

NEW HAVEN CITY PLAN COMMISSION ADVISORY REPORT

RE: **ZONING ORDINANCE TEXT AMENDMENT AND ZONING ORDINANCE MAP AMENDMENT** for the remapping of properties from the PDD-15 Zone to the Transit-Oriented Community Zone, and to allow residential uses in the Transit-Oriented Community Zone, including modifications to Section 42, Table 3 (Use Table), for the purposes of implementing the Union Square Choice Neighborhoods Transformation Plan.

REPORT: 1677-01

ADVICE: Approval

PROJECT ADDRESSES:

- 169 Union Avenue (MBLU: 237 0086 00100)
- 94 Columbus Avenue (MBLU: 238 0086 00200)
- 89 Union Avenue (MBLU: 238 0086 00300)
- 49 Union Avenue (MBLU: 238 0086 00400)
- 86 South Orange Street (MBLU: 238 0110 00200)
- 91 Columbus Avenue (MBLU: 238 0110 00100)
- 1 Tower Lane (MBLU: 238 0110 00300)
- No # Union Avenue (MBLU: 237 0086 00500)
- 90 South Orange Street (MBLU: 238 0110 00404)

APPLICANT/OWNER:

Applicant: The Housing Authority of the City of New Haven (HANH)

Owners: The Housing Authority of the City of New Haven (HANH) and the City of New Haven

SUBMISSION:

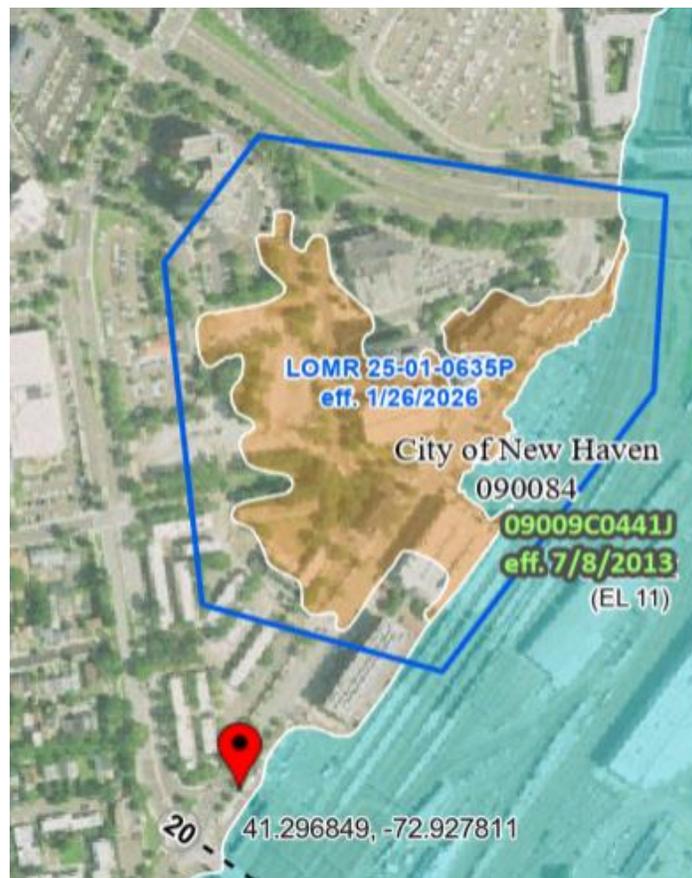
This petition for this ordinance amendment was dated for and received at the January 5, 2026, Board of Alders meeting. Legistar File ID: OR-2026-0003. The submission included:

- Checklist for Aldermanic Submissions
- Fiscal Impact Statement
- Prior Notification Form
- Cover Letter
- Petition Order
- Petition Exhibits
 - Exhibit A: Zoning Map Amendment
 - Exhibit B: Amendments to Section 42, Table 3, Use Table
 - Exhibit C: Statement with Respect to the City's Plan of Conservation and Development
- Filing Fee

