Field Dr.

It should be noted that 300 N. Field Drive is just 5 miles north of the subject property at the interchange of IL Route 60 and the Tri-State Tollway in the same North Suburban sub-market as the subject property.

Colliers 4th Quarter Suburban Office Report makes the following observations relative to the North Suburban Market:

Stagnant leasing continued in the North market; however, there is slight optimism with large users in the market.

Overall vacancy in the North market decreased 60 basis points in the fourth quarter, dropping to 24.3 percent. The decrease came from both Class A and B properties.

Year-to-date absorption ended at negative 304,354 square feet. Quarterly absorption in the North market ended on a positive note for the second consecutive quarter, with 171,505 square feet of net absorption.

Bradford Allen's 2022 Year End Office Market Report for Suburban Chicago makes the follow-

ing observations regarding the overall Suburban Market:

The Chicago suburban office market showed signs of strength through the second half of 2022 as rental rates increased, absorption levels turned positive, and vacancy rates stabilized at approximately 27%. Although the vacancy rate is at a record high, the data remains distorted by zombie offices (typically outdated corporate campuses); one of which was sold in October for more than \$230 million. The 1.4 million-square foot-campus in Northbrook, formerly the long-time home of Allstate, is being redeveloped into an industrial mega site. Developers must determine the highest and best use for these vacant office campuses, whether into more digestible-sized office product or into an entirely new asset class.

Regarding the North Suburban Market, Bradford Allen makes the following observations:

In Q4/22, the direct vacancy rate was 30.9%. The sublease availability rate decreased from 5.6% in Q2/22 to 5.4% at year-end.

Absorption levels turned positive in the second half of 2022, posting nearly 185,000 square feet of net absorption—an improvement relative to the 946,000 square feet of negative net absorption seen in 2021.

The general tenor of these more recent reports is that while the Chicago suburban office market continues to struggle, there is still cause for optimism for “amenitized” Class A properties.

The Baxter Campus, designed, in 1972 by Skidmore Owings & Merrill's design partners Bruce Graham and Fazlur Kahn—world class architects and engineers known for such iconic and innovative structures such as the Sears Tower and the John Hancock Building – is a timeless example of and form, function, aesthetics and

sensitivity to context. Organized around two central parking structures and a striking $\pm 85,000$ square foot central pavilion that houses a 1,000 seat cafeteria an auditorium and other employee support functions serves as an architectural centerpiece. Its executive pavilion and five modular office buildings are designed for flexibility. With floor plates ranging from $\pm 22,500$ to $\pm 37,500$ square feet in three-to five-story buildings the size and configuration of the structures are consistent with modern Class A properties in the North Suburban Market. Weather-protected connections to sheltered parking facilities match or exceed amenities associated with Class A properties. The elegantly designed and landscaped campus environment with naturalistic water features, mature high quality trees, and native prairie vegetation provides one of the best office environments in the market.

Sustainable (Green) Elements

The applicant list a series of measures designed to achieve LEED certification, however there is no commitment to actually achieving LEED Certification (the lowest level of LEED certification levels) or Silver, Gold or Platinum Certification levels. Listed among those measures are:

Project located on a previously-developed site with well developed existing infrastructure as opposed to a less developed greenfield site.

Storm water Pollution Prevention and Erosion Control measures implemented per EPA's 2012 Construction General Permit (CGP) guidelines.

More than 50% of const. waste expected to be diverted from landfills in addition to an overall waste prevention goal of generating less than 10 lbs./SF of waste during construction.

While it is true that the subject property has existing infrastructure, the applicant fails to men-

tion the need to demolish over 640,000 square feet of buildings plus three parking garages. The need to remove this volume of construction materials and the truck traffic required to do so adds to the negative environmental impact of the proposed development. The site plan also requires removal of hundreds of mature high-quality trees and acres of mature native plantings that were part of the original landscape plan for the site.

With respect to compliance with EPA standards, the scope of the project requires compliance with these regulations. Further, regarding site storm management, the existing campus covers only $\pm 350,000$ square feet of its 101 acre site. The proposal increases impervious surface to over 1.5 million square feet – quadrupling the coverage. While it is anticipated that the site will comply with the minimum storm management requirements of Deerfield and Lake County, there is no accounting for the elimination of what was likely a surplus of storm management capacity on the subject property prior to redevelopment.

