



**THE LAKE FOREST PRESERVATION FOUNDATION’S
STATEMENT REGARDING THE REVISED DRAFT COMPREHENSIVE PLAN FOR
LAKE FOREST’S CENTRAL BUSINESS DISTRICT**

June 13, 2023

The Lake Forest Preservation Foundation (the “LFPF”) is a non-profit organization, having over 500 members and supporters, almost all of whom are residents of Lake Forest. For over four decades, the LFPF has been dedicated to the stewardship, safeguarding, and endurance of Lake Forest’s exceptional architectural and landscape legacy for succeeding generations, through public education, historic preservation and advocacy. LFPF submits this statement with regard to the Plan Commission’s Revised Draft Comprehensive Plan for Lake Forest’s Central Business District. The LFPF incorporates by reference its prior comments submitted on April 20, 2023.

Issues With the Revised Draft Comprehensive Plan

As the Plan Commission is aware, among the LFPF’s key beliefs are the preservation of the historic visual character of Lake Forest and thoughtful development that is sensitive to that character. It is a belief that the Plan Commission seems to share, as reflected in its draft “Vision” statement in the Revised Comprehensive Plan (the “RCP”):

Looking forward, the vision for Lake Forest’s Central Business District is not to change it into something different, something more akin to business districts in other communities, but instead, to enhance and preserve the historic character and architecturally significant buildings and spaces

Id. at 13.

While the plan is not considered a “regulatory document,” it is intended, among other things, to (1) “be used by Boards, Commissions and the City Council as a tool and guide in making decisions about development, adaptive reuse, preservation, investment in infrastructure, policies, and regulations,” and (2) “set realistic expectations for property owners, investors, developers, and residents and to avoid surprise.” RCP at 16. As such, the LFPF believes that the plan should be free of ambiguities, inconsistent statements, and omissions that could be used to undermine the very vision it seeks to achieve.

Unfortunately, the LFPF submits that they are such ambiguities, statements and omissions which, if not corrected, could well result in changes to Lake Forest’s Central Business District that will undermine its historic character and result in unpleasant surprises. To be frank, the LFPF has grave concerns that despite the stated Vision, the Central Business District could end up being very much akin to business districts in neighboring communities, like Highland Park, dominated by unsympathetic four and five story condominiums, unless there are clear safeguards in place to prevent this. Overwhelming, Lake Forest Residents are opposed to this sort of development and yet when the LFPF reviews the RCP, it does not see the safeguards necessary to prevent this.

Rather, there is language that leaves open this possibility and arguably undermines current protections. Consider the following statements all contained in the RCP:

- “Preservation, restoration, and maintenance are the utmost importance in the Core.” (RCP at 8)
- “The Inner Ring subarea offers the greatest opportunity for development and redevelopment in the CBD including the adaptive reuse of existing important buildings and the potential for redevelopment of sites that are underutilized and do not contribute significantly to the character of the CBD.” (RCP at 10)
- “The historic and more contemporary buildings and spaces share common themes and create a unified whole that is welcoming, invites exploration, and contributes to the unique character of the district.” (RCP at 14)
- “Preserve and enhance the unique character of the CBD by identifying elements that define the character of specific areas of the CBD and specific blocks.” (RCP at 19)
- “The 17 standards should be adhered to for properties within the historic district and any applicable design guidelines should be followed for other sites.” (RCP 19)
- “Provide an efficient and predictable review process for development projects that closely adhere to the 17 Standards applicable to properties within the Historic District, achieve the vision and goals established in this document, and align with regulations and parameters established by the City.” (RCP 19)
- “Once developed, adopt Development Parameters through a public process to proactively set realistic expectations and assist property owners, developers, architects, contractors, and designers in the renovation or construction of buildings in a manner compatible with the architectural heritage and character of Lake Forest’s CBD.” (RCP 20)

Collectively, these statements (1) suggest that the “Core” and “Inner Ring” are separate and distinct areas within the Central Business District that will be treated differently and governed by different standards, (2) demonstrate that the plan sets no realistic expectations for property owners, investors, developers, and residents because discussion of design parameters are deferred, and (3) undermine the already existing design standards and process that apply to much of the Central Business District, including many of the City owned parking lots in the Inner Ring that the plan identifies as being underdeveloped.

To begin, as the public comments at the last Plan Commission meeting made clear, the Core and the Inner Ring are not architecturally independent spaces or areas that can be viewed in

isolation or even block by block. They are visually and functionally interconnected and what is done in one area of the Central Business District impacts other areas. Indeed, the City owned parking lots sit right across from the Core. It cannot be credibly argued that new construction on that site would have no impact on the architectural integrity of the Core 30 feet away. There must be a unified master plan for the Central Business District (the Core + The Inner Ring) so that development is thoughtful and sympathetic to the Central Business District as a whole, as opposed to the block in which it sits or the structures that sit on either side of it.

Next, it is generally untrue that the “historic and more contemporary buildings and spaces [within the Central Business District] share common themes and create a unified whole that . . . and contributes to the unique character of the district.” While this may be true for the Lake Forest Bank Building, for example, it is certainly not true for many of the contemporary buildings within the Core Business District, which detract from the historic character of the Central Business District.

Thus, contrary to the implications in the RCP, these contemporary structures should not be held out as models or visual points of reference for new developments within the Central Business District, as was argued in connection with Phase 3 of the McKinley Rd. Development. Rather, the historically significant structures in the Central Business District, such as Market Square and the Deer Path Inn, should be used as templates and inspiration for new design within the district. If developers could point to contemporary structures within the Central Business District as relevant exemplars for new development within that district, then the City will never achieve its stated vision of preserving the historic character of the Central Business District.

Finally, this points out the central problem with the RCP. Not only does it fail to identify any design parameters – *which is the key component to setting expectations and preserving the historic character of the Central Business District* – it undermines existing design parameters and processes. While the RCP states, on the one hand, that “[t]he 17 standards should be adhered to for properties within the historic district and any applicable design guidelines should be followed for other sites,” it goes on to provide that the recommended actions include “[p]rovid[ing] an efficient and predictable review process for development projects that closely adhere to the 17 Standards applicable to properties within the Historic District”

There already is, however, an efficient and predictable review process for developmental projects as well as developmental parameters, at least for that portion of the Central Business District that is in the East Lake Forest Historic District. They are the 17 standards, which are based on approved Dept. of Interior standards for Historic Preservation, and the review process set out in the Lake Forest Historic Preservation Ordinance, which is administered by the HPC. And to the extent that additional guidance is needed for the Central Business District, the HPC has the express power under that ordinance “[t]o develop guidelines, if it deems appropriate, to further explain how the [17] standards . . . may appropriately be incorporated into a project.” 155.03(B)(10).

For the past 25 years, this ordinance has achieved the stated Vision of the RCP to preserve Lake Forest’s historic character and architecturally significant buildings through standards that are well articulated, comprehensive and understood. More than anything else, it has prevented Lake

Forest from suffering the same sad fate as neighboring business districts, which have lost their historic visual character to unsympathetic development. To the extent that the Plan Commission is advocating a change to this process or ordinance, the LFPF opposes it. Instead, if the desire of the Plan Commission is to set realistic expectations for property owners, investors, developers, and residents and to avoid surprises, it should recommend that those 17 standards be extended to the entire Central Business District.

In sum, it is clear that no one wants the Lake Forest Central Business District to look like neighboring communities that have developed their business districts without regard to their historic character. What the LFPF would like to see in the RCP is safeguards and language that would ensure that this will not happen.

Thank you for your consideration.

The Lake Forest Preservation Foundation