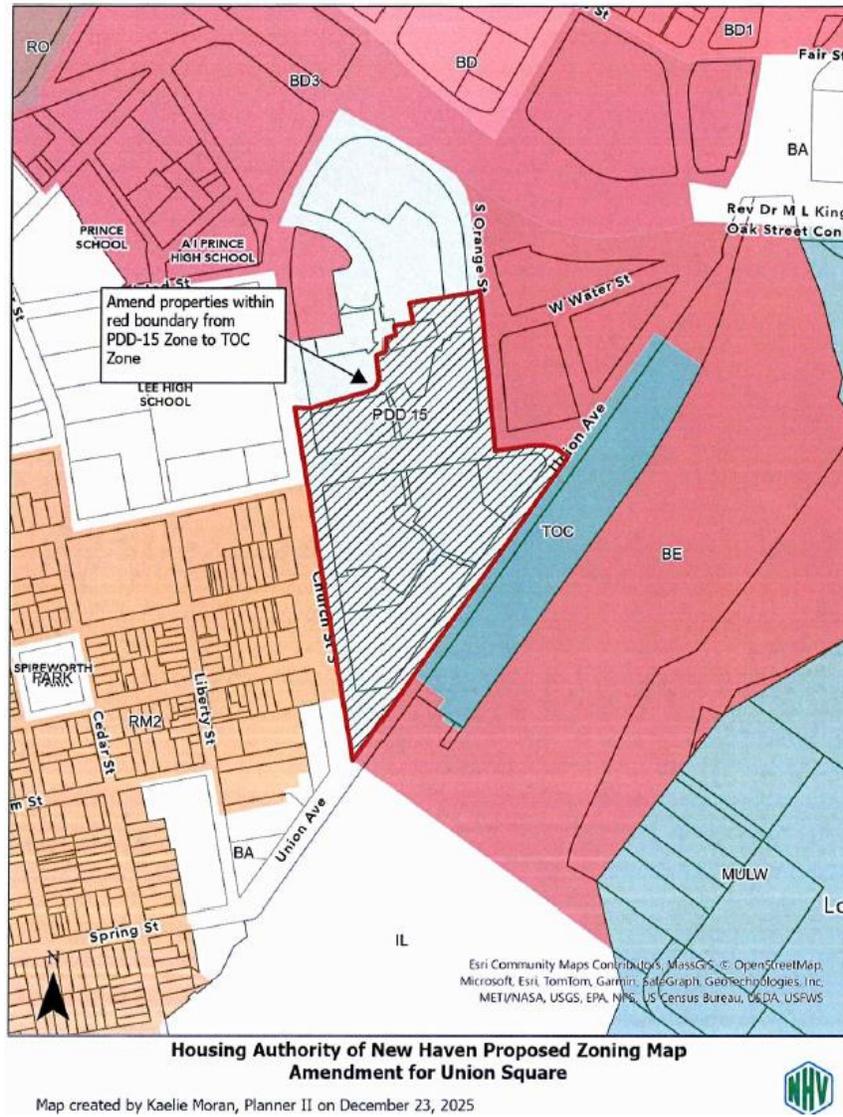
BACKGROUND AND PDD HISTORY

The site of the proposed zone change comprises 9 parcels, approximately 11.2 acres, located in the Hill neighborhood and bounded by Tower Lane to the north, Church Street South in the west, Union Avenue to the south and South Orange Street to the east. The site is bisected by Columbus Avenue. These parcels comprise a large portion of an existing Planned Development District 15 (PDD 15), which extends northerly to South Frontage Road.

Portions of the northeast area of the proposed parcels were previously in the Special Flood Hazard Area. The updated FEMA map demonstrates a Letter of Map Revision that no longer includes these parcels within the Special Flood Hazard Area as shown below.



These properties are owned by the Housing Authority of New Haven and the City of New Haven. The Housing Authority of New Haven currently owns certain real property located in the City of New Haven commonly known as: (i) 169 Union Avenue (MBLU: 237 0086 00100); (ii) 94 Columbus Avenue (MBLU: 238 0086 00200); (iii) 89 Union Avenue (MBLU: 238 0086 00300); (iv) 49 Union Avenue (MBLU: 238 0086 00400); (v) 86 South Orange Street (MBLU: 238 0110 00200); (vi) 91 Columbus Avenue (MBLU: 238 0110 00100); and (vii) 1 Tower Lane (MBLU: 238 0110 00300) (collectively, the "HANH Property"). The City currently owns certain real property located in the City commonly known as: (a) No # Union Avenue (MBLU: 237 0086 00500); and (b) 90 South Orange Street (MBLU: 238 0110 00404).



