



ZONE CO⁺⁺

Zoning Diagnostic Report

Evanston, Illinois

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What is a Diagnostic Report?

The development of this Diagnostic Report is the first step in rewriting the City's Zoning Ordinance as part of Envision Evanston 2045. This report evaluates the Zoning Ordinance in its ability to achieve the preliminary goals that have emerged as part of the process to develop a new comprehensive plan. Evanston has a very active tradition of long-range planning, and the consultant team is also reviewing several other long-range plans, studies, and projects that contain implications for the Zoning Ordinance rewrite. However, the main objective is to understand on a granular level whether the current zoning ordinance is, or is not, achieving the objectives of the Envision Evanston 2045 preliminary goals.

It is crucial for the community to distinguish between the Diagnostic Report and the Comprehensive Plan. The Comprehensive Plan will result from the year-long planning process that includes community engagement, visioning, and goal setting. The goals generated in this process can range from broad objectives, like "Maintain accessible neighborhood green space," to precise directives, such as "Allow buildings up to 42 feet in height."

A Comprehensive Plan is adopted by the City Council and serves as a high-level roadmap to guide future decision-making. In contrast, a Zoning Ordinance is codified into law and establishes regulations that, if not adhered to, constitute a legal violation. Envision Evanston 2045 includes a rewrite of the City's Comprehensive Plan and Zoning Ordinance and this Diagnostic Report focuses on opportunities for improvement based on the "Five Pillars" or goal areas that have emerged thus far as part of the process.

This report was developed by a team of unbiased professionals through a review of existing adopted plans, policies, and regulations. Drawing on their expertise in zoning and knowledge of national best practices, the team conducted an evaluation of the Evanston Zoning Ordinance. Where long-range goals did not address specific coding language, the team compared the language against best practices in zoning, land use planning, and zoning administration to generate recommended revisions or areas for further analysis.

The purpose of this report is to provide guidance for the Zoning Ordinance rewrite. The Envision Evanston 2045 process has established five preliminary goal areas, which serve as a point of comparison for this report through the "Five Pillars" framework.

Acknowledging Historic Inequities in Planning: Nationally and Locally

The United States has a deeply rooted history of inequitable land use practices. While outright race-based zoning was deemed unconstitutional by the United States Supreme Court in 1917, other racially restrictive land use practices, including redlining and racially or religion-based restrictive covenants, took hold soon after.

Redlining refers to the discriminatory lending practice dating back to the 1930s in which neighborhoods were “graded” for perceived lending risk based on characteristics of the residents and property owners in that neighborhood. Often, neighborhoods where primarily Black and minority residents lived received failing grades, such that the homes within them were excluded from government-backed homeownership and lending programs. These areas were marked with red ink redlined on the map. Conversely, areas where primarily white residents lived were given better grades and were thereby included in government-backed programs. Many of those redlined neighborhoods suffered from the corresponding disinvestment and are still segregated.

Around the same time, racially restrictive covenants, contractual agreements between neighbors that prohibited the sale, lease, or even occupation of property in certain neighborhoods to communities of color and diverse backgrounds, became commonplace. Despite the United States Supreme Court holding the practice to be unconstitutional in 1948, many people still included them in their deeds. Despite the Fair Housing Act of 1968 prohibiting discriminatory housing practices, redlining persisted in Evanston well into the 1980s, particularly through discriminatory lending practices by banks. These financial institutions continued to deny loans or impose unfair terms on Black residents and other minority groups, effectively restricting their ability to buy homes in certain neighborhoods. This practice reinforced racial segregation, limiting economic opportunities and perpetuating disparities in housing and wealth that still impact the community today. Redlining's legacy in Evanston highlights the long-term effects of systemic racism in housing policies and underscores the need for ongoing efforts to address these inequities.

The City of Evanston has taken steps to address historical racial discrimination. Evanston's Local Reparations program emerged from a recognition of past harm, particularly in housing policies, that affected Black residents. The program was initiated by the Evanston City Council in 2019, following advocacy from local residents and community leaders. It is funded primarily through a tax on recreational cannabis sales. The current program, Restorative Housing, focuses on providing financial assistance to eligible Black residents for housing-related expenses, such as down payments and home repairs. This initiative aims to address the wealth and opportunity gaps created by past discriminatory practices, offering grants to help rectify historical injustices and promote economic stability within the Black community in Evanston. The initial funding comes from a 3% tax on recreational cannabis sales, with the first phase allocating \$400,000 to eligible households. To qualify, residents must have lived in Evanston between 1919 and 1969 or be direct descendants of such residents, demonstrating the city's commitment to rectifying past harms. This initiative is one of the first municipal reparations programs in the United States. Additional programs such as Guaranteed Income, Pathways to Wellness, and a Health Hub are also targeted to areas

significantly affected by redlining, creating a suite of interventions aimed at addressing the lasting impacts of the racist policy.

Zoning regulations are crucial in building an inclusive, equitable, prosperous, and healthy community. Ensuring that zoning and planning promote equity and racial justice is essential for the City. To achieve these goals, it is important to acknowledge and address both current and past problematic zoning practices as we undertake this project.

Zoning Ordinances and How They Evolve

This report, referred to as a Diagnostic Report, was developed part of Evanston's Zoning Ordinance Rewrite project. Zoning codes, also known as land-use regulations or zoning ordinances, define how land can be used within a city or municipality. Over time, as cities evolve and planning priorities shift, these codes require updates or adjustments. Both "zoning ordinance rewrites" and "text amendments" are mechanisms for updating and refining these regulations, but they differ in scope and purpose. Throughout this document, the terms "zoning code" and "zoning ordinance" will be used interchangeably.

A zoning ordinance rewrite represents a thorough revamp of a city's zoning ordinance, requiring a holistic re-evaluation and potential redrafting of the existing code in order to implement the goals of long-range plans. Cities opt for such rewrites to modernize in line with current planning practices, cater to urban growth, resolve inconsistencies in older codes, further specific development priorities, achieves desired policy outcomes, and respond to contemporary challenges. This endeavor is typically an extended and rigorous process, requiring extensive community engagement, expert input, numerous public discussions, and multiple rounds of careful review to ensure alignment with long-term goals. Ultimately, the process culminates in a fresh, updated zoning ordinance that supersedes the previous one.

Text amendments to the zoning ordinance, which could occur piecemeal or as batches of amendments, entail targeted modifications to an existing zoning code, making incremental changes rather than overhauling the entire policy document. These amendments are typically pursued to address highly specific issues, clarify vague language, or integrate previously un-considered land uses. The amendment process is not as lengthy as a full rewrite, but depending on its extent, it requires public hearings, reviews by the planning commission/land use commission, and final approvals by governing bodies. As a result, the overall zoning ordinance remains intact, but with precise adjustments to selected sections.

In essence, a zoning ordinance rewrite is like writing a new book, while a text amendment is like editing or updating specific chapters or sections of an existing book. Both serve important roles in ensuring that the zoning code remains relevant, clear, and effective in guiding land use and development in a community.

Evanston’s Vision: The Plan’s Five Pillars

The Envision Evanston 2045 process represents a strategic initiative to update both the Comprehensive Plan and the Zoning Ordinance, addressing current and future development trends. The Comprehensive Plan is being developed through a year-long process that combines public engagement, data analysis, and strategic planning. Through public input, key concerns were identified, including a lack of housing diversity, the complexity of the current zoning code, and the need for improved east-west connectivity and equitable access to the lakefront.

Key findings and observations in the data, alongside community feedback, led to the development of five guiding pillars: fostering a healthy community, building a strong local economy, prioritizing environmental sustainability, increasing housing diversity, and enhancing connectivity. These initial pillars represent a set of goals that will guide Evanston’s future growth and development.

Five Pillars	Description
Pillar One: Create Healthy Community	<p>We strive to build a vibrant, inclusive community that supports the holistic health of all its residents by:</p> <ul style="list-style-type: none"> • Ensuring equitable access to housing and essential amenities such as grocery stores, parks and recreational facilities, hospitals, and so on. • Promoting safety by designing walkable neighborhoods with well-lit streets, ample sidewalks, and designated bike lanes to encourage active transportation. • Enhancing the aesthetics of the built environment through thoughtful urban design, green spaces, preservation of natural landscapes, creating visually pleasing & inspiring places for residents to live, work, and play
Pillar Two: Establish a Strong Local Economy	<p>We aspire to build a prosperous, inclusive community where economic vitality and quality of life are interwoven and benefitting to all by:</p> <ul style="list-style-type: none"> • Supporting local businesses, attracting new industries, and promoting workforce development initiatives to stimulate job growth. • Encouraging entrepreneurial endeavors and small business development through accessible resources, training programs, and financial incentives. • Revitalizing and supporting downtown and business districts to create thriving hubs of commerce and culture, characterized by a mix of retail, dining, entertainment, and office spaces.

