April 19, 2017

Mayor William D. McLeod, and
Board of Trustees
Village of Hoffman Estates
Municipal Center
1900 Hassell Road
Hoffman Estates, IL 60169

Dear Mayor McLeod and Members of the Board,

I am writing on behalf of the government members of the Barrington Area Council of Governments (BACOG). Our members are opposed to the proposed development called Plum Farms located near Route 59 and Higgins Road.

Since its formation in 1970, BACOG’s mission has been to support reasonable development and protect environmental resources. These concepts are intimately linked in the BACOG regional land use plan, first developed in 1975 and supported by our members in their implementation of development over the past 40+ years. The fundamental tenet of the plan is to match the type, level and density of development to the environmental resources necessary to support it, without causing harm to those resources.

The regional plan is aimed at implementing reasonable, compatible, predictable development that protects property values throughout the area as well as environmental resources. The proposed development disrupts this regional planning in a very significant way. We will discuss our objections below, and thank you for your consideration.

Density Objection

The site under consideration, “Plum Farms” as it is proposed to the Village of Hoffman Estates, is a very high density development for Hoffman Estates and in comparison to the areas surrounding it. The site is surrounded by these land uses:

- Cook County Forest Preserve to the west in Barrington Hills, open space
- Barrington Hills’ 5-acre zoning, beyond to the north
- South Barrington’s The Woods development, net about 1 unit per acre
- Commercial uses to the south, near Route 72

With such low densities in the surrounding area, we would hope to see the Plum Farms’ site density similar to adjacent uses – or at least be designed as a transitional area that would blend with the properties surrounding it. A lower density than proposed would certainly be typical in planning practice.

Instead, the residential density proposed is over 1,000 units, and as many as 1,500 units over time, on something over 150 acres. This is not in any way similar to 1/5th of a unit/acre (Barrington Hills) or 1 unit/acre (adjacent South Barrington). Although the anticipated number of residential units on number of acres is not completely clear for Plum Farms, it appears its density is roughly 7 times that of adjacent South Barrington and 37 times the density of Barrington Hills. And it will have up to 200,000 square feet of commercial and retail uses on the same site. The housing units also will be clustered (horizontally and vertically) around the dedicated open space, giving the appearance of extremely high density.

At the April 5th Plan Commission meeting, a member of the Plum Farms team said the land use is transitional. As a planner, it is really difficult for me to see Plum Farms as a transitional area. In fact I cannot, and it is not.

The site is also proposed for Traditional Neighborhood Development, a new zoning category described in a village staff report as: having “characteristics that are more similar to traditional urban neighborhoods” than the more typical suburban design found in most suburbs. While developers may say that 600 square foot apartments are now “what people want”, only time will tell if this extremely high density is desirable, saleable, or sustainable in this suburban area.

BACOG opposes the extremely high density proposed at Plum Farms, and we urge the Board of Trustees to require lower densities.

**Impacts to Surrounding Communities**

The TND zoning and urban densities are troublesome to the people who now live in the area, on multiple levels: aesthetic issues, effect on nearby property values, anticipated traffic congestion, and financial burden on taxpayers of other communities. Several of these concerns are addressed below.

**Objection to Shifting Cost Burden to Other Communities**

While sales taxes generated by the commercial/retail uses will benefit the Village of Hoffman Estates, the taxpayers who will carry the additional costs of new schools and other facilities live in other communities.

Members of BACOG were glad to see the Tax Increment Financing (TIF) request withdrawn. The development team stated at the April 5th Plan Commission meeting that
the TIF was withdrawn for now, but they could not guarantee that it would not come back. We urge the Board of Trustees NOT to consider re-instatement of a TIF in the final annexation and other agreements, as this would certainly be perceived by the public as misleading, or insincere at the least.

The TIF aside, a very significant part of the cost burden comes purely from the proposed densities. Fewer homes and apartments would mean fewer people to serve and for whom to build facilities. It would logically mean fewer costs on taxpayers as well, that is, taxpayers who reside in communities outside Hoffman Estates. This point goes to the “why” of BACOG’s involvement and objection: taxpaying residents of school districts 220, the Barrington Area Library district, the regional fire protection districts, and other governmental districts will pay Plum Farms’ costs. The districts’ taxpayers are the same as the residents of the BACOG communities. While the development will be located in Hoffman Estates, its costs will be paid in increased tax bills by residents of other communities.

