



NEW HAVEN CITY PLAN DEPARTMENT

165 CHURCH STREET, NEW HAVEN, CT 06510

TEL (203) 946-6378 www.newhavenct.gov/cityplan

July 24, 2025

Response to public comment – Vision 2034 draft June 6, 2025

The following comments were received from members of the public in response to the first draft of Vision 2034, New Haven's Comprehensive Plan published to the Vision 2034 website on June 6, 2025. City Plan responses are in red. While we did incorporate many of the suggestions into the text, in our review we focused on raising up common themes or areas where we felt there were gaps that hadn't been addressed already in the text. We're so grateful to the many residents who took so much time to continue to read, and comment on the plan.

Comment 1

Good morning, and thank you for all the work you and your team have put into the draft Vision 2034 plan. I took the opportunity to review the draft today and wanted to share some feedback. By way of context, my husband and I bought our home in New Haven in 2017. I am originally from California; he grew up in a house a few blocks from our home in Westville. In 2020 it was my pleasure to join the Board of Directors of the Westville Village Renaissance Alliance. As I have come to know New Haven, one of the things that is most striking - and that I appreciate most - is that artists and creative entrepreneurs own property here, seemingly at much higher rates than in other cities where I have lived (NYC, LA, and Hartford among them). While I understand that the Vision 2034 document needs to accomplish a lot in a limited number of pages, I believe it is an oversight to gloss over this important fact. Yes, the programmatic elements of New Haven's arts and culture sector are important - however, local ownership and investment are a crucial part of what makes the programming possible at all, as well as vibrant and distinctive. I do hope that in the final version of Vision 2034, there is acknowledgement of how locally-owned arts and culture assets are a positive driver for the city, its residents and visitors.

Response: This is covered broadly in New Haven Today/Arts and Culture Chapter. This is not data we currently have access to but will share this with the Department of Arts, Culture, and Tourism for future research.

Comment 2

The second sentence of the Move Together section of the Vision 2034 plan is "The elimination of fatal crashes should be the City's highest transportation priority." That raises a very obvious question: Why is the 1km of Orange St. on which there have been no crashes that caused a serious injury or fatality since 1/2022 a higher priority than----every single street---- on which there have been crashes that caused a serious injury or fatality? Ignoring the demographic data, that raises two more obvious questions: Does the City of New Haven intend to follow this plan? What mechanism exists to ensure that the city does follow the plan? Adding the demographic data provides an answer to why this street is a priority: The data shows that this is a majority-White, relatively high-income neighborhood that has one of the lowest percentages of "qualified individuals who have a disability" in New Haven. It must be noted that Vision 2034 includes completing two previous plans that were not fully-implemented and that the parts of those plans that were deprioritized would have reduced Discrimination on the Basis of Ability, Ethnicity and Economic Condition. They were deprioritized in favor of bike lanes, which disproportionately benefit Able (nearly 100%) White (81-86%) Men (67-73%). The data proves all of that and that proves that the City of New Haven is, once again, perpetuating Systematic Patterns of Discrimination that it has previously acknowledged - and that indicates that the discrimination is intentional.



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Response: Comments on current City projects will be shared with relevant departments. We have updated the chapter on Implementation with additional detail regarding how the plan is intended to be implemented.

Comment 3

Once again, thank you and everyone else for validating what I knew to be true, that in New Haven, discrimination can only exist if people don't recognize it because, if they did, they would eliminate it. This plan, if followed, will eventually remove that discrimination and can provide other cities with a road map to accessibility. You should all be proud of this. As you know, I am concerned about the apparent deviation from this plan that resulted in the prioritization of a safe street in a majority White neighborhood because it changes "if followed" to "IF, big IF, followed" and the city has a history of planning but not doing. (I assume that that deviation is isolated and due solely to the fact that the Mayor lives there and does not predict the future.) Some of this is a reiteration of things I've already mentioned but I wanted to get them into this final-draft review. Pedestrian Mobility: It should be noted that accessibility improvements benefit everyone and serve the greater good. Someone who uses an assistive device and can't travel over a section of sidewalk can't be injured by the conditions. The most Able people, joggers, face the highest risk of injury from a lifted or broken-up sidewalk. I looked at forty or so personal injury lawsuits filed against the city that were caused by ADA violations and none of the plaintiffs had a disability that was noted in the Court documents. ADA improvements should be prioritized by #1 access to critical facilities but #2 should be the violations that present the greatest risk of injury to elderly folks, school kids and the general public. For example, the sidewalks at the main transportation hub stops around the Green all have minor ADA violations that are, for the most part, not even "substantial limitations" for someone who uses an assistive device but they present a trip-and-fall risk to a very large number of pedestrians and a liability risk to the city.

Response: We agree that accessibility improvements benefit everyone and feel that Goals 1, 2, and 3 in Move Together prioritize safety and mobility for all users.

The photo on page 31 of the E-Bike debut shows seven bicyclists, five White men, one White woman and one Black man and, of course, none have an apparent disability. That is as close to statistically accurate as a total of seven can get. The Complete Streets Review Committee must keep those disparities in mind in the prioritization and details of transportation plans. Bike lanes are great. Bike lanes a part of a comprehensive, equitable approach don't violate Federal law, ignore pedestrian safety or the city's liability. In order for there to be equity in programs like that E-bike program, about 10% of rentable vehicles would be usable by people who have a mobility impairment. It would be a much more valuable service for that population. We think of disability as a binary - you either need a wheelchair or you don't but for most people, older folks in particular, the degree of disability is variable and often determined by weather. The ability to walk to and then ride back from, or to attach a walker to a vehicle and travel a longer distance, or to compensate for an injury by riding, or get somewhere faster in the winter all have great value to the population that is underserved by these active transportation initiatives.

Response: Strategy 3.6 in Move Together states that "the City should continue to explore options for providing electric bikes and scooter that are accessible to people with disabilities." (p.109) The City's Department of Transportation, Traffic, and Parking Department is actively working on this with the State and our bike/scooter vendors.

Housing: Thank you for including the Elm City waiting list data. I hope that helps with grant proposals. There is no requirement that accessible housing be rented to a tenant who has a disability so an overall



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housing shortage and a shortage of affordable housing creates a shortage of accessible housing. I don't know how widespread this is but there are two accessible apartments less than a block from me and neither of them is occupied by a tenant who has a disability. I assume there are others. If possible, an incentive to rent accessible housing to people who actually need it would help. Disability is not a binary and housing needs are also not a binary. The majority of people who have a mobility impairment don't use a wheelchair and don't need a fully accessible apartment that can accommodate the turning radius of one. Meeting the need with "more accessible" housing, perhaps with incentives or zoning regulations could reduce the demand for "accessible" housing. Modification incentives to, for example, replace stairs with ramps wouldn't make an apartment "accessible" but could result in a reduction of demand for accessible housing. Eastview Terrace, for example, has some accessible units but the ones that are not accessible are ground-floor units that all have three or four steps. Had they been built at ground-level, people who are elderly or somewhere within the able/disabled continuum could live in them and reduce the demand for the accessible units. This and the references it cites may be helpful -

<https://pmc.ncbi.nlm.nih.gov/articles/PMC10810508/#pone.0291228.ref087>

Response: These suggestions should be explored as part of Great Places to Live Strategy 2.7 (p.65) during implementation.

