BEFORE THE PLANNING AND ZONING COMMISSION AND CITY COUNCIL OF THE CITY OF CRYSTAL LAKE

In the Matter of	)	
	)	
NVA TRUCKING, LLC	)	#2023-36
	)	
7013 Sands Road – Rezoning, Preliminary and Final Planned Unit Development and Special Use Permit for a Freight Terminal	)	

MEMORANDUM IN SUPPORT OF OBJECTORS' MOTION TO DENY NVA TRUCKING PETITION #2023-36 AND RESPONSE TO PETITIONER'S PROJECT NARRATIVE

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MEMORANDUM IN SUPPORT OF OBJECTORS'
MOTION TO DENY NVA TRUCKING PETITION #2023-36
AND RESPONSE TO PETITIONER'S PROJECT NARRATIVE

The Objector, DAN DOOLEY, by and through his attorneys, Zukowski, Rogers, Flood and McArdle, and the Objector, DEBRA ALCOCK, by and through her attorneys, The Waggoner Law Firm, P.C., hereby jointly request the matter of Petitioner, NVA TRUCKING, and Petition #2023-36 be denied by the Planning and Zoning Commission (the "Commission"). In support thereof, the Objectors state as follows and attach an Appendix of Supporting Documents (hereinafter "Appendix"):

Background

1. Petitioner's Petition #2023-36, filed with the City of Crystal Lake (the "City"), for the property located at 7013 Sands Road (the "Subject Property") requests :

i) rezoning from *M Manufacturing* and *M-L Limited Manufacturing* to *M Manufacturing PUD*;
ii) Preliminary and Final Planned Unit Development;
iii) Special Use for a Freight Terminal;
iv) Variation from the maximum 8-foot height permitted for a fence to allow 12 feet, a variation of 4 feet;
v) Variation from the required landscape buffer between industrial and commercial properties to allow 20.5 feet, a variation of 9.5 feet; and
vi) Variation from the requirement to have a landscape island every 10 spaces to allow 13 spaces along the south parking area.

2. Based upon Petitioner's new Development Application dated January 17, 2024 and Project Narrative dated January 17, 2024 (the "Narrative"), Petitioner has modified its request to include

i) Warehousing and transportation;
ii) Office headquarters and logistics;
iii) Truck leasing;
iv) Automotive repair (minor);
v) Automotive repair (major);
vi) Automotive Oil/Lube;
vii) Automotive Parts, Accessories and Tire Stores;
viii) Private parking with vehicle service plan; and
ix) Outdoor storage.

3. Truck Leasing and Automotive Repair (Major) are limited uses that have specific criteria under the City's Unified Development Ordinance ("UDO") that must be met prior to initiation of the uses.

4. Automotive Parts, Accessories and Tire Stores is not a permitted use in the Manufacturing District under the City's UDO.

5. Private parking lots are special uses under the City's UDO.

6. Petitioner's Site Plan illustrates Semi-Tractor/Trailer Parking and Semi-Tractor/Trailer Truck Repairs on the Subject Property including parking of *more than* 300 Semi-Tractors/Trailers immediately south of a residential neighborhood.

7. The Subject Property is located adjacent and immediately south of the Lor-El Estates, Unit 2 residential subdivision, which is itself zoned *R1 Single-Family Residential* in the County of McHenry and includes 52 single family detached homes.

8. Petitioner's request includes reclassification of approximately 450 feet of the northerly portion of the Subject Property (part of PIN 19-03-401-021), from *M-L Limited Manufacturing* to *M-Manufacturing PUD*, as those classifications are defined in the UDO. This portion of the Subject Property is directly adjacent to the Lor-El Estates, Unit 2 residential subdivision.

9. The City's UDO gives this Commission direction as to how to interpret and apply the UDO regulations in this matter. Specifically, see the following:

> *Section 1-700. District Purposes. … This Ordinance…is based upon the concept…to protect that development from being encroached upon by incompatible types of development.*
>
> *…*
>
> *I.* ***Limited Manufacturing (M-L) District.*** *1. General. This district is for "clean" (low environmental impact) industrial uses that are compatible with neighboring residential…districts. …*
>
> *J.* ***Manufacturing (M) District.*** *1. General. This district is the primary heavy industrial district, serving uses that are visually obtrusive, generate nuisances such as noise and odors, or have excessive exterior operation or storage of equipment and materials. … 3. Uses. This district is intended to provide for heavy industrial uses with high nuisance potential.*
>
> *Section 2-100. Purpose. The purpose of this* [land use] *article is to: … B. Prohibit uses, buildings or structures which are incompatible with the character of surrounding development…*

Appendix, P.042-P.044 (*emphasis added)*.