The applicant indicates that in addition to the previously referenced Green Initiatives that it will be over-structuring the roof in order to accommodate solar panels. While the notion is admirable the installation of such a potentially large generator in the roof of a $\pm 900,000$ square foot facility poses potential hazards from malfunction and fire that could result in catastrophic events. Recently, according to an article by CNBC from September of 2022 six of Amazon's 47 fulfillment centers with solar installations caught fire. As a result, Amazon has moved to decommission solar installations its facilities in the U.S:

On June 17, 2021, roughly a week after the fire at the warehouse known as MDT2, Amazon's sustain-

ability division directed the owners and developers of solar rooftop systems on its U.S. warehouses to decommission them. The solar rooftops would no longer be generating electricity from the sun or producing renewable energy credits.²

Incidents of fire in warehouses of this relatively unprecedented size has become a problem for municipal fire departments. A recent article (January 2023) outlines some of the challenges and pitfalls regarding mega-warehouse fires:

“...it is clear by the continuing stream of destructive large building fires and mega-warehouse fires that we have more work to do, particularly as these massive incidents pose complex risks to both firefighters and occupants. Although the risk is intended to be mitigated by sprinklers and other fire protection systems, something is clearly not working – at least not as designed in the laboratory.”³

“A careful review of fire flow and fire flow duration in NFPA 1: Fire Code, NFPA 13: Standard for the Installation of Sprinkler Systems and other relevant codes applicable to these massive buildings should quickly raise fire department concerns about our ability to both access and conduct manual firefighting operations in these buildings that are often sized in acres, not square feet.”⁴

“Coupled with the practical limitations of a hydraulically calculated firefighting water supply that by code receives a 75% credit just for having sprinklers, access to interior portions of 1.5 million square feet of high-density rack storage that is 10 feet apart, 40 feet high and up to 2,000 feet in length is of great concern to many fire chiefs.”⁵

“Even when a fire can be accessed for manual firefighting, how many departments are resourced to deploy appropriately sized attack line(s) or master stream(s) in a timely manner hundreds of feet to the interior, or to the center portions of a rubber roof assembly (non-

combustible by code) that is literally hundreds of feet from the building’s perimeter?”⁶

“In plain language, the fire department in Anytown USA is challenged with a fuel package and roof assembly that, in one form or another, is equivalent to solidified gasoline.”⁷

In summary, this article makes several points:

1. Building codes regarding fire resistive construction and fire suppression are not sufficient to safeguard firefighters, occupants and the general public from catastrophic fires in these mega-structures.
2. The size, dimensions, construction materials and fuel packages of these mega-warehouses pose significant challenges for local fire departments.

Annexation, Zoning & Comprehensive Plan

The applicant makes the following assertions regarding the Village of Deerfield Comprehensive Plan:

The Village Comprehensive Plan from 2004 shows this site as future Office/Research. Since that time, the suburban office market has gone through an extensive downturn with excessive vacancy rates. Future projections for the suburban office market do not show any improvements. In particular, the suburban office headquarters campus has been hard hit with many corporations relocating out of state for tax and quality of life benefits or to downtown Chicago. Also, because of the Covid shutdown, a much larger percentage of employees are working remote so the demand for office space is significantly reduced.

Here, the applicant attempts to argue that a change in market conditions alone provides justification for a change in land use from Office/research to Industrial. It ignores other factors that come to bear on land use decisions such as the existing adjacent and nearby land use and

zoning patterns; the extent to which property values may be diminished; the balance between harm/gain to the public vs. harm/gain to the land owner; suitability of the property for the proposed uses; the amount of time the property has been vacant; community care in planning and community need for the proposed use.

The applicant makes the following statements:

Given this dynamic, Bridge believes that the highest and best use of the site is for industrial use. The demand for industrial product in suburban Chicago has been very strong and is projected to continue into the near future.

Highest and best use is a concept used in property valuation. It is not, in and of itself, a justification for a change in zoning. In fact, Illinois case law establishes that a property owner is not entitled to develop property to its “highest and best use” in *Elmhurst National Bank v. City of Chicago*, 22 Ill.2d 396, 176 N.E.2d 771 (1961).

Notwithstanding that fact, the applicant bases its assertions regarding Highest and Best Use on perceived market conditions alone. It ignores the other factors that are considered when determining highest and best use such as whether the use is legally permissible, physically possible, economically feasible and maximally productive. All four of these factors must be satisfied with the analysis evaluating each factor in order. That is to say the proposed use must first be proven to be legally permissible before an evaluation of whether it is physically possible can occur. While it is true that a portion of the subject property is zoned for light industrial use, the development scheme put forward is not legally permissible.

The applicant goes on to state:

Therefore, Bridge is proposing to redevelop the site for industrial use, which will increase the tax base and create more job opportunities for area residents.

The applicant provides a cursory real estate tax analysis indicating an increase in real estate taxes due to the construction of the proposed development. Given that the applicant has altered their development scheme to eliminate the recreational building and instead donate land to the Deerfield Park District this would reduce the positive impact and remove unknown acreage from the tax rolls. The applicant fails to provide a complete analysis of economic impact considering factors such as the different in indirect benefits of office occupancy compared to industrial occupancy, the difference in comparative impacts on police, fire, roadways, water, sewer and stormwater management.