Planned Development District 15 - Church Street South

The Church Street South Planned Development District (PDD) #15 is an approximately 15-acre mixed-use area in the Hill neighborhood bounded by Union Avenue, South Orange Street, South Frontage Road (Route 34), and Church Street South. The PDD supported the development of the mid-density Church Street South (now demolished) and high-density residential towers, including Tower One and Tower East, which primarily serve elderly and moderate-income residents. Residential development includes courtyards, landscaped open spaces, pedestrian walkways, and internal streets part of the Robert T. Wolfe apartments operated by Elm City Communities fronting on Union Ave. Institutional facilities in the district include the Greek Orthodox Church (St. Basil's) The parcel known as 9 Tower Lane was removed from the PDD in 1989.

Prior to Redevelopment, the area around including the parcels in PDD 15 played an important role in New Haven's early economic history providing blocks of row houses for primarily immigrant families and an array of local shops, bakeries, and family-owned businesses that served the

neighborhood. As factories closed and the manufacturing economy shifted through the late 20th century, buildings fell into decline and neighborhoods in this area became less cohesive.

PDD #15 was adopted by the Board of Alders in 1967 with the purpose of establishing low-income multifamily housing as part of the Church Street Redevelopment and Renewal Project. The original project area was bounded by Church Street Extension, the Oak Street Connector (South Frontage Road), South Orange Street, and Union Avenue known as Church Street South. The project consisting of 30 buildings of low-income housing was constructed in 1969 ultimately housing approximately 260 families. In 2008 Northland Investment Corporation purchased the property from the prior owner, The Community Builders. After years of ongoing structural issues, the project was demolished in 2018 to make way for a newly visioned mixed-use development first articulated in the Hill to Downtown Community Plan in 2014.

In 2023 Elm City Communities (ECC, the Housing Authority of New Haven), with the Glendower Group, (the development arm of ECC) purchased the Northland-owned parcels at the former Church Street South. Elm City Communities, in partnership with the City of New Haven, received a grant to initiate the Union Square Choice Neighborhood Planning process through HUD from 2023 to 2025 <https://unionsquarechoice.com/>.

There have been numerous amendments to the PDD as detailed below primarily to accommodate ongoing developments of the Towers buildings by the New Haven Jewish Community Council and the Greek Community Church (Saint Basil's) ongoing developments of the Towers buildings by the New Haven Jewish Community Council and the Greek Community Church (St. Basil's).

Date	CPC Meeting / Report No.	Action Taken
August 1, 1967	621-01A	Amendment to change the BE zone to the RH-2 zone for Parcels J, K, and L
August 1, 1967	621-01B	Initial approval of Planned Development District #15 (Church Street South).
March 5, 1968	654-01	Amendment approving inclusion of Tower One within PDD #15.
September 30, 1968	644-06	Amendment to PDD #15 reducing overall project size.
November 30, 1971	687-01	Revision to PDD permitting commercial space, daycare, and 12 residential units.
December 16, 1983	952-01	Action related to Church Street South Housing Finance Corporation (Tower One).
June 20, 1984	968-11	Detailed Plan Review (primarily landscape-related comments).
August 17, 1988	1072-04 / 1072-02	Approval of Land Disposition Agreement (LDA) to the New Haven Greek Community and PDD amendment to permit church and related uses.
April 5, 1989	1088-01 / 1088-02	Amendment to PDD deleting parcel K-1 and approving mixed-use commercial/residential plans.

July 19, 1989	1094-24	City Site Plan Review (CSPR) and Detailed Plan Review (DPR) for Greek Community development (K-1-B and K-2).
July 31, 1991	1135-21	Revised DPR and CSPR approval with NHRA advisory input for Greek Community facilities.
February 19, 1992	1143-08	Detailed Plan Review approval for church construction.
May 20, 1992	1148-06	Minor modification approval for Tower One (accessory commercial use).
September 16, 1992	1151-12	Administrative approval for change in utility vault location.
May 12, 1994	1176-10	DPR approval for Tower One parking lot and related minor modifications.
June 15, 1994	1177-05	Amendment to Land Disposition Agreement for K-1-B parcel.
September 22, 1999	1278-19	Approval of Section 108 Loan (\$10.5 million) with HUD guarantee supporting PDD development.
May 31, 2002	<i>Administrative</i>	Modification for accessibility improvements (no CPC meeting number noted).
December 16, 2009	<i>Administrative</i>	Approval for addition to the Greek Orthodox Church within the PDD.
December 15, 2015	<i>Administrative</i>	Lot split approved to facilitate a 4,300 sq. ft. addition to St. Basil's Church.