I. The Proposed Map Amendment from M-L District to M District Must Be Denied Based on the City's 40-year History of Protecting the Residential Subdivision from Manufacturing Uses

10. Petitioner requests a zoning map amendment and reclassification of the north portion of the Subject Property from Limited Manufacturing (M-L) District to Manufacturing (M) District.

11. Copies of the City Zoning Map, Petitioner's own drawing dated July 21, 2023 and a plat map are attached as Appendix P.001-P003. These exhibits delineate the currently zoned Subject Property as Limited Manufacturing to the north (Lot Nos. 2, 3 and 4) and Manufacturing to the south and the Lor-El Estates Unit 2 residential subdivision to the north, which immediately abuts the north section of the Subject Property.

12. Section 1-700(I) and (J) of the UDO specifically highlights the significant difference of use intensity between the Limited Manufacturing District and the Manufacturing District:

Manufacturing is:	Limited Manufacturing is (intended for uses that are):
for heavy industrial district	
visually obtrusive	"clean"
generate nuisances: noise	Low environmental impact
generate nuisances: odor	Compatible with neighborhood residential
excessive exterior operations	

See Appendix P.042-P.043.

13. In 1985, prior to annexation of the Subject Property to the City in the same year, the entire Subject Property was classified in the County as Light Manufacturing. *See* Appendix, P.004. The Subject Property was annexed into the City 40 years ago, with the north portion of the Subject Property zoned Limited Manufacturing and the south portion zoned Manufacturing. The Limited Manufacturing classification was recommended by the City staff, City Zoning Board, and imposed by the City Council to buffer the sensitive Lor-El Estates Unit 2residential subdivision to the north from the allowed permitted manufacturing uses to the south. This reasoning is made clear via the detailed 1985 development documents which state, in part, as set forth below.

Excerpt from
Planning Department Staff Report
March 22, 1985

> As part of annexation, an appropriate city zoning district must be given to this subdivision. *Staff recommends "M" Manufacturing for all lots except Lots 2, 3 and 4. For these three lots we recommend "M-L" Manufacturing Limited since they abut a residential subdivision*.

> Manufacturing Limited is a district intended to prevent conflicts between manufacturing uses and any non-manufacturing uses. This district is designed to accommodate primarily office, warehousing, and service uses which have a low level of vehicular and customer traffic and a lower potential for exhibiting offensive characteristics. Staff still feels, however, that Manufacturing zoning is appropriate for the remaining subdivision because it is compatible with the other surrounding land uses and zoning district. The City's Comprehensive Plan also designates this property for industry.

Appendix, P.004-P.009 (*emphasis added*).

Excerpt from
Crystal Lake Zoning Board of Appeals (approving staff recommendation)
April 3, 1985

> …(Petitioners) were requesting to rezone the property from Light Industrial in the County to "M" Manufacturing and "M-L" Manufacturing-Limited for lots 2, 3 and 4 upon annexation.
>
> Mrs. Kurtz moved that the Zoning Board of Appeals recommend to the City Council to amend the provisions of the Zoning Ordinance of the City of Crystal Lake to reclassify the (property) from County "I-1" Light Industrial to "M-L" Manufacturing-Limited, (for) lots 2, 3, and 4 of the proposed Preliminary Plat and "M" Manufacturing on the remaining property.
>
> *Mr. Dahl moved that the Zoning Board advise the City Council that because of the sensitive nature of lots 2, 3 and 4 more logical safeguards could be included in the Annexation Agreement by increase in square footage of 20,000 square foot for the M-L zoning for lots 2, 3, and 4.* Ms. Kurtz seconded the motion and passed with a vote of 4 ayes and 1 nay.

Appendix, P.017-P.020 (*emphasis added*).

Excerpt from
City of Crystal Lake Zoning Chair Letter to the City Council
April 5, 1985

> Mr. Dahl moved that the Zoning Board advise the City Council that because of the sensitive nature of lots 2, 3, and 4 more logical safeguards could be included in the Annexation Agreement by increase in square footage of 20,000 square foot for the M-L zoning for lots 2, 3, and 4.

Appendix, P.021-P.023.

Excerpt from
Annexation Agreement between City of Crystal Lake and Mrs. William Sturm
July 2, 1985

> That part of the subject property which is described as Lots 2, 3 and 4 on the proposed Preliminary Plat marked Exhibit "A" attached hereto and by reference made a part hereof shall be zoned "M-L" Manufacturing Limited.
>
> That the remainder of the subject property as contained on the proposed Preliminary Plat shall be zoned "M" Manufacturing.

