



Agenda Item: **Presentation on the Preliminary Downtown Tax Increment Financing (TIF) Eligibility Report**

Type: **Discussion**

Report From: **Administration**

Introduction

The Committee of the Whole held discussions on Tax Increment Financing (TIF) District on February 15, March 1 and June 7, 2022. At the February 15th Committee of the Whole meeting, the Village's TIF Consultant, Phil McKenna, provided an overview of TIF Districts and the TIF implementation process. The Committee held additional TIF discussions on March 1 and June 7 where staff provided further information on TIF Districts and introduced a preliminary TIF boundary for discussion.

An agreement with Kane, McKenna & Associates was approved on June 21, 2022. This agreement included providing a preliminary TIF qualification report based on the proposed TIF boundary. On November 15, an additional ordinance was approved for this agreement.

Representatives from the Village's TIF consultant, Kane, McKenna & Associates, Inc, will provide their findings of their preliminary analysis for the potential TIF district. The preliminary report is attached as exhibit A.

Exhibits

[A - Preliminary Downtown Tax Increment Financing \(TIF\) Eligibility Report](#)

PRELIMINARY DRAFT

MEMO

TO: Jacob Rife, Village Administrator, Village of Cary

CC: Brian Simmons
Dan Gardner

FROM: Kane, McKenna and Associates, Inc.

DATE: December 1, 2022

RE: **Preliminary Downtown Tax Increment Financing (TIF) Eligibility Report**

I. Introduction

The Village's 2015 Comprehensive Plan and the Village's 2021 "Downtown Cary Strategic Plan" both identify the need for leveraging TIF districts to help the Village achieve its economic development goals for the downtown area. Accordingly, the Village has asked Kane, McKenna & Associates, Inc. ("KMA") to review certain properties within the Village's downtown area. The selection of these properties was influenced and guided by the identification of certain downtown area properties in the Village's 2015 Comprehensive Plan, the Village's 2021 Downtown Strategic Action Plan, and trends in EAV, and the Village.

The Study Area consist of two hundred and forty-four (244) tax parcels primarily located along US Route 14 (Northwest Highway/Crystal Street/Main Street) which runs from the northwest to southeast of the community and bisects the Village's downtown area and is bounded by Cary-Algonquin Road to the northwest and the Village boundary at the Fox River to the southeast (the "Study Area"). The parcels consist of approximately two hundred and eleven (211) acres, improved with one hundred and ninety-eight (198) structures with a combination of commercial, industrial, mixed-use, recreational, and residential uses. All of the properties are located in the Village. A map of the Study Area can be found in Exhibit A.

KMA reviewed the Study Area in order to determine whether potential Tax Increment Finance (TIF) district eligibility factors are present, pursuant to the Illinois Tax Increment Allocation Redevelopment Act ("the Act"). Potential TIF Qualification Factors for the improved area are summarized below.

MEMO

Page Two

December 1, 2022

The findings set out below are preliminary, to be supplemented by review of the findings with the Village, its attorneys, and engineers.

II. TIF Improved Area – Qualification Factors:

Under the Act, "Conservation Area" means any improved, or vacant, area within the boundaries of a redevelopment project area located within the territorial limits of the municipality, in which 50% or more of the structures in the area have an age of 35 years or more, and where certain conditions are met, as identified below. (ILCS 5/11-74.4-1 et. Seq., as amended.). 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 (3) 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 determine 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 not 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.

MEMO

Page Three

December 1, 2022

(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.

MEMO

Page Four

December 1, 2022

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

(K) Environmental Clean-Up. The 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 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) "Stagnant" or Declining EAV. The total equalized assessed value (EAV) of the 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.