Economic development: There are at least seven violations of the American with Disabilities Act in the photo on page 79. The city was notified of the denial of access on Chapel St. in 2019. Those businesses suffer a revenue loss of 8-12%. National retail chains are all accessible and incentives for commercial landlords to modify entrances while at the same time, removing 'substantial limitations' and 'denials of access' on access routes to them would help small businesses. (added to # 4.8 on p. 91). Empowered Together has expertise in making business facilities themselves accessible but the effectiveness has been limited by inaccessible routes to those newly accessible businesses. <https://www.empoweredtogether.us/>

Response: There are numerous recommendations in the plan that address direct access to and accessible routes to businesses (Move Together goals 1, 2, and 3, Economic Opportunity for All Goals 4 and 5).

Transportation: I mentioned that the focus should be on accessibility, not necessarily ADA compliance, primarily because funds are limited. On a residential street on which there are no places of public accommodation and all of the buildings have stairs - if one side of the street and the crossings are accessible, there is an accessible path of travel on that street and no "harm." It would be better to create an accessible path of travel on some other street that does not have one and remove that "harm" than it is to make both sides of one street ADA-compliant or install a new sidewalk on the other side of the street. If an access route is altered, the ADA requires audible pedestrian warnings even if the access route is to nothing but a parking lot and there is no "harm." It would not be objectionable to divert the cost of those accessibility improvements to, for example, City Hall and the US District Courthouse where that lawsuit would be filed. No one would object to that prudent diversion of funds for the purpose of removing "harm." Thank you for noting the need for an ADA-Transition plan and a design guide, a Complete Streets policy and review committee. New Haven has many transportation plans. What it does not have is one comprehensive plan or a comprehensive approach. That, more than anything, can eliminate this discrimination. The lack of a comprehensive approach has missed many 'more birds/fewer stones' opportunities (and some of what has been missed are violations of Federal law). For example, the city installed a bike lane on Crescent St, alongside an access-route to the Polling Place in Hillhouse HS that is barely traversable and somewhat hazardous and, since 1/2022, there has been a crash that caused a serious injury or fatality on each of the four corners that surround Hillhouse HS. A comprehensive approach would have fixed all of those problems at once. - There was a fatal crash on Eastern St. (I've not been able



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to find the cause) in the same place that residents of Bella Vista ride wheelchairs in the roadway because the sidewalk isn't really a sidewalk. - There was a fatal crash on Chapel St. where neither side of the street is safely traversable for someone in a wheelchair and it's half a block from a public school. - Two crashes that caused serious injuries on Willow St. were on an access route to a school/polling place that is not accessible to voters who live three blocks away. - And there are many more. Combining all of the existing plans, merging all of the various goals and adding the ADA-Transition plan into the consideration of the Complete Streets Review Committee would be more cost-effective, efficient and equitable than the "bike lane here, new curb ramps there, remove one tree stump here, put a raised crosswalk there" approach. The curb ramp in the photo on p. 101 is not ADA-compliant and there are no audible pedestrian warnings on the access routes to the govt buildings across the street. I do realize that this is an extremely difficult engineering challenge but the curb ramp on p.107 exceeds the maximum vertical-level change at the junction with the roadway. I did not notice the severity of the impact of what seems to be insignificant until I started using the wheelchair. The city has ignored the maintenance requirement and the "in a single undertaking" remediation requirement of the ADA and should consider adopting a 'prudent investment' approach rather than an 'as cheap as possible' approach. Metal tactile feedback pads cost more but require no maintenance for decades. Dispatching fewer works crews and creating accessible paths of travel instead of fixing something at one specific address may stretch annual budgets but will have long-term cost benefits. Climate/parks: "Improve the condition of parks and open space and ensure that they are safe and accessible to all" New haven Ordinance 43.1-11 requires that "All public plazas shall conform to applicable laws pertaining to access for persons with disabilities regardless of whether the Building associated with the public plaza is existing or new." That was and continues to be ignored and none of the public plazas that I have visited comply with applicable laws

Response: We have updated the chapter on Implementation with additional detail on approach and how progress will be shared.

Comment 4

I thought there was a consensus that the # 1 goal was increase the housing supply. Also a goal should be to increase home ownership & it should be explicitly stated as a goal. And that support for gaining & keeping home ownership (not just financial help) should be a priority, eg education on insurance, taxes, maintenance, etc. Not just renters should risk displacement. I planned to be on the zoom call. I am interested in other peoples reaction to the draft

Response: The order of the goals within each chapter does not indicate priority level or importance and housing supply did emerge as one of the most significant areas of focus. Homeownership and preventing displacement of homeowners is addressed in Great Places to Live Goals 6 and 7.

Comment 5

Someone else caught this detail. If "can't walk or have difficulty walking" and "have a disability that impairs their mobility" mean the same thing, the math doesn't work. 13.8% of 135,000 is 18,630. (The numbers I got from various sources were all over the place. No one really knows.) 13.8% is just about the percentage of people who have a cognitive disability. That may be where that number came from. Numbers derived from the census only include people under 65 who have a disability and that may be where 8000 came from. I would use DataHaven's 11.2%. Their accuracy is very high. " Nearly 8,000 New Haven residents either can't walk or have difficulty walking." American Community Survey, 2023 "According to the Center for Disease Control, 13.8% of New Haven's residents have a disability that impairs their mobility."



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Response: We checked the data to ensure accuracy.

Comment 6

I am very, very impressed by the draft. Congratulations to Esther and everyone involved in developing it. I think the draft plan can be made even better in two ways. One is by presenting useful information regarding plan implementation. The second is identifying how tax policy can be used as a complement to promote the plan's goals. I will present a version of these thoughts at the Board of Alders hearings on the plan. **PLAN IMPLEMENTATION** In the past, the Comp Plan has played a very limited role in actual land use decisions. (Not a criticism - this was true long before you joined City Plan.) Many provisions of the current Comp Plan are not reflected in the zoning ordinance. In contrast, you have been very clear that you want the new plan to be salient, and not just a document on the bookshelf. I think it would be useful for the plan to identify which recommendations would require (1) changes to the zoning ordinance or state law; (2) collaboration with other city departments, identifying the department, or (3) funding. This could take the form of check boxes in the recommendations section of the draft plan. The department anticipates preparing a comprehensive revision of the zoning ordinance at some point after the Comp Plan is adopted. This is needed, but will take substantial time and funding. Given the current budget situation, I would be pleasantly surprised if the department could start the revision process in the upcoming fiscal year. I think it would be very helpful to identify recommendations that can be implemented before the ordinance revision process starts.

