Zine, Natalie

From: Thiemo Gruber [redacted]
Sent: Wednesday, October 28, 2026 7:37 AM
To: Zine, Natalie
Subject: EX: Zoning Petition #4694 - Northern Illinois Recovery LLC - OPPOSITION

Dear Ms. Zine,

Please include our opposition in the official record for this petition and confirm receipt. Please also let us know the dates of subsequent Development Committee and County Board consideration, and whether we must submit our comments separately for those meetings.

Thiemo Gruber and Heidi Buettner
35W521 Parsons Rd
Dundee, IL 60118

October 28, 2026

Members of the Zoning Board of Appeals

Re: Zoning Petition #4694 - Northern Illinois Recovery LLC - OPPOSITION

Dear Members of the Zoning Board of Appeals:

We are writing to OPPOSE the proposed Special Use in the F-Farming District to allow Northern Illinois Recovery LLC to establish a residential treatment facility on Miller Road.

We live next to 35W543 Miller Road and submit this objection for the record of Petition #4694.

We do not oppose treatment or the people who seek it. Our objections are that the applicant has not shown, with evidence, that this use at this site and at this scale meets each standard of Section 25-4-8-2. If any standard is not met, the Board may not recommend approval.

THE APPLICATION MISSTATES KEY FACTS
The Board's findings should rest on accurate facts. Several statements in the Zoning Application (signed October 21, 2026) are contradicted by the applicant's own filings or by the county's records:

1. "Rural setting characterized by estate homes, agricultural land, and large- lot residential parcels." The applicant's own Project Narrative says "there are no agricultural or business operations on the property." The parcel is bordered by single-family subdivisions, including the Spring Acres Hills subdivision, where homes, yards and ponds back directly onto the parcel. The application's answer on nearby zoning (Question 2) and its description of development trends (Question 4) mention only E-3 and F parcels and "scattered rural residences," leaving out these subdivisions entirely.

2. "Residents living together in a supervised household setting… maintaining a household." The county's Zoning Enforcing Officer has already found that this use is not a group home, which the ordinance caps at eight people. The officer classified it as similar to a nursing home. By the applicant's own description, it is an ASAM Level 3.5 licensed clinical program with nursing care, twelve staff a day across three shifts, about seven

admissions and seven discharges every week, catered meals and a commercial linen service. That is an institution, not a household.

3. "Recovery residence." The application and the standards worksheet repeatedly call the facility a "recovery residence," a term usually used for non-clinical sober living. The project description itself calls it a residential treatment facility licensed by the state. The Board should evaluate the use actually proposed.

4. "Up to 30 residents in accordance with spacing guidelines from the National Alliance for Recovery Residences." Those guidelines set minimum bedroom sizes for sober-living homes. They do not show that a 1954 house, its private well, or its septic system can safely support 30 residents plus staff under fire code and Health Department rules.

5. "Aligns seamlessly with the 2040 Plan… low-density residential." The application lists the parcel's 2040 designation as Countryside/Estate Residential. The 2040 Plan says this category should "not generally exceed an average of one dwelling unit per four acres," with density limited in part by "soil suitability for septic systems." On 8.42 acres that means about two homes. The applicant's septic design of 5,310 gallons per day matches the wastewater of roughly a dozen households. That is not consistent with the Plan.

6. "Does not involve commercial activity or site redevelopment." This is a licensed healthcare operation run by a private company, Northern Illinois Recovery LLC. The applicant's own plans call for a new 1,427-foot septic absorption field plus a reserve field, two new 4,000-gallon septic tanks and three dosing tanks, about 16–18 paved parking spaces, an interior remodel, and life-safety construction.

7. Licensing "with IDPH and or DHS." The applicant does not say which state agency will license the facility or which license type it will hold. That determines staffing, medical services and whether withdrawal management occurs on site.

8. The application is incomplete. The owner section names Northern Illinois Recovery LLC. The applicant's narrative states the record owner is the Brennan Alfred E Jr 2008 Trust, with 815 Investments LLC as contract buyer. The "Record Owner" signature line on page 4 is blank. The form requires a notarized trust disclosure for property held in a trust, and none appears among the documents posted for this petition. The Natural Resources Inventory report from the Kane-DuPage Soil & Water Conservation District, which the form requires for every special use, is also not among the posted documents. The application was signed October 21, 2026, only 13 days before the hearing, while the form calls for submission 45 days in advance. We ask the Board to confirm that the application was complete and timely before proceeding.

STANDARD A – PUBLIC HEALTH, SAFETY AND WELFARE Supervision. The applicant proposes 24–30 residents with four staff per shift, about one staff member for every 7–8 residents, across a main house, a separate guest house and 8.4 open acres. Fire code requires that exits remain unlocked.
Residents are adults with substance use disorders and co-occurring mental health conditions at ASAM Level 3.5. The application does not explain how four staff can handle a medical emergency, a crisis and a resident leaving the site at the same time.

Discharges. Under the operator's zero-tolerance policy, violations lead to discharge. Residents have no cars. The filings do not say how a discharged person leaves the site, what time of day this happens, or whether they are escorted off the property.

Emergency response. The site is in unincorporated Kane County at the far north end of the Sheriff's coverage area. Fire and EMS come from Carpentersville.
There are no hydrants on or in front of the property. The fire department's letter approves the use only "in concept for zoning purposes" and says no fire or life-safety plans have been reviewed. A 1954 single-family house converted to 30-person occupancy should have a reviewed life-safety plan before the Board makes its findings, not after.

