
**VILLAGE OF NILES, ILLINOIS
GROSS POINT-TOUHY TAX INCREMENT FINANCE
DISTRICT ELIGIBILITY REPORT**

A study to determine whether all or a portion of an area located in the Village of Niles qualifies as a “conservation area” as set forth in the definition in the Tax Increment Allocation Redevelopment Act, 65 ILCS 5/11-74.4-3, et seq., as amended.

Prepared for: Village of Niles, Illinois

Prepared by: Kane, McKenna and Associates, Inc.

April 2015

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EXECUTIVE SUMMARY

Kane, McKenna and Associates, Inc. (KMA) has been retained by the Village of Niles (the “Village”) to conduct an analysis of the qualification of an area for the establishment of the Gross Point-Touhy Tax Increment Finance (TIF) District. The Village is pursuing the creation of the Gross Point-Touhy TIF District to promote the revitalization of under-utilized properties located within the Village and the overall improvement of the Gross Point-Touhy area.

In the context of planning for the establishment of the Gross Point-Touhy Tax Increment Financing District (the “TIF District,” the “TIF,” “Redevelopment Project Area,” or “RPA”), the Village has initiated the study of parcels within the Gross Point-Touhy area to determine whether they qualify separately or in aggregate under the Tax Increment Allocation Redevelopment Act, 65 ILCS 5/11-74.4-3, et seq., as amended (the “TIF Act” or “Act”) for inclusion in the creation of the TIF District. KMA agreed to undertake the study of the RPA on the Village’s behalf.

Based upon the analysis completed to date, KMA has reached the following conclusions regarding the potential qualification of the RPA:

- 1) *The area qualifies as a “conservation area”* – The RPA qualifies as a “conservation area” as defined under the TIF Act. The area in aggregate is in danger of declining toward a blighted condition due to factors identified in this report which the area generally suffers from. These conditions prevent or threaten healthy economic and physical development of the area. The TIF Act states that an area may only qualify as a “conservation area” if the majority (50% or more) of the structures are 35 years or older. 38 of the 52 structures or 73% are over 35 years of age, thus the RPA meets the statutory criteria for consideration as a “conservation area.”
- 2) *The current conditions impede redevelopment* – The existence of certain conditions found within the RPA present a barrier to the area’s successful redevelopment. The current conditions in the RPA are impediments to redevelopment, creating an environment where it is reasonable to assume redevelopment would not take place “but for” the use of the TIF Act. The factors present on the ground negatively impact coordinated and substantial private sector investment in the overall area. Without the use of Village planning and economic development resources to mitigate such factors, potential redevelopment projects (along with other activities that require private sector investment) are not likely to be economically feasible.
- 3) *Viable redevelopment sites could produce incremental revenue* – Within the RPA, there are several parcels which potentially could be redeveloped and thereby produce incremental property tax revenue. Such revenue, used in combination with other Village resources for redevelopment incentives or public improvements, would likely stimulate private investment and reinvestment in these sites and ultimately throughout the RPA.

4) *TIF designation is recommended* – To mitigate “conservation area” conditions, promote private sector investment, and foster the economic viability of the RPA, KMA recommends that the Village proceed with the formal TIF designation process for the entire area.

The Village will not be considering the redevelopment of residential parcels, and will certify that it will not dislocate 10 or more residential units within the TIF district. Therefore, a housing impact study pursuant to the TIF Act will not be conducted by the Village.

I. INTRODUCTION AND BACKGROUND

The RPA is located in the southeast corner of the Village in an area traditionally used for light industrial manufacturing, commercial, and other mixed-uses. The RPA is generally bounded by Howard and Jarvis Avenues on the north, Lehigh Avenue on the east, Touhy Avenue on the south, and the North Branch Chicago River on the west. The RPA consists of approximately 80 tax parcels and is approximately 192 acres in size, excluding right of ways. Please see Appendix A for a list of the proposed parcels for inclusion in the TIF District.

The area has long been an economic engine for the Village and the heart of the Village's manufacturing district but also home to commercial and other mixed-uses including hotels, restaurants and recreation. The area thus serves as a major economic engine for the Village. The area was identified in the *Niles 2030 Comprehensive Plan* (2011) as a focus area and a potential growth area. Portions of the RPA are identified in the *Touhy Triangle: Market Study and Development Concept* (2014) as areas that could be subject to redevelopment for mixed-use.

Objectives- The Village's general economic development objectives are to enhance the industrial, commercial and mixed-use opportunities within the area, to promote redevelopment in the underused areas, and entice private redevelopment of the RPA to strengthen the Village's tax base while improving the quality of life for residents.

Given the Village's objectives as well as the conditions described in this report, the Village has made a determination that it is highly desirable to promote the redevelopment of the under-utilized areas of the proposed RPA. Without an implementation plan for redevelopment, Village officials believe adverse conditions will worsen. The Village intends to create and implement such a plan in order to restore, stabilize, and increase the economic base associated with the RPA, which will not only benefit the community as a whole but also generate additional tax revenues to support municipal services.

