

Date: March 30, 2005

To: Planning Commission

From: East Norwalk Neighborhood Association Board of Directors

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Subject: Norwalk Mid-Harbor Planning Study Public Hearing

The East Norwalk Neighborhood Association would like to commend Mayor Knopp, the Planning & Zoning staff, the Mid-Harbor Development Committee and Chan Krieger & Associates for the creation of the Mid-Harbor Plan. The ENNA has stayed involved throughout the study process since the entire eastern portion of the harbor that is included within the study area is also within the neighborhood association boundaries. Our comments are restricted to the Mid-Harbor study area within ENNA boundaries – and are in keeping with our mission statement.

The East Norwalk Neighborhood Association is organized and operated exclusively for educational and charitable purposes as follows:

- To foster and preserve the residential character, natural and historic resources and quality of life in the East Norwalk Community;
- To encourage the residents of East Norwalk to actively participate in achieving the purpose set forth above;
- To provide assistance to governmental and not-for-profit organizations with purposes similar to, or with activities in furtherance of, the purposes set forth above.

The ENNA has reviewed the August 2004 draft and November 2004 Memorandum on waterfront zoning prepared by Chan Krieger.

The ENNA would like to highlight several recommendations and observations contained in the current draft that we strongly support.

1. Page 6: "Protect harborside neighborhoods from inappropriate development and preserve views and Harbor access".
2. Page 6: "Maintain vehicular connections within neighborhoods surrounding the Harbor and protect those neighborhoods from regional and truck traffic".
3. Page 6: "Extend the Harbor trail and enhance pedestrian river crossings".
4. Page 15: "Retail at Liberty Square...support improvements to these attractive and historic structures...in need of upgrading".
5. Page 16: "A connection beneath the abutments of the railroad bridge on the east side of the Harbor would connect the existing trail along the Sewage Treatment Plant to the Neptune Marina area and Veterans Park".
6. Page 19: Public access to harbor on eastside including inset on Katherine Gibbs Site.
7. Page 20: "While large seasonal events are easily accommodated within Veterans Park, these spaces lack sufficient furniture, lighting, and public amenities that will encourage new types of activities and welcome new users on a more regular basis".

8. Page 21 (inset): "Veterans Park is comprised principally of active recreational areas. The edges are in need of landscape enhancements".
9. Page 22: "On the east side, East Avenue is the primary route for driving along the water. Views and access to the Harbor trail system should be preserved and can be expanded upon as sites are redeveloped".
10. Page 33: "the former Katherine Gibbs site is a prime redevelopment parcel. From East Avenue...views to the water could provide a magnificent visual and physical connection between east side communities and the water. Guidelines for any redevelopment at the Gibbs site should consider views to be a prime consideration in building massing and placement".
11. Page 34: "Screening the edge of the treatment plant would reinforce the natural character of the Middle Harbor area...improve the public walkway...reintroduce fresh or salt water wetland habitat... invasive weeds...could also be replaced with native vegetation".
12. Page 37: "I-95 and the railway viaduct through the Mid-Harbor area tend to form pedestrian barriers between neighborhoods. Crossing or walking under underpasses is often undesirable, difficult, and at times even impossible for some members of the community. It would be desirable for individual neighborhoods between these barriers to each have connections to the water. An access point for the Lower East Avenue/Van Zant Street neighborhood could be located on public land between the Sewage Treatment Plant and Oyster Bend Marina. Parking could be shared with the Treatment Plant as usage times would rarely conflict".

The ENNA has questions, comments and suggestions for additions on the following items stated in the plan.

1. Page 4: "Current environmentally minded leaders should encourage redevelopment of places within the Mid-Harbor area that are in need of reinvestment and well served by public transit in order to take pressure off undisturbed natural areas on the periphery". This sentence implies that the mid-harbor area is open for intensive development, even if inappropriate, in order to save other areas of Norwalk. We strongly disagree with this statement and suggest removing it.
2. Page 8: "Allow for reconfiguration of Third Taxing District Park to encourage the best possible realm in support of redevelopment at Neptune Marina". This park needs to be preserved in some form to prevent removal of green space. There needs to be recommendations in the plan for greenways, pocket parks and passive recreation at specific locations on the east side of the water from the Stroffolino Bridge to the Wall Street area.
3. Page 9: "Modify zoning to support strong neighborhoods and ensure Harbor access and views". 'Strong neighborhoods' is not defined so could be open to interpretation allowing for future inappropriate development. We suggest "support the preservation of low-rise family housing in neighborhoods where it now exists" in lieu of "strong neighborhoods".
4. Page 9: "A Harbor overlay district could ensure higher level of scrutiny to all areas around the Mid-Harbor that would be equivalent to the Village zoning procedures that protect portions of the east side". It is uncertain how well the Village zoning protects. An overlay district is a flexible and powerful tool that should be used to