PROPOSED ZONING – TOC Districts—Transit Oriented Community

The applicant proposes to rezone 9 parcels, approximately 11.4 acres from PDD #15 to the Transit Oriented Community (TOC) Zone and to amend the New Haven Zoning Ordinance to modify Section 42, Table 3 (Use Table), for the purposes of implementing the recommendations from the above-mentioned planning grant. More information on the formal title of Union Square Choice Neighborhoods Transformation Plan is found later in this report.

As stated in the application for the new Zoning District, “Transit-Oriented Development is generally defined as a mixed-use community within an average 2,000-foot walking distance of a transit hub and core commercial area. Such districts mix residential, retail, office, open space, and public uses in a walkable environment, providing convenience for residents, visitors, and employees to travel by foot, bicycle, transit, or car. The TOD concept connects land use and transportation in an integrated development approach.”

The proposed New Haven Zoning Ordinance modification would permit the following use As-of-Right where it is currently permitted by Special Permit within the TOC zone:

Dwelling units in multi-family dwellings located above first stories of structures at a maximum density of one unit per 1,000 sq. ft. of gross floor area of entire building and limited to gross floor areas as defined in the New Haven Zoning Ordinance. Except that the TOC zone shall have a maximum density of one unit per 500 sq. ft. of gross floor area of entire building, limited to gross

floor area as defined in the New Haven Zoning Ordinance, and except that properties subject to Development or Land Disposition Agreements involving the City of New Haven shall not be subject to the above density limitations

The modification would also permit the following use by Special Permit where it is currently Not Permitted within the TOC zone:

Dwelling units in multi-family dwellings located on first stories only in combination with upper story residential use (if applicable) at a maximum density of one unit per 1,000 sq. ft. of gross floor area of entire building and limited to gross floor areas as defined in the New Haven Zoning Ordinance. Except that properties subject to Development or Land Disposition Agreements involving the City of New Haven shall not be subject to the above density limitation

The proposed new footnote 9 would allow for exceptions to the proposed change to dwelling units on the ground floor that would permit them As-of-Right when within a limited set of geographic areas:

9. In the TOC, first floor dwelling units are permitted As-of-Right along Church Street South between Union Avenue and Columbus Avenue, along Columbus Avenue between Church Street South and Union Avenue, along South Orange Street between Columbus Avenue and West Water Street, along the portion of Portsea Street to be established between Columbus Avenue and Church Street South, and along the portion of Portsea Street to be established between Columbus Avenue and South Orange Street. First floor dwelling units are permitted by Special Permit in all other locations.

Zoning Table – Comparison of Bulk, Yard, Density, and Parking Regulations

The table below demonstrates the differences between the original underlying zone that the existing PDD varies from (the RH-2 zone), the existing enacted PDD, and the proposed BD-3 zone.

Standard	RH-2 in Aug 1967 Underlying Zoning	PDD 15 Approved Variation of Underlying Zoning	TOC Proposed Zoning
Maximum Density of Units per Lot Area	One unit per 2,000 sq ft	One unit per 1,010 sq ft	N/A
Maximum Density of Units per Gross Area of the Building	N/A	N/A	One unit per 1,000 sq ft ¹
Maximum Building Coverage	30%	40.4%	No direct limit
Maximum Gross Floor Area (Floor Area Ratio – FAR)	0.5 to 1.7 (depending on building coverage)	1.03 to 1.89	10.0

Front Yard Setback		17-25 ft	3-5 ft	No front yard required with exceptions ²
Side Yard Setback		One side at least 8 ft; other side at least 10 ft	0 ft; 5 ft for the side containing the “Dining Area”	No side yard required with exceptions ²
Rear Yard Setback		25 ft	No variation from RH-2	No rear yard required with exceptions ²
Accessory Buildings in Required Yards		Permitted with a minimum of 5 ft from the lot line	No minimum	Same yard regulations as principal buildings apply
Covered Front Yard Parking		Permitted by Special Exception	“Requested” (as stated in PDD materials)	N/A
Distance Between Facing Walls of Two Garden Apartments	Both walls contain windows	50 ft	28 ft	N/A
	One wall contains windows	20 ft	9 ft	
Distance Between Facing Walls of Other Residential Principal Buildings	Both walls contain windows	41 ft	27 ft	N/A
	One wall contains windows	27 ft	14 ft	
Projection into Corner Visibility Area		Not Permitted	Permitted up to 4 ft	Not Permitted
Maximum Building Height – Tower		110 feet	224 ft	No limit on building height
Maximum Building Height – Dining / Low-Rise Areas		40 feet	Up to 72 feet	N/A
Minimum Parking		108 parking spaces (a ratio standard is not provided)	45 parking spaces	0.5 spaces per dwelling unit 0.33 per Assisted Living and Elderly Housing unit
Minimum Open Space per Dwelling Unit		250 sq ft / 125 ft for elderly units	Approx. 351 sq ft	50 sq ft with exceptions ³