II. Preliminary Improved Area Qualification Factors and TIF Eligibility

As stated previously, under the Act, "Conservation Area" means any improved, or vacant, area within the boundaries of a redevelopment project area located within the territorial limits of the municipality, in which 50% or more of the structures in the

MEMO

Page Five

December 1, 2022

area have an age of 35 years or more, and where certain conditions are met, as identified below. KMA's *preliminary* analysis finds that more than eighty nine percent (89%) of the structures in the Study Area are 35 years of age or older. As a result of KMA's *preliminary* evaluation of the Study Area, the following factors are identified for potential qualification of the area as a "Conservation Area." We believe these factors are reasonably distributed to a meaningful extent as required by the TIF Act. **Note: All findings are to be supplemented by a full study prepared pursuant to requirements under State statute.**

"Conservation Area" Qualification Factors

1. **Deterioration of Buildings and Site Improvements** – The Act states that with respect to buildings, defects include, but are not limited to, major defects in the secondary building components such as doors, windows, porches, gutters, downspouts, and fascia. With respect to site improvements, the conditions of roadways, alleys, curbs, gutters, sidewalks, off-street parking, and surface storage areas evidence deterioration, including, but not limited to, surface cracking, crumbling, potholes, depressions, loose paving material and weeds protruding through paved surfaces. Several of the properties in the Study Area exhibit deteriorated conditions in either site improvements or building components or both. These site conditions are characterized by, among other things, the following:
 - Extensively cracked and crumbling asphalt pavement, along with potholes and other settlement in parking lot areas and driveways, requiring re-surfacing
 - Weed and vegetation growth in cracked pavement and/or loose pavement material
 - Faded and cracked parking space striping and curb caution paint, requiring re-painting
 - Crumbling curb and gutter throughout parking areas and approaches, requiring removal and replacement
 - Cracked public walks with weed growth

Village staff also report that some streets and pathways within the Study Area are in need of upgrading to be pedestrian and bicycle accessible. Building deterioration was found to consist of cracked or damaged exterior building surfaces including masonry facades in need of tuckpointing, faded and peeling trim paint, deteriorated windows or doors or window/door frames, rusted

MEMO

Page Six

December 1, 2022

metal service doors, rusted metal fencing, and damaged gutters or downspouts, for example.

As an example, the property located at 500 Cary-Algonquin Road suffers from both site and building deterioration. The parking lot is severely cracked with loose pavement material and weed growth throughout. Parking curbs are deteriorating, and walkways also have vegetation overgrowth. The building itself requires tuckpointing and has several boarded-up windows. The front entry stairwell had been recently replaced but had makeshift wooden handrails and caution tape surrounding the newly poured concrete steps.

Another example of deteriorated site conditions is the strip center located at 169-181 Northwest Highway. The parking lot area is severely cracked and spalling, with loose pavement material. The parking lot terminates at the northwest end of the site, with a makeshift gravel drive which was used at the time for vehicle storage. A pickup truck was parked on-site with a for sale sign.

The property at 340-342 Crystal Street has also suffered from deterioration as well as a lack of overall maintenance. The property has been the subject of significant code enforcement efforts in the past and has current outstanding violations.

Deterioration is also evident at the Maplewood School Site located at 415 Krenz Avenue. The property has been vacant since 2011 and currently suffers from cracked and loose pavement in parking lots and sidewalks, as well as significant weed growth. This property is specifically identified in the Village's 2015 Comprehensive Plan as a high priority redevelopment site. The Comprehensive Plan calls for the Village to "Partner with School District 26 to assure responsible redevelopment of the Maplewood property with a combination of single-family attached and multi-family housing, and park space in keeping with the recommendations of the Downtown Subarea Plan."

2. **"Stagnant" or Declining EAV** – The act states that this factor is present if the total equalized assessed value (EAV) of the 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

MEMO

Page Seven

December 1, 2022

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. The table below indicates that the total EAV of the Study Area has been increasing at an annual rate that is less than the balance of the municipality for five (5) of the last five (5) calendar years for which information is available.