- define specific planning and design objectives that supplement and enlarge upon the prohibitions and limits encoded in the zoning ordinance.
5. Page 12: "It is likely that if water-dependent industries have trouble continuing to operate successfully in these locations, non-industrial or non-water-based uses may be the most prepared to redevelop these valuable sites abutting the water". Is this considered a challenge or an opportunity? This noncommittal statement can easily be interpreted to mean that no-water-based uses SHOULD take over water-based uses UNLESS water based uses can prove their viability. Land cost and lack of dredging could eventually force water-dependent uses out. This would be a sad loss to this vibrant Harbor. The ENNA feels strongly that the plan should take a decisive position that water-dependent uses must be preserved and enhanced using all available tools, including zoning controls, incentives and subsidies.
 6. Page 13 (inset): "Conducted interviews with..." Consider adding 'neighborhood association and historic preservation advocates'. Reps from both (ENNA and NPT) were part of the interview process.
 7. Page 18 (inset): "Build-out analysis. Under current zoning, development along the Harbor could block visual access and discourage use of the Harbor". On the east side it is no longer "could" because at several of the diagramed locations it already 'does' block visual access and discourage use of the Harbor. The excessive length and repetitive design of Riverway, the new condominium development on the east side of the harbor, is an example of undesirable development.
 8. Page 19 (inset): "Perhaps the greatest single site on the east side, the former Gibbs College parcel offers panoramic views of the Harbor, with Sherry Street a logical access point for neighborhoods around City Hall. The pedestrian crossing at East Avenue and Sherry could be enhanced to make this a safe access point for neighborhood families and would connect to existing recreational facilities at City Hall". ENNA strongly agrees but wants to make sure this recommendation is not lost. As private development plans come to the P&Z Department, and to the city boards, a provision for this access needs to be part of the approval process.
 9. Page 22: "East Avenue is designed to accommodate auto traffic efficiently, and the few pedestrian crossings are discouraging to residents from east side neighborhoods trying to approach the Harbor". Unfortunately, current design encourages speeding to promote efficiency. We suggest traffic calming, such as neckdowns and roundabouts, to slow traffic. Auto traffic can be efficient without designs that encourage speeding.
 10. Page 23 (inset): "East Avenue is dominated by heavy, high speed traffic. Crossings are infrequent and hostile environments for pedestrians". We agree, but would like to see specific recommendations in the plan for traffic calming and pedestrian crossings.
 11. Page 23 (inset): "Intersections at either end of the Stroffolino Bridge discourage the most intrepid of pedestrians". We strongly agree. Again we would like to see the addition to the plan of recommendations for improvement that would not include widening the road. Since this is a State road we would also like to see recommendations specific to creating a working relationship with the DOT to increase the likelihood of realizing city master plans.
 12. Page 24: "most of the residential proposed in the redevelopment plans and within the study area will be multifamily condominiums and apartments (primarily one- and two-bedroom) that attract a different demographic; including singles, young professional

couples without children, and older empty nesters". Inclusion of an acceptable percentage of affordable units should be part of the recommendations. Single home dwellings also need to be accommodated and included within the plan. It is widely assumed that family residences are revenue-negative. This idea is based on data from suburban development, where the cost of new infrastructure and new schools must be absorbed by the community, and where large families are likely to settle. If the actual costs and tax revenue for family housing were calculated for the specific context of downtown Norwalk, the ENNA believes that this type of development will be revenue-positive, perhaps strongly so. We recommend that this analysis be undertaken and published before any more plans follow the lead of the Central Business Design zoning regulations, which recommend building almost no family housing downtown.

13. Page 25 (inset): "Other Housing Projects within Study Area" is missing some projects. River Watch, etc.
14. Page 27: "This prompted the planning team to continue examining the possibility of developing an upscale, independently owned and operated, midsize hotel (50-65 rooms) that might also include a marina and restaurant". The Neptune Marina site had been recommended. To prevent precipitous destruction of Liberty Square and Constitution Park by eager developers, this recommendation needs to be studied well prior to moving forward.
15. Page 32: "On the east side of the water, Village Zoning provisions protect views and facilitate the public review of new projects; pocket parks on publicly owned parcels or purchase of view easements could ensure views to the water from Harbor Avenue". The ENNA is concerned that Village Zoning on the east side may not protect views or provide for pocket parks reliably. We support a Mid-Harbor overlay zone to better protect and enhance the whole study area for the public.
16. Page 38: "Neptune Marina". The recommendations for a "small hotel" and "reconfiguration of the Third Taxing District Park" are worth considering. But, the restoration of Liberty Square buildings, wetland restoration near the Treatment Plant and a Sherry Street public access to the Harbor, need to be concurrent so as to avoid loss of neighborhood historic charm, open space and public access. Additionally, any hotel constructed at this location should allow for, and encourage, use by the general public (including locals) indoors and out in the form of dining and outdoor trails. We suggest that the TTD Commission be consulted prior to any recommendations for the TTD Park being written in this plan. If the Commission was interviewed then this needs to be mentioned in the plan.
17. Page 38: "Veterans Park" improvements don't go far enough. Since the entire park is included within the study area, recommendations should go beyond the tourist attraction aspects and include more in depth planning for passive and active use by locals.
18. Page 41: "Enhancements to the Stroffolino Bridge Crossing". The recommendations for transformation into a "friendlier pedestrian environment" are excellent. But, it is essential that mention be made that this is a State Road (Route 136). This location will lose any chance of gaining a pedestrian friendly environment if the city does not act proactively. The plan needs to include a recommendation that the city engage the State in dialogue through the Metropolitan Planning Organization (MPO), or through the creation of a separate State Property Projects Committee with members representing the city and the state. The meetings should be noticed in the local