Notes

1. Specified in Use Regulations – Section 42, Table 3, Use Table, A (Residential Uses).

2. In the TOC zone, there must be a minimum of 20 ft of unobstructed land from the ground up on which no structures shall be located between the outer face of a building foundation wall at grade of a principal building that fronts on a street and the curb of such street – Section 43(h)(4) (Yard Regulations, Exceptions).
3. If any point on the lot upon which the mixed-use building or the residential principal building is situated is located within a 1,000-foot radius of publicly accessible usable open space, then a minimum of 25 square feet of usable open space per dwelling unit shall be required.

Zoning Table – Comparison of Relevant Use Regulations

Use	RH-2 in Aug 1967 Underlying Zoning	PDD 15	TOC Current Zoning	TOC Proposed Amendment
Dwelling Units	Permitted As-of-Right	Permitted As-of-Right	Permitted by Special Permit (above ground floor)	Permitted As-of-Right (above ground floor)
			Not Permitted (ground floor in combination with upper story dwelling units)	Permitted by Special Permit with exceptions ¹ (ground floor in combination with upper story dwelling units)
Retail	Permitted As-of-Right (limited to accessory use)	Permitted As-of-Right (PDD materials only specify ground floor use)	Permitted As-of-Right (majority of retail uses)	Same as current TOC zone

Notes

1. In the TOC, first floor dwelling units are permitted As-of-Right along Church Street South between Union Avenue and Columbus Avenue, along Columbus Avenue between Church Street South and Union Avenue, along South Orange Street between Columbus Avenue and West Water Street, along the portion of Portsea Street to be established between Columbus Avenue and Church Street South, and along the portion of Portsea Street to be established between Columbus Avenue and South Orange Street. First floor dwelling units are permitted by Special Permit in all other locations.

PUBLIC HEARING

A Public Hearing was held by the City Plan Commission on January 27, 2026. A transcript of the hearing, meeting #1677, will be available from the City Plan Department.

PLANNING CONSIDERATIONS

Given the long history of PDD #15, it is not surprising the City’s approach to land uses in this area have changed significantly since its inception. In spite of the many changes to the PDD over the years, it still codifies the auto-centric redevelopment era approach to housing and mixed-use

development on these parcels. Previous zoning approaches failed to capitalize on the unique location of this land adjacent to one of the most important public transit hubs in New England, or fully utilize the nearby City's amenities core to several established neighborhoods.

As is evident in the previously submitted zoning for the Transit Oriented Community Zone, both the City of New Haven and the State of Connecticut have recognized the importance supporting Transit Oriented Development.

Pursuant to General Statutes §13b-790, a Transit-Oriented Development is "the development of residential, commercial and employment centers within one-half mile or walking distance of public transportation facilities, including rail and bus rapid transit and services, that meet transit supportive standards for land uses, built environment densities and walkable environments, in order to facilitate and encourage the use of those services." The State of Connecticut demonstrates an investment in these areas both through upgrades the commuter rail network in response to growth in rail ridership and the ongoing work by the Municipal Redevelopment Authority focused on "grow neighborhoods by expanding housing around transit hubs and in downtowns."

This application aligns with the City's Plan of Conservation and Development, New Haven Vision 2034 (2025), the recently adopted Union Square Choice Neighborhood Transformation Plan (2025) and the goals set forth in the Hill to Downtown Community Plan (2014).

NEW HAVEN COMPREHENSIVE PLAN: SUBMISSION MEETS REQUIREMENTS

The City of New Haven's Vision 2034 Comprehensive plan emphasizes the need for greater housing development city wide. Staff find the proposed zoning amendment to be in alignment with that vision and note that several goals found in the Great Places to Live focus area would be furthered by it. The applicant identified some of these goals in their submission, highlighting the increased number of dwelling units this amendment would facilitate, the deep affordability of many of those units, and the development of a vast swath of currently vacant land to productive use. The applicant envisions a mixed-use community with thousands of new dwelling units and added commercial space to support them. Overall, staff find the proposed amendment to be consistent with the goals of the comprehensive plan.