Determination of the "But For"- The Village has determined that planned redevelopment for the RPA is feasible only with public finance assistance. The creation and utilization of a TIF redevelopment plan and redevelopment agreements are intended by the Village to help provide the assistance required to eliminate conditions detrimental to successful redevelopment of the RPA and to improve the tax base and job creation within the Village.

TIF Mechanism- The use of TIF relies upon induced private redevelopment in the RPA to create higher real estate values that would otherwise decline without such investment. By so doing, it would result in increased property taxes compared to the previous land use (and/or absence of use). In this way, the existing tax base for all tax districts would be protected and a portion of future increased taxes pledged to attract the requisite private investment.

Current Land Use- Land uses include industrial, commercial, mixed-use and institutional. The area is predominantly zoned for industrial, commercial and mixed-use. Despite its advantageous location, zoning, and historical success as an area of economic activity, certain parcels in the area are underutilized and face challenges due to changing spatial needs for development and changing standards for mixed-use, commercial and industrial uses. The creation of a TIF District in this area would provide the Village with the opportunity of bringing new development to an area that has become underutilized and has exhibited a relatively high number of vacancies.

The RPA suffers from a variety of economic development impediments identified in the TIF Act. Specifically, it experiences deterioration, obsolescence, and lagging or declining equalized assessed valuations (EAV). Section V of this report identifies other impediments to redevelopment.

General Scope and Methodology- KMA formally began its analysis by conducting a series of meetings and discussions with Village staff starting in May 2014 and continuing up to the date of this report's issuance. The purpose of the meetings was to establish boundaries for initial analysis and to gather data related to the qualification criteria for parcels included in the RPA. These meetings were complemented by a series of field surveys for the entire area to evaluate the condition of the proposed TIF. KMA made numerous site visits to the area to examine the parcels and the conditions. KMA also utilized the 2011 Village Comprehensive Plan and other Village reports.

For the purpose of the study, properties within the RPA were examined in the context of the TIF Act governing improved areas (separate provisions of the Act address non-improved or vacant areas). The qualification factors discussed in this report qualify the area as a "conservation area," as the term is defined pursuant to the TIF Act.

During the course of its work, KMA reported to key Village staff its findings regarding TIF qualification and feasibility prospects for the area under study. Based on these findings the Village (a) made refinements to the RPA boundaries and (b) directed KMA to complete this report and to move forward with the preparation of a Redevelopment Plan and Project for the RPA.

For additional information about KMA's data collection and evaluation methods, refer to Section IV of this report.

II. QUALIFICATION CRITERIA

With the assistance of Village staff, Kane, McKenna and Associates, Inc. assessed the RPA to determine the presence or absence of qualifying factors listed in the TIF Act. The relevant sections of the Act are found below.

The Act sets out specific procedures which must be adhered to in designating a RPA/Redevelopment Project Area. By definition, a Redevelopment Project Area is:

“An area designated by the municipality, which is not less in the aggregate than 1½ acres and in respect to which the municipality has made a finding that there exist conditions which cause the area to be classified as a blighted area or a conservation area, or a combination of both blighted areas and conservation areas.”

Under the Act, “conservation area” means any improved area within the boundaries of a Redevelopment Project Area located within the territorial limits of the municipality where certain conditions are met, as identified below.

TIF Qualification Factors for a “conservation area”- In accordance with the Illinois TIF Act, KMA performed a two-step assessment to determine if the RPA would qualify as a “conservation area.” First, KMA analyzed the threshold factor of age to determine if 50% or more of structures were 35 years of age or older.

If a proposed “conservation area” meets the age threshold, then the following factors are examined to determine TIF qualification:

If a “*conservation area*,” industrial, commercial and residential buildings or improvements are detrimental to the public safety, health or welfare because of a combination of three or more of the following factors, each of which is (i) present, with that presence documented to a meaningful extent so that a municipality may reasonably find that the factor is clearly present within the intent of the Act and (ii) reasonably distributed throughout the improved part of the Redevelopment Project Area:

(A) Dilapidation: An advanced state of disrepair or neglect of necessary repairs to the primary structural components of building or improvements in such a combination that a documented building condition analysis determines that major repair is required or the defects are so serious and so extensive that the buildings must be removed.

(B) Obsolescence: The condition or process of falling into disuse. Structures become ill-suited for the original use.

(C) Deterioration: With respect to buildings, defects including, but not limited to, major defects in the secondary building components such as doors, windows, porches, gutters, downspouts, and fascia. With respect to surface improvements, that the condition of roadways, alleys, curbs, gutters, sidewalks, off-street parking and surface storage areas evidence deterioration, including, but limited to, surface cracking, crumbling, potholes, depressions, loose paving material and weeds protruding through paved surfaces.