papers, and the public invited to informational meetings. The State should be discouraged from any widening of Route 136 on the east side of the Stroffolino Bridge – and, in fact, encouraged to construct traffic calming devices (traffic circles or neckdowns & pedestrian refuges) to reduce the length of pedestrian crossings and to slow down traffic.

19. Page 42: “Preserve Water-Dependent Uses along the Harbor” should be a recommendation expanded throughout the Mid-Harbor area, not just specific to Water Street.
20. Page 42: “Reducing the parking requirement for retail establishments, and...changes and additions to regulatory mechanisms...development of shared parking could reduce on-site parking requirements...” The recommendation is specific to Water Street but similar zoning changes could be beneficial in other areas of the plan area and throughout Norwalk. Reduced parking would encourage increased use of public transportation and generate more foot-traffic, which is a major goal of the Mid-Harbor Plan.
21. Page 46: “Modify zoning to support strong neighborhoods and ensure Harbor access and views”. This section recommends concepts that we endorse but specifics are missing that could lead to several conflicting interpretations. What is meant by “strong neighborhood”? A Harbor overlay district throughout the Mid-Harbor area is an excellent idea, but what would it include? And if it doesn’t happen then are there loopholes in this Mid-Harbor Plan that would allow for inappropriate development? The Plan states that “most of the residential proposed in the redevelopment plans and within the study area will be multifamily condominiums and apartments”. (See No. 12 above). Is this the scale of the neighborhood that is to be the standard when allowing for new development? Recommended height restrictions should be included. And what becomes of the adjacent neighborhoods with low-to-moderate income single family dwellings? If no plans are in place for these neighborhoods, will they survive?
22. Page 48-64: Information found in appendices “Economic Analysis”, “Brownfields Research” and “Transit Data and Maps” is of value and is important material for inclusion in the plan. But the ENNA has not researched the information for its validity or completeness. We recommend an addition to the Appendices section following “Transit Data and Maps” on Train Stations and Maps” that would include information on the SoNo and the East Norwalk Stations.
23. Page 65: “Comments from Public Gatherings” include several comments made by members of the ENNA reflecting a sincere effort on the part of the planners to incorporate public comment, which we applaud. These comments include: “A desire for public access along water treatment facility”; “Concern that new retail should be compatible with SoNo retail (not big box)”; “Better connections from neighborhoods to the water; especially from east side”; “Support for certain ideas such as screening the water treatment facility, a new fish market on the Harbor, hotel/marina combination. Bolstering synergy...” We also support several other comments that were made, including “The East Norwalk Train station is as close to Aquarium as SoNo station. A pedestrian link there would be good”. (See No. 22 above)
24. Page 66: “Significant Architecture in the Mid-Harbor Area: Academy Street and Harbor Avenue Homes” is a good addition to the appendices section but no mention of other significant architecture within the plan area is included. This omission creates

the impression that there is nothing worth saving elsewhere, including the east side of the harbor. The Liberty Square buildings, highlighted in the plan, have significant architecture. Other structures on Osborne Avenue should also be included.

25. Memorandum dated November 23, 2004: "Waterfront Zoning" includes valuable recommendations that warrant consideration.

The ENNA asks that you consider adding to this plan, and/or the citywide master plan, the following items.

1. In the not too distant future the Walk Bridge, the railroad bridge over the harbor, will need to be refurbished. This requires equipment and requires a staging area that could affect the Mid-Harbor Plan. We suggest that mention be made in the City's master plan of the importance of the city initiating dialogue with the state to plan for projects such as this. (See No. 18 above). If inconsistent dialogue exists, with limited public awareness, the state may demolish historic structures in Liberty Square, and elsewhere, and interrupt or drastically alter the city's plans of conservation and development.
2. East Norwalk train station, with connecting streets and improved pedestrian walkways, is a significant location that needs consideration in the citywide master plan.
3. The Van Zant Street, Fort Point Street, Osborne Street and lower East Avenue neighborhood is likely to be negatively impacted as Mid-Harbor Plan development is realized, unless there is a solid visionary plan of development also in place for this adjoining neighborhood. We strongly recommend that a special section be included for this neighborhood in the citywide master plan. All other areas adjacent to the Mid-Harbor plan area have plans for development. Left unprotected, with no plan in place, this neighborhood on the east side could become a slum, or be grabbed up by individual developers lacking a cohesive vision and consideration for what the neighborhood or city wants.

Once again, we appreciate the work that has gone into this plan and offer our thanks for your efforts. The ENNA will continue our participation in the master plan process.