New Haven Vision 2034, Goals addressed by this project include:

Great Places to Live

Goal 1: Increase the number of deeply affordable housing units.

- Strategy 1.2: Prioritize the development of housing units affordable to households at or below 30% of Area Median Income (AMI) in development of mixed-income housing.
- Strategy 1.4: Support expansion and redevelopment of public housing projects
- Strategy 1.7: Advocate for the development of more affordable housing across the region.

Goal 2: Increase housing supply.

- Strategy 2.1: Identify opportunities for and take measures to support infill residential development, expansions, and redevelopment.
- Strategy 2.2: Amend ordinances and policies to better support housing development.
- Strategy 2.7: Increase affordable, accessible housing options for people with disabilities.

Goal 4: Transform empty and run-down properties into affordable housing and other community resources.

Goal 5: Support place-based programs, policies, and improvements that align with the unique assets and goals of each neighborhood and residents' quality of life.

- Support mixed-use development and ensure that such development is sensitive to the neighborhood.

Choice Neighborhood Transformation Plan

The Union Square Choice Neighborhood Transformation Plan sets several goals for the revitalization of the Union Square Neighborhood. These goals were developed based on extensive community outreach and were drafted to ensure Union Square becomes a thriving, equitable, and resilient community. The goals are grouped into three categories: People, Neighborhood, and Housing. Staff have identified areas where the proposed zoning amendment aligns with the goals of the Choice Neighborhood Plan. In many ways the amendment supports the Housing goals of the transformation plan, increasing density and affordability at a large scale. By its very nature the TOC zone promotes the design of pedestrian and cyclist first transportation networks, which is consistent with some of the neighborhood goals of the plan. Lastly it will facilitate the creation of jobs throughout construction phases of future developments, and through the creation of ground floor commercial space in the zone.

People

- Goal 5: Foster job creation and economic development.

Neighborhood

- Goal 1: Calm traffic, ensure pedestrian and bicyclist safety, and improve connections within and outside Union Square.
 - Strategy 1.3 Improve pedestrian amenities to make the neighborhood safer and more comfortable to cross on foot
- Goal 2: Make sure the neighborhood's public places support wellness, safety, and economic mobility.
- Goal 4: Increase the supply of affordable and high-quality homes for homeowners and renters who want to stay here.
 - Strategy 4.2 Promote new housing development for all ages and family types, especially on underutilized land and at neighborhood hubs.

Housing

- Goal 1: Ensure the right to return for current Wolfe residents and former Church Street South residents.
- Goal 2: Provide affordable, safe, and high-quality housing choices.
 - Strategy 2.1 Provide diverse housing options: townhouse-style homes and tall apartment buildings
- Goal 3: Deliver new infrastructure for flood resiliency, pedestrian connectivity, parking, and access to public transit
 - Strategy 3.1 Design buildings above Base Flood Elevation and use green infrastructure to absorb stormwater and runoff

- Goal 4: Offer amenities for community gatherings, social support, and recreation.
 - Strategy 4.1 Allocate space on the ground floor of residential buildings for community rooms and community services, such as daycare.
- Goal 5: Design spaces for retail and commercial development.
- Goal 6: Housing and Neighborhood Revitalization.

Hill to Downtown Plan (Adopted 2014)

The Hill-to-Downtown Community Plan emphasizes the need for an organic connection between the Hill Neighborhood and Downtown. This connection must be growth based, including the development of high-quality housing that accommodates a wide range of incomes, places that serve the social needs of residents, and businesses that serve economic needs of the community. All these initiatives work towards a community vision of a vibrant, walkable, mixed-use district. The intent of this application is to facilitate the construction of a community scale development that embodies these principles. The goal is to fill in the currently vacant land nearest Union Station to high density mixed income and mixed-use building. The scale of density this ordinance would allow is rarely seen. It would have a permanent effect on New Haven's population, as well as a noticeable social benefit by connecting this portion of the Hill to Downtown. In short, the proposed text and map amendments aligns with the following goals explicitly referenced in the Community Plan:

- Encourage Development of Commercial, Residential, and Retail Space in the Areas Around Union Station and within the Medical District Areas.
- Strengthen the Existing Neighborhood.
- Improve Connectivity within the District and to Downtown
- Expand the City's Tax Base