<p>Pillar Three: Prioritize Environmental Sustainability</p>	<p>We strive to protect and preserve natural environment by implementing comprehensive climate action strategies that prioritize sustainability, reduce carbon emissions, and promote the conservation of ecosystems and biodiversity. We will actively preserve our natural environment for the benefit of current and future generations by:</p> <ul style="list-style-type: none"> • Conserving the lakefront and beaches through sustainable management practices that maintain water quality, support biodiversity, and provide public access for recreation and enjoyment. • Enhancing and expanding parks and open spaces to ensure they serve as vital green lungs for the community, promoting physical activity, mental well-being, and ecological balance. • Protecting ecologically sensitive areas by implementing conservation strategies, preventing habitat destruction, and promoting biodiversity to maintain healthy ecosystems.
<p>Pillar Four: Celebrate Arts and Culture</p>	<p>We aim to honor our history, celebrate our diversity, and foster a thriving cultural landscape for all by:</p> <ul style="list-style-type: none"> • Preserving and restoring historic buildings to maintain Evanston’s architectural heritage and connect our residents to our shared past. • Supporting diverse cultural expressions and events that reflect the rich cultural tapestry and unique identity of our community. • Developing vibrant public spaces with impactful public art where people can gather, interact, and engage with cultural and artistic activities, that inspire creativity, foster community pride, and attract visitors.
<p>Pillar Five: Increase Housing Diversity</p>	<p>We strive to build resilient and inclusive neighborhoods where people of all ages, incomes, and family structures can find suitable and attainable housing by:</p> <ul style="list-style-type: none"> • Developing a wide range of housing types and sizes to meet the diverse needs of our community, from single-family homes to multifamily units and accessory dwellings units (ADUs). • Implementing policies and incentives that provide options for low-to-middle-income households, preventing displacement and promoting economic diversity throughout the City. • Encouraging the development of medium density housing solutions that bridge the gap between single-family homes and large apartment complexes.

General Guiding Principles: Best Practices in Land Use Regulation

Zoning is a powerful tool to shape the built and natural environment. When reviewing Evanston's zoning code, the regulations were viewed through the lens of the "Five Pillars" in addition to the following principles.

1. Zoning should regulate only what needs to be regulated.

The orderly development and use of land and structures requires comprehensive regulation through the implementation of planning and zoning controls. However, regulations that do not relate to public interests of health and safety may overstep the power granted to governments and may not be legally defensible.

2. Zoning should respect both existing and desired development patterns.

Zoning regulations should relate to a community's existing and desired development patterns and should foster a climate that facilitates investment and redevelopment within the community. When regulations are out of context with existing or desired development patterns, land owners may need to apply for numerous administrative approvals for typical development projects that increase the cost of investment in a community. Further, antiquated or burdensome zoning regulations may act as a disincentive to investment and development, hindering growth.

3. Zoning should implement the plan, not be a barrier to achieving the vision.

Zoning should be a tool to implement a community's vision as expressed in its long-range planning documents. In many instances, a community invests time, funds, and energy into the development of a comprehensive plan, but zoning regulations are overlooked or revised over time in a disjointed manner. This scenario leads to outdated, inconsistent, and disorganized zoning regulations that are cumbersome, intimidating, and costly for property owners and administrators alike, impeding planning goals and economic development. On the other hand, a comprehensive rewrite to the zoning ordinance within the long-term planning process allows for clear, usable, defensible, and consistent regulations that operate efficiently to protect the public interests and encourage desired outcomes.

4. Zoning should prioritize equity.

Zoning codes are complex and multi-disciplinary documents, and given the ubiquity and power of zoning, there is relatively little research regarding all the myriad ways that zoning has contributed to segregation and differential access to opportunity within the United States. At a minimum, zoning has reduced the availability, affordability, and diversity of housing options in communities across the country and impeded investment in older and obsolete properties. All zoning amendment processes should explore and find solutions for the direct and indirect ways zoning codes contribute to inequity.

Other Evanston Plans, Studies and Initiatives

The City of Evanston has adopted or implemented several plans that collectively help guide the Envision Evanston 2045 plan. These plans include the 2022 EPLAN, Central Street Master Plan, Chicago Avenue Corridor Study, City of Evanston Comprehensive Plan (2000), Climate Action & Resilience Plan (CARP), Downtown Evanston Plan, Evanston Main Street Station TOD Plan & Study, Evanston Thrives, Lakefront Master Plan, One Howard Street Economic Recovery Plan, Preserve 2040 and the West Evanston Master Plan. The following section, derived from the "Preliminary Findings Report" (pages 23-24), provides a brief overview of each plan.

2022 EPLAN

The 2022 EPLAN examines health and racial equity using a variety of metrics, such as life expectancy, healthcare access, and proximity to parks and grocery stores. The plan reveals geographic differences in health indicators across the community and proposes strategies to address these inequities. While some advancements in health are tied to services, many are linked to the condition of the built environment considered in EE45, such as the locations of parks, trails, grocery stores, medical facilities, and community spaces. EE45 also makes programmatic recommendations to increase residents' access to a healthy lifestyle.

Central Street Master Plan

This master plan provides streetscape and development strategies for Central Street from Gross Point Road to Ridge Avenue. The plan aims to sustain and enhance Central Street as an attractive, mixed-use, pedestrian- and neighborhood-oriented street with distinct character. Key strategies include diversifying commercial and housing options, improving appearance and safety, and enhancing pedestrian, bicycle, and vehicular circulation. EE45 coordinates private land use and public investment to achieve the streetscape and development pattern envisioned in the Central Street Master Plan. Additionally, EE45 outlines strategies to enhance the multimodal transportation network to support walking and biking to and along Central Street.

Chicago Avenue Corridor Study

This study provides recommendations to revitalize Chicago Avenue in Southeast Evanston. The report recommends improvements to the pedestrian environment, redevelopment of vacant and underutilized properties, and advancement of a cohesive, visually appealing corridor. EE45 establishes policies for urban design, land use, and public infrastructure, all of which are key to achieving an attractive Chicago Avenue corridor. EE45 recommends policy realignment and incentives to promote redevelopment, while also prioritizing city-wide sidewalk enhancements.

City of Evanston Comprehensive Plan (2000)

The 2000 Comprehensive Plan is Evanston's existing planning document that guides land use and transportation decision-making within the city. EE45 is an update to this plan. The plan embraces growth and aims to guide it in a manner that enhances the community's character and quality of life. Key goals include offering a range of housing choices, maintaining viable commercial areas, creating mixed-use neighborhoods, preserving and establishing green space, and offering high-quality transportation

options while prioritizing pedestrians, cyclists, and transit. EE45 builds upon the 2000 Comprehensive Plan by clarifying and advancing policies that remain relevant while augmenting them with new recommendations and priorities. While EE45 considers current trends and opportunities, the plan builds on legacy planning guidance to hone Evanston's high quality of life.

Climate Action & Resilience Plan (CARP)

This plan focuses on two main areas: climate mitigation and climate resilience. Key mitigation goals by 2050 include achieving city-wide carbon neutrality; transitioning half of current trips to transit, walking, or bicycling; achieving zero waste; and fostering a healthy and growing tree canopy. The plan also calls for resilient green infrastructure, cooling facilities, and other preparations to enable human and natural populations to adapt to a changing climate. EE45 addresses the built environment, which is a focus of key CARP goals. Specifically, EE45 guides the city's pattern of development and influences available transportation modes, both of which are significant contributors to emissions. EE45 also guides natural preservation, green infrastructure, and critical community facilities to ensure climate preparation.

Downtown Evanston Plan

This plan establishes guidelines for downtown planning and development. Key recommendations include protecting downtown's walkable, mixed-use, and transit-oriented character while elevating design quality, sustainability, and predictability. EE45 contains land use policies to guide the desired form for downtown as expressed in the Downtown Evanston Plan. Additionally, EE45 establishes guidance for public improvements to reinforce and improve the existing pedestrian, cycling, and public transportation networks in line with Downtown Evanston Plan goals.

Evanston Main Street Station TOD Plan & Study

This plan provides a vision for improvements to Main Street Station and the immediate surrounding area. The plan outlines improvements to station function, streetscape design, and pedestrian and bicycle access while calling for new mixed-use development in the transit-oriented development (TOD) area. EE45 recognizes the importance of Evanston's transit stations in meeting mobility needs as well as sustainability and climate goals. EE45 coordinates transportation improvements with public and private land use to provide recommendations and implementation strategies for the Main Street Station TOD area.

Evanston Thrives

Evanston Thrives establishes a retail action plan in order to support and attract businesses. Recommendations range from sponsoring events in public spaces to installing wayfinding signage to developing branding for retail districts. The plan also recommends physical improvements to various retail areas. EE45 plays a key role in guiding public investment and coordinating private development activities to create vibrant spaces. High-quality public spaces are a key driver of foot traffic, which supports retail as well as community connection. EE45 can also recommend prioritization and funding sources for design guidelines, business incentives, wayfinding, and other strategies to help address resident concerns about a declining retail environment.