(D) Presence of Structures Below Minimum Code Standards: All structures that do not meet the standards of zoning, subdivision, building, fire and other governmental codes applicable to property, but not including housing and property maintenance codes.

(E) Illegal Use of Individual Structures: The use of structures in violation of applicable federal, State, or local laws, exclusive of those applicable to the presence of structures below minimum code standards.

(F) Excessive Vacancies: The presence of buildings that are unoccupied or under-utilized and that represent an adverse influence on the area because of the frequency, extent, or duration of the vacancies.

(G) Lack of Ventilation, Light, or Sanitary Facilities: The absence of adequate ventilation for light or air circulation in spaces or rooms without windows, or that require the removal of dust, odor, gas, smoke or other noxious airborne materials. Inadequate natural light and ventilation means the absence of skylights or windows for interior spaces or rooms and improper window sizes and amounts by room area to window area ratios. Inadequate sanitary facilities refers to the absence or inadequacy of garbage storage and enclosure, bathroom facilities, hot water and kitchens and structural inadequacies preventing ingress and egress to and from all rooms and units within a building.

(H) Inadequate Utilities: Underground and overhead utilities such as storm sewers and storm drainage, sanitary sewers, water lines and gas, telephone and electrical services that are shown to be inadequate. Inadequate utilities are those that are: (i) of insufficient capacity to serve the uses in the Redevelopment Project Area; (ii) deteriorated, antiquated, obsolete or in disrepair; or (iii) lacking within the Redevelopment Project Area.

(I) Excessive Land Coverage and Overcrowding of Structures and Community Facilities: The over-intensive use of property and the crowding of buildings and accessory facilities onto a site. Examples of problem conditions warranting the designation of an area as exhibiting excessive land coverage are: (i) the presence of buildings either improperly situated on parcels or located on parcels of inadequate size and shape in relation to present-day standards of development for health and safety and (ii) the presence of multiple buildings on a single parcel. For there to be a finding of excessive land coverage, these parcels must exhibit one or more of the following conditions: insufficient provision for light and air

within or around buildings, increased threat of spread of fire due to the close proximity of buildings, lack of adequate or proper access to a public right-of-way, lack of reasonably required off-street parking or inadequate provision for loading service.

(J) Deleterious Land-Use or Layout: The existence of incompatible land-use relationships, buildings occupied by inappropriate mixed-uses or uses are considered to be noxious, offensive or unsuitable for the surrounding area.

(K) Environmental Clean-Up: The proposed Redevelopment Project Area has incurred Illinois Environmental Protection Agency or United States Environmental Protection Agency remediation costs for (or a study conducted by an independent consultant recognized as having expertise in environmental remediation has determined a need for) the clean-up of hazardous waste, hazardous substances or underground storage tanks required by State or federal law. Any such remediation costs would constitute a material impediment to the development or redevelopment of the Redevelopment Project Area.

(L) Lack of Community Planning: The proposed Redevelopment Project Area was developed prior to or without the benefit or guidance of a community plan. This means that the development occurred prior to the adoption by the municipality of a comprehensive or other community plan or that the plan was not followed at the time of the area's development. This factor must be documented by evidence of adverse or incompatible land-use relationships, inadequate street layout, improper subdivision, parcels of inadequate shape and size to meet contemporary development standards or other evidence demonstrating an absence of effective community planning.

(M) Lagging or Declining EAV: The total equalized assessed value (EAV) of the proposed Redevelopment Project Area has declined for three (3) of the last five (5) calendar years prior to the year in which the Redevelopment Project Area is designated, or is increasing at an annual rate that is less than the balance of the municipality for three (3) of the last five (5) calendar years, for which information is available or increasing at an annual rate that is less than the Consumer Price Index for All Urban Consumers published by the United States Department of Labor or successor agency for three (3) of the last five (5) calendar years prior to the year in which the Redevelopment Project Area is designated.

III. THE REDEVELOPMENT PROJECT AREA

The RPA contains approximately 80 tax parcels located within the boundaries of the area. The RPA is approximately 192 acres in size, excluding right of ways.

The RPA contains improved land designated primarily for industrial, commercial, and institutional purposes. The area's potential for redevelopment is challenged due to the fact that certain structures are older, and also to some unsuitable land-use layouts. The area has long been an economic engine for the Village but is still suffering from the effects of the recession.

The RPA is home to some of the Village's largest employers: Coca-Cola, Fort Dearborn Lithographers, Wells Lamont Products and W.W. Grainger. But the area also recently lost Metaldyne, which had employed 220 people when it left the Village. The loss of Metaldyne exemplifies the challenges facing the RPA.