	2021	2020	2019	2018	2017
Study Area Total EAV:	\$ 25,809,692	\$25,223,278	\$24,289,308	\$23,253,560	\$22,219,486
% Change from Previous Year:	2.3%	3.4%	4.9%	4.7%	5.1%
Village of Cary	\$556,403,831	\$540,347,671	\$519,120,789	\$491,756,292	\$462,371,776
Balance of Municipality EAV	\$530,594,139	\$515,124,393	\$494,731,481	\$468,502,732	\$440,152,290
Percentage increase/decrease	3.0%	4.1%	5.6%	6.4%	6.8%
CPI All Urban Consumers	4.7%	1.2%	1.8%	2.4%	2.1%

Source: McHenry County and McHenry County Assessor, U.S. Bureau of Labor Statistics
Lagging/Declining values are indicated in **bold font**

- Inadequate Utilities.** The Act defines “inadequate utilities” as 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.

According to Village staff, the Village’s water system has three separate pressure zones. The Study Area is considered a “Low Pressure Zone.” While this area currently meets the EPA minimum for water pressure, any service for new uses such as multifamily, mixed-use, or industrial would be insufficiently serviced by the current system. To address this issue, a new well and

MEMO

Page Eight

December 1, 2022

additional connection points through the Maplewood site and to the different pressure zones will need to be constructed.

Immediately adjacent to the Study Area's southwest boundary along South Spring Street, municipal Well #8 and Well #9 have been taken offline due to water quality concerns given new EPA regulations. These municipal wells formerly served as primary water service points for the Study Area. Removing them from the Village's water system has negatively impacted water pressure throughout the Study Area.

EPA regulations require that community water systems update their inventory of known lead service lines by April 15, 2023. A final replacement plan must be submitted by 2027, and all replacements must be completed by 2042. Within the Study Area, there are approximately 50 private lead service lines that would be required to be replaced under these regulations.

The Study Area has existing overhead electric utility poles along US Route 14. According to Village staff, these poles limit the amount of roadway right-of-way available for pedestrians, and as such should be buried to accommodate Comprehensive Plan and Downtown Cary Strategic Plan goals of creating a more pedestrian friendly downtown area.

Many of the buildings along US Route 14 between downtown and E Main Street experience frozen water and sanitary sewer service lines during extremely cold winters as a consequence of shallow service line depth. Repairs of leaking service lines are challenging and expensive for property owners as the public mains are located beneath the US Route 14 pavement.

One of the Village's primary goals for the Study Area is the development of the Jack's Channel site along US Route 14. This area is specifically called out in the Village's 2015 Comprehensive Plan and the 2018 CMAP/McHenry County Fox River Corridor Plan as an opportunity for future development with enhanced Fox River access and recreational amenities. At present, this site is not currently served with water or sewer utilities. Because of topography, a sanitary sewage lift station would also be needed to connect to the existing sewer mains to the southwest. Both water and sewer connections would require extending utilities beneath the US Route 14 pavement. Due to proximity to the Fox River, utilities would need to be extended strategically to preserve an environmentally sensitive habitat.

MEMO

Page Nine

December 1, 2022

- 4. Obsolescence.** Under the Act, obsolescence is defined as the condition or process of falling into disuse. Structures have become ill suited for the original use. The Study Area potentially includes both functional and economic obsolescence.

Functional obsolescence can be present due to age, physical condition, poor layout and building orientation. As mentioned previously, more than eighty-nine percent (89%) of the one hundred and ninety-eight (198) structures within the Study Area are over 35 years old. Of these structures, nearly seventy percent (70%) are over fifty (50) years old, and forty-seven percent (47%) are over seventy-five (75) years old. All of the structures over 35 years old range in age from 36 to 179 years old. The advanced ages of almost all the structures within the Study Area, along with their associated deterioration, make them obsolete in comparison to contemporary construction and development standards.

Additionally, the Village's 2021 "Downtown Cary Strategic Plan" acknowledges one of the primary challenges of obsolete structures, namely that small, compact, and narrow parcel size and older building stock in the Downtown Core make redevelopment challenging. The numerous, small, individually owned parcels make land assembly difficult for redevelopment. Modern parking requirements and other design standards also make attracting newer businesses difficult.