Findings in Support of Rezoning

The applicant provides proposed findings of fact regarding the criteria for approval of Zoning Map Amendments contained in §13.10-D of the Deerfield Zoning Ordinance. Regarding the first criteria:

1. Existing Uses. Existing uses of the property within the general area of the property in question.

The applicant responds as follows:

The subject site, which fronts on Saunders Road to the west and I- 94 to the east, is surrounded by commercial properties to the southeast, south, southwest, and north, with residential properties to the northeast and northwest. I-94 acts as a significant buffer for properties to the east while Saunders Road and the wooded/open green spaces on the west side of the subject property are a good buffer for the properties to the west.

The applicant’s response is overly general and does not provide a thorough inventory of the land uses in the vicinity of the subject property. As a result the applicant fails to mention that two child day-care centers servicing up

to 250+ children daily are located within 500 feet of the boundary of the subject property or the roadway corridor most affected by car and truck traffic to and from the site (Saunders Road between Deerfield Road and Lake Cook Road; Lake Cook Road between Saunders Road and the full Tri-State Tollway interchange; and Deerfield Road from Saunders Road to the partial Tollway Interchange). There is no mention of the 20,000 square foot facility for the developmentally disabled is immediately across Saunders Road. Also not mentioned is the fact that there are over 400 dwelling units, a ±150 bed skilled nursing facility, ±70 units of senior assisted living and a 39 bed facility for children with behavioral disorders, all within 500 feet of subject property or the roadway corridor most affected by traffic to and from the site.

The applicant draws no conclusion as to whether the proposed use is consistent with the land use context. Based on the foregoing detailed inventory of nearby and potentially affected land uses, along with the general high quality character of the office campus uses adjacent to the site, and sheer size and configuration of the buildings associated with the proposed use, the proposed industrial warehouse use is incompatible with the existing land use context.

Regarding the second criteria:

2. Current Zoning in Area. The zoning classification of property within the general area of the property in question.

The applicant responds as follows:

The commercial properties to the north, southeast and south are located in Deerfield and are zoned I-1 Office, Research, Restricted Industrial. The residential properties to the northeast are in Deerfield and are zoned R-1, R-2, and R-3 Single Family Residential. The commercial properties to the southwest are in Riverwoods and are zoned O&R-1, Office & Research

and the residential properties to the northwest are zoned R-1 and R-1 PUD, Single Family Residential.

Again, the applicant makes no assertion whether the existing zoning pattern supports a change from the existing split Lake County GO/LI zoning to Deerfield R-1 zoning classification to the I-2 classification as modified by text amendment to allow a “warehouse and distribution facility with motor freight warehouse”. The fact of the matter is that there no adjacent zoning classification that is consistent with the proposed Deerfield I-2 zoning as amended. While the adjacent I-1 Office, Research, Restricted Industrial classification has the word “industrial” in its name the only industrial use listed as either a permitted or special use is “research” and warehousing or freight terminal is not permitted. In fact, motor freight terminals are not permitted anywhere in the Village of Deerfield according to current zoning. The I-2 District is in fact rare in the Village of Deerfield and occupies less than 25 acres on three sites in a compact area at the south east extremity of the Village. Those three sites are all less than 10 acres in size and completely isolated from any residential zoning classification. Given the foregoing the proposed zoning change is inconsistent and incompatible with zoning in the general area of the subject property.

With respect to the third criteria:

3. Suitability of Present Zoning. The suitability of the property in question for the uses permitted under the existing zoning classification and the proposed classification.

The applicant responds as follows:

The subject site is currently located in unincorporated Lake County with LI, Limited Industrial and GO General Office zoning. In general, the proposed use would be permitted under the LI zoning with some

variances.

The applicant's response is not responsive to the standard. The standard queries whether the property is suitable for uses permitted under the existing and proposed zoning. In the context of the proposal the question is whether the "warehouse and distribution facility with motor freight warehouse" use is suitable to the property. It should be noted that while the existing Lake County split zoning includes a classification that permits certain industrial uses it is not clear that the proposed "warehouse and distribution facility with motor freight warehouse" use would be permitted. It should also be recognized that the Lake County Regional Framework Plan designates the site for Office/Research uses, not industrial uses. As discussed earlier, the property's location amid other sensitive uses and the high quality corporate campus environment makes it unsuitable for the higher impact warehouse use. Further exacerbating the situation is the fact that the property has only a single viable access point which is incompatible with a freight movement use that needs the ability to manage significant traffic volumes in and out of the site for both heavy and light duty vehicles. Also of concern is the fact that that same access point— a signalized intersection – is the only point of access and egress to a 305 unit single-family residential subdivision. The traffic study submitted by the applicant's consultant KLOA comes to the conclusion that this intersection would continue to operate at "acceptable levels of service," however that evaluation does not consider the potential worst case scenario for traffic volumes for a High Cube Sorting Fulfillment Center for which the proposed development is designed. The traffic report submitted by Mr. John A. Nawn, P.E., PTOE, FNSPE indicates the following:

"...a High-Cube Fulfillment Center Warehouse can be expected to generate 4 times more daily traffic, and 6 to 8 times more traffic in the peak hours than as reported in the KLOA analyses."