Response: The strategies that require zoning amendments are noted with a book icon throughout the plan. Collaborations between departments and agencies will be noted in the Implementation Guide which is in development, and we will consider adding some indicators related to funding. However, we anticipate that the specific strategies and funding for implementation and will likely not make it into the version submitted with the Plan.

TAX POLICY State law gives municipalities limited ability to use tax policy to promote municipal goals. But New Haven has been surprisingly unsophisticated in using the tools it does have. The department and CPC have no jurisdiction over tax policy. But the Comp Plan presents an opportunity to present policy options to the Board of Alders, which does have jurisdiction. The draft plan has very limited discussion of tax policy, although I think the BOA should adopt the recommendations it makes. I think the plan should briefly discuss the potential expansion/modification of two existing New Haven policies as a means to promote the plan's goals. And the potential adoption of Tax Increment Financing as a policy tool.

Existing New Haven Tax Policy Measures New Haven phases in the added property taxes due to new development. And it regularly grants tax abatements for low and moderate income housing. The city can modify and expand both tools, within existing statutory authority, to promote the plan's goals. Currently, except in one regard, all eligible developments get the same property tax phase-in benefit. (The exception is that developments in redevelopment zones get a seven-year rather than five-year phase in.) A development that includes deeply affordable housing gets the same phase-in as one that merely meets the requirements of the IZ ordinance. A net-zero development gets the same phase-in as one that merely complies with the State Building Code. State law gives municipalities broad discretion to set the terms and conditions for this tax benefit. Within the parameters of state law, the city could offer a more generous tax benefit to developments that promote the goals of the Comp Plan. For example, a development that includes deeply affordable housing could pay less in property taxes in the early years of the phase-in than one that does not. The same for a Net Zero development vis-a-vis one that merely meets the State Building Code. This approach would not reduce current tax revenue, but would reduce the growth in revenue. The city grants tax abatements to developments with low- and moderate-income



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housing. In practice, the city grants abatements for large new developments. It grants abatements on an ad hoc basis, and has no visible policy for determining the amount and term of the abatement. The bulk of the housing that will exist in 2034, when the Comp Plan will be again revised, already exists. To effectively promote affordability, as the plan urges, the city needs to address existing housing as well as promoting housing construction. One way to do this is to offer abatements to existing affordable housing under the same terms and conditions as it offers new developments. The property owner would have to reserve the housing for low/moderate income households and make a long-term commitment to keeping the unit affordable for them. I think the city should have clear policy in this area. As in the case with the tax phase-in the abatements could be tailored based on the degree to which a development furthers the goals articulated in the Comp Plan. For example, a unit reserved for low-income households would get a larger abatement than one reserved for moderate-income households.

Tax Increment Financing State law authorizes the use of Tax Increment Financing. Under TIF, the additional tax revenue produced by a development is pledged for a specific purpose. This can be for capital improvements or specified operating purposes. In the case of the former, the revenue is typically used to back bonds that are used to fund investments such as public infrastructure enabling the development. TIF is widely used in other states and has been used by several other CT municipalities. It has not been used to date in New Haven. TIF could be used to promote several Comp Plan goals with regard to proposed large scale New Haven projects. These include the redevelopment of the Long Wharf and Mill River areas and the Union Square project. Other CT municipalities have used TIF for directly analogous uses. These include the redevelopment of Steelpointe Harbor and Harbor Point in Bridgeport and Stamford, respectively and the conversion of a former mill in Enfield to 160 units of housing. TIF is not a panacea and requires careful analysis to be successful. But I believe the plan should briefly discuss how it can be used to promote its goals.

Response: Text was added to the Great Places to Live strategy 1.3 (p63) to address the focus on tax policy. Exploring changes to tax policy also falls under strategy 2.2 (p64) and relates to several other strategies in the chapter. These will also be shared with economic development staff who work on tax abatement.

Comment 7

I hope this note finds you well. Below follow suggestions for changes to the draft Vision 2034 comprehensive plan that I believe would better align it with political realities and desirable outcomes. While the plan rightly praises economic and population growth, it should set its targets for both of those higher for fiscal independence and political clout. Market-rate housing While the city should strive to be a place for anyone, it needs to be mindful that the private sector has been delivering housing much faster and more cheaply than the public sector. Speed is essential in combating the region's housing crisis. Housing prices indicate substantial market demand for new units. Allowing them to get built means counterbalancing the city's tens of thousands of poor residents with individuals who have disposable income and their tax revenue. For the foreseeable future, acquiring privately built units and/or complexes is likely to be more cost-effective for the city than building out subsidized housing itself. Make no mistake, the city, currently holding a middling 7,000 people per square mile, has plenty of room for new residents of all socioeconomic statuses. The plan has several goals in section 11.2 that get at this idea, but I would suggest more explicit language embracing market-rate construction.

Response: These are astute observations. We feel this is adequately addressed in Great Places to Live Goal 2-Increase the supply of housing.



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Zoning code The plan contains several good ideas for zoning code reform. Parking minimums should be eliminated citywide. More generally, the zoning code needs to more strongly embrace density. Lot coverage, height, and setback requirements prohibit the replacement of many buildings asof- right, whereas the American public expects larger housing units than it did when most of the city's stock was built. The most prominent zone, RM2, has a 22 du/acre goal density; it should be at least double that. **Building code** To increase the supply of accessible family-sized and family-configurable housing units, New Haven should seek to copy New York City's building code provisions allowing structures up to 6 stories to have a single stair. To increase accessibility and aid aging in place, the code should allow such buildings to be built new with elevators that fit a wheelchair and permit retrofits with even smaller units.

Response: This is addressed in Great Places to Live Strategies 2.2 and 2.3 (p.64) and changes such as those referenced are intended to be implemented in future changes to the Zoning Ordinance to align with the Plan.

Buses The plan should rewrite goal 11.4.4.6 "Partner with Yale to integrate CTtransit and Yale shuttle service and expand shuttle service access to the public." to reflect transit best practices and political reality. I might suggest "Consolidate the Yale Shuttle into CT Transit and rework service according to the Move New Haven plan and global best practices." The entire concept of an overlay shuttle system misses the mark. The public prefers frequent and understandable service that they know will get them most of the way over hypertargeted, confusing service that might take them all the way. The city and state should boost CT Transit service citywide, especially off-peak and on weekends, by eliminating the Yale Shuttle and integrating the drivers into the CT Transit labor pool and cutting CT Transit routes to outlying areas, especially those served by rail (215 to Meriden, 271 to Milford). Mass transit networks are much more politically durable and useful for fighting climate change when they are well ridden and recover a high percentage of their costs through fares. To further support service, it is time to raise the fare. Like it or not, the main thread in transit politics is that subsidizing charity transportation is toxic. Moreover, the high proportion of secondhand cars in the area indicates that riders are much less captive to bus service than often assumed and uninterested in free fares since the marginal savings falls short of the buses' time cost. The public would prefer a \$3.50 fare for a service that runs frequently 19 hours a day 7 days a week over the service that today's \$1.75 fare buys. Reduced-fare programs already exist for those that really need them. I personally use ride-hails much less frequently as a Yale employee than I did as a graduate student even though my pay has about doubled. The reason is that I got to move downtown, where I can reach many more things without ride-hails. Relatedly, living downtown, I seek out supermarkets along rail, not along bus lines, at a slightly increased ticket cost because of the predictability and comfort.