In the 2011 Comprehensive Plan, the Village identifies economic development as a top priority and Tax Increment Financing as a possible tool for encouraging redevelopment. The Comprehensive Plan also identifies sections the RPA as important investment areas for the Village's future growth and redevelopment. As an area with industrial zoning and larger parcels, the RPA represents a unique opportunity for the Village to attract larger employers and bigger developments. However, potential light industrial uses and other developments require heavy infrastructure investments; the Comprehensive Plan recognizes that the area is deficient for modern light industrial uses and has the potential to develop more commercial and mixed uses too.

IV. METHODOLOGY OF EVALUATION

The RPA was examined to assess the applicability of the different factors required for qualification for TIF designation under the Act. Data collected from the RPA, Village and Cook County and used to determine relevance and severity of conditions compared against the statutory factors. Land and buildings within the RPA were examined to determine the applicability of the 13 different factors for qualification for TIF designation under the Act. The following steps were undertaken in this process:

- 1) Site visits to the RPA were undertaken by representatives from KMA. These site visits required the area to be walked multiple times by the same team while taking notes, filling out site surveys and taking photographs. The purpose of these site visits included parcel counts, address matches, current land uses, building conditions, lot conditions, and traffic flow. KMA documented the area's conditions through site surveys, notes and photography. Site surveys were completed for each parcel within the RPA.
- 2) To determine if the area qualified as a "conservation area" the age of the buildings were ascertained by matching site surveys to Cook County tax and building records.
- 3) KMA conducted evaluations of exterior structures and associated site improvements, noting such conditions relevant to the qualifying factors on the site surveys.
- 4) KMA reviewed the 2008-2013 tax information from Cook County, parcel tax maps, site data, local history (discussions with Village staff) for an evaluation of area-wide factors that have affected the area's development to determine the presence of qualifying factors.
- 5) KMA performed EAV trend analysis to ascertain whether EAV growth in the RPA underperformed relative to EAV growth in the balance of the Village and the Consumer Price Index-All Urban Consumers.

V. QUALIFICATION FINDINGS FOR RPA

Based upon KMA’s evaluation of parcels in the RPA and analysis of each of the eligibility factors summarized in Section II, the following factors are presented to support qualification of the RPA as a “conservation area.” These factors are summarized in Table 1 below. These factors are found to be clearly present and reasonably distributed throughout the RPA, as required under the Act.

Table 1
Summary of Conservation Area Findings

Maximum Possible Factors per Statute	Minimum Factors Needed to Qualify per Statute	Qualifying Factors Present in RPA
13	3	6 <ul style="list-style-type: none"> • Lagging or Declining EAV • Deterioration • Inadequate Utilities • Deleterious Land Use or Layout • Obsolescence • Lack of Community Planning

Note: In addition to 6 qualifying factors above, the RPA meets the statutory age threshold that 50% or more of the structures are 35 years or older.

Finding as a “conservation area”- The RPA is found to qualify as a “conservation area” under the statutory criteria set forth in the TIF Act. As indicated in Section II, KMA performed a two-step assessment, first finding that 50% or more of structures within the “conservation area” were over 35 years of age. Based upon Cook County Assessor and site survey data, 38 of 52 structures or 73% were over 35 years in age, please see Table 2 below.

Table 2

Conservation Area Findings	
Total Number of Buildings in RPA	52
Total Number of Buildings 35yrs+	38
Percentage of Buildings 35yrs+	73%

“Conservation area” factors- As a second step, KMA reviewed the criteria needed to qualify an area as a “conservation area,” finding that six factors were present:

- 1) Lagging or Declining EAV: This factor is present if the total equalized assessed value (EAV) of the proposed Redevelopment Project Area has declined for three

(3) of the last five (5) calendar years prior to the year in which the Redevelopment Project Area is designated, or is increasing at an annual rate that is less than the balance of the municipality for three (3) of the last five (5) calendar years, or increasing at an annual rate that is less than the Consumer Price Index for All Urban Consumers published by the United States Department of Labor or successor agency for three (3) of the last five (5) calendar years prior to the year in which the Redevelopment Project Area is designated. The RPA qualifies under two of these measurements. Please see Table 3 on for a breakout of the detailed numbers.

The RPA's EAV has declined for four (4) of the last five (5) years, only showing slight growth in 2010. The RPA's EAV also lagged behind the CPI-U (Consumer Price Index-All Urban Consumers) for five (5) of the last five (5) five years. Just one of these quantitative measurements would qualify for this category under the TIF Act but the RPA's qualification under two categories highlights its particular trouble maintaining growth since 2008.