Given the foregoing, the subject property is not suitable for the proposed use permitted (partially) under the existing or (fully) under the proposed zoning classification.

With respect to the fourth standard:

4. Trend of Development. The trend of development, if any, in the general area of the property in question, including changes, if any, which may have taken place since the day the property in question was placed in its present zoning classification.

The applicant responds as follows:

The trend in the Chicago suburban office market is to redevelop sites containing functionally obsolete office buildings with much in demand industrial facilities. This trend is apparent in the immediate area with the ongoing redevelopment of the Allstate headquarters campus in Northbrook with multiple industrial buildings, the recent redevelopment of the 225 acre Cardinal Health campus in Waukegan from office, research & development and manufacturing facilities to 3,500,000 square feet of industrial facilities, and the redevelopment of an office/research facility at the southeast intersection of I-294 and I-94 in Northbrook with a soon to be competed industrial building.

The applicant cites only two developments as representative of a "trend" of development. The applicant fails to mention three other cases in the north and northwestern suburbs of corporate campus properties being repurposed to uses other than industrial uses. As mentioned earlier, immediately adjacent to the south the former Takeda corporate campus was purchased, renovated and reused as corporate campus for

Horizon Pharmaceuticals after Takeda relocated to Boston due to acquisition and consolidation activities. Similarly, the former McDonald's Oak Brook corporate campus was purchased and re-used as multi-tenant office campus that is now home to the corporate headquarters for Ace Hardware's 1,100 employees. Another example of adaptive reuse of a corporate headquarters campus is the Bell Works Chicagoland development which repurposes the former Ameritech Campus in Hoffman Estates as a "Metrohub" with conversion of a portion of the office spaces to commercial and entertainment uses with added residential development.

It should also be mentioned that both of the examples cited by the applicant are located in significantly different land use contexts and have multiple, suitable access points not shared with single-family residential subdivisions.

The former Cardinal Health Campus in Waukegan is located adjacent to Amhurst Lake Business Park, a mixed use office/industrial park, and Norman Woods Business Park. Both developments containing a mix of office and light industrial/warehouse and distribution uses. While there are multi-family residential uses in the vicinity of the former Cardinal Healthcare Campus, the direct route for traffic to and from the site to the nearest Tri-State Tollway interchange (Route 176) does not come within 500 feet of any residential or other sensitive use.

The former Allstate Campus is relatively isolated from incompatible land uses with the path to the nearest Tri-State Tollway interchange (Willow Road) completely devoid of residential or other sensitive uses. These examples are in completely different land use contexts than the Baxter property.

Findings in Support of PUD Plan

The applicant provides proposed findings

of fact regarding the criteria for approval of Planned Unit Developments contained in §12.09-D(2)(c) of the Deerfield Zoning Ordinance. Regarding the first criteria:

1. Effect on Community. That the proposed Planned Unit Development will not be significantly or materially detrimental to or endanger the public health, safety, or general welfare of the community. This shall include consideration of the impact on the development upon physical development, tax base, and economic well-being of the Village.

The applicant responds as follows:

The subject property is currently improved with multiple office buildings comprising the Baxter corporate headquarters located in unincorporated Lake County. Bridge is proposing to annex the property to the Village of Deerfield, which will add to the tax base without putting a burden on the school system.

As mentioned earlier in the report, the applicant fails to provide a complete analysis of economic impact. The report submitted does not consider factors such as the difference in indirect benefits of office, or any other occupancy compared to industrial occupancy, or the difference in comparative impacts on police, fire, roadways, water, sewer and stormwater management.

Furthermore, the projected increase in revenues to the village and other taxing bodies over the current levels amounts to a less than 1% of each of the taxing bodies' annual revenue streams.

The applicants response fails to adequately address the impacts on health, safety or general welfare of the community. An evaluation of impacts on health, safety and welfare should address the impacts of any increases in noise, vibration, odor, air quality, particulate matter and danger of fire, explosion or contamination. A report submitted by the applicant's con-

sultant Tetra Tech on air quality relies on the average daily traffic number contained in the KLOA report. The report indicates a rise in nitrous oxides and particulate matter due to the proposed development but indicate the levels would remain within EPA guidelines. As established earlier, the KLOA report fails to evaluate the potential worst case scenario therefore the Tetra Tech evaluation also does not consider the impact of four times the average daily traffic volume on emissions impacts. The applicant does not address the potential noise impact of the proposed development nor does it mention the potential danger a fire in a $\pm 900,000$ square foot warehouse facility could cause given the surrounding land use context.