Response: The feasibility of this proposal with CT Transit and Yale could be explored further in implementation.

Offices Goal 11.2.2.5 should be eliminated. Office-to-residential conversions generally create undesirable, cost-ineffective housing, and job centralization is one of the primary drivers of mass transit ridership. While New Haven holds 97,000 jobs, hundreds of thousands more around the region require a car to reach, many of which are centralizable. The city has plenty of room to accommodate both more residents and more jobs. It should work with property owners, businesses, and economic development entities to fill commercial buildings with commercial uses.

Response: Interesting point. While supporting office to residential conversions is important this should be assessed against demand or other types commercial spaces. Best adaptive reuse of these spaces should be considered as economic conditions change.



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Food trucks The city should be able to support fledgling food vendors without such a high proportion of food trucks. The food truck strip along Long Wharf is much too far out of the city center, a symptom of the lack of small foodservice spaces there. My guess is that a combination of zoning changes, code changes, and working with building owners can fix that. It would also be helpful to see private foodservice penetrate Science Hill and the medical campus, perhaps at the cost of a carveout from Yale foodservice workers' putative exclusivity agreement.

Response: This is addressed in Goal 7 in Arts and Cultural Identity and will be shared with economic development staff.

Comment 8

The Vision 2034 Plan is a very impressive document and creates a very exciting vision for New Haven over the next decade! I appreciate your recognition of all the people involved in the teams and working groups that contributed to it. Personally, it was my pleasure being a part of the process! Most of my concerns were included, but I was hoping to see some strategy for improving/beautifying the gateways into the City like corner of Ella De Grasso and Columbus Ave and near the interstate ramps Like Exit 8 on Middletown Avenue. There should be increased landscaping and wayfinding to welcome people to New Haven. I'm also looking forward to seeing more plans for the development on the old New Haven Coliseum site. I hope there's another "gateway" opportunity here to welcome people coming from Union Station and perhaps to provide more direct pedestrian access into Downtown. Otherwise a great plan!

Response: Gateways are important and so glad this was raised. We made some revisions to Economic Opportunity for All Goal 3 to capture this for the Union Station/Union Square area. We believe other "gateway" corridors are captured by goals related to the Neighborhood Commercial Districts but hope this will continue to be raised up during implementation as well.

Comment 9

The draft plan is very good. I would particularly like to commend Esther and her colleagues for their role in its development. But the plan will have very little impact if the Board of Alders does not substantially amend the zoning ordinance to implement it. This largely did not happen after the current Comp Plan was adopted. Laura and her colleagues have stressed the need to have the new plan actually guide land use decisions, but that will require support from the Commission.

The city owns hundreds of vacant parcels that provide an opportunity to promote the plan's affordable housing and other goals. Most of the parcels are sliver lots, but many are developable. The developable lots are concentrated in lower income neighborhoods, where the need for housing is the greatest. The city should treat these parcels as an asset. In consultation with neighbors and other stakeholders it should develop a strategy for using these properties in a way that reflects the new plan. And the city should actively market sliver lots, first to abutters and then to other parties. The city currently allows abutters to acquire the sliver lots for free, but does little to actively market them. As a first step, I believe the city should develop a catalog of vacant land it owns, as Hartford and other cities have done <https://www.hartfordct.gov/Government/Departments/DDS/DDS-Services/Purchase-City-Owned-Property>

Response: Sliver lots can be challenging to build on, but also present significant opportunities as mentioned. Some of the strategies related to this are captured in Great Places to Live goal 4 and strategy



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2.1. The staff position that administers the City's sliver lot program was vacant for a period of time but was recently filled so we should see more immediate actions on these in the near future.

The city also has several opportunities to use tax policy to further the plan's housing, sustainability, and other goals. The commission does not set the city's tax policy. But I believe it is appropriate for the commission to recommend steps the Board of Alders and the administration can take to implement the plan. Here are some suggestions.

Tax Deferrals The city phases in the added taxes attributable to new developments. In practice, it primarily does so for new construction. I believe the city should publicize that this tax benefit is also available for the substantial rehabilitation of existing structures. This could promote the plan's housing quality goals. I believe the Board of Alders should amend the tax deferral ordinance to reflect the plan's goals. Specifically, I believe the ordinance should provide more generous benefits, within the parameters of the state enabling law, for developments (1) that go beyond the city's housing affordability requirements, either in terms of the number of affordable units or the depth of affordability (e.g., a development with units that are affordable for households making 30% of Area Median Income should get a more generous benefit than one whose units are affordable to a household at 50% of AMI); (2) with owner-occupied units (condominium developments and small owner-occupied apartment buildings); and (3) that go beyond the State Building Code's sustainability requirements, including LEED-rated buildings. These changes would reduce future tax revenues. To offset this, the Board of Alders may wish to consider reducing tax benefits for future developments that merely meet legal requirements. (This would not affect existing developments/).

Tax Abatements The city abates taxes on low- and moderate income housing. In practice, it does so for large developments. The city could expand this provision to existing "naturally affordable" housing, most of which is in smaller buildings. The city could use the affordability standard set by the Inclusionary Zoning ordinance (rent is no more than 30% of the income of a household at 50% of AMI) or require that the housing be more deeply affordable. Under state law, tenants must receive the value of the tax benefit. In the case of an affordable apartment in a three-unit building, providing an abatement comparable to that currently provided to large developments could cut the rent by \$200-250 per month. This proposal would reduce current tax revenue. But the city is not able to substantially increase housing affordability by simply building more housing, although that is crucial. The housing stock expands at about 1%-2% per year. The vast majority of the housing that will exist when the next Comprehensive Plan is adopted already exists.

Tax Assessments State law generally requires that property be taxed on its fair market value. For large apartment buildings, this value is largely determined by the net income the building generates. Long-term affordability requirements reduce this income stream. I believe the city's assessment of buildings with long-term affordability requirements should reflect this. This provision would not apply to buildings with abatements, but unlike abatements it would apply to workforce housing. **Tax Increment Financing** State law allows municipalities to use tax increment financing, which earmarks part of the added tax revenue attributable to development. Commonly, the revenue is used to pay off bonds that financed site improvements made at the start of the development process. Connecticut municipalities have used TIF to help build housing, remediate contaminated buildings, and develop new parks. Stamford and Bridgeport have used TIF to redevelop their waterfronts. The city could use TIF to promote the plan's goals, most obviously in the context of redeveloping Long Wharf and the former Church Street South sites. Another potential site is the Mill River District, where TIF could also help finance climate preparedness measures. TIF is not a magic wand, and any potential site must be carefully analyzed. But redeveloping these areas could greatly increase the amount of tax revenue they produce. And TIF may be helpful in promoting the plan's housing, economic development, and sustainability goals.



