

2 April 2024

Re: Petition for Union Station Map and Text Amendment.

Dear Members of the Legislation Committee of the Board of Alders:

Although the Union Station Partnership has worked on a plan for the 7 acres of State owned land for the past few years, their current proposal is fundamentally flawed and not thought through. The plan needs to be coordinated with the other major developments in the area: the rebuilding of Church Street South, the Towers, Long Wharf, and the Hill and Downtown neighborhoods.

There is a complete lack of coordination with these other developments in the proposal before the Legislation Committee. The city has an opportunity to undue the planning defects created by the *ad hoc* development practices of the Redevelopment Era, and make the most of the billion or more dollars in public and private investment coming to this area.

Although the proposed plan and zone are being described as a Transit Oriented Development, it fails to meet the basic requirements of a TOD plan, which is to design and finance an area plan where transit development is integral to plan. The Park New Haven petition for a new zone is limited to just the train station lands and is not integrated with current transportation modes, much less improved transit development in the area.

For instance, the designation of the West lot for a multi-modal transportation center (trucks, cars, bikes, regional buses in one location) does not resolve the multi-modal traffic conflicts which have for too long hobbled the area's development. This plan concentrates the transportation conflicts in one spot rather than solving them. It will create a dangerous and difficult place to navigate, whether one is walking, driving, or biking.

TOD is can provide enormous benefits to their communities — TOD can support livable density, greater housing affordability, enhanced access to employment, and air-quality improvements. All of these benefits are needed for the New Haven community, and every care needs to be taken to ensure they are realized. The well-planned transit plan that is a prerequisite for all the benefits TOD can provide is missing from the "Transit Oriented Community" zoning amendment now before the Board of Alders.

What's at stake is too important to sacrifice for political expedience. The Glendower Group / HANH has acquired the Church Street South site and won a prestigious HUD grant to replan that site. We are concerned the the plan and zoning proposed now for Union Station will not only set-back transportation planning for another generation, but that it will harm the future development of Church Street South and the quality of life of its future residents.

Additionally, the fundamental defects of the proposed Union Station plan and zoning proposal point to the proposal's lack of compliance with the City Comprehensive Plan of Development (CPOD). The Board of Alders formally accepted the Hill to Downtown Plan to stand as the CPOD for this area, and rightly so. It was an award-winning plan that was, generated (unlike the current proposal before the Board of Alders) with significant community involvement.

Finally, it is important to note that the City Plan Commission recommended that the Board of Alders deny this zoning application. Although some changes to the petition have been made since the City Plan Commission review, those changes do not address in an substantial way, the concerns raised by that Commission regarding impacts on the historic train station, the impacts of the concentration of transportation use conflicts on the West lot, the proposal's lack of cohesive development with either parcels across the street or transit planning, the need for additional substantial community engagement, and the appropriateness of the "Transit Oriented Community" zone for potential use in other parts of the city.

Considering these major flaws, we ask that the Committee recommend leave to withdraw or that the petition be denied.

Yours,



Anstress Farwell
President