Lakefront Master Plan

The Lakefront Master Plan establishes a vision for the redesign of the Evanston shoreline. The plan recommends shoreline improvements, park space construction, and natural area preservation to enhance user experience and ecological function. Lakefront redesign is a City-led effort involving various infrastructure and capital improvements. EE45 guides public investment and recommends policies and funding sources to achieve the outcomes envisioned in the Lakefront Master Plan.

One Howard Street Economic Recovery Plan

The One Howard Street plan provides an economic recovery plan for the Howard Street corridor from Western/Asbury Avenue to Sheridan Road. The plan recommends redevelopment, streetscape improvements, and placemaking efforts to improve corridor vibrancy. EE45 aims to achieve the streetscape and development pattern envisioned in the One Howard Street plan through coordination of public investments and private development. The plan provides strategies to enhance multimodal transportation options and increase vibrancy within Evanston's corridors.

Preserve 2040

Preserve 2040 is a preservation plan for cultural resources including buildings, sites, structures, people, stories, and objects. The plan aims to guide the Preservation Commission and its partners in their stewardship of Evanston's resources through preservation tools, adaptive reuse, education, and other means. The plan aims to be a foundational land use, economic development, and planning tool. EE45 guides Evanston's development pattern, which influences the extent to which infill development, preservation, and maintenance of the urban fabric occur. EE45 brings together the goals of Preserve 2040 and other planning efforts to link historic preservation with community goals such as climate mitigation, affordable housing, and retail vibrancy.

West Evanston Master Plan

The West Evanston Master Plan guides redevelopment of the West Evanston TIF District, which includes primarily industrial land and a vacated railroad right-of-way. The plan, which was developed following an extensive community engagement process, provides recommendations for the future development pattern and proposes streetscape and greenway enhancements. The plan culminated in a zoning overlay district adopted in 2009. EE45 advances the vision set forth in the West Evanston Master Plan through policies and strategies that promote its implementation. EE45 guides public infrastructure investments and promotes redevelopment that is consistent with community goals.

Report Methodology

The following section describes the general methodology for completing this report.

The first step was to develop a diagnostic matrix which is the analysis of the existing zoning code. The provisions of Evanston's existing code were placed within a spreadsheet, and each provision was reviewed against the five planning pillars that guide the comprehensive plan goals. The development of the diagnostic matrix reflects the consultant's thorough and objective review of the code. Further to this, the consultant, while developing the diagnostic matrix, logged observations regarding the code's organization, layout, flow, and readability – these observations are used to populate the "General Observations" and "Zoning Code Assessment" sections.

General Observations

Throughout the code review process, general observations regarding code-wide issues were compiled. The general observations listed below apply to multiple sections of the Code, and instead of stating them repeatedly for multiple sections, they are presented cohesively within the section below.

The zoning code contains roughly 800 provisions. For the purposes of this assessment, we have categorized each provision into one of three categories:

Categorization of Provisions	
Policy	<p>There are instances where overarching policy goals are listed within the zoning code.</p> <p>For example, "Purpose Statements" found throughout the code contain prescriptive language about what a particular provision or provisions are trying to accomplish, like the following: <i>"The R3 two-family residential district is intended to provide for infill development of single-and two-family residences in moderate density neighborhoods and to preserve the present physical character of such neighborhoods."</i>¹</p>
Procedures	<p>All zoning codes contain procedures which are essentially action steps that must be taken to receive planning approvals or permits.</p> <p>For example, <i>"an application for a special use permit may be filed with the Zoning Administrator by the owner or lessee of the subject property or other person having a legal or equitable interest in the subject property."</i>¹</p>
Development Standards	<p>The development standards communicate which uses are permitted and how the building and site must be constructed or arranged.</p>

Categorization of Provisions

For example, “the maximum floor area ratio in the D2 district is 2.75,” or “the maximum building height in the MU district is forty-one (41) feet or three (3) stories, whichever is less.”¹

¹ Excerpts taken from the City of Evanston Zoning Code

Additionally, this section of the report offers a general zoning code assessment, highlighting key areas that need addressing to ensure the revised code aligns with the goals of the Envision Evanston 2045 Plan. It also covers organization, language and consistency issues, procedural clarity, and provides a high-level zoning code assessment.

Policy

There are passages throughout this code that communicate the overarching policy goals guiding zoning regulations. These passages identify community goals and objectives underlying and shaping adopted zoning standards, which are usually drawn from long-range planning documents. In the initial review, we made the following observations:

- There are inclusionary housing bonuses within the code, which demonstrate a commitment to affordable housing for residents (though not for very-low- and extremely-low-income residents). Each inclusionary zoning section references section 5-7-3 of the City Code which states an objective to “promote the public health, safety, and welfare of the residents of Evanston by requiring residential developments or developments which contain a residential component to include a certain percentage of dwelling units in a proposed development to be priced affordably for low-income, moderate-income, and middle-income households or to make a payment in accordance with the terms of this Chapter.”
- Equity and equitable outcomes are notably absent from the purpose statements, public benefit statements, and other sections of the code. This is despite the inclusion of other prescriptive statements focused on preserving natural, historic, architectural, and environmental features.
- The planned development code lists “provision of a variety of housing types in accordance with the City’s housing goals” as a desirable public benefit, indicating a commitment to the community’s housing goals. However, there are no real policies in place to effectively address and increase housing diversity.
- Within the R zoning districts, which is where the majority of the city’s residents reside, there is no reference to the City’s housing goals.
- There are several policy goals related to reducing congestion. Populated areas, especially cities, inherently have congestion due to a more concentrated population than rural areas. Where any city has a high level of accessibility and activity, which is positive, it will also have congestion. The goal of lessening congestion can be used selectively and in discriminatory ways to prevent the

construction of smaller, more concentrated units that tend to be more affordable. Additionally, there is a notable absence of policies addressing walkability, bike lanes, and overall transportation infrastructure, which are crucial for reducing congestion and promoting sustainable urban living.

- Small businesses frequently do not have the space needs of larger businesses and retailers, and in most cases do not have the resources or the desire to pursue large lot development. It is positive that several business districts aim to accommodate “small neighborhood business districts”, “small storefronts”, and “unique, small scale, pedestrian oriented retail shops, services, and restaurants”, which makes business ownership more accessible generally. The plan and zoning code rewrite should prioritize and promote opportunities for small scale, pedestrian oriented retail shops, services and restaurants.
- There are multiple instances where maintenance of “character” is a stated policy goal. The term “character” could be used to reinforce or enforce exclusionary dynamics in the built environment if they already exist in a given zoning district.

Procedures

Construction or alteration activity that requires any kind of permit or planning approval is required to follow a set of procedures. It can be challenging to fully understand how procedural steps in any zoning ordinance are experienced by residents, and public engagement will help to understand resident experiences. In the initial review of procedures, we made the following observations:

- Amendments to the zoning code require a public process to determine whether the amendment is in the best interest of the community. Segments of the community might support or oppose an amendment. In Evanston, if 30% of adjacent property owners oppose a map amendment, support from $\frac{3}{4}$ of the City Council Members is needed to approve it. This provision allows a minority of adjacent property owners to create an additional hurdle for an amendment. The city should study instances where this provision has been triggered to ensure it is not being used discriminatorily against more affordable housing types, such as smaller, attached dwellings.
- Where low-income residents are in violation of the zoning ordinance due to lack of funds, the code should direct property owners to the Owner-Occupied Housing Rehabilitation Program; this program is positive and demonstrates commitment to treating homeowners equitably.
- It is positive that the Housing and Community Development Committee is mandated to have housing advocate and professional appointments; however, the Land Use Commission is not mandated to have a housing or equity professional on the Commission, which should be examined given the high proportion of residentially zoned land in Evanston.

Standards

Development standards are the provisions within a code that govern how uses, buildings, and site features are organized on a given property. In the initial review of development standards, we made the following observations:

- **Residential Zones and Residential Uses.** The City’s housing goals are not represented within the policy goals for the R districts, despite the limited availability of land for development or redevelopment. Zoning codes sometimes mandate economically inefficient land utilization, such as excessive lot standards and setbacks, which disproportionately impact lower-income residents. This inefficiency can lead to exclusionary or segregationist effects on housing. In the R districts, certain standards are excessively restrictive, and in some instances, these restrictive standards are found outside of the R district but still apply directly to residential properties, including:
 - Lot coverage maximums;
 - Floor area ratio maximums;
 - Height maximums;
 - Minimum lot size, especially where additional lot size is required per residential unit on-site; and
 - The limited range of housing types permitted in the R1, R2, and R3 districts, especially since regulations can mandate that their form and design be complementary to existing structures.