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Response: We added text to Great Places to Live strategy 1.3 (p63) and feel that exploring changes to tax policy also falls under strategy 2.2 (p64) and relates to several other strategies in the chapter. These should all be explored in implementation.

Comment 10

Page 29 In addition to the statistic related to households that do not own cars, it would be good to add a statistic about car-light households as it helps give a more holistic impression of how many New Haven residents operate without reliable access to a personal private vehicle.

Response: Good suggestion. We will look into what data is available on this.

"The City has invested in bicycle infrastructure" is way too vague — please include specific data related to how many miles of hard protected/separated micro mobility lanes are in New Haven and compare it to how many miles are car-centric. Additionally, you may want to add data about micro mobility lane miles that are marked by paint or vertical delineators, but this data should be kept separate from hard protected/separated miles in order to give a reasonable understanding of the conditions.

Response: At this point we do not have accurate maps/mileage of protected or separated lanes but staff from City Plan, Engineering and Transportation, Traffic, and Parking have created draft maps of this information that can be regularly updated. These will be beneficial for tracking and comparison to autocentric miles.

"Extensive bus network" is way too vague. Please use real data to reflect what is/n't happening in New Haven. Examples include: How often do buses consistently achieve running on schedule (and particularly with a spoke and wheel system, how much does a late bus negatively affect transportation times)? How many neighborhoods lack direct bus access to key transportation hubs like Union Station? Etc.

Response: These are good questions. Additional information on the bus system beyond this brief mention can be found on page 32. The MOVE New Haven study, which is referenced throughout Vision 2034, provides an extensive analysis of the bus system in New Haven.

When mentioning what highways connect, it's important to also note what they disconnect. Most of New Haven is disconnected from its waterfront due to highways. Likewise, many New Haven neighborhoods are disconnected from each other/resources due to highways. These facts/examples should be noted.

Response: True and this is something we have been very focused on. We added text to this effect on page 33.

When mentioning Tweed Airport, the lack of reliable bus access and lack of bus information should be noted.

Response: Thank you. We added text to this section to this effect (p29).

Page 30 Similarly to micro mobility lanes, sidewalks should be measured in real data: specifically how many roads in New Haven lack sidewalks? How about ADA compliant sidewalks? Which sidewalks lack best practice separation from traffic and/or street trees? In which neighborhoods are these elements more/less likely to exist?



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Response: These are important datapoints that we simply don't have now. Additional data collected in the planning process will be made available in the future.

It would be good to mention that New Haven is currently opening itself up to legal liability due to ADA noncompliance. Perhaps noting an example of a city that has been successfully sued for noncompliance, such as Seattle, would be helpful.

Response: This is noted and appropriate staff should be aware but not something we feel needs to be called out in the plan.

Claiming "Pedestrian safety is an important issue for the city" is not well-supported by data and should therefore not be included, or edited to reflect specific improvements not general vibes. A number of local community participants, myself included, spoke up about how dissatisfied we were with the Safe Routes for All plan and how we saw our substantial work and feedback left out of the final plan. It would be good to see this feedback to the process reflected.

Response: This sounds frustrating. We would need more specific feedback to understand what changes could be made.

Page 31 Again, real data is needed to accurately portray the number of type of micro mobility routes in New Haven. The bike route map does not accurately reflect the difference between hard protected/separated lanes and marked lanes. "Supportive facilities" should have real data attached to these claims.

Response: At this point we do not have accurate maps/mileage of protected or separated lanes but staff from City Plan, Engineering and Transportation, Traffic, and Parking have created draft maps of this information that can be regularly updated. These will be beneficial for tracking and comparison to autocentric miles.

Page 32 University-operated shuttles directly undercut the effectiveness and community support of public transportation. This longtime concern should be addressed/noted here. Spoke and hub is not considered best practice, this should be noted. Bus ridership saw a spike when buses were fare-free, this should be noted along with the fact that after fares were reintroduced, some services were cut. Shore Line East's schedule is set up primarily to support the commutes of people living outside New Haven, and not to support New Haven residents accessing CT resources (one example: beach access), this should be noted.

Response: The MOVE New Haven study, which is referenced throughout Vision 2034, provides an extensive analysis of the bus system in New Haven.

Page 33 State roads are statistically the most dangerous roads in New Haven, this should be noted. State roads are designed to center moving people who live outside New Haven into and through New Haven, while putting New Haven residents at greater harm for risk factors including traffic violence and asthma, this should be noted.

Response: Thank you. We added text to this effect in the draft.

Comment 11



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I don't have time to read in full but CHATGPT did. I asked it for a bunch of stuff. Let me know if you want me to do any tacks on the draft. Happy to do so.

Response: As stated by the submitter, these comments were produced using AI. City Plan staff found many inaccuracies in the AI analysis which are noted in our responses.

Here are several inconsistencies and issues identified in the "**Vision 2034 Draft (6/26/25)**" document:

1. Timeline Confusion Page 4 (Vision Statement) refers to a long-term planning horizon ending in 2034. **Page 6 (Recent Accomplishments)** includes projects as recent as **2023–2024**, but some are phrased in the **future tense** ("will continue to...") without clarification of when they started or how they relate to the 2034 goal. **Page 7 (Community Engagement)** refers to feedback gathered in 2023–2024, but doesn't clarify if engagement is still ongoing or concluded. **Inconsistency:** There's no clear demarcation between **past, present, and future** stages of the plan, which makes the 2034 endpoint less grounded.

Response: We made updates made to Implementation chapter to clarify this.

2. Measurement and Accountability Gaps Many goals (e.g., "create more inclusive and accessible public spaces") lack **metrics** or **measurable targets**, which contradicts language found elsewhere about **tracking progress** and ensuring accountability. **Inconsistency:** The plan speaks of **data-informed policies** but does not consistently apply measurable criteria to outcomes.

Response: We made updates made to Implementation chapter to clarify this.

3. Affordable Housing Terminology In one section, "affordable housing" is defined using **Area Median Income (AMI)** thresholds, but elsewhere (e.g., in "Zoning and Land Use"), affordability is mentioned **without reference to AMI or clear benchmarks**. **Inconsistency:** The document inconsistently defines or fails to define key terms like "affordable," which undermines clarity in implementation.

Response: We reviewed this for consistency and determined that no changes are needed at this time.

4. Disparity Between Vision and Implementation Tools The **Vision Statement** emphasizes **climate resilience, equity, and economic inclusion**, yet specific tools in the **Implementation** section (like zoning updates) are not clearly tied back to these themes. **Inconsistency:** There is a lack of **alignment between high-level principles and concrete strategies**.

Response: Implementation strategies such as rezoning explicitly discuss how they will be rooted in the principles of equity and resilience on page 18. This is something that needs to be emphasized in practice during the implementation process.