Detox. The county's interpretation excludes stand-alone detox facilities, and the applicant says it is not one. The application does not say whether residents will go through withdrawal management on site. That would add medical risk and more emergency calls.

STANDARD B – USE AND ENJOYMENT OF NEARBY PROPERTY, AND PROPERTY VALUES The parcel is bordered by hundreds of single-family homes, including the Spring Acres Hills subdivision. Some yards and ponds back directly onto the property. The applicant's worksheet calls the area "rural" with "estate or agricultural uses", which understates how close and how many the homes are.

There is no fencing plan. Neighboring yards contain ponds, some reportedly over 30 feet deep. The only route to Raceway Woods is through private yards.

Standard B specifically requires a finding that the use will not "substantially diminish and impair property values." The research is mixed. One study found home prices 8% lower near treatment centers, and up to 17% lower near centers treating opiate addiction (La Roche, Waller & Wentland (https://
https://urldefense.com/v3/__http://www.tandfonline.com/doi/full/10.1080/10835547.2014.12091865__;!!NVL4pk8hLUA!DiYm_ADQnhkUlh-H7sGpTxmbhE-5hx-7NAT5JO66A69th_78Q78fPW5vogrCDOV5SWbZQFX5YsRZx-XhBidje8b1WF7Yi4PJ$)). Another study found no effect (NBER
(https://urldefense.com/v3/__https://www.nber.org/system/files/working_papers/w25427/__;!!NVL4pk8hLUA!DiYm_ADQnhkUlh-H7sGpTxmbhE-5hx-7NAT5JO66A69th_78Q78fPW5vogrCDOV5SWbZQFX5YsRZx-XhBidje8b1WNlB6_ru$
w25427.pdf)). The applicant has submitted no evidence on this standard beyond its own assurances. We ask that the Board require an independent appraisal study for this specific setting.

STANDARD C – ORDERLY DEVELOPMENT OF SURROUNDING PROPERTY Under Section 25-5-15, an unlisted use approved by the county is added to the district's use list. Approval here would set a precedent for similar uses on other F-zoned parcels that are actually home lots, which is common in this area.

STANDARD D – UTILITIES AND DRAINAGE
The applicant's worksheet says the project "will not require new utility connections… no major changes." In fact, the septic system would grow from
1,600 to 5,310 gallons per day, more than three times its current capacity, with two new tanks, three dosing tanks and a new 1,427-foot absorption field.

Water demand of about 4,700 gallons per day (12+ times a typical household) would come from a private well that has not yet been yield-tested. It still has to be certified as a non-community water system. Every nearby home relies on private wells, and one neighbor already had to deepen his well after a nearby municipal well was added.

The new septic fields are uphill from a neighbor's shallow well. They are also near a pond, a spring-fed stream and recorded drainage easements. The IDNR review found protected resources nearby, including Raceway Woods and Fen and the Blanding's turtle.

The Board cannot find that adequate utilities "have been or are being provided"
until the well yield test, a hydrogeological assessment of effects on neighboring wells, and Health Department approval of the septic system are in the record. The septic plan should also address what happens during an extended power outage, since the dosing tanks run on pumps.

STANDARD E – INGRESS, EGRESS AND TRAFFIC The applicant's own study found that the east driveway fails the required stopping-sight distance (305 ft) and intersection-sight distance (445 ft) for exiting vehicles. It

proposes a "Do Not Enter" sign as the fix. That means drivers will still be turning left into a driveway near a hill crest, on a 35 mph two-lane road with no turn lanes, that carries over 4,100 vehicles on a weekday.

The traffic study and the narrative do not agree. The study counts 36 daily trips and three food deliveries. The narrative describes 40–45 typical trips and 64 on a worst-case day. The study doesn't mention crashes, even though residents describe serious crashes on Miller Road and at Route 31. It also relies on the posted speed limit rather than measured speeds.

We request a revised study using measured speeds, crash history, the higher trip numbers, and an assessment of whether an eastbound left-turn lane is needed.

STANDARD F – CONFORMANCE WITH OTHER REGULATIONS The applicant has not yet shown compliance with the parking requirement in the county's interpretation memo, and its own filings give conflicting space counts (about 16 vs. about 18). It has also not shown compliance with the 2018 International Fire Code and NFPA 101 for this occupancy, the Health Department's water and wastewater rules, or the requirements of a state SUPR license. These should be in the record before the Board makes its findings.

NOTICE AND PARTICIPATION
Many neighbors received notice only days before the hearing, which falls on Election Day. Residents' written questions to the county and the operator have gone unanswered. We ask that the hearing be continued, or the record held open, so residents can review the roughly 20 technical documents and respond.

REQUEST
Because the record does not yet support findings on Standards A, B, D and E, we respectfully ask the Board to recommend denial of Petition #4694.

If the Board does not deny the petition, we ask that any approval include binding conditions:
1. A maximum of 24 residents
2. No withdrawal management or detox on site 3. A minimum staffing ratio, with at least one licensed nurse on site at all times 4. A written plan for residents who leave without authorization and for discharges, including staff escort off the property 5. Perimeter fencing near the ponds and neighboring yards 6. The east driveway closed or made entry-only, with a turn lane if the revised study warrants it 7. A well yield test before opening, plus monitoring of neighboring wells paid for by the operator 8. A neighbor contact person and complaint process 9. No expansion of buildings, beds or operations without a new special use

Respectfully,

Thiemo Gruber and Heidi Buettner