The applicant goes on to describe alleged benefits to the community associated with the proposed development:

The proposed redevelopment will remove an underutilized, functionally obsolete office campus and provide job opportunities to area residents while decreasing the traffic volume as compared to Baxter when they operated at full capacity.

The proposed use is for a warehouse facility. “The majority of warehousing jobs on site are unlikely to be filled from the labor pool of residents of Deerfield and the surrounding communities. The applicant has not shown that this project would provide job opportunities to Deerfield residents. It should also be noted that the number of jobs created for the proposed industrial use are fewer than the jobs that would be created by an adaptive reuse for other uses such as continued office or other commercial or institutional uses.

Regarding traffic reduction, as mentioned earlier, the traffic analysis by the applicant’s consultant does not consider the potential increase in traffic over the prior occupancy that would be caused by a High Cube Sorting Fulfillment Center for 1942 Zoning Map: North Avenue Corridor

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which the proposed development is designed.

The development will preserve the wooded green space at the west end of the site and improve it by removing all the buckthorn and putting in a walking path and wet basins with fountains.

The current site plan on the subject property also preserves the wooded green space at the west end of the site. It also features over 10 acres of water features surrounding the buildings on three sides. The proposed development does not improve on the environmental quality of the existing condition and thus does not provide a benefit.

The buildings are also being designed to be solar ready, which will be a major benefit to the tenants and the community.

As mentioned earlier, while the notion of providing green energy resources is admirable, recent experience in these types of solar installations leading to mega-warehouse fires, and the proximity of more sensitive uses rises questions as to whether any benefit is offset by the risk associated. Also of concern is the suggestion that the solar array would be installed, owned, operated and maintained by a third party that is not the applicant. Given the risks associated and the recent history of warehouse fires, the applicant should perhaps explore other measures for providing environmental benefit.

In addition, the Deerfield Park District is very interested in developing one of the three proposed buildings as an indoor recreational center. This facility will provide much needed indoor fields that can be used for soccer, lacrosse, football, baseball, and softball, among other activities, for area youth and young adults. The center will also include several outdoor pickleball courts, which are in high demand.

Given the change in plans regarding indoor

facilities and the revised proposal for outdoor recreational fields and courts, the question must be raised as to whether – given the proposed industrial warehouse/freight movement use and its immediate proximity – outdoor recreational facilities are appropriate for this site. The applicant’s report on emission impacts addresses only the impact of traffic to and from the site as indicated by the applicant’s traffic consultant. There is no mention of the impact of vehicle movements and idling internal to the site. Again, this raises the question as to whether the proposed benefit provided is offset by the risks associated with its proximity to what is likely to be a significant source of emissions.

Regarding the second criteria:

2. Effect on Neighborhood. That the proposed Plan Unit Development will not be injurious to the use and enjoyment of other property in the immediate vicinity for the purposes already permitted nor will it diminish or impair property values within the neighborhood.

The applicant responds as follows:

At full occupancy, the proposed development will produce less traffic volume and put less demand on the existing infrastructure than what Baxter did at full capacity.

As mentioned earlier, the applicant’s traffic report does not consider the potential worst case scenario which would generate overall light and heavy duty vehicle volumes in excess of what Baxter would generate based on ITE trip generation rates. It should be mentioned that the applicant presents no evidence as to what Baxter’s actual traffic generation characteristics were when functioning at full capacity.

The wooded green area at the west end of the site will be preserved and enhanced with a walking path and basin fountains for the enjoyment of tenants as well as

the neighborhood.

As mentioned earlier, the preservation of the wooded area is not an additional benefit to the neighborhood as it already exists. With respect to the enhancement of adding a path, the applicant has not indicated whether this amenity would be available for the public to use or if there is a safe and viable pedestrian path providing public access.

As stated previously, the Deerfield Park District is very interested in developing one of the buildings as an indoor recreational center. This facility will provide much needed indoor fields that can be used for soccer, lacrosse, football, baseball, and softball, among other activities, for area youth and young adults. The center will also include several outdoor pickleball courts, which are in high demand.

Again, as mentioned earlier, given the industrial warehouse/freight movement use and the potential impact on air quality in close proximity to youth outdoor athletic and recreational facilities, the question as to whether the proposed benefit provided is offset by the risks must be considered.

Regarding the third criteria:

3. Effect on Development of Surrounding Property. That the proposed Planned Unit Development will not impede the normal and orderly development and improvement of the surrounding property.