5. Public Transit Goals vs. Current Infrastructure Goals such as improving **multi-modal transportation** and reducing car dependency are emphasized. But the **maps and zoning visuals** still highlight auto-oriented infrastructure and lack any detailed **transit overlays** or transit-oriented development language. **Inconsistency:** Aspirations for transit equity and walkability are not well-supported by the current land use and circulation frameworks shown.

Response: We felt this was somewhat inaccurate as these topics are addressed in the plan including in maps and visuals.



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6. Mismatch Between Illustrative Projects and Equity Focus Highlighted projects (like new development zones or greenway enhancements) are often located in **more affluent or already developed neighborhoods**. This may contradict the stated intent to **prioritize historically underserved communities**. **Inconsistency:** Distribution of capital improvements and development focus may not match stated equity goals.

Response: The locations of Coastal Mixed-Use areas, Special Project Areas, and Neighborhood Commercial Districts on the Future Land Use Map on page 183 specifically highlight areas of focus in historically underserved neighborhoods.

Would you like a marked-up PDF or Word summary of these inconsistencies for presentation or comments? The "**Vision 2034 Draft (6/26/25)**" includes **some demonstrable goals**, but they are unevenly distributed and often lack detailed metrics or timelines. Below are sections that contain **more concrete and demonstrable goals**, meaning they are **specific, measurable, and actionable**, at least in part:

1. Transportation and Mobility The plan identifies specific goals such as: **Improving pedestrian and bicycle infrastructure** **Implementing bus priority improvements** **Establishing a citywide greenway system** These are tangible and potentially measurable if tied to mileage, capital funding, or implementation phases.

2. Housing and Affordability The plan sets a goal to **expand housing options across income levels**, with some references to **zoning reform and affordability thresholds**. It mentions the use of tools like **inclusionary zoning** and **affordable housing overlays** which can be translated into numerical targets (e.g., units produced or preserved). However, many of the housing goals are **aspirational** unless quantified (e.g., "promote housing choice").

3. Climate and Resilience There is mention of supporting **energy-efficient buildings, green infrastructure**, and **resilient land use**, with strategies such as: Expanding **tree canopy** and urban greening Strengthening **coastal and stormwater protections** These lend themselves to measurable outcomes (acres restored, number of trees planted, flood-prone parcels remediated), but such metrics aren't always included explicitly.

4. Economic Development The plan refers to goals like: **Supporting small businesses and minority-owned enterprises** Enhancing **job access** and workforce development, especially in green jobs and tech While these are pointed goals, **quantitative benchmarks (e.g., jobs created, firms supported)** are largely missing or implied.

5. Community Engagement and Equity The plan includes a goal to **institutionalize inclusive public engagement** using practices such as: Holding events in multiple languages Compensating community partners These practices are demonstrable if tracked by number of events, demographics reached, or stipends issued, though the plan lacks numeric targets or accountability timelines.

6. Implementation Section The **Implementation Framework** contains some of the clearest demonstrable content: Proposed actions organized under thematic goals Identification of responsible entities (e.g., Planning Dept., Transportation, etc.) Tools mentioned include zoning updates, capital budget alignment, and design guidelines However, this section **stops short of assigning deadlines or numerical**



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performance indicators.

If you'd like, I can extract and format a table summarizing only the demonstrable goals with fields like "Topic Area," "Stated Goal," "Is it Measurable?," and "Notes on Gaps." Let me know.

Response: These are a great start. We made updates made to Implementation chapter to incorporate this.

As a professional urban planner reviewing the *Vision 2034 Draft (6/26/25)*, several opportunities stand out to enhance its clarity, effectiveness, and implementability. Below is a structured set of **recommendations for improvement**, grounded in best practices in comprehensive planning:

◆ **1. Establish Clear, Measurable Goals and Benchmarks Issue:** The plan frequently uses aspirational or qualitative language (e.g., "support equity," "enhance resilience") without defining **how success will be measured**. **Recommendations:** Develop **SMART goals** (Specific, Measurable, Achievable, Relevant, Time-bound) for each major topic area. Include **baseline data** (e.g., existing tree canopy percentage, affordable units built annually). Add **numeric targets** (e.g., "create 1,000 affordable housing units by 2030," or "reduce pedestrian fatalities by 50% by 2028").

◆ **2. Include a Robust Implementation and Monitoring Framework Issue:** The Implementation section lacks a concrete **schedule, funding sources, and responsible agencies** for each action. **Recommendations:** Create an **implementation matrix** listing each strategy/action with: Lead and partner agencies Timeframe (short-, mid-, long-term) Funding source (CIP, CDBG, ARPA, etc.) Measurable performance indicators Build in an **annual review process** and public reporting mechanism to ensure transparency and accountability.

Response: Well taken. We made updates made to Implementation chapter to reflect this.

◆ **3. Incorporate Equity and Resilience Metrics Issue:** The plan emphasizes equity and resilience but does not track them consistently across sectors. **Recommendations:** Use **equity mapping tools** to prioritize investments in historically underserved neighborhoods. Define **resilience indicators** such as: Number of vulnerable households within flood zones Number of green infrastructure projects completed Access to cooling centers or resilience hubs

Response: The data on flood and heat vulnerability is included in the plan and strategies related to those impacts prioritize the most vulnerable neighborhoods. Equity metrics will be incorporated into implementation, and these should be developed in the early stages of implementation.

◆ **4. Deepen Alignment with Capital Planning and Budgeting Issue:** The plan is not clearly tied to the City's Capital Improvement Plan or budget cycles. **Recommendations:** Include a **Capital Project Prioritization Framework** based on plan goals. Identify specific infrastructure, open space, and mobility projects for inclusion in the next CIP. Recommend changes to the capital budgeting process to require consistency with Vision 2034.

Response: This is a good suggestion and something that could be developed even if not within the submitted plan. The Capital Plan runs on a two-year cycle and was just approved so this would be applicable for review again in 2027.



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◆ **5. Strengthen Land Use and Zoning Integration Issue:** The land use vision is aspirational and general, and not clearly aligned with zoning updates. **Recommendations:** Include a **Future Land Use Map (FLUM)** that connects proposed land uses to zoning district reforms. Prioritize **zoning amendments** aligned with housing, climate, and economic development goals (e.g., TOD overlays, missing middle housing zones, green code updates). Consider a **form-based code** for certain districts to promote design quality and flexibility.

Response: We believe Vision 2034 includes all these recommendations and clearly makes recommendations that connect to zoning. Form based code will be considered in the Zoning amendment implementation.

◆ **6. Address School Enrollment Decline Strategically Issue:** Declining public school enrollment is mentioned but not addressed in terms of land use, housing, or demographic trends. **Recommendations:** Analyze school facility utilization and forecast implications for land use. Explore strategies to stabilize or increase family housing (e.g., affordability near schools, supportive services). Align school planning with neighborhood revitalization and housing policies.

Response: New Haven Public School District completed a comprehensive utilization analysis last year and that data was included in the plan. Implications for land use beyond school facilities should be considered in implementation.