Appendix, P.024-P.026.

14. Aerial photos from 1988, 2005 and 2021 clearly reflect that the neighboring land uses to the south of the Lor-El Estates residential subdivision, including the Subject Property, has not changed. Appendix, P.027-P.029. Therefore, the reasoning of the 1985 Zoning Board of Appeals and City Council (40 years ago) should not change. Lots 2, 3 and 4 of the Subject Property still provide the much-needed sensitive 450-foot buffer to the Lor-El Estates Unit 2 residential subdivision from the intense uses allowed in the Manufacturing District to the south. Petitioner is requesting to reduce this buffer to a mere 50 feet. *See* Appendix, P.030; July 19, 2023, Planning and Zoning Commission Meeting, https://youtu.be/buLclmejig4 at 00:50:40.

15. Rezoning the north portion of Subject Property to the Manufacturing District will permit the following uses, that are by definition incompatible with the adjacent residential neighborhood and prohibited in the existing Limited Manufacturing District with "high nuisance potential":

- Gas/Electric power generation facility
- Landfill and transfer station
- Recycling facility
- Heavy industrial use
- Concrete batch plant
- Earth extraction, stockpiling and processing (crushing)
- All other noxious uses

See Appendix P.043.

For the stated reasons, the Petitioner's application for a zoning map amendment to reclassify the north portion of the Subject Property from Limited Manufacturing District to Manufacturing District must be denied.

II. The Proposed PUD Must Be Denied Because Petitioner Does Not Meet the Required Development Standards

16. The UDO in Section 4-500(C) sets forth development standards specifically for PUDs. Notably, one of these development standards is Section 4-500(C)(3), which states:

> Development along the perimeter of a PUD must be compatible with adjacent existing or proposed future development. In cases where there are issues of compatibility, the PUD must provide for transition areas at the edges of the development that provide for appropriate buffering and/or ensure a complimentary character of uses. Complimentary character shall be identified based on densities/intensities, lot size and dimensions, building height, building mass and scale, hours of operation, exterior lighting, and siting of service areas.

Appendix, P.059.

17. The Petitioner's proposed PUD does not meet this required development standard. Manufacturing uses are not compatible with residential uses while Limited Manufacturing is. This is specifically stated in City's UDO in Sections 1-700(I) and (J):

> *I. Limited Manufacturing (M-L) District.*
>
> *1. General: This district is for "clean" (low environmental impact) industrial uses* ***that are compatible with neighboring residential, office and commercial districts.***

Appendix, P.043. Limited Manufacturing provides the transition and buffering to "ensure a complimentary character of uses."

For the stated reasons, the Petitioner's application for a Planned Unit Development must be denied for failure to meet one of the City UDO's required development standards for PUDs.

III. The Proposed PUD Must Be Denied as to Automotive Parts, Accessories and Tire Stores Because It Is Not a Permitted Use and as to Truck Leasing, Automotive Repair (Major), and Private Parking Because No Special Uses Have Been Requested

18. In its recently filed Narrative, Petitioner argues that its request for reclassification of the entire parcel to Manufacturing District with a PUD somehow provides wide discretion for the City to grant unlimited variations to uses listed in the City's UDO. *See* Narrative, p. 16.

19. Although subsections A-C of Section 4-500 of the City's UDO do provide the City with broad authority in this regard, subsection D, Additional Standards for Planned Unit Developments, provides otherwise when dealing with Industrial PUDs. Specifically, Section 4-500(D) of the UDO provides as follows:

> D. Additional standards for planned unit development. … *3. Industrial PUDs. ... b. Permissible uses: Uses which are principal permitted uses in the underlying zoning district listed in Article 2.*

Appendix, P.061.

20. Section 2-300, Permitted Uses Table, sets forth the City's zoning classifications and the Permitted, Special and Limited Uses permitted within the Zoning Classifications. Automotive Parts, Accessories and Tire Stores is not a permitted use in the Manufacturing District under the City's UDO. Appendix, P.047. Because Section 4-500(D) specifically limits an Industrial PUD approval to extend only to permitted uses within the UDO zoning district classifications, the PUD use must be denied.

21. Further, the UDO Section 2-400(A)(1) states: "…*if the principal use on site requires the approval of a special use, any accessory use that is a limited use in the district must also be approved as a special use."* Appendix, P.054.