The applicant responds as follows:

As opposed to the existing buildings, which are severely underutilized and functionally obsolete, the proposed development will add energy and interest to the surrounding properties by providing new job opportunities to area residents, increased use of restaurants and hotels along with a recreation center that will draw from the entire area.

The applicant provides no evidence that the existing buildings are severely underutilized. The traffic counts to and from the Baxter property in November of 2022 indicate in excess of 430 cars. Absent traffic counts while Baxter was functioning at full capacity, there is no way to know what percent of capacity the campus is currently functioning. Similarly, the applicant provides no evidence that the existing buildings are functionally obsolete. Similarly, the applicant provides no evidence regarding the degree to which there would be increased use of restaurants or hotels. There is no discussion regarding the questions as to whether these alleged benefits are offset by the negative impacts due to potential increases in traffic volumes, emissions, noise, odor, vibration or increased danger from fire.

With regard to the fourth criteria:

4. Adequacy of Utilities and Facilities. That the applicant has demonstrated that adequate sewer and water, access roads, drainage and other necessary facilities are present or will be provided.

The applicant responds as follows:

All utilities are adequately sized and have served the existing Baxter campus for many years. The proposed redevelopment will put less demand on the existing infrastructure than Baxter did at its peak, including traffic volumes.

The assertion that utilities adequate for a $\pm 650,000$ square foot corporate campus would, as a matter of fact, be adequate to service a ± 1.2 million square foot industrial park is questionable. The issue as to whether existing water supply infrastructure would be sufficient to accommodate sprinkler and/or firefighting requirements for a $\pm 900,000$ square foot warehouse should be examined in more detail. With respect to traffic volumes and roadway infra-

structure, as mentioned earlier, the applicant's traffic study does not consider the High Cube Sorting Fulfillment Center which would generate significantly more traffic than analyzed.

With respect to the fifth criteria:

5. Adequacy of Ingress and Egress. That the applicant has demonstrated that adequate means of ingress and egress designed to handle the traffic contemplated are present or will be provided.

The applicant responds as follows:

The traffic study, which is part of the overall submittal, verifies that the existing infrastructure is more than adequate to accommodate the projected traffic volumes from the redevelopment. The study shows the traffic volume generated by Baxter at its peak exceeds what the proposed redevelopment will produce at full occupancy.

Again, as mentioned earlier, the applicant's traffic study does not consider the High Cube Sorting Fulfillment Center which would generate significantly more traffic than analyzed. According to Mr. Nawn's analysis as referenced earlier:

"...a High-Cube Fulfillment Center Warehouse can be expected to generate 4 times more daily traffic, and 6 to 8 times more traffic in the peak hours than as reported in the KLOA analyses."

With regard to the sixth and final criteria:

6. Conformity to Regulations. That the proposed Planned Unit Development meets all the regulations of this Ordinance except as such regulations may in each instance be modified by the Board of Trustees.

The proposed redevelopment of the site meets all the regulations of this Ordinance other than the list of exceptions that have been included in this submittal along with the reasons they are needed.

While the relief sought from the letter of specific ordinance standards, given the nature and intensity of the use, reducing setbacks should not be permitted.

Conclusions

- The applicant's proposal represents a significant departure from long-standing land use policies established by Lake County, Illinois, the Village of Deerfield and an intergovernmental agreement between the Villages of Deerfield and Northbrook.
- The proposed use is more intensive than the existing use on the property and has the potential to generate significantly more traffic and related off-site impacts.
- The potential negative off-site impacts are not offset by the alleged benefits associated with the proposed use.
- The proposed use is inconsistent with both the land use and zoning patterns in the vicinity of the subject property.
- There is no clear trend of development such that it would mandate the demolition of the Baxter Campus for redevelopment as an intensive "warehouse and distribution facility with motor freight warehouse" as proposed.
- The lack of multiple points of direct access to and from the site makes the subject property unsuitable to the proposed intensive "warehouse and distribution facility with motor freight warehouse"
- Given the foregoing the proposed development does not meet the standards for Zoning Map Amendments or Planned Unit Developments.