Table 3
EAV Trends for Proposed TIF District

	2013	2012	2011	2010	2009	2008
Total EAV for Proposed TIF District	\$79,548,127	\$87,644,018	\$93,091,020	\$107,546,606	\$107,038,522	\$127,351,953
EAV Change (%)	-9.24%	-5.85%	-13.44%	0.47%	-15.95%	
Village with EAV (Excluding TIF)	\$1,009,405,332	\$1,178,921,443	\$1,277,584,221	\$1,405,004,046	\$1,492,524,033	\$1,544,614,101
Village EAV Change (%)	-14.38%	-7.72%	-9.07%	-5.86%	-3.37%	
CPI- All Urban Consumers	1.50%	2.10%	3.20%	1.60%	-0.40%	

Source: Cook County Clerk, Cook County Assessor & U.S. Census Bureau

- 2) **Deterioration:** The Act defines deterioration as the physical decline of surface improvements, primary building components, and secondary buildings components such as doors, windows, porches or gutters. With respect to surface improvements, deterioration is determined by the condition of roadways, alleys, curbs, gutters, sidewalks, off-street parking and surface storage areas (including but not limited to surface cracking, crumbling, potholes, depressions, loose paving material and weeds protruding through paved surfaces).

In the RPA deterioration was observed in the majority of parcels. Deterioration was primarily observed among the surface improvements. Parking lots adjacent to both vacant and occupied structures have widespread cracking as well as potholes and depressions. Because parking lots constitute a large percentage of overall land use in the RPA, the poorly maintained lots have a negative aesthetic impact on the area.

Deterioration is present in the secondary building components such as doors, windows, gutters, and fasciae. Furthermore, some buildings exhibit deterioration in the brickwork and exhibited the need for new tuck-pointing. Secondary evidence of deterioration was observed among certain buildings, such as the vacant properties identified above and in the rear portions of some occupied buildings.

- 3) **Inadequate Utilities:** This factor is present if underground and overhead utilities such as storm sewers and storm drainage, sanitary sewers, water lines and gas, telephone and electric services that are shown to be inadequate. Inadequate utilities are those that are: (i) of insufficient capacity to serve the uses in the Redevelopment Project Area; (ii) deteriorated, antiquated, obsolete or in disrepair; or (iii) lacking within the Redevelopment Project Area.

The Village Engineering department states that both the water mains and the storm and sanitary sewer within the RPA are antiquated and would need to be updated if redevelopment occurred. The water mains and the sewer system were constructed in the 1960s and are approaching the end of their useful life.

The water mains are made of cast iron, which is brittle and prone to break sooner than modern ductile iron, PVC and HDPE materials. The Village has been forced to replace small sections of the water mains as they break. The sewer system would need to be updated if redevelopment occurred within the RPA. The Village Engineering department recommends updating the sewer system to meet the needs of the *Niles 2030 Comprehensive Plan*. The combination of age, deterioration, and insufficient capacity qualifies this utility system as inadequate.

- 4) **Deleterious Land Use or Layout:** The act states that deleterious land use and layout occurs with the existence of incompatible land-use relationships, buildings occupied by inappropriate mixed-uses or uses are considered to be noxious, offensive or unsuitable for the surrounding area.

The RPA suffers from a number of issues which in aggregate create its land use and layout deficiencies. The lack of a grid system creates heavy traffic issues at certain choke points like the intersection of Touhy and Caldwell Avenues. The size of the parking areas, loading docks, and streets combined with the heavy traffic of semi-trailer and articulating vehicles creates congestion in many areas of the RPA. Furthermore, the lack of barriers and buffers between the industrial use, commercial use, and institutional use creates congestion.

The *Niles 2030 Comprehensive Plan* addresses multiple issues in regards to the RPA's layout, the lack of sidewalks, the need for center turn lanes on Touhy and Caldwell Avenues, and the continued protection of the area against incompatible uses. Traffic patterns and conditions are determinants in relation to deleterious land use and layout. Traffic issues in the RPA which contribute to this factor are management of traffic flow and volumes along Touhy, Gross Point, and Caldwell Avenues.

- 5) Obsolescence: The Act states that obsolescence is the condition or process of falling into disuse or structures that have become ill-suited for their original use. The area exhibits both economic and functional obsolescence. The RPA exhibits area-wide obsolescence in need of investment and redevelopment for attracting new tenants.

The onset of obsolescence can be measured through qualitative and quantitative means. Building age, EAV, deterioration in buildings and lots, traffic flows, infrastructure and vacancy rates can signify obsolescence as proxies. By these measures the RPA is exhibiting obsolescence. In general the RPA has seen a substantial loss in value in the last five years. Between tax years 2013 and 2008 the area wide valuation fell 38%. In the previous findings, the RPA's building age (p. 8), lagging EAV (p. 9), deterioration (p.9), inadequate infrastructure (p.10) and traffic flow (p.10) issues have all been identified.

From a qualitative standpoint the Village has identified through its planning documents the limitations to the RPA which are associated with obsolescence. The *Niles 2030 Comprehensive Plan* makes note that many of the buildings in the industrial section of the RPA lack appropriately-sized loading docks for modern uses. KMA's site visits confirmed that the size and shape of the loading docks as well as their location within the RPA forces semi-trailer traffic into the public right-of-ways, impeding traffic flows. Current business owners within the RPA feel that the shortage of parking, truck access and circulation as well as the outdated infrastructure and land use conflicts within the RPA are potential problems.