As neighbors, we ask you to consider lowering the densities to lower the impact on the residents and governmental districts that neighbor you.

**Objection to Development Impact Fees Component Values**

To help pay for other districts’ costs, the Board of Trustees has the ability to charge whatever impact fee it wishes because the property is under an annexation agreement. A significant help to the affected districts and their taxpayers would be a significantly higher impact fee than is proposed.

The “Naperville formula”, which is basically utilized in both Hoffman Estates and in the BACOG municipalities, uses several components in the equation that determines how much the fee will be. At least two of the components in the calculation are significantly lower in the Hoffman Estates agreements than the components used in the BACOG-area ordinances. These include the land cost per acre, and the number of acres required for school buildings.

We believe it would be far better to use the component cost figures in the BACOG communities’ ordinances, which would generate a higher impact fee to offset the costs of expanding schools and other facilities. Because the land that would be purchased for school expansion will be located in the BACOG area, it is only fair to use the BACOG area land values. Because the acreage required for a new school or expansion in the BACOG area is the school district standard for CUSD220 where the new school or expansion will be located, it is only fair to use the BACOG area acreage requirement.

The real costs to CUSD 220 are reflected in our ordinances. The Hoffman Estates impact fee land values and acreage requirements are not relevant to a school constructed in the BACOG area. Additionally, under the annexation agreement it appears that the developer reserves the right to commission their own demographic study (number of students generated by each type of housing, another component of the impact fee calculation),
which we suppose could result in an even lower impact fee for the Plum Farms development.

We would ask you to modify the section of the agreement concerning development impact fees and use all the BACOG impact fee ordinance component values in your impact fee calculation for Plum Farms.

**Environmental Concerns**

BACOG has been working on groundwater for more than 15 years. We know that the development site sits on a glacial moraine, composed mainly of clay and till, which are soil materials that do not readily conduct water downwards. In addition to not readily replenishing the aquifers, the preponderance of low-conductivity clay and till materials means that rain and snowmelt will sit on the site for long periods of time, or flow horizontally away from all its rooftops and paved areas as stormwater. Considering the density of the proposed development and that a great deal of the Plum Farms site will be covered with rooftops and paved surfaces such as roadways, parking areas and driveways, it will be critically important to approach stormwater retention and drainage in a manner that is equally unique and innovative as the zoning and development itself.

We ask the village to require an in-depth environmental site analysis, and we offer that permeable pavers, rain gardens and other groundwater/surface water-friendly and innovative practices and structures be introduced on the entire site as a requirement of approvals. This would support “doing no harm” to the environment, and in fact could be an innovation of note for Hoffman Estates. There are regional conservation organizations, including BACOG, that would be most happy to contribute to this consideration.

The governments of BACOG recognize the right of the Village of Hoffman Estates to develop as you think best. In your definition of “best”, we ask you to consider the impacts of the proposed Plum Farms development on your neighbors and the environment in your final decisions.

Thank you for your consideration of our concerns. Please feel free to contact me or members of our Executive Board at any time.

Sincerely yours,

Janet L. Agnoletti
Executive Director

*The Barrington Area Council of Governments (BACOG) is a regional planning organization*
representing eight local governments in portions of Cook, Lake, McHenry and Kane Counties.

Located in the northwest Chicago metropolitan area, BACOG's governmental members are the Villages of Barrington, Barrington Hills, Lake Barrington, North Barrington, South Barrington and Tower Lakes, and Cuba and Barrington Townships.

cc: Chairman and Members, BACOG Executive Board:
Albert R. Pino, President – Village of North Barrington, and Chairman, Executive Board
Paula McCombie, President – Village of South Barrington
Karen Y. Darch, President – Village of Barrington
Amy Nykaza, Supervisor – Barrington Township
Martin McLaughlin, President – Village of Barrington Hills
David F. Nelson, Supervisor – Cuba Township
Kevin C. Richardson, President – Village of Lake Barrington
David R. Parro, President – Village of Tower Lakes