◆ **7. Improve Data Visualization and Usability Issue:** The plan includes valuable charts and maps, but they are inconsistently formatted, and the narrative is dense. **Recommendations:** Add **executive summaries** and **one-page dashboards** for each chapter. Use **infographics and simplified icons** to explain key strategies and metrics. Create an **interactive online version** with clickable maps, filters, and data overlays.

Response: Creating a short concise plan is a challenge. We included hyperlinks and embedded summaries and pop-outs with key points that we hoped would accomplish this. There will be an interactive online version of the plan.

◆ **8. Add Scenario Planning or Future Trends Analysis Issue:** The plan assumes linear trends (e.g., population growth, climate risks) but does not explore alternative futures. **Recommendations:** Incorporate **scenario planning** tools to examine futures under different assumptions (e.g., economic downturn, climate shocks, migration surges). Develop a **resilience stress test** for key systems (transportation, housing, utilities).

Response: Good recommendation – this is not something we do enough of.

◆ **9. Broaden Youth and Community Partner Roles in Implementation Issue:** Community engagement is well-documented, but future roles for participants are unclear. **Recommendations:** Create a **standing community advisory group** to monitor implementation. Institutionalize the **Youth Leadership Team** as a pipeline for civic engagement. Provide **stipends or training grants** for community navigators to support planning and zoning literacy.

Response: Great suggestions to crystalize the participation in the plan to date. These types of strategies are under consideration but will require funding. We anticipate forming an advisory committee to guide



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and monitor implementation.

◆ **10. Ensure Legal and Regulatory Cohesion Issue:** The plan mentions zoning reform, but doesn't address potential conflicts with the charter, enabling statutes, or regional coordination.

Recommendations: Include a **legal consistency review** of zoning, subdivision, and stormwater ordinances. Align recommendations with the **State Plan of Conservation & Development** (per CGS §8-23). Coordinate with **SCRCOG** and adjacent municipalities for regional impact areas (transportation, housing spillovers, coastal resilience).

Response: The Plan will be referred to SCRCOG and while it currently addresses consistency between the State POCD and the Regional POCD, if there are conflicts we hope this will be raised in the referral process. We believe the policy recommendations are not at a level of detail would require legal review at this time but this would be considered in implementation. In the plan we framed recommendations dependent on state and regional policy strategies such that it is clear they are not under the direct control of the City.

Comment 12

Thank you for your hard work and for the opportunity to comment upon the Vision 2034 Draft. I agree in principle with our community's shared concern about affordable housing and I fully understand its repeated mention in Vision 2034. However, your document seems to rest its housing hopes mostly upon our recently passed Inclusionary Zoning law. Regrettably, it's my observation that the IZ ordinance is flawed in several significant ways. Since Vision 2034 is a decennial statement of purpose, I hope that these flaws will be acknowledged and/or that there will be a stated goal of avoiding the negative repercussions I describe below. The first IZ flaw is unintendedly encouraging the degradation of our historic fabric. The reduction of average unit size from 1000 sf to 650 sf has incentivized the radical alteration of New Haven's most ubiquitous housing type, the double and triple decker. This housing type tends to have approximately 1200 sf or more floor plates and the law has incentivized chopping them in half with radical changes to the building architecture (both internal shedding of historical finishes, stairs, and woodwork; and external application of ahistorical finishes, clumsy alteration of rooflines, and poorly proportioned window replacement and relocation). This law is already eroding New Haven's most popular and valuable housing unit which is a family friendly, whole floor, 2BR or 3BR unit. The current Vision 2034 draft has many self-promoting mentions of physical historicism, scant mention of preservation in specific terms, and no acknowledgement of the negative consequences I describe in this email. The second flaw is an inadvertent omission of regulating how rules are applied at district boundaries. What I mean is, between business zones, which tend to allow bigger buildings, and residential zones, where a smaller scale is more typical. This problem is best exhibited by the public debate surrounding the 15 Edwards project where a large project will be constructed almost directly up against several small residential houses. This illustrates that there are significant IZ omissions that put it in conflict with primordial zoning issues such as legal light and air, and also with individual homeowner rights. The third IZ flaw, and maybe the most important, is that it will quite likely diminish the city's longtime goal of fostering home ownership and the community benefits that stem from owner-occupant landlords. (Your draft acknowledges diminishing homeownership rates so I do hope you'll pay close attention to this point). The reason I state this is that IZ's dramatic average unit size reduction, the relatively minor giveback of 5% affordable housing, and the elimination of parking requirements will supercharge the financial incentive for out-of-town investors to scoop up properties and outbid potential homeowners who do not have the same access to capital markets. The national trend of hedge funds and



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other institutional investors targeting residential property as investments is well documented, has been noticeable for more than a decade, and has accelerated in recent years. New Haven should be cautious that the welcome mat we lay for outside investors hasn't been pulled from under the feet of our local families. At the hotlink below is a green paper I authored on the subject of IZ flaws and potential solutions. I have shared this with City Planning, Alders and several concerned organizations in the city. Please feel free to share this and to harvest it for whatever you think might be useful.

<https://www.dropbox.com/scl/fi/x7rw914nxh8kid3bzmltj/Better-IZ-Green-Paper-Promoting-Legislative-Remedy-To-The-New-Haven-Inclusionary-Zoning-Ordinance.pdf?rlkey=eli8c4e5xuz0xu56qhr0tuxu9&st=70iu5ag9&dl=0>

Response: Vision 2034 recommends many, varied strategies to create more affordable housing including strategies related to financing, lowering regulatory barriers, acquiring land through the Land Bank, exploring creation of community land trusts, and pushing for housing creation at the regional level. Inclusionary Zoning is not a major feature in the plan given that it is an existing policy. However, Vision 2034 recommends, and the Inclusionary Zoning ordinance requires, periodic evaluation and revision (if necessary) of the ordinance. This is work City Plan is initiating and there will be opportunities for public feedback as part of the evaluation of the Inclusionary Zoning Ordinance.

Comment 13

I just spent a little time skimming through the draft comprehensive plan. It reflects so much good work by so many people, and I REALLY respect and appreciate your leadership of this process. And, I really appreciated the way you lifted up the work done by Common Ground students and other young people on this plan -- seeing Sana's name on the steering committee, a full page on the youth leadership team's role, etc., felt really good. I also appreciate the acknowledgements of harm, and local and beyond New Haven case studies, that appeared throughout. I just noted a few small things, and one substantive comment, as I was reading through: P12 - I'd appreciate knowing how much lower New Haven's median income is than that for the metro region and the state.

Response: We agree- the Youth Leadership Team added so much to the planning process and the plan itself! We added information regarding median income to page 12.

P37 - States that 17% of the city is parks, while P16 says 15% are parks, open space, and cemeteries.

Response: Thank you for your attention to this detail! We resolved the discrepancy between p37 and p16.