Many of the structures exhibit design features or components that are outdated in relation to market conditions. Signage, façade and exterior treatments, and site improvements in many cases are "dated" and appear outmoded in relation to newer properties. Deterioration of site improvements or building components also contributes to the outmoded or "tired" appearance of many structures and facilities. The *Niles 2030 Comprehensive Plan* states that the RPA is in need of improvements because functional obsolescence is setting in, or will be soon, and to attract market viable uses improvements need to be made to the loading docks, access, building facades, signage, streetscaping, landscaping and parking areas.

Overall, the physical restrictions of the outdated buildings, the aging infrastructure and presence of older buildings have resulted in fewer opportunities for area industrial/retailer/commercial establishments to remain competitive in comparison to alternative locations. This puts pressure on the remaining tenants to seek opportunities elsewhere. These factors in aggregate make a compelling case for the qualification of the area for the obsolescence factor.

- 6) Lack of Community Planning: The Act states that if the proposed Redevelopment Project Area was developed prior to or without the benefit or guidance of a

community plan the factor is present. This factor must be documented by evidence of adverse or incompatible land-use relationships, inadequate street layout, improper subdivision, parcels of inadequate shape and size to meet contemporary development standards or other evidence demonstrating an absence of effective community planning. The Village published its first Comprehensive Plan in 1972. However, most of the RPA was already developed by the time the planning process started. In the RPA, 38 of the 52 buildings or 73% were built before 1972.

Table 4

Buildings Pre-Comp Plan	
Total Number of Buildings in RPA	52
Total Number of buildings which pre-date 1972 Comp Plan	38
Percentage of Buildings pre-date Comp Plan	73%

Much of the development that has occurred within the RPA took place in an era prior to modern community planning techniques, and/or occurred under a lack of comprehensive and coordinated planning. The area lacks many of the modern hallmarks of community planning that the rest of the Village enjoys. A key planning factor the area lacks is the grid system for its streets that the rest of the Village is structured around. Furthermore, there is conflict between the mixed-use, commercial and industrial uses with the institutional uses in the RPA overtime.

The 1972 Comprehensive Plan, though a step in the right direction, did not guide development in the RPA beyond the established zoning. The *Niles 2030 Comprehensive Plan* (2011) states that the RPA requires guidance from updated planning practices focused on human capital and transportation. *The Go To 2040 Comprehensive Plan* (Chicago Metropolitan Planning Agency) articulates the changes in planning since mid-century such as livability, regional mobility, and efficient government should be utilized in the planning process for future redevelopment. The *Niles 2030 Comprehensive Plan* maintains that these new principles should be used in the future planning of the Village.

The *Niles 2030 Comprehensive Plan* states that the 1972 Comprehensive Plan is out of date “because of its age and the changes that have occurred both within Niles and the rest of the country since that time, a new vision and associated goals and objectives are necessary to help guide the community” (p.7, *Village of Niles Synthesis Report*).

This is not to say that improvements did not take place over the years, but that they were implemented without the guidance of an updated and modern master plan directed toward long-term benefit for the RPA. A lack of such efforts has contributed to the evolution of factors currently present within the RPA.

VI. SUMMARY OF FINDINGS / GENERAL ASSESSMENT OF QUALIFICATION

The following is a summary of relevant qualification findings as it relates to the Village's potential designation of the RPA.

1. The area is contiguous and is greater than 1½ acres in size;
2. The proposed RPA will qualify as a “conservation area.” Further, the “Conservation area” factors found in the RPA are present to a meaningful extent and are distributed throughout the area. A more detailed analysis of the qualification findings is outlined in Section V of this report;
3. All property in the area would substantially benefit by the proposed redevelopment project improvements;
4. The sound growth of taxing districts applicable to the area, including the Village, has been impaired by the factors found present in the area; and
5. The area would not be subject to redevelopment without the investment of public funds, including property tax increments.

In the judgment of KMA, these findings provide the Village with sufficient justification to consider designation of the RPA.

