February 26, 2021

Rich Klawiter & Paul Shadle
DLA Piper
444 W. Lake Street #900
Chicago, IL 60606

Re: Proposed Planned Development and Lakefront Protection Ordinance: ONE Central

Dear Mr. Klawiter & Mr. Shadle

Thank you for meeting with the Department of Planning and Development (“DPD”) regarding a mixed-use Planned Development and Lakefront Protection Ordinance proposal for approximately 32 acres of rail yards between the McCormick Place Convention Center and the Museum Campus on the Near South Side. The Applicant is proposing a multi-modal transit hub and vertical development that will include up to 9,050 residential units, 1.5 million square feet of retail uses, 9.45 million square feet of office space, 1.5 million square feet of hotel uses, 350,000 square feet of event space, and 3,500 parking stalls. The applicant is proposing an underlying zoning of DX-16 and a total FAR of 16.42.

The proposal is a mandatory planned development review due to the following sections of the Zoning Code: Planned development review and approval is required for the development of air rights above land used for railroad (17-8-0501); a residential building that exceeds or meets the height of 440’ and a nonresidential building that exceeds or meeting the height of 600’ in a DX-16 district (17-8-0512-B); exceeds the unit count threshold of 350 units in a DX-16 district (17-8-0513-B); for any development using floor area bonuses under Section 17-4-1000 (17-8-0514); or results in the expansion of an approved Planned Development (17-8-0515-A).

The applicable City Planning documents for the area are the: Near South Community Plan, Central Area Action Plan, and the Central Area Plan.

After conducting an initial review of the project, and following preliminary internal review and consideration of this proposal, DPD has the following comments regarding the project:
• Planning/Zoning:
  o The proposed transit and transportation connections will need to be determined as feasible before the City can comment on the level of density and programming requested.
  o Alternatively, provide details on the scenario for this project if it is determined proposed transit connections can’t be accommodated or its determined proposed vehicular access can’t accommodate the proposed full build. Identify the reduced transit hub costs, how the costs will impact the State Act Payments, reduced FAR request, and reduced public/economic benefits.
  o Provide details how the proposal meets the Planned Development Standards and Guidelines under section 17-8-0900 and the LPO policies/provisions.
  o Provide supporting information showing that the FAR ask (16.42) is compatible with the area and the level of density can be supported.
  o Provide a zoning analysis to confirm new PD boundaries 331, 499, 883, and 821 will still be legal/conforming and consent is provided from those property owners.

• CDOT/Transit:
  o The proposal identifies only two vehicular ingress/egress points to the entire development site (S. Lake Shore Drive & E. McFetridge Drive and S. Lake Shore Drive & E. 18th Drive). Both of these intersections/areas are already congested, particularly during rush hour and special events. How does the proposal to use only these two access points meet emergency access requirements? How does this proposal meet vehicular access requirements for the site?
    ▪ The existing geometry at the proposed access points (particularly McFetridge Drive) on S. Lake Shore Drive is extraordinarily tight and the "concept" geometries are not satisfactory to determine feasibility. Proposed geometries at these intersections must consider future impacts on capacity. Dimensioned, scale drawings of the proposed changes to the intersections at McFetridge and at 18th, in both plan and profile, are required for CDOT to continue reviewing the proposal. The preliminary sketches shown in the August 2020 ONE Central Station Mixed-Use Development Traffic Impact Study do not contain an adequate level of detail to prove feasibility of the proposed configurations.
    ▪ Any modifications to the intersections with S. Lake Shore Drive will require IDOT review and approval.
  o CDOT, CTA, Metra, Amtrak, and IDOT, are currently working with the development team to determine whether the infrastructure proposed is feasible and will meet operating requirements.
Until the transit and roadway infrastructure is determined to be feasible, DPD is not in a position to approve a level of FAR/density characteristic of downtown developments.

CDOT has reviewed preliminary plans over many months and meetings and has provided feedback on these preliminary proposals and asked questions that have not yet been answered satisfactorily. The following is a high-level summary of the questions that have not been satisfactorily answered, however, it is not meant to be a comprehensive list. The Applicant should refer back to comments and questions provided by CDOT on 6/2019 and 7/17/2020 for a complete list.

- General need - In addition to developer’s analysis, a robust community process should inform the level of service provided at the site.
- Infrastructure feasibility - Are the proposed physical changes feasible and acceptable to the various agencies impacted (CDOT, CTA, Metra, IDOT, Amtrak)?
- Site access - Limited site access is proposed, entirely from S. Lake Shore Drive. How will this impact emergency response and site evacuation? Are the proposed connections to S. Lake Shore Drive feasible and acceptable to IDOT? How will neighbors to the west access the site and the lakefront?

- Provide evidence of support from SCAL (St. Charles Air Line) owners to allow study/use of ROW.
- Provide details that show the community impacts of the proposed CTA elevated train along the SCAL.

- Other:
  - Provide a more detailed cost/payment breakdown related to the State Act.
  - We will need confirmation that the developer will agree to hire a third-party consultant paid by the developer to review the impacts of the State Act and study projections.
  - We will need confirmation that the developer will agree to involve the City in the P3 agreement process.
  - Until these issues are resolved to our satisfaction we will not be providing comments on proposed zoning request, design, programming/uses, massing, and public benefits such as open space and affordability.
  - Filing a PD Application is at the applicant’s own risk considering our concerns outlined.

Applicants should provide a follow-up packet that addresses the above comments and a written response to each comment. Note that the comments provided in this letter are based on a partial review of the proposal and do not reflect a complete list of DPD’s issues or concerns. Additional comments may be provided throughout the review process. The project will not receive final recommendation from staff until a complete review has taken place, all documents have been received, and all comments have been addressed.
This project will need to meet the City’s Sustainable Development Policy, Landscape Ordinance, Stormwater Requirements as well as the Chicago Department of Transportation’s requirements. For more information on the Sustainable Policy, please review the documents online, and for questions please contact Brad Roback, at (312) 744-8563. Please contact Ron Daye at 312-744-6507 to discuss the landscaping requirements for the site. Please contact Andrew Billing at 312-744-7774 with the Department of Buildings to discuss storm water management requirements and Karen Rogulja at 312-744-4496 at the Chicago Department of Transportation for transportation review. Please contact Ricardo Lopez at (312) 744-0228 with questions related to the Affordable Requirements Ordinance.

Please note that departmental approvals will be required from the Mayor’s Office for People with Disabilities (312-744-4441), the Chicago Department of Transportation, the Chicago Fire Department (John Javorka, 312-744-1874), as well as DPD and possibly other departments including Fleet and Facilities Management (Paul Waite, 312-744-9667) and Stormwater, prior to scheduling the item for review by the Chicago Plan Commission.

If you have any questions or concerns, please contact me at Emily.Thrun@cityofchicago.org.

Sincerely,

Emily Thrun  
City Planner, Central Region

Cc: Alderman Dowell, Alderman King, Cindy Roubik, Noah Szafraniec, Patrick Murphey, Karen Rogulja, Bill Higgins, Jeff Sriver, Vig Krishnamurthy, Ricardo Lopez, Leah Mooney, David Kralik, Lynnette Ciavarella, Joe Shacter, Main File