- The term “family” should not be used throughout the code and should not be defined. Instead, issues of overcrowding, health, and safety within structures should be more effectively governed by applicable governing codes. Households should have the inherent right to form regardless of whether the members are related or unrelated. It is reasonable for a municipality to implement regulations that guard against overcrowding or unsafe conditions, but mandating familial structures is an inherently flawed and discriminatory approach to achieving these objectives.

- **Planned Developments (PD) in Residential Districts.** A PD is intended to be a tool that provides flexibility in land use that complements the zoning code. Applicants go through a public process to ensure that their proposals are advantageous for the City of Evanston in meeting planning goals and objectives even if they do not conform to existing zoning code. The following restrictions are antithetical to the goal of utilizing the PD flexibly to meeting planning objectives:
 - The maximum increase in dwelling units permitted within the PD, which is none in R1-R3, and 25% in R4-R6, is overly restrictive.
 - The additional allowances for lot coverage are overly restrictive. While the provision of open space, parks, or permeable surface areas are tangible objectives, the other lot coverage standards merely mandate inefficiency without achieving a tangible goal.

- **Other Zones.** The following standards may be acting as barriers within the B1, B1a, and B2 districts, hindering the development of dense, walkable, mixed-use areas that provide a high level of accessibility to residents:
 - Maximum building heights;
 - Minimum lot sizes;
 - Floor to area ratios.

- It is positive that the first 3,000 square feet of building space for a non-residential property in any D district is exempt from providing a minimum number of parking spaces. However, the downtown area lacks an overall parking strategy enforcing parking space minimums. Given that many downtown sites are historic and were developed before the widespread use of private automobiles, continuous implementation of parking space minimums could create an additional barrier to development. This is counterproductive in an area that should prioritize walkability and accessibility.
- The limitations that the development standards within the U1, T1, and T2 impose have the potential to severely restrict residential density. The City should assess whether these limitations have facilitated additional student demand for housing within the R districts due to an undersupply of student housing in those districts.
- The Commercial and Downtown districts generally provide clear and comprehensive standards, although some sections could benefit from increased conciseness and the inclusion of visual aids for better readability. The regulations effectively cover various aspects of zoning but may be overly restrictive in areas such as height limits and lot coverage, potentially hindering development flexibility. Additionally, modern urban planning principles, particularly those promoting walkability and mixed-use development, could be more prominently integrated to align with current best practices. A clearer definition of what constitutes an "active storefront" would also be beneficial to ensure consistent application of zoning standards
- The Transitional Manufacturing (M) Districts and Industrial Districts (I1, I2, I3) codes reveal several areas for improvement. Notably, the I1 and I2 districts are no longer effectively industrial in nature and function more like commercial districts. Only I3 maintains true industrial uses. Moving forward, regulations for the M districts and I1/I2 areas should be aligned or consolidated, given their similar commercial character. Additionally, some M districts no longer exist, as they have fully phased out. Streamlining the regulations for these areas would enhance clarity and reflect their current commercial usage.
- The Research Park (RP) District is outdated, as the research park concept never fully materialized. The area now functions as a significant part of the downtown, and its regulations should be updated to reflect this reality. The RP district should have standards appropriate for a downtown environment that also encourage appropriate research and development, considering its historical intent and proximity to Northwestern University.
- The City should review the Special Purpose and Overlay Districts to determine their current applicability and areas of impact within the city. Some districts may benefit from consolidation, with clearer and more readable standards. Additionally, incorporating a map of these districts into the code would be beneficial. The districts can be summarized in a table and then detailed in individual sections outlining specific standards. This approach would enhance organization and accessibility.
- Incorporating sustainability measures, such as green building requirements and incentives for renewable energy use, should be applied across all districts to

position Evanston as a leader in sustainable development. These measures will ensure that all areas, whether residential, commercial, or industrial, contribute to the city's environmental goals and foster a more sustainable and resilient community.

Organization

The organization of the Evanston Zoning code could benefit from a more streamlined structure, where related sections are combined to enhance clarity and ease of navigation. Currently, the code is divided into multiple chapters that address various aspects of zoning, such as rules of interpretation, development standards, and specific district regulations. By consolidating sections that address similar topics, the code can be more user-friendly.

- **Information is hard to find.** The code lays out development standards within long passages of text, which make them challenging to find and interpret. Modern zoning codes present permitted uses and numeric development standards within tables to make the information easy to identify and access.
- **The code does not contain visuals.** In addition to condensing information into tables for ease of access, graphics and illustrations should be utilized in the Code to provide a visual guide to facilitate better comprehension of concepts and standards within the Code.
- **Like standards are sometimes scattered throughout the code.** The Code chapters should be reorganized, and some information should be consolidated. For example, off-street parking and loading and landscaping and screening requirements are found within three separate sections of the code: Chapter 4 – General Provisions, Chapter 16 – Off-street Parking and Loading and Chapter 17 – Landscaping and Screening.
- **Some zones are not mapped.** Zoning districts that are not mapped and not used anywhere in the City should be removed from the Code in order to streamline information.
- **Clearly state permitted uses.** When listing permitted uses in any district, clearly list all uses, do not reference other zoning districts. This requires flipping between sections which gets onerous for the code user.

Language/Consistency Issues

The language throughout the Evanston zoning code is inconsistent, reflecting amendments made over decades without standardized terminology. This inconsistency can lead to varying interpretations and outcomes, undermining the code's effectiveness.

- **Language is inconsistent throughout the Code.** As a zoning code is amended over decades, there is an increased likelihood that terminology and language does not stay consistent from amendment to amendment. The code rewrite will provide an opportunity to foster consistency throughout the code. When terms are not used consistently, this can lead to inconsistent outcomes.
- **Language is not standardized.** Within the sections for individual districts and zones, the information is not standardized; navigation of the code can be

simplified so that the user becomes habituated to the information found within each zoning district, whereas this information currently varies between zoning districts.

- **Definitions are absent or require revisions.** In addition to consistency, all terms used throughout the code should be clearly defined to ensure uniformity in interpretations and outcomes. Furthermore, our review and stakeholder input regarding administration of the code revealed that some definitions are overly broad. Additionally, some definitions conflict with each other, certain necessary definitions are missing, and others contain embedded regulations that are not explicitly stated elsewhere in the code. Clarifying and refining these definitions will improve both the clarity and functionality of the zoning code.
- **Dated terms.** Many of the use terms are dated and do not reflect a modern economy, especially one with advanced biomedical industry like Evanston.

Procedural Clarity

- **Conciseness in process descriptions.** In reviewing the code, many of the sections that describe processes and procedures are written in a manner that is overly verbose and needlessly wordy. Use of cross-referencing between zoning districts creates unintended and possibly undesired results when the underlying regulation is changed. These sections should be re-written with the goal of making processes and procedures easy to understand.
- **Provide certainty to applicants.** Assess whether some of the discretion given to amend site plans during the review process are creating a high degree of uncertainty for applicants.
- **Consistency in zoning approval terms.** Some zoning permissions are addressed by different terms within the code, which will create confusion for applicants.
- **Revamping Commission approval process.** Currently, the City of Evanston has a consolidated review process where the Land Use Commission reviews applications for zoning amendments, special use approvals, and variations. Additionally, while the Zoning Administrator currently holds significant authority to make administrative decisions, more than what is typical in other communities, it may be more appropriate to reduce that authority. Shifting more items to be as-of-right, without requiring additional Commission review, would streamline the process and enhance efficiency. To reduce permitting time and the number of board and council reviews, the City of Evanston should consider allowing the Zoning Administrator to make administrative decisions or adopt a Design Review Commission to address these amendments.

Zoning Code Assessment

The following section presents the assessment of the zoning code by chapters. The assessment covers all sections of the chapter unless specifically indicated otherwise. When a chapter is absent, this means that the provisions were deemed to be standard zoning language, and it is not apparent that comment or revision is necessary.

Observation Chapter 1 – Title, Purpose and Intent. This section does not fully incorporate the City of Evanston’s five pillars and also uses the term "character," which should be removed from the zoning code as previously recommended.

Observation Chapter 2 – Rules Of Interpretation and Legal Effect. Many of the rounding rules are accurate for smaller measurements, but for larger measurements, they are overly restrictive, often resulting in variation requests for minor discrepancies, such as inches of land or small amounts of square footage.

Observation Chapter 3 – Implementation and Administration. This chapter currently contains multiple sections that could be reduced or combined for efficiency. Furthermore, some sections lack specific requirements and should be eliminated altogether. The responsibilities of the boards and City Council, including public notice and hearing requirements, are scattered throughout the chapter but could be consolidated into one section. Procedures, standards, and application processes such as "Site Development Allowances," "Variations," and "Special Use" could be organized into a separate chapter for ease of use and readability, distinct from any administrative functions like those of city boards, the City Council, and the Zoning Administrator.