APPENDIX A
Tax Parcels for RPA

Table 1

Village of Niles Proposed Gross Point-Touhy Tax Financing District	
PINS	Address
10-29-301-003	6105 W. HOWARD ST.
10-29-301-004	6055 W. HOWARD ST.
10-29-301-011	6050 GROSS POINT DR.
10-29-301-013	6065 GROSS POINT DR.
10-29-301-023	6119 HOWARD ST.
10-29-301-024	6119 HOWARD ST.
10-29-301-025	6119 HOWARD ST.
10-29-302-001	7400 N. MELVINA AVE.
10-29-302-019	7398 N. MELVINA AVE.
10-29-302-021	6311 W. GROSS POINT RD.
10-29-302-025	6310 TOUHY AVE.
10-29-302-036	6200 TOUHY AVE.,
10-29-302-037	6330 TOUHY AVE.
10-29-302-046	6200 TOUHY AVE.,
10-29-302-047	7300 N. MELVINA AVE.
10-29-302-049	2424 TOUHY AVE.
10-29-302-050	2425 TOUHY AVE.
10-29-303-008	6035 GROSS POINT DR.
10-29-303-009	7420 LEHIGH AVE.
10-29-303-017	7420 LEHIGH AVE.
10-29-303-018	6019 HOWARD ST.
10-29-303-020	6001 GROSS POINT DR.
10-29-303-021	7460 LEHIGH AVE.
10-29-303-022	6035 GROSS POINT DR.
10-29-303-023	6000 W. SHERWIN AVE.
10-29-307-006	6333 W. GROSS POINT RD.
10-29-307-007	6343 W. GROSS POINT RD.
10-29-307-008	6363 W. GROSS POINT RD.
10-29-307-009	7300 N. MELVINA AVE.
10-29-307-010	7300 N. MELVINA AVE.
10-29-307-011	6151 GROSS POINT DR.
10-29-307-012	6101 GROSS POINT DR.
10-29-307-015	6150 W. TOUHY AVE.
10-29-307-016	7311 N. MELVINA AVE.
10-29-400-008	7420 LEHIGH AVE.
10-29-400-018	7480 LEHIGH AVE.
10-29-400-019	7460 LEHIGH AVE.

Table 2

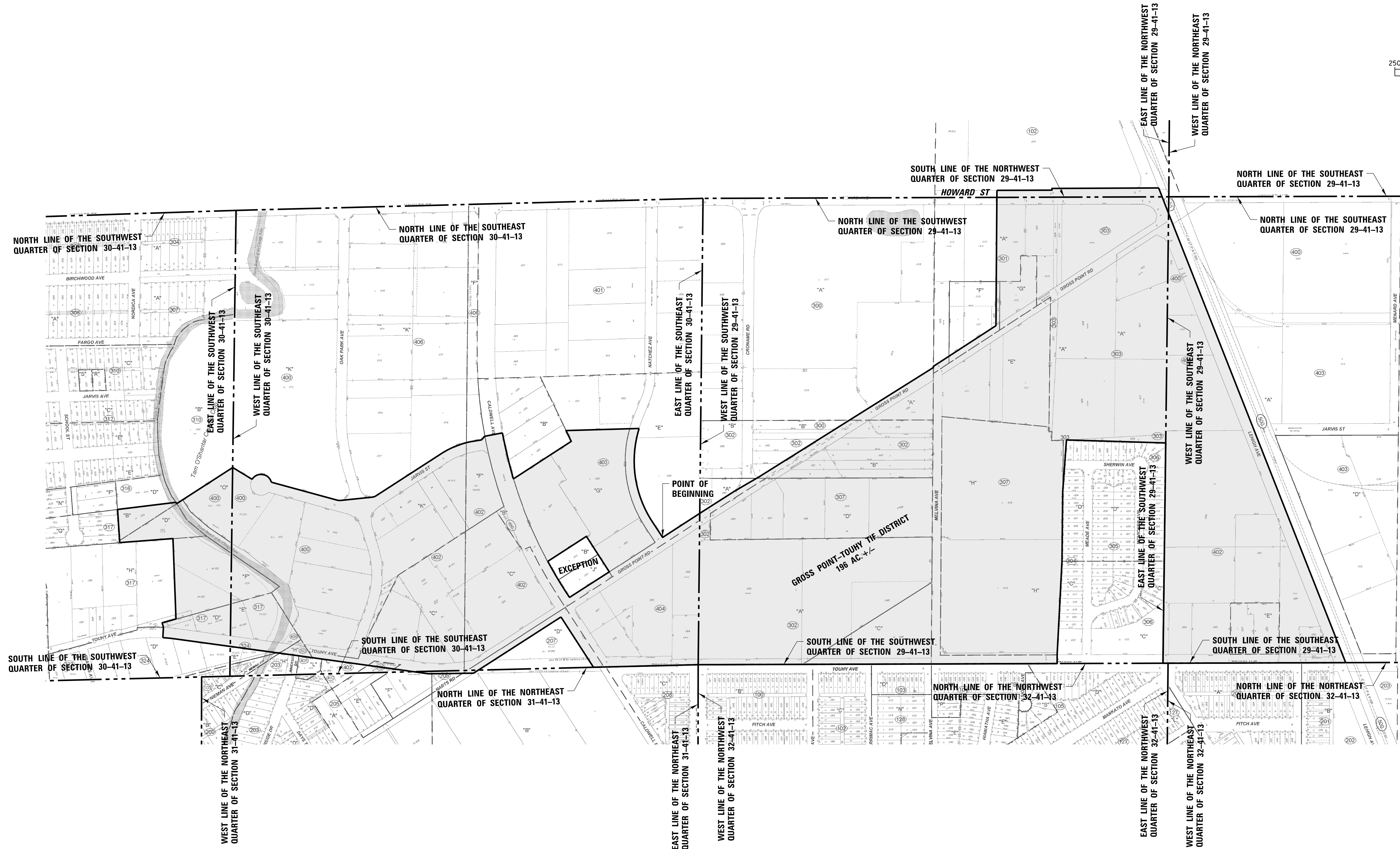
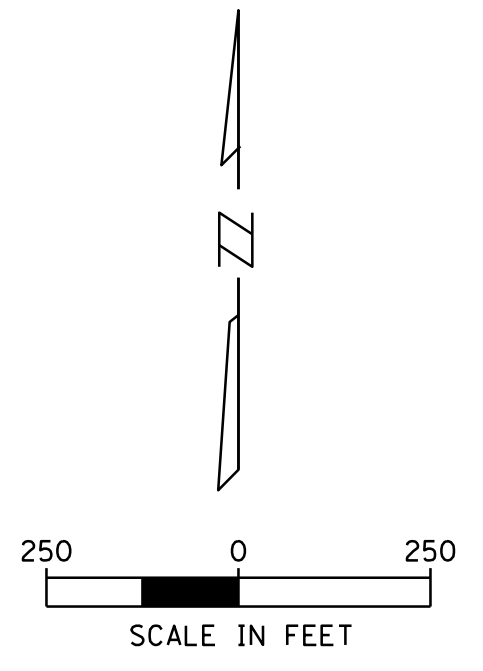
Village of Niles	
Proposed Gross Point-Touhy Tax Financing District	
PINS	Address
10-29-402-024	5990 W. TOUHY AVE.
10-29-402-025	5960 W. TOUHY AVE.
10-29-402-028	5900 W. TOUHY AVE.
10-29-402-029	5940 W. TOUHY AVE.
10-29-402-030	5900 W. TOUHY AVE.
10-29-402-031	7300 W. TOUHY AVE.
10-29-402-032	7400 N. LEHIGH AVE.
10-29-402-035	5950 W. TOUHY AVE.
10-29-402-036	7313 N. HARLEM AVE.
10-30-317-028	6840 NILES TERR.
10-30-317-029	6850 TOUHY AVE.
10-30-317-030	6840 W. TOUHY AVE.
10-30-317-037	6850 TOUHY AVE.
10-30-317-044	6840 TOUHY AVE.
10-30-317-060	7315 N. WAUKEGAN RD.
10-30-400-008	7280 CALDWELL AVE.
10-30-400-016	6700 TOUHY AVE.
10-30-400-022	7300 OAK PARK AVE.
10-30-400-024	6801 JARVIS AVE.
10-30-400-025	6801 JARVIS AVE.
10-30-400-026	7200 OAK PARK AVE.
10-30-400-027	6700 TOUHY AVE.
10-30-402-017	6640 TOUHY AVE.
10-30-402-018	7354 CALDWELL AVE.
10-30-402-019	6611 JARVIS AVE.
10-30-402-022	6619 JARVIS AVE.
10-30-402-023	7333 OAK PARK AVE.
10-30-402-024	7227 OAK PARK AVE.
10-30-402-025	7201 OAK PARK AVE.
10-30-402-026	7201 OAK PARK AVE.
10-30-402-029	7230 CALDWELL AVE.