Endnotes

- ¹ Ecker, Danny, *Baxter Looks to Ditch Deerfield HQ*, Crains Chicago Business, May 4, 2022, <https://www.chicagobusiness.com/commercial-real-estate/baxter-international-looks-selldeerfield-hq-campus>
- ² Palmer, Annie and Kolodny, Lora, *Amazon Took Solar Rooftops Offline Last Year After Flurry of Fires, Electrical Explosions*, CNBC, September 1, 2022, <https://www.cnbc.com/2022/09/01/amazon-took-solar-rooftops-offline-last-year-after-fires-explosions.html>
- ³ Lohr, Steve, *Mega-warehouse Fires: We Can't Throw The Baby Out With The Sprinkler Water*, Fire Rescue 1, January 11, 2023, <https://www.firerescue1.com/warehouse-fire/articles/mega-warehouse-fires-we-cant-throw-the-baby-out-with-the-sprinkler-water-YagyT9wWXYDB0E8/>
- ⁴ Ibid.
- ⁵ Ibid
- ⁶ Ibid.
- ⁷ Ibid

GEORGE V. KISIEL, AIA, AICP
PROFESSIONAL EXPERIENCE

Okrent Kiesel Associates, Inc.
President 2015—Present

Okrent Associates, Inc. 1982—2015
Director of Planning/Vice President, 1987—2015
Project Planner, 1982—1987

PROFESSIONAL LICENSES/CERTIFICATIONS

Licensed Architect, State of Illinois #001-014612
Certified Planner, #013708

ASSOCIATIONS/ORGANIZATIONS

American Institute of Certified Planners
American Institute of Architects
American Planning Association

EDUCATION

University of Illinois, Chicago, Master of Urban Planning and Policy 2009
University of Illinois, Chicago, Bachelor of Architecture, 1989

LECTURES/PRESENTATIONS

The Return of the Mega Development: Large-Scale Projects that Could Transform Chicago and its Suburbs
The Real Estate Center and the Chaddick Institute at DePaul University
Keynote Speaker: 2019 Conference
Chicago, Illinois

Planning in the Middle East and North Africa Region
2012 APA National Conference
Los Angeles, California

The Planner's Role in the Development Process
Illinois Institute of Technology
ARCH 562—Planning Law and Land Development
Guest Lecturer 2011—2012

SELECTED PROJECT EXPERIENCE

Urban Planning And Consulting

Lake Meadows Master Plan

Chicago, IL

Master Plan

70 Acres

Cabrini Green Hope VI Redevelopment (pending)

Chicago, IL

Master Plan

10 Acres

Prince Abdulaziz Bin Mousaed Economic City

Ha'il, Saudi Arabia

Master Plan Consulting and Development Control Regulations

New City for 100,000 residents

South of Shamkha

Abu Dhabi, UAE

Master Plan Consulting and Development Guidelines

New City for 130,000 residents

City of Chicago Retail Study

Chicago, IL

Analysis of Existing Retail Development

Abu Dhabi Capital City District

Abu Dhabi, UAE

Master Plan Consulting, Retail Demand Analysis, Development Guidelines for Emirati Neighborhood

New neighborhood for ±25,000 residents

Emerald Gateway

Abu Dhabi, UAE

Development Guidelines and Development Manual

88 Highrise Building Sites

SELECTED PROJECT EXPERIENCE

Urban Planning And Consulting (continued)

Rockwell Gardens Hope VI Redevelopment

Chicago, IL

Master Plan

17 Acres

Louis Armstrong New Orleans International Airport

Kenner LA

Highest and Best Use Study: Master Plan for Redevelopment

1700 Acres

Mohammed Bin Zayed City

Abu Dhabi, UAE

Development Guidelines Income Equalization Modeling and Development Manual

298 High-rise Building Sites

Windham Lakes Business Park Master Plan Studies

Romeoville, IL

Master Plan Studies

500 Acres

Northern Illinois Gas Co. Headquarters Master Plan

Naperville, IL

Corporate Campus Master Plan

105 Acres

West Loop Gate Master Plan

Chicago, IL

Urban area master plan

450 Acres

Illinois Medical District GIS Support/Master Plan

Chicago, IL

Urban Medical District Master Plan and GIS

560 Acres

SELECTED PROJECT EXPERIENCE

Urban Planning And Consulting (continued)

Lake Calumet Airport

Chicago, IL

Planning & Policy Studies: 3rd Airport

2000+ Acres

O'hare International Airport

Chicago, IL

Planning Studies for Collateral Development

3000+ Acres

* * * * *

SELECTED PROJECT EXPERIENCE

Expert testimony: Administrative Review

Focal Point Community Campus: St. Anthony Hospital

Zoning Map Amendment/Planned Development: Large Project Development

31st St. & Kedzie Ave.

Chicago, IL

North Union: Moody Bible Properties Redevelopment

Community Assessment Report/Planned Development: Large Project Development

Near North Side.