Observation Chapter 4 – General Provisions. This chapter could benefit from consolidation of several code sections that relate to specific subjects, such as "Child Daycare Homes and Adult Daycare Homes." Appeal rights for denials of these uses could be incorporated into these combined sections or detailed in the "procedures" section of the revised code. Moreover, regulations on lot size, width, floor area ratio, yards, fencing, and similar parameters could be unified under a general regulations section. Development standards for some uses need to be revisited to ensure they remain relevant and not overly restrictive. Additionally, the chapter contains too many hidden regulations, which could be more effectively organized into separate chapters for accessory structures, uses, and yard obstructions. Streamlining all accessory uses and structures, along with special regulations, into fewer sections would greatly simplify the code and improve clarity.

Observation Chapter 5 – Home Occupations. This chapter should be reviewed to determine if the listed home occupations remain relevant, especially given post-COVID changes in how people work. The rise of remote work, use of virtual meeting options, and home-based businesses necessitate updates to the regulations. Clarification is needed regarding the use of garages for home occupations and whether current registration requirements, such as both a Business Registration and a Home Occupation license, are unnecessarily burdensome. It may also be worth reconsidering the necessity of submitting a Major Home Occupation application, as home occupations are often permitted by right, making approval requirements redundant. Additionally, permit procedures for home occupations could be outlined in a dedicated section focused on procedures, improving the clarity and usability of the code.

Observation Chapter 6 – Nonconforming Uses and Noncomplying Structures. While the majority of this chapter uses standard zoning language, it could benefit from streamlining. Sections 6-6-3-2 through 6-6-3-6, for example, could be condensed under a single title and rewritten for more cohesive readability. This consolidation would simplify the information and improve the overall clarity of the chapter.

Observation Chapter 8 – Residential Districts. This chapter should be reviewed for potential enhancements to housing diversity, including a reduction in the number of residential districts, as well as decreases in minimum lot size and width requirements. Height requirements should also be evaluated to allow for more diverse housing options and to facilitate smoother transitions between high and low-density housing areas. A chart should be created for ease of use, outlining the development standards across all zoning districts, followed by specific regulations for each district. Additionally, ADU (Accessory Dwelling Unit) requirements should be reassessed to further support affordable housing and housing diversity.

Moreover, all references to "Planned Developments" should be removed from the residential districts and consolidated into their own standalone section. References to any standard (e.g., parking and loading, landscaping and screening) not specifically listed in this chapter should be removed. Additionally, title headings without any provisions should be eliminated.

Purpose Statements for all districts: The purpose statements for all districts are almost identical. Purpose statements should explicitly outline the goals and objectives of the district standards as drafted. This ensures that, as the code evolves, it remains clear whether the goals of the district are still relevant and reflective of the community's desires. The current purpose statements lack specific guidance on livability, equity, community well-being, and the particular objectives of this district. In residential districts, the purpose and intent statements should reflect community-wide goals for housing, health, sustainability, livability, quality of life, and the built environment.

6-8-1-2. Accessory Uses and Structures: There is an unclear distinction between accessory uses and accessory structures within this code. While it is reasonable to impose limitations on accessory structures and uses in residential districts, the same restrictions may not be appropriate for non-residential areas. Non-residential uses should have greater flexibility to operate accessory uses, provided they do not create negative externalities or impact neighboring properties. This flexibility would allow small business owners to diversify their offerings, adapt to changing market demands, and support more sustainable business models. Additionally, it is important to ensure that modern technologies, such as EV charging stations, solar battery storage, and microgrids, are allowed as accessory uses across all districts. Clarifying the definitions and distinctions between accessory uses and structures would enhance the code's clarity and functionality for both residential and non-residential areas, while supporting sustainability initiatives.

6-8-1-3. Site Plan Review: Multiple-family residential uses, planned developments, and non-residential uses in residential districts shall be subject to site plan review. This review should possibly also include single-family homes and duplexes.

6-8-1-10. Planned Developments: This section includes positive provisions such as mandatory pedestrian pathways and a tree preservation plan, which enhance the quality

of life in new developments. However, other aspects are excessively restrictive. The provision limiting the maximum height increase to twelve (12) feet over the residential district allowance contradicts the flexibility intended for the Planned Development (PD), as it only accommodates one additional story. Additionally, the restriction on additional dwelling units, none in R1-R3 and only 25% in R4-R6, is prohibitive and undermines the purpose of the PD. While the lot coverage increases provide some flexibility, they still conflict with the PD's intended purpose. Instead of imposing these somewhat arbitrary maximums, the PD should be reviewed based on design criteria. Flexibility to meet housing demand is crucial, especially with rising home costs in Evanston.

Furthermore, the current requirements for PDs in R Districts, including the minimum lot size, the landscape buffer around the entire site boundary, the prohibition of any dwelling within 15 feet of a boundary line, and minimum dwelling unit sizes, are overly restrictive. These regulations have stifled development, making it difficult for PDs to be implemented in R Districts. Eliminating these requirements would encourage more development in residential districts and allow for greater housing flexibility. With these changes, PDs can better align with the goal of providing a range of housing options to meet increasing demand.

6-8-1-12. Townhouse Orientation: This provision should be changed in instances where townhouse developments have a condo structure and there is a centralized mail drop-off point. In this instance, there is no reason for a mandatory street facing frontage.

6-8-2-2. Applicability of Overlay Districts: It is uncommon for an estate zoning district to exist within an overlay, as these districts typically do not have overly complex standards, aside from design guidelines in historic estate areas. Additionally, there is no mapped overlay for this specific provision, and past determinations have concluded that no properties are specifically identified for its application. As such, this code section should be considered obsolete and removed.

6-8-2-3. R1 Single-Family District – Permitted Uses: The existing R1 district contains a mix lower density building types such as two-unit structures; however, the current regulations restrict these types from being constructed today. The City should consider allowing a more diverse mix of housing types to achieve the plan's Five Pillar's.

6-8-2-4. R1 Single-Family District – Special Uses: The special uses listed for the R1 district are largely limited to institutional uses. To promote more diverse housing options, these could be allowed either by-right or as a special use, provided they conform to the district's development standards to ensure visual compatibility. Some cities have found that regulating the consistency of the built form is sufficient. As long as the built form remains consistent, there is little reason to limit housing types in any residential district, aside from a desire to separate units by affordability and misplaced perceptions of multi-family structures and their residents. Maintaining healthy conditions and preventing overcrowding should be addressed through building code standards and/or Property Maintenance Code standards.

6-8-2-7. R1 Single-Family District – Building Lot Coverage: Assess whether the coverage maximum should be increased in instances where an ADU is being built to help increase the housing supply in the City. The current coverage maximum should be replaced with a regulation focused solely on impervious surface limits, as the two

metrics can conflict in some cases. Additionally, if building lot coverage remains a regulation, it should not apply to any accessory structures. This change would streamline zoning reviews and make the approval process more efficient while encouraging the development of accessory dwelling units and other building types that support housing diversity.

6-8-2-8. R1 Single-Family District – Yard Requirements: Although a minimum setback this large (27 feet) should only be applied in suburban settings, it is positive that there is an allowance for front setback averaging. The City should consider relaxing this in instances where affordable units are being built or a lot is being targeted for additional housing provision.

6-8-2-10. R1 Single-Family District – Impervious Surface: The lot coverage maximum should be replaced with an impervious surface maximum to avoid potential conflicts between these standards. A maximum impervious surface ratio of 45% is relatively restrictive. Additionally, consider permitting attached homes with relaxed site standards. Since these districts are largely built out, this change would primarily ensure that infill development maximizes land for housing, given the limited development opportunities.

6-8-3-3. R2 Single-Family District – Permitted Uses: The existing R2 district contains a mix lower density building types such as two-unit structures; however, the current regulations restrict these housing types from being constructed today. The City should consider allowing a more diverse mix of housing types within the residential districts to achieve the plan's Five Pillar's.

6-8-3-4. R2 Single-Family District – Lot Size: The minimum lot width is 35 feet. For a lot to meet the minimum size with this width, its length would need to be 142 feet. Given that the lot width at the street has the greatest impact on neighborhood character, a lot with a width of 35 feet could reasonably be 100 feet in length without affecting the character of the neighborhood, especially since the rear yard beyond the home is often not visible from the street. Consider permitting a 3,500 square foot lot, given that a 35-foot width minimum at the street is unlikely to impact neighborhood character. This adjustment would allow for development in areas with excess capacity to sustain it.

6-8-3-6. R2 Single-Family District – Building Lot Coverage: Assess whether this should be increased in instances where an ADU is being built to increase housing supply in the City. The coverage maximum should be replaced by having only an impervious surface maximum - these numbers could be in conflict in some instances.