As further evidence of deterioration within the Study Area, the "Downtown Cary Strategic Plan" notes that the existing BMO Bank is considerably underutilized and offers a prime redevelopment site that could serve as a catalyst to Downtown redevelopment and reinvestment. As another example of obsolescence, the Strategic Plan also states that "the open field between the downtown Core and the True Value Manufacturing site presents a greenfield site just off Jandus Road. The site is adjacent to Cary Creek and may provide access or other challenges, but nonetheless provides another opportunity for infill development."

The properties 4-48 Crystal Street for example date back to the original founding of the Village and have limited access to Route 14 despite fronting the roadway. The properties share vehicle access from the intersection of Route 14 and Main Street and a shared parking area that is located within a Flood Zone.

MEMO

Page Ten

December 1, 2022

5. **Deleterious Layout.** The Act defines “deleterious layout” as existence of incompatible land-use relationships, buildings occupied by inappropriate mixed-uses or uses considered to be noxious, offensive or unsuitable for the surrounding area.

Deleterious layout is found within the Study Area as demonstrated through the current alignment of US Route 14 in relation to the downtown Area. The Village’s 2015 Comprehensive Plan specifically details this challenge in Chapter 6: Transportation Plan. In this section, the Village identifies that US Route 14 carries high volumes of traffic through Cary and is nearing capacity of a four-lane roadway. Chapter 6 goes on to detail that “the dog-leg alignment of US Route 14 and West Main Street combined with the short spacing of traffic signals (four signals within ½ mile) between West Main Street and Jandus Cutoff Road, hampers traffic progression, creates congestion during peak commuting hours, causes acute turning movements and traffic divisions onto Jandus Cutoff Road and Jandus Road into the downtown area, and impacts safety for pedestrians trying to reach the Metra station and the downtown area.”

The 2015 Comprehensive Plan continues, indicating that “Metra riders oriented to the east end of the station platform cross US Route 14 at W Main Street and must complete a time-consuming two-stage crossing that traverses an island in the middle of the intersection. Metra riders oriented to the west end of the station platform cross US Route 14 at an uncontrolled location at Borden Avenue that lacks crosswalks, signage, or any measures for pedestrian safety.”

In addition to pedestrian safety issues, the intersection of US Route 14 and W Main Street is of concern with respect to vehicular traffic safety. According to Village staff, during the period from 2016 to 2020, a total of fifty-seven (57) crashes occurred, resulting in thirty-two (32) injuries. The addition of advance overhead lane use signage and pavement markings indicating destination route numbers will reduce improper lane usage and motorist confusion this critical intersection. Measures such as these will statistically lead to fewer traffic collision incidents.

In order to further mitigate these transportation issues, Chapter 6 also calls for “a realignment of US Route 14 to soften the curve at W Main Street and create a more traditional T-type intersection that would eliminate the island, improve traffic flow on US Route 14 and access to the downtown area, allow

MEMO

Page Eleven

December 1, 2022

for safer pedestrian crossings, and potentially create space to relocate the Metra station to the inbound side of the tracks.”

The Village of Cary recognizes the importance of improving this intersection and has notified the Illinois Department of Transportation (IDOT) of this need.

The deleterious layout of this intersection causes further challenges to nearby property owners. The Downtown Cary Strategic Plan (2021) acknowledges that revitalization of commercial properties east of the UP-NW Metra tracks will remain a challenge in the future due to the high speeds and volume of traffic along US Route 14, awkward intersection geometry, and limited building setbacks and block depths.

According to Village Staff, 68 of the 244 parcels in the Study Area, or nearly 28%, are existing non-conforming uses. This information provides further evidence of deleterious land use. For example, the “Downtown Cary Strategic Plan” notes that “banks with drive-in are not allowed in the Downtown,” which would qualify the BMO Harris Bank as an existing non-conforming use. Throughout the study area, there are multiple parcels with more than one structure and use. There are seven (7) separate parcels that have multiple housing structures, most combining single and multifamily. 330 Park Avenue, 342 Crystal Street, 254 Crystal Street, 222 Crystal Street, 230-232 Crystal Street, and 121 E Main Street contain a mix of the two. Another property, 215 S Northwest Highway, has 17 residential structures on one parcel. This particular use is accessed by a private club drive adjacent to the Fox River.