Chicago, IL

375 N. Morgan Development

School Impact Analysis for Planned Development: Mixed-use Residential/Commercial

375 N. Morgan St.

Chicago, IL

Connections for the Homeless

Special Use: Non-congregate Homeless Facility

1566 Oak Ave.

Evanston, IL

Underwriters Laboratories

Sign Variations: Tall Building Signage

1603 Orrington Ave.

Evanston, IL

Haymarket Itasca

Special Use/Planned Development: Drug & Alcohol Rehab Center

860 W. Irving Park Rd..

Itasca, IL

Near North Multiple Property District

Chicago Landmarks Proceeding: Landmark District evaluation

9 E. Huron St.

Chicago, IL

SELECTED PROJECT EXPERIENCE

Expert testimony: Administrative Review (continued)

161 E. Erie St.

Chicago Landmarks Proceeding: Individual Property Landmarks Evaluation
161 E Erie St.
Chicago, IL

Acreage Holdings

Special Use Proceeding: Adult Use Cannabis Dispensary
810 W. Randolph St.
Chicago, IL

MedMen LLC

Special Use Proceeding: Adult Use Cannabis Dispensary
1001 W. North Ave.
Chicago, IL

MOCA LLC

Special Use Proceeding: Adult Use Cannabis Dispensary
216 W. Ohio St.
Chicago, IL

61 East Banks (1320 N. Lake Shore Drive)

Planned Development Proceeding: Mid-rise Residential
Lake Shore Drive at Banks St.
Chicago, IL

One Winnetka

Planned Development Proceeding: Mixed Use T.O.D.
Lincoln Ave. at Elm St.
Winnetka, IL

Roascrans Lakeview

Special Use Proceeding: Group Home/Medical Offices
Ashland Ave. at Waveland Ave.
Chicago IL

SELECTED PROJECT EXPERIENCE

Expert testimony: Administrative Review (continued)

Wolf Point

Special Use Proceeding: High-rise Mixed Use Office/Residential
Intersection of N. and W. Branch Chicago River
Chicago IL

Mather Lifeways

Planned Development/Historic Preservation Process: CCRC
Hinman Ave. at Davis St.
Evanston, IL

Church St. Plaza

Planned Development Process: Mixed Use
Church St. at Maple Ave
Evanston, IL

Columbus Hospital Redevelopment

Planned Development Process: High-rise Residential
Lakeview Ave. at Deming Pl.
Chicago, IL

Latin School Of Chicago

Planned Development Process: School Addition
North Ave. at Clark St.
Chicago, IL

840 N. Lake Shore Drive

Planned Development Process: High-rise Residential
Lake Shore Dr. at Chicago Ave.
Chicago, IL

SELECTED PROJECT EXPERIENCE

Expert testimony: Litigation

United States v. Village of Hinsdale IL

Fair Housing Law Suit

111 N. Grant St.: Trinity Sober Living

Hinsdale, IL

McNaughton Development v. City of Lake Forest, IL

LaSalle Factors Law Suit

Amberley Woods Courtyard Homes

Lake Forest, IL

Village of Villa Park v. Wawak

Restrictive Covenant Law Suit

North Ave. at Harvard Ave.: Aetna Property

Villa Park, IL

Dikmen v. Peoples Gas

Land Use Trial: Highest & Best Use/Reasonable Probability of Re-zoning

1040 N. Kingsbury Ave.

Chicago, IL

City of Chicago vs. Eychaner

Condemnation Trial: Highest & Best Use/Reasonable Probability of Re-zoning

Grand Ave. at Jefferson St.

Chicago, IL

City of Chicago v. American National Bank et al

Condemnation Trial: Highest & Best Use

Fullerton Ave. at Elston Ave.

Chicago, IL

Hanna vs. City of Chicago

Arlington Demming/East Village Historic District Challenge (pending)

N. Winchester Ave., N. Wolcott Ave., N. Honore St., and N. Hermitage Ave.

Chicago, IL

SELECTED PROJECT EXPERIENCE

Expert testimony: Litigation (continued)

United States ex rel Albert C. Hanna vs. City of Chicago

Qui Tam Trial: Affordable Housing (pending)

Chicago, IL

DWG v. LCDOT Saddlebrook Farms

Condemnation Trial: Highest & Best Use

Il Route 60 at Peterson Rd.

Lake Co., IL

City Of Chicago vs 2600 Sacramento Corporation

Condemnation Trial: Highest & Best Use

26th St. at California Ave.

Chicago, IL

Village Of Woodridge vs Board Of Education, High School District 99

Condemnation Trial: Highest and Best Use

75th St. at Woodridge Dr.

Woodridge, IL

1350 Lake Shore Associates vs City Of Chicago

Zoning Trial

Lake Shore Drive at Scott St.

Chicago, IL

Hanna vs City of Chicago

Zoning Trial (SD19)

N. Lincoln Ave.; W. North Ave.; N. Halsted st.; and W. Fullerton Ave.

Chicago, IL

Hanna vs City of Chicago

Zoning Trial (Deming)

W. Fullerton Ave; N Orchard St.; W. Deming Pl.; and N. Clark St.

Chicago, IL