6-8-3-9. R2 Single-Family District – Impervious Surface: The lot coverage maximum should be replaced with an impervious surface maximum to avoid potential conflicts between these standards. A maximum impervious surface ratio of 55% is relatively restrictive and not significantly different from the R-1 district. Consider whether these districts can be combined, as lot coverage is the primary distinction between them. Additionally, consider permitting attached homes with relaxed site standards. Since these districts are largely built out, this change would primarily ensure that infill development maximizes land for housing, given the limited development opportunities.

6-8-4-2. R3 Two-Family District – Permitted Uses: There are multiple instances of structures that have more than two units, especially in the area just south of the Robert

Crown Community Center. These structures are assumedly not disruptive to the neighborhood and permitting a diverse mix of housing types should be considered.

6-8-4-6. R3 Two-Family District – Building Lot Coverage: Assess whether this should be increased in instances where an ADU is being built to increase housing supply in the City. The coverage maximum should be replaced by having only an impervious surface maximum - these numbers could be in conflict in some instances.

6-8-4-7. R3 Two-Family District – Yard Requirements: Although a minimum setback this large (27 feet) should only be applied in suburban settings, it is positive that there is an allowance for front setback averaging. Most of this district is built with limited new construction, but consider relaxing this in instances where affordable units are being built or a lot is being targeted for additional housing provision.

6-8-4-9. R3 Two-Family District – Impervious Surface: The impervious surface maximum of 60% provides more flexibility than the R1 and R2, but is potentially still too restrictive to make the best use of limited land left in Evanston. As stated in the analysis for previous districts, consider having an impervious surface maximum and remove the lot coverage maximum.

6-8-5-4 – 6-8-5-8 R4 General Residential District – Lot Size, Lot Width, Building Lot Coverage, Yard Requirements, Maximum Building Height: Given how urbanized Evanston is, the almost imperceptible differences between the R-4 and R-4a districts bring into question the need for this distinction. In the context of constrained affordability and housing supply, there should be a greater focus on maximizing the number of units on residential lots while maintaining consistency in built form. For example, different lot sizes are required for detached single-unit homes, attached single-unit homes, and multi-unit homes within the R-4 and R-4a districts, which are unnecessary and increase the cost burden of providing multi-unit structures. Consider revising these districts to create more flexible lot standards that are dynamic and ensure compatibility with adjacent buildings.

6-8-5-9. R4 General Residential District – Impervious Surface: It is unclear why the impervious surface maximum is more restrictive for the R4 than for the R3. Given the relatively limited area within residential zoning districts where housing diversity is permitted, more site flexibility should be given to develop additional housing units to address the high cost of housing in Evanston.

6-8-6-4 – 6-8-6-8 R4a General Residential District – Lot Size, Lot Width, Building Lot Coverage, Yard Requirements, Maximum Building Height: Given how urbanized Evanston is, the almost imperceptible differences between the R-4 and R-4a districts bring into question the need for this distinction. In the context of constrained affordability and housing supply, there should be a greater focus on maximizing the number of units on residential lots while maintaining consistency in built form. For example, different lot sizes are required for detached single-unit homes, attached single-unit homes, and multi-unit homes within the R-4 and R-4a districts, which are unnecessary and increase the cost burden of providing multi-unit structures. Consider revising these districts to create more flexible lot standards that are dynamic and ensure compatibility with adjacent buildings.

6-8-6-9. R4a General Residential District – Impervious Surface: It is unclear why the impervious surface maximum is more restrictive in the R4a District than it is in the R3

District. Given the relatively limited area within residential zoning districts where housing diversity is permitted, more site flexibility should be given to develop additional housing units.

6-8-7-4 – 6-8-7-8 R5 General Residential District – Lot Size, Lot Width, Building Lot Coverage, Yard Requirements, Mean Building Height: The lot standards for the R4/R4a and R5 districts are very similar, with the primary difference being the building height: 35 feet in R4/R4a and 50 feet in R5. It may be more appropriate to group R4 with R1-R3 rather than with R5, as this would better align with the character and lot standards of lower-density residential areas. This adjustment could create greater consistency across these districts while maintaining the desired scale and development patterns, particularly in neighborhoods where more modest residential development is intended. Building height could be dynamic and relative to surrounding buildings, with additional bonuses for providing affordable housing or diverse housing types.

6-8-7-9. R5 General Residential District – Impervious Surface: Given the goal of increasing the diversity in housing types in Evanston, it is unclear why the impervious surface maximum in the R5 District is the same as the R3 District. Greater flexibility should be given for the development of multi-family units since this district could support a greater number of units and contribute to a more sustainable environment.

6-8-8-3. R6 General Residential District – Special Uses: It is positive that the R-6 permits neighborhood supportive uses as special uses. Consider whether additional neighborhood amenities can be permitted uses or allowed via a special permit so that residents, especially with mobility challenges, can access small markets or small-scale services.

6-8-8-4. R6 General Residential District – Lot Size: It is unclear why multiple-unit structures must have larger lot sizes. A 24,000 square foot single-family home will have the same footprint as a three-unit structure with 800 square feet per unit. The larger lot sizes for multiple-family dwellings increase the cost of developing these structures, even though they do not require significantly more parking than the average detached single-unit dwelling. Vehicle ownership per household is correlated to income levels, and it is likely that owners of single-family homes in Evanston will have higher than average car ownership given the city's above-average income levels.

6-8-8-6. R6 General Residential District – Building Lot Coverage: The building lot coverage standard in the R6 District is restrictive and limits the development of multi-unit structures. Dwellings in multi-unit structures tend to be smaller than detached units and therefore should have the same minimum lot standards as detached or attached single-unit structures.

6-8-8-7. R6 General Residential District – Yard Requirements: Although a minimum setback of 27 feet is typically suited for suburban settings, it is positive that there is an allowance for front setback averaging. Given that most of this district is built out, consider relaxing this requirement in cases where affordable units are being built or where a lot is being targeted for additional housing provision.

6-8-8-9. R6 General Residential District – Impervious Surface: Given the goal of increasing the diversity in housing types in Evanston, it is unclear why the lot coverage maximum in the R6 District is the same as the R3 District. Greater flexibility should be

given for the development of multi-family units since this district could support a greater number of units and contribute to a more sustainable environment.

Observation Chapter 9 – Business Districts. This chapter should be reviewed to better support local businesses and optimize development. Height requirements should be evaluated to allow greater flexibility, especially in areas that can support higher density and mixed-use developments, enhancing urban growth and economic vitality. Simplifying and unifying the standards across various business districts can streamline the development process, making it easier for businesses to comply with regulations.

Investing in public spaces and infrastructure improvements within business districts can further enhance their appeal. High-quality public spaces, such as parks, plazas, and pedestrian-friendly streetscapes, can attract more visitors and create a pleasant environment for businesses and customers. Reducing parking requirements, especially in transit-oriented areas, can encourage the use of public transportation and make more land available for development. Allowing greater flexibility for the adaptive reuse of existing buildings can help preserve the historical character of Evanston while accommodating new businesses and uses. Exploring incentives and additional flexibility in zoning regulations for properties with historic designations is a worthwhile effort. Preservation review, unlike zoning regulations, is process-based and treats each resource as unique rather than as a commodity.

All references to standards not specifically listed in this chapter should be removed, and title headings without any provisions should be eliminated. Additionally, references to "Planned Developments" should be consolidated into their own standalone section.

Purpose Statements for all districts: The purpose statements for all districts are currently almost identical. To be more effective, they should explicitly outline the goals and objectives of the district standards as drafted. This will ensure that, as the code evolves, it remains clear whether the goals of each district are still relevant and reflective of the community's desires. The current purpose statements lack specific guidance on key issues such as livability, equity, community well-being, and the broader objectives of the districts.

In particular, the purpose statement for neighborhood business districts should include language that highlights their significant social and cultural associations. It should emphasize the desire to preserve and retain their human-scaled fabric, traditional retail character, quality storefronts, and richness of visual intrigue.

6-9-1-2. Accessory Uses and Structures: There is an unclear distinction between accessory uses and accessory structures within this code. Although it is reasonable to impose limitations on accessory structures and uses in residential districts, non-residential uses should have greater flexibility to operate accessory uses as long as they do not create negative externalities. This flexibility will enable small business owners to diversify their offerings and foster more sustainable business models. Additionally, modern technologies such as EV charging stations, solar battery storage, and microgrids should be permitted as accessory uses in all districts, further supporting sustainability efforts and ensuring that businesses and communities can adapt to evolving energy needs.

6-9-1-9. Planned Developments. While it is still recommended to separate this section into its own chapter within the revised code, it should be noted that the maximum dwelling units, height, and Floor Area Ratio (FAR) should not be dictated within this section. Instead, the development should be given the flexibility to provide housing as long as the building massing and design are consistent with adjacent structures. This approach allows for greater adaptability in meeting housing needs while ensuring that new developments harmonize with the existing neighborhood character.