22. Again, Section 2-300, Permitted Uses Table, sets forth the City's zoning classifications and the Permitted, Special and Limited Uses permitted within the Zoning Classifications. Truck Leasing and Automotive Repair (Major) are limited uses. No special use application was filed for Truck Leasing and Automotive Repair (Major). Further, no publication was made for such special uses. Appendix, P.048. Because Section 2-400(A)(1) requires these limited uses to also be approved as a special use and no special use has been applied for or notice published, the PUD uses must be denied.

23. Again, Section 2-300, Permitted Uses Table, sets forth the City's zoning classifications and the Permitted, Special and Limited Uses permitted within the Zoning Classifications. Private Parking Lots are special uses under the City's UDO. Appendix, P.049. No special use application was filed for a Private Parking Lot and no publication was made for such special use; therefore, the PUD use must be denied.

For the stated reasons, the Petitioner's application for a PUD approval that would include Automotive Parts, Accessories and Tire Stores, Truck Leasing, Automotive Repair (major), and Private Parking for with Vehicle Service Plan PUD uses must be denied.

IV. The Proposed Special Use Should Be Denied Because Petitioner's Primary Proposed Use of the Property is Not for a Freight Terminal

24. The phrase *Freight Terminal* is not defined in the City's UDO. However, research reveals a number of definitions from well-known sources including the following:

> Freight Terminal – A freight terminal is a processing node for freight. They may include airports, seaports, container ports, goods stations, railroad terminals and trucking terminals…. (*Wikipedia*)

> Freight Terminal – a terminal used for loading or unloading of freight. (*The Free Dictionary*)
>
> Freight – goods to be shipped; the ordinary transportation of goods by a common carrier.... (*Merriam-Webster*)
>
> Terminal – either end of a carrier line having facilities for the handling of freight…. (*Merriam-Webster*)

Appendix, P.031-P.037.

25. On July 19, 2023, during the first Planning and Zoning Commission hearing of this proceeding, the Petitioner and his attorney referred to his business plan and proposed uses of the Subject Property as a "*truck yard"* (*see* Appendix, P.030; July 19, 2023, Planning and Zoning Commission Meeting, https://youtu.be/buLclmejig4 at 1:00:30); a "*truck terminal*" and a second "*repair facility*" (*see* Appendix, P.030; July 19, 2023, Planning and Zoning Commission Meeting, https://youtu.be/buLclmejig4 at 1:06). Not once did the Petitioner refer to his business as a "*Freight Terminal*".

26. Petitioner testified that the tractors and trailers proposed to be parked on the Subject Property are empty. They have no freight in them and even if there was freight in the trailer, no freight will be loaded or unloaded from the trailers. *See* PZC Meeting at 1:04:30; 1:05:50 and transcript, Appendix, P.030. No materials or freight is stored on site. *See* Appendix, P.030; July 19, 2023, Planning and Zoning Commission Meeting, https://youtu.be/buLclmejig4 at 1:04:36; 1:06.

27. On July 26, 2023, the City staff sent an email to the Petitioner recognizing that outside storage is not a principal use and stating the following:

> "*After evaluation the use must be classified as a Freight Terminal as that is the only cause for the ancillary outside storage. Storage is not a principal use so it must be ancillary to a use. The truck repair only handles 3 or so truck per day so outside storage related to truck repair would be about 5 to 10 spaces. There is not another use that would justify the 300+ parking spaces….Since it is one zoning lot, the zoning will need to reflect the principal use. That use is Freight Terminal, which is only allowed as a special use in the M Zoning district".* Appendix, P.038.

28. Six months after this Commission heard the Petitioner's testimony summarized above, the Petitioner ostensibly has disclosed in its Narrative that "warehousing and moving and dividing of freight shipments" on the far south end of the proposed building will occur. Narrative, p. 6.

29. Based upon the Narrative description of the approximate square footage within the building dedicated to warehousing, it appears that only approximately 20% of the building may be used for warehousing and approximately .9 % of the entire Subject Property may be used as a

Freight Terminal, while Semi-Tractor and Trailer parking spaces make up the vast majority of the use of the Subject Property.

30. Because the amount of freight now being handled on the Subject Property as a whole equates to only 20% of the Narrative's described uses, the principal use of the Subject Property is something other than a Freight Terminal; perhaps a truck repair facility; a truck parking lot; or a truck yard, but it is not a Freight Terminal.

31. Because handling of Freight, thus a Freight Terminal is not nearly the primary use of the proposed building/property, according to the City staff memorandum and the City's UDO, "there is not another use that would justify the 300+ parking spaces". Appendix, P.038.

For the stated reasons, the Petitioner's application for a Special Use as a Freight Terminal and 300+ accessory parking spaces must be denied.