An even greater example of deleterious land use are the two (2) parcels in the Downtown that have multiple structures for vastly different uses. Both 208 W Main Street and 212 W Main Street have commercial and multifamily structures on the same parcel.

6. **Lack of Community Planning.** The Act defines “lack of community planning” as an area that was developed prior to or without the benefit 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

MEMO

Page Twelve

December 1, 2022

inadequate shape and size to meet contemporary development standards or other evidence demonstrating an absence of effective community planning.

The Village's first Comprehensive Plan was adopted in 1963. This was followed by periodic updates in 1970, 1982, and 1992. In 2015, the Village adopted its latest Comprehensive Plan which states that "The Village of Cary has experienced significant changes since the passage of its last Comprehensive Plan update in 1992." The Comprehensive Plan further states that "Today, Cary has begun a transition from managing rapid growth and expansion to new opportunities for reinvestment, redevelopment and placemaking within its established, successful community." Indeed, according to the Village of Cary, the population of the Village in 1960 was only 2,530; by 2020 the population had grown to 17,826.

Planning and zoning standards have evolved over time, most recently with updates to the Village's Zoning regulations in 1998 and 2019, along with the adoption of the current Comprehensive Plan in 2015. These instances have created several instances throughout the Study Area where evidence of Lack of Community Planning is clear. Of the two hundred and forty-four (244) parcels in the Study Area, sixty-eight (68) parcels or nearly 28%, are existing non-conforming uses. Thirteen (13) parcels contain more than one building, most with separate and non-complimentary uses.

The Village's 2015 Comprehensive Plan and "Downtown Cary Strategic Plan" note concern among residents "about lack of retail options in the community." As noted in the "Downtown Cary Strategic Plan," small, compact, and narrow parcel size make redevelopment for more modern commercial and retail uses challenging. Again, the numerous, small, individually owned parcels make land assembly difficult for redevelopment. Updated parking requirements exacerbate this issue, creating a significant hurdle for retailers seeking downtown sites. The 1998 Zoning revisions caused several properties to become non-conforming due to new code provisions for items such as density and lot coverage.

The 2015 Comprehensive Plan notes that the Village should better leverage the Fox River as an economic asset by pursuing destination development at Jack's Channel. The Comprehensive Plan notes that "Cary is a river town with no riverfront." This goal is complicated by the infrastructure challenges, as noted in the Inadequate Utilities section.

MEMO

Page Thirteen

December 1, 2022

The 2015 Comprehensive Plan and the Downtown Cary Strategic Plan both identify the US Route 14 alignment in the downtown as a significant planning deficiency. The 2015 Comprehensive Plan states, “US Route 14 alignment in the Downtown needs to be evaluated and addressed in the future.” The Downtown Cary Strategic Plan states, “Accessibility and travel to Downtown from US Route 14 is challenging. This federal highway is a designated truck route and serves a primary purpose of serving regional traffic through the area. Its alignment jogs with a sharp curve, creating an awkward intersection at Main Street which is the gateway into downtown.” The Downtown Cary Strategic Plan continues, stating that “Westbound travelers have two independent lanes that require sharp right-handed curve to stay on US Route 14 or the option of a ‘left-turn lane’ to cross the railroad tracks and access the southern portion of Downtown Cary. The geometry of the intersection combined with limited signage and traffic speeds make this intersection challenging and intimidating to cross.”

IV. Summary

Based upon our preliminary review, the following TIF qualifications may be present, subject to further review of KMA’s findings by Village staff.

<u>Study Area</u>	<u>Potential TIF Eligibility Factors</u>
Conservation Area	<ol style="list-style-type: none">1. Deterioration of Building and Site Improvements2. Stagnant or Decline in EAV3. Inadequate Utilities4. Obsolescence5. Deleterious Layout6. Lack of Community Planning

These findings are preliminary – to be supplemented by the review of these findings with the Village staff.

EXHIBIT A
MAP
PROPOSED DOWNTOWN TIF DISTRICT