6-9-2-2. Permitted Uses: There are additional uses that should be permitted by-right in the B1 district, some of which are listed as special uses. Allowing more flexibility for small businesses such as micro-breweries, micro-distilleries, small-scale local makers with combined retail spaces, and test kitchens that serve small-scale food businesses can greatly benefit the local economy. Consider expanding the number of uses permitted by-right to benefit small businesses. Furthermore, when multi-family units are considered as part of a mixed-use development, they should be permitted by-right.

6-9-2-3. Special Uses: Some of the uses listed as special exceptions are compatible with existing B1 districts and should be permitted by-right.

6-9-2-4. Lot Size: It appears that the only distinction between the B1 and the B1a is the amount of lot area required per residential dwelling unit, which is 900 per unit in the B1a and 2,500 per unit in the B1. It is unclear why the lot requirements for the B1 are so stringent which will lead to less supply of housing and greater cost in a district that is already slated for higher densities. Consider combining these districts and give the unit flexibility found in the B1a.

6-9-2-6. Floor Area Ratio (FAR): Given that the B1 is intended to serve a neighborhood-level function, consider whether the development standards should promote commercial buildings that are zero lot line, and that have a mixed-use format. At this scale, a FAR of 2.0 would not be appropriate and should be re-considered in order to give flexibility to smaller-scale development within the B1.

6-9-3-2. Permitted Uses: There are additional uses that should be permitted by-right in the B2, some of which are listed as special uses. There should be flexibility for small-scale local makers with combined retail spaces, or test kitchens that serve small-scale food businesses and beverage establishments. Consider expanding the number of uses permitted by-right to benefit small businesses.

6-9-3-3. Special Uses: Some of the uses listed as special exceptions are compatible with existing B2 districts and should be permitted by-right. Furthermore, when multi-family units are considered as part of a mixed-use development, they should be permitted by-right.

6-9-3-6. Floor Area Ratio (FAR): Given that the B2 is supposed to serve a neighborhood-level function, consider whether the development standards should

promote commercial buildings that are zero lot line, and that have a mixed-use format. At this scale, a FAR of 2.0 would not be appropriate and should be re-considered in order to give flexibility to smaller-scale development within the B2.

6-9-4-3. Special Uses: Multi-unit dwellings within mixed-use developments should be allowed by-right to support the district's function as an accessible neighborhood-level business district for residents. Additionally, food stores should be permitted by-right to ensure that essential services are conveniently available.

6-9-5-2. Permitted Uses: There are additional uses that should be permitted by-right in the B1a, some of which are listed as special uses. There should be flexibility small-scale local makers with combined retail spaces, or test kitchens that serve small-scale food businesses and beverage establishments. Consider expanding the number of uses permitted by-right to benefit small businesses. Furthermore, when multi-family units are considered as part of a mixed-use development, they should be permitted by-right.

6-9-5-3. Special Uses: Some of the uses listed as special exceptions are not incompatible with existing B1 districts and should be permitted by-right.

6-9-5-6. Floor Area Ratio (FAR): Given that the B1a is intended to serve a neighborhood-level function, consider whether the development standards should promote commercial buildings that are zero lot line, and that have a mixed-use format. At this scale, a FAR of 2.0 would not be appropriate and should be re-considered in order to give flexibility to smaller-scale development within the B1a.

Observation Chapter 10 – Commercial Districts. This chapter should be reviewed to better support local businesses and encourage optimal development in Evanston. Height and density requirements need to be reassessed to provide greater flexibility, particularly in areas that can support higher density. Most C Districts do not currently allow residential uses, but all should include an as-of-right option for residential development to promote density where appropriate. Additionally, all references to standards not explicitly detailed within this chapter should be removed, and title headings without specific provisions should be eliminated. The code should also allow for more flexibility in the adaptive reuse of existing buildings, which would help preserve Evanston's historical character while accommodating new businesses and uses. References to "Planned Developments" should be consolidated into their own standalone section to improve clarity and organization within the code.

This section should include a purpose statement that clearly outlines the intent of the commercial district. The purpose statement should articulate the goals of fostering a vibrant, business-friendly environment that supports local commerce, promotes equity, and enhances the economic vitality of Evanston. The use of the word "may" should be replaced with more definitive language to clearly specify whether a use is allowed administratively or by special use, ensuring clarity and reducing ambiguity. Given that the regulations in this chapter are generally clear and reasonable, only minimal changes

are recommended. The use of tables throughout the chapter enhances readability and makes the regulations easy to interpret.

Observation Chapter 11 – Downtown Districts.

This chapter should be reviewed with a focus on enhancing flexibility, supporting diverse commercial activities, and promoting a vibrant downtown area. Height and density regulations should be reassessed to allow for greater flexibility, particularly in areas suited for higher-density mixed-use developments. This will maximize land use efficiency, fostering a dynamic mix of residential, commercial, and office uses essential for a thriving downtown core. Additionally, incentivizing the retention, adaptation, and reuse of existing buildings that contribute to the downtown's vibrancy, human-scaled fabric, and physical characteristics should be a priority. These buildings are key to maintaining the unique character and historical continuity of the area. References to "Planned Developments" should also be consolidated into their own standalone section to improve clarity and organization within the code.

This section should include a purpose statement that clearly outlines the intent of the downtown districts. The purpose statement should articulate the goals of fostering a vibrant, business-friendly environment that supports local commerce, promotes equity, enhances livability, and strengthens the economic vitality of Evanston. The use of the word "may" should be replaced with more definitive language to clearly specify whether a use is allowed administratively or by special use, ensuring clarity and reducing ambiguity. Given that the regulations in this chapter are generally clear and reasonable, only minimal changes are recommended. The use of tables throughout the chapter enhances readability and makes the regulations easy to interpret.

Observation Chapter 12 – Research Park District.

The RP district should be eliminated, as its intended purpose has not materialized, a fact that has been documented over time. The area should be rezoned to align more closely with downtown zoning, while still considering and allowing for research and development uses.

The purpose statement for this chapter should clearly outline the goals and objectives for the research park district. This statement should focus on fostering innovation, supporting research and development activities, and promoting economic growth in a way that is consistent with the overall vision for Evanston.

Observation Chapter 13 – Transitional Manufacturing Districts. Some of these districts no longer contain any properties and should be eliminated entirely. The remaining districts, with MXE potentially being the only one still in use, should be aligned more closely with the I1, I2, and possibly O districts to ensure consistency in zoning regulations.

It is recommended to revamp the minimum lot size, width, yard requirements, and height regulations within the transitional manufacturing districts. Revising these standards will provide greater flexibility for development and better accommodate the evolving needs of modern manufacturing and industrial activities. By adjusting these requirements, the district can promote more efficient land use, integrate new technologies, and support economic growth, all while ensuring compatibility with adjacent areas.

Additionally, while the purpose statements in this chapter are generally clear, they should be updated to reflect the current goals and objectives of the City of Evanston. This update will ensure that the district's regulations align with the city's broader vision for sustainable development and economic vitality, helping to position Evanston as a forward-thinking community that meets the demands of both current and future industries.

Observation Chapter 14 – Industrial Districts. This chapter should be revamped to better align with the city's current goals and the evolving industrial landscape. While the code is generally clear and reasonable, the purpose statements should be updated to reflect the city's emphasis on sustainability, innovation, and economic growth, while ensuring compatibility between industrial activities and the surrounding community. I1 and I2 districts, for example, rarely contain actual industrial uses, with land typically being used for retail goods and services, often in strip mall-style buildings. As retail is not a permitted use in these districts, it is regularly requested and granted, highlighting the need to rename these districts to reflect their true function. Revising the development standards, including minimum lot size, width, yard requirements, and height regulations, will provide greater flexibility and more accurately address current land use trends. Modernizing these regulations can attract new industries, support more efficient land use, and better facilitate advanced manufacturing and technology-driven businesses. Additionally, organizing some of these standards into table formats will enhance readability and make the regulations more user-friendly.

Simplifying the regulatory framework by removing outdated references, consolidating standards, and clarifying language will streamline the code, making it easier for applicants to navigate. Additionally, any references to "Planned Developments" should be eliminated from this chapter and placed in a standalone section to improve clarity and organization.

Encouraging the adaptive reuse of existing industrial buildings can accommodate new business types or community-oriented uses, preserving the district's character while fostering economic growth. Finally, improving connectivity and access within the industrial districts, including infrastructure enhancements and better public transit options, will ensure these areas are easily accessible to both businesses and workers.

Observation Chapter 15 – Special Purpose and Overlay Districts.

This chapter could be significantly revamped to improve functionality and better align with the city's evolving needs. To begin, overly restrictive form-based codes should be reviewed and considered for elimination, as they no longer reflect the flexible and dynamic approach needed in urban planning. Eliminating or consolidating districts that are no longer applicable or relevant to the current urban landscape will streamline the code, making it more efficient and easier to navigate. Where goals and regulations overlap, combining certain district standards would reduce redundancy and create a more cohesive regulatory framework.