V. The Proposed Special Use, Including Outdoor Storage, Should Be Denied Because the City's UDO Mandates All Outdoor Storage Be Located in the Rear Yard and Petitioner's Proposal Violates this Requirement

32. The plans filed by the Petitioner show a minimum of between 150 and 250 Semi-Tractor and Trailer parking spaces in a "yard" other than what can be interpreted as the rear yard of the proposed facility building.

33. The following sections of the City's UDO requires outside storage to be located only in the rear yard of a lot:

> *Section 2-400. Limited and special use criteria. … C. Review criteria for specific uses. The following review criteria for specific uses, to be approved as either limited or special uses are hereby established.*
>
> *…*
>
> *8. Outdoor sales, service, storage or display. All outdoor sales, service, storage or display must comply with the following standards: … b. Site design: Outdoor service or storage areas shall be located at the rear of the property. …*
>
> *…*
>
> *55. Warehousing distribution. Warehousing Distribution uses must comply with the following standards: … b. Outdoor storage: Outdoor storage areas must be located to the rear of the principal structure… .*

Appendix, P.054-P.057.

34. The "Front Yard and Front Lot line" of a zoning lot are defined in section 10-200 as follows: "*The open* space *extending across the full width of the zoning lot, between the front line of the lot and the nearest setback; and the narrowest boundary of a lot which is along a public right-of-way…or accessway*. Appendix, P.065-P.067.

35. The layout of the proposed building relative to the access drive and Sands Road make it clear that the 150+ Semi-Truck and Trailer parking spaces proposed to be located immediately south of the Lor-EL Estates, Unit 2 residential subdivision are not located in the rear of the lot and no variation to the above regulations has been requested by Petitioner. For that reason, the Petition must be denied.

36. The fact that the UDO limited and special use criteria for these two proposed uses requires outdoor service and storage areas to be located to the rear of the property/principal structure is indicative of the UDO's stated intention of protecting adjacent properties from the possible negative and nuisance characteristics of outdoor storage and warehousing uses.

For the stated reasons, the Petitioner's application for a Special use as a Freight Terminal, including outdoor storage, must be denied.

VI. Specific Response to Issues and Arguments Raised in Petitioner's Recently Filed Project Narrative

37. In its Narrative, Petitioner took the opportunity to respond to significant issues raised by neighboring objectors and suggest solutions, when in fact they are empty promises and representations which are either unenforceable or cannot be verified by anyone.

38. Most importantly, the Narrative addresses whether Petitioner's business plan is in fact a Freight Terminal. At the first hearing, Petitioner and its Attorney testified there would be no loading or unloading of freight. Now, the story/representation changes. In its Narrative, Petitioner conveniently represents that the south portion of its building will be used for breaking down freight, etc. If the petition is allowed and after the 20+/- acres is paved for Semi-Truck and Trailer parking, and the building is built, no one will ever know if one pallet is ever broken down and freight loaded or unloaded in one truck. Even if some freight is loaded/unloaded, according to calculations we provided in our memorandum, only .9% of the Subject Property is dedicated to this use. This is hardly the principal use of the property.

39. Petitioner offers up conditions to conveniently respond and supposedly settle issues raised by hundreds of neighbors. Many of these conditions, if imposed in the first place, will be impossible to police or monitor by the City. Examples include the following:

- No sleeping in the 300+ trucks;
- Limiting where certain types of trucks will be parked on the lot;
- Complying with idling laws;
- Where idling trucks may be parked;
  (Note: The Illinois Vehicle Code, 625 ILCS 5/11-1429, provides numerous exceptions allowing excessive idling. *See* Appendix. P.039-P.041.)
- Dimming of lights;
- Working on trucks and trailers with doors closed; and
- Promising to provide detailed compliant architectural specifications during the permitting process – too late for the public to comment on.

For each and all of the reasons detailed herein, Objectors request the Petition be denied.

Respectfully submitted,

Objector, DAN DOOLEY,

/s/ David W. McARDLE
By: David W. McArdle
Zukowski, Rogers, Flood & McArdle

Objector, DEBRA ALCOCK

/s/ Lisa M. Waggoner
By: Lisa M. Waggoner
The Waggoner Law Firm, P.C.

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APPENDIX OF DOCUMENTS
SUPPORTING MEMORANDUM

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5. City of Crystal Lake Plan Commission Minutes, 3/27/85	010-013
6. City of Crystal Lake Plan Commission Chair Letter to the City Council, 3/27/85	014-016
7. City of Crystal Lake Zoning Board of Appeals (approving staff recommendation), 4/3/85	017-020
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