CITY CHARTER AND ZONING ORDINANCE CRITERIA

Sections(s) 181 and 182 of the Charter of The City of New Haven

The City Plan Commission finds that, based on submitted information, the proposed zoning ordinance amendment complies with Sections 181 and 182 of the Charter of the City of New Haven in that it is:

- (i.) uniform for each class of buildings or structures,
- (ii.) made in accordance with the comprehensive plan,
- (iii.) designed to lessen congestion in the streets, secure safety from fire, panic and other dangers, promote health and the general welfare, provide adequate light and air, prevent the overcrowding of land, avoid undue concentration of population, facilitate the adequate provisions for transportation, water, sewerage, parks and other public requirements, and
- (iv.) made with reasonable consideration, as to the character of the proposed district and its peculiar suitability for particular uses, and with a view to conserving the value of buildings and encouraging the most appropriate use of land throughout the City.

Section 64(d)(2)c of the New Haven Zoning Ordinance

Section 64(d)(2) requires that the City Plan Commission take the following into consideration in evaluating any amendment to the Zoning Map:

a. Errors in the existing ordinance, changes that have taken place in the city and in patterns of construction and land use, the supply of land and its peculiar suitability for various purposes, the effect of a map change on the surrounding area, the purposes of zoning and the comprehensive plan of the City of New Haven:

Since the approval of the subject PDD, there has been increased need for housing New Haven and increased consideration for housing growth near transit resources like Union Station. The surrounding area has also been rezoned to the BD-3 zone to the northwest of these parcels as part of work to support mixed-use development between Downtown New Haven and Union Station. The mapping of the Transit-Oriented Community (TOC) zone and the adoption and mapping of the Downtown for All Overlay District in this surrounding area has further indicated a plan for increased residential and mixed-use development in support of greater housing and economic opportunity.

These parcels were once part of the BE zone (Wholesale and Distribution) and were rezoned to the RH-2 zone in the same City Plan Commission meeting (August 1967) at which these parcels were then added into PDD 15. The intent of that rezoning was to support more viable and necessary residential development in a formerly industrial part of the city. The proposed text and map changes continue that intent – they further apply new ground floor residential allowances to the TOC that maintain the underlying RH-2 and existing PDD’s residential priorities while adjusting to the modern contextual needs of ground floor commercial uses facing Union Station and ground floor residential uses facing the Hill neighborhood.

b. Whether some other method or procedure under the zoning ordinance is more appropriate:

The proposed ordinance text and map amendments are the most appropriate method to support mixed-use and residential development on this site that is also sensitive to the divergent abutting characteristics of residential uses to the west in the Hill neighborhood and proposed mixed uses to the east at Union Station. The added footnote that specifies areas for as-of-right ground floor residential units is in keeping with the abutting residential conditions of those named streets. It reflects a continuation of the TOC zone in an area that will be served by various public transit uses while adding in exceptions to ensure that the TOC zone can be contextually applicable adjacent to a lower density residential neighborhood context.

Considering that the Union Square Transformation Plan will be implemented in phases over time, the TOC zoning is a more appropriate path forward from a zoning perspective because (1) the Commission wishes to ensure long-term alignment with the Union Square Transformation Plan and (2) that a new PDD would not be practical for a multi-phase implementation due to the requirements for project-specific design review. Additionally, because this PDD includes parcels meant for two future proposed projects (Tower Three by this proponent, and Union Square by the Housing Authority of New Haven as described in report 1677-01), an amendment to the existing PDD would be insufficient as it would make it difficult for two different residential and mixed-use development projects to proceed without conflicting regulatory pathways.

c . In the case of a map change, the size of the area involved. As a general policy, the City Plan Commission shall not consider favorably any petition which would result in a total contiguous area (separated only by streets, and excluding the area of streets) of less than two acres in the case of a residence district, less than one acre in the case of a Business District, or less than four acres in the case of an Industrial District:

The contiguous area of the proposed ordinance map amendment exceeds the required minimum at a total size of approximately 11.4 acres.

FINDINGS AND ADVICE

Based on the above it is the recommendation of the Commission that the proposed map amendment is in full compliance with the standards and requirements of Section(s) 181 and 182 of the Charter of the City of New Haven and Section 64(d)(2) of the New Haven Zoning Ordinance and should be **approved**.

ADOPTED: January 27, 2026
Ernest Pagan
Chair

ATTEST: _____
Laura E Brown
Executive Director, Plan Department