To further enhance readability and clarity, key standards should be presented in table format. This would make the regulations more accessible and user-friendly, allowing developers and city officials to quickly reference and compare important information across different districts. The use of tables can simplify the application of the code, improving overall functionality.

Additionally, the purpose statements within Chapter 15 should be updated to reflect the city's current goals and objectives. These statements should clearly articulate the intent behind each district and align with modern planning principles such as sustainability, community engagement, and economic vitality. By updating the purpose statements, the code will have a solid foundation for effective application and future amendments, ensuring it remains adaptable to the city's evolving needs.

Observation Chapter 16 – Off-Street Parking and Loading. This chapter should be revamped with key updates and revisions to better align with the city's goals for development and sustainability. The first priority is to reassess the minimum parking requirements across all districts, particularly in areas well-served by public transportation. Current parking standards can drive up housing costs and create obstacles to developing more affordable housing options. By reducing or eliminating these minimum requirements in transit-rich areas, the city can encourage higher-density developments that are more affordable and better suited to residents who do not rely heavily on private vehicles. Additionally, the zoning code should explore the creation of shared or centralized parking facilities, which would alleviate the need for each development to provide extensive on-site parking. This approach can free up land for additional housing units, green spaces, or community amenities.

The code should also include more flexible parking provisions that consider the specific needs of different neighborhoods. For instance, areas with higher concentrations of low-income residents or those with limited access to public transportation may still require more accessible parking options. However, this need should be balanced with the broader goal of reducing environmental impact and promoting walkability.

A more detailed review of the parking standards will be conducted as the consultants continue to evaluate both proposed and existing uses and districts. To ensure that

parking requirements align with the city's broader goals of efficiency, affordability, and sustainability, this review should consider creating subgroups of uses.

Recognizing that the current code lists parking requirements for some uses but omits many others, it is essential to provide clarity and address these gaps. By creating subgroups that account for the significant variations in parking needs among different uses, the code can offer a more nuanced and flexible approach to parking requirements. By tailoring parking standards to the specific demands of different subgroups, the city can better accommodate diverse development patterns and support more efficient land use. Additionally, this approach would enable the city to more effectively address the varying needs of different neighborhoods, ensuring that parking regulations contribute positively to the overall urban environment.

Observation Chapter 17 – Landscaping and Screening. The chapter lacks a comprehensive Manual for Design Guidelines, with only a document for Planned Developments (PDs). There are no actual regulations currently in place, highlighting the need for substantial updates. Expanding the design guidelines and introducing clear, enforceable regulations would provide more consistent and effective development standards across all districts. To further enhance its impact and align with the City of Evanston's sustainability goals, it is recommended that this section be expanded to include key elements from the Climate Action and Resilience Plan. By integrating sustainability measures, such as updated landscaping requirements and the incorporation of green screens, the chapter can play a pivotal role in promoting environmentally responsible development practices.

Incorporating these elements would not only enhance the aesthetic appeal of developments but also contribute to broader environmental objectives, such as reducing urban heat islands, improving air quality, and increasing green space. Specifically, the addition of native plantings, permeable surfaces, and enhanced green infrastructure in zoning policies would support stormwater management, reduce the need for artificial cooling, and foster biodiversity. These measures would ensure that new developments contribute positively to Evanston's ongoing efforts to combat climate change and enhance community resilience.

Observation Chapter 18 – Definitions. This chapter should be updated to reflect modern terminology and align with the city's evolving goals. First, it is essential to incorporate contemporary and inclusive terminology that reflects current land-use practices and societal changes. Definitions related to housing types, such as "multi-family housing," "accessory dwelling units," and "tiny homes," should be added or updated, while also ensuring that terms are inclusive of diverse household compositions and living arrangements.

To support Evanston's sustainability goals, definitions related to environmental impact, such as "green infrastructure," "permeable surfaces," and "net zero development" or

"buildings with zero onsite emissions," should be included. These updates will ensure that all zoning regulations align with the city's climate action initiatives. Additionally, any ambiguous terms currently in the code should be clarified. Vague language, such as "character," "appropriate," or "substantial," should be revised to provide precise guidelines, reducing the potential for inconsistent interpretation.

The chapter should also be updated to include definitions related to modern technology and infrastructure, such as "electric vehicle charging station," and "telecommunications facilities." These additions will reflect current technological advancements and infrastructure needs. Furthermore, definitions that support more flexible land use, including terms like "mixed-use developments" and "live-work units," should be added to encourage innovative land-use models that respond to changing community needs.

Equity and inclusion should be reflected in the definitions, ensuring that terms related to affordable housing, accessibility, and community engagement are clearly defined and consistently applied. Lastly, the chapter should include terms related to digital infrastructure and environmental considerations, such as "smart grids," "net-zero buildings," and "environmental impact assessments," to guide the zoning code in accommodating future technologies and environmental standards.

Observation Chapter 19 – Sign Regulations. This chapter could benefit from several improvements to better align with current case law, contemporary urban design principles, community values, and technological advancements. Firstly, the code could be more flexible in accommodating modern sign technologies, such as digital and dynamic displays, which are currently either heavily restricted or not adequately addressed. Updating the regulations to allow for controlled use of digital signage could enhance business visibility while maintaining aesthetic standards.

Secondly, there should be a more comprehensive approach to sustainability in signage. This could include guidelines or incentives for using energy-efficient materials and technologies, such as LED lighting or solar-powered signs. This would align the sign regulations with broader environmental goals.

Another improvement could be the simplification and clarification of language to make the code more user-friendly. As it stands, the code is somewhat dense and could benefit from clearer definitions and examples to help business owners and developers better understand what is permissible. Additionally, there is room for improving the integration of sign regulations with the overall urban design strategy of the city. This could involve ensuring that sign regulations complement other zoning and design standards, particularly in historic districts or areas with specific aesthetic goals.

Appendix 1: The Plan's Five Pillars

<p>Create Healthy Community</p>	<p>We strive to build a vibrant, inclusive community that supports the holistic health of all its residents by:</p> <ul style="list-style-type: none"> • Ensuring equitable access to housing and essential amenities such as grocery stores, parks and recreational facilities, hospitals, and so on. • Promoting safety by designing walkable neighborhoods with well lit streets, ample sidewalks, and designated bike lanes to encourage active transportation. • Enhancing the aesthetics of the built environment through thoughtful urban design, green spaces, preservation of natural landscapes, creating visually pleasing & inspiring places for residents to live, work, and play
<p>Establish a Strong Local Economy</p>	<p>We aspire to build a prosperous, inclusive community where economic vitality and quality of life are interwoven and benefitting to all by :</p> <ul style="list-style-type: none"> • Supporting local businesses, attracting new industries, and promoting workforce development initiatives to stimulate job growth. • Encouraging entrepreneurial endeavors and small business development through accessible resources, training programs, and financial incentives. • Revitalizing and supporting downtown and business districts to create thriving hubs of commerce and culture, characterized by a mix of retail, dining, entertainment, and office spaces.
<p>Prioritize Environmental Sustainability</p>	<p>We strive to protect and preserve natural environment by implementing comprehensive climate action strategies that prioritize sustainability, reduce carbon emissions, and promote the conservation of ecosystems and biodiversity. We will actively preserve our natural environment for the benefit of current and future generations by :</p> <ul style="list-style-type: none"> • Conserving lakefront and beaches through sustainable management practices that maintain water quality, support biodiversity, and provide public access for recreation and enjoyment. • Enhancing and expanding parks and open spaces to ensure they serve as vital green lungs for the community, promoting physical activity, mental well-being, and ecological balance. • Protecting ecologically sensitive areas by implementing conservation strategies, preventing habitat destruction, and promoting biodiversity to maintain healthy ecosystems.
<p>Celebrate Arts and Culture</p>	<p>We aim to honor our history, celebrate our diversity, and foster a thriving cultural landscape for all by:</p> <ul style="list-style-type: none"> • Preserving and restoring historic buildings to maintain Evanston's architectural heritage and connect our residents to our shared past. • Supporting diverse cultural expressions and events that reflect the rich cultural tapestry and unique identity of our community. • Developing vibrant public spaces with impactful public art where people can gather, interact, and engage with cultural and artistic activities, that inspire creativity, foster community pride, and attract visitors.
<p>Increase Housing Diversity</p>	<p>We strive to build resilient and inclusive neighborhoods where people of all ages, incomes, and family structures can find suitable and attainable housing by:</p> <ul style="list-style-type: none"> • Developing a wide range of housing types and sizes to meet the diverse needs of our community, from single-family homes to multifamily units and accessory dwellings units. • Implementing policies and incentives that provide options for low-to-middle-income households, preventing displacement and promoting economic diversity throughout the City. • Encouraging the development of medium density housing solutions that bridge the gap between single-family homes and large apartment complexes.