Table 3

Village of Niles Proposed Gross Point-Touhy Tax Financing District	
PINS	Address
10-30-402-031	7280 CALDWELL AVE.
10-30-402-032	6600 W. TOUHY AVE.
10-30-403-026	7300 N. NATCHEZ AVE.
10-30-403-027	7301 N. CALDWELL AVE.
10-30-403-028	7300 N. NATCHEZ AVE.
10-30-404-002	7201 TOUHY AVE.
10-30-404-004	6400 TOUHY AVE.
10-30-404-006	6401 GROSS POINT DR.
10-30-404-007	7225 TOUHY AVE.
10-30-404-008	6450 TOUHY AVE.
10-30-404-009	7201 TOUHY AVE.
10-31-202-001	6700 W. TOUHY AVE.

APPENDIX B
Boundary Map of RPA

GROSS POINT-TOUHY TAX INCREMENT FINANCE DISTRICT



CB **CHRISTOPHER B. BURKE** ENGINEERING, LTD.
 9575 West Higgins Road, Suite 600
 Rosemont, Illinois 60018
 (847) 823-0500

GROSS POINT-TOUHY TAX INCREMENT FINANCE DISTRICT
 IN
 VILLAGE OF NILES, ILLINOIS
 PREPARED FOR
 VILLAGE OF NILES

CALC.	KJR	PROJECT NO.
DWN.	AJK	150145
CHKD.	JRM	SHEET 1 OF 1
SCALE:	1" = 250'	DRAWING NO.
DATE:	04-03-2015	TIF150145A