P39 - Is there a more recent assessment than this 2020 list of impaired waterways, which includes several in New Haven? <https://www.epa.gov/system/files/documents/2022-09/2022-ct-iwq-rpt-list.pdf>. I've been working under the assumption/understanding that our waterways are still impaired. If that's no longer the case, it might be helpful to note that progress, and the need to sustain it?

Response: Thank you for catching this, we revised the language in the plan to reflect impaired conditions.

P127 - I'm realizing there aren't any actions specifically focused on connecting children, young people, and families with nature; building their understanding of environmental issues; and building and activating natural areas at schools, parks, and city greenspaces as resources for natural world access. Nor is there focus on engaging community organizations -- Gather New Haven, Common Ground, New Haven Climate Movement, youth development organizations, others -- as partners in the work of connecting community members to natural areas or educating residents about climate action (e.g., under



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7.10). I am not sure if there's much space for this sort of substantive change at this point, or if this is squarely focused enough on land use in the city -- but let me know if this does seem on point, and I can try to make a more targeted suggestion!

Response: We agree and made revisions to Goal 10 of Climate and Ecological Connections.

Comment 14

On page 34, talking about our streets, there is no mention of the extensive “speed hump/table” project. As someone who works in Fair Haven, I have tried since the “table” was first installed at Long Wharf to get the City to post speed limit signs alongside the “speed table/hump” signs. There are now humps all over the back streets as well. For Sargent Drive esp, I had put it into See/Click/Fix and have sent emails to City Hall. Nothing. I understand that this is also a project to improve safety, however it is not safe for those that follow the speed limit- you can’t go over those tables at Sargent Drive more than 10mph. I see that some of the speed limit signs have been removed, but no new ones have been put up, and maps services in the internet still list the old numbers. “Speed Table” is not a widely known thing, and cars can be damaged at worst, drivers rattled at best. As we approach yet another Sept, with droves of visitors to Ikea and new students to the area, can’t we be proactive and more welcoming to them? If there is anything you can do about this, it would be most appreciated.

Response: This comment was more technical than the level of detail Vision 2034 gets into, but we passed it along to relevant city departments.

Comment 15

Introduction

As CEO of the New Haven Economic Development Corporation (EDC), I submit this comment to voice support for the plan’s goals of the Vision 2034 Comprehensive Plan and offer several recommendations to help ensure inclusive, long-term economic wellbeing for New Haven’s residents. I applaud the City of New Haven for the development of Vision 2034, which reflects a thoughtful, equity-centered approach built through an inclusive community engagement model that offers a promising roadmap for future planning. I am glad to see the ways that Vision 2034 builds on previous EDC-supported partnerships, including the Affordable Housing Task Force, New Haven Land Bank, and the Comprehensive Economic Development Strategy (CEDS) coordinated by our sister organization, REX Development. As a non-profit public-private partnership working to strengthen New Haven’s economy, EDC welcomes the opportunity to partner with the City in implementing the bold agenda outlined in Vision 2034 – and offers several examples of impactful plan components and suggestions to consider in the final document.

I. Support for Neighborhood-Level Economic Development Planning We commend Vision 2034’s emphasis on local planning studies and support further investment in community-driven, neighborhood-level economic development plans. Inclusive planning frameworks uplift localized economic challenges and published plans identify clear, actionable priorities – which increase the effectiveness of our private-sector engagement and regional collaboration around shared needs. Within the “Great Places to Live” strategy, Goal 5’s Strategies 5.1, 5.2, and 5.4 describe community-level engagement to align housing and mixed-use development priorities with the unique assets and goals of each community. With the opportunity to conduct this thorough neighborhood-level planning, we encourage the City to include other economic development goals in the same process - in particular, identifying the preferred business types and employment categories desired in each community. This would align with “Great Places to Live” Strategy 8.4, multiple of the “Economic Opportunity for All” goals, as well as the “Future Zoning Work” intention to: “Revise the use table to reflect modern uses and revise the Neighborhood Convenience Use



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regulations to reflect the types of small businesses that are desired in neighborhood residential zones.” Working with each community to identify the types of businesses that they are interested in supporting in their residential, local main street, and adjacent mixed-use spaces would be a critical step to aligning community support and private sector investment towards equitable growth. EDC would welcome the opportunity to work with the City to coordinate local economic development action plans and align our efforts around the local goals and needs identified through that process.

Response: There are lots of synergies here. We have provided hyperlinks for strategies that are connected within the document. The hope is that implementation will involve a less siloed approach and opportunities to connect strategies across area of interest. Most residents connect with the plan in terms of how it impacts their neighborhood and we are hopeful that we’ll have an opportunity to raise up neighborhood level priorities.

II. Promote Adaptive Reuse for Commercial, Industrial, and Retail Uses Rightly seeking to create new housing stock wherever possible, the “Great Places to Live” Goal 2.5 is to “continue to convert underutilized office buildings to residential use, with a focus on key areas downtown.” Office-to-residential conversion, particularly downtown, has been a key tool for new housing creation in New Haven and should be continued. However, EDC encourages the City to balance this approach by explicitly supporting the reuse of underutilized buildings for specialized commercial, light industrial, and creative sector use, where supported by the local community. We are increasingly seeing demand from growing companies for graduation and scale-up space in uses like assembly space, climate tech fabrication, cold storage, wetlab, food preparation, and media studio. When assessing office conversion opportunities, we would suggest the language like “convert underutilized office buildings to preferred community use, including residential, commercial amenity, and employment-generating uses.” As more buildings convert to residential use, it becomes increasingly important to identify and invest in the preferred (and remaining) employment-generating uses.

Agree. While supporting office to residential conversions is important, we believe this should be assessed against demand or other types commercial needs as described. Best adaptive reuse of these spaces should be considered as economic conditions change.

Ensuring local employment uses within each community should be an important planning goal, particularly paired with the thorough workforce pipeline partnerships described in the draft document. Many properties in New Haven’s industrial corridors, older commercial streets, and even some mixed-use districts offer cost-effective, low-barrier entry points for small manufacturers, food entrepreneurs, and artists. Doing so aligns with “Economic Opportunity for All” Goal 3.3 (zoning reform to support emerging industries), “Arts & Cultural Identity” Goals 3.1–3.6, and Goal 7.4 (supporting food business start-ups): 3.1 “...make underutilized spaces available to artists... [including] studio, rehearsal, and performance space for the visual and performing arts.” 3.2 “work with property owners to make ... [vacant and underutilized] space available to artists and arts and culture organizations through short-term rentals, leases, or purchase agreements.

New Haven should also continue its support for redevelopment of the Armory and for the inclusion of arts and culture space when redeveloped.” 7.4 “...support the development of and access to food business incubation space, shared kitchen space, food trucks and food truck vending locations, food halls, and markets including farmers' markets”



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EDC recommends the City: Incentivize reuse of underutilized space for studios, light manufacturing, shared kitchens, and small-batch production. Promote short-term leases or City-held “community commercial shells” for early-stage businesses.

Utilize the New Haven Land Bank and tax-delinquent property acquisitions to create industrial/retail incubators in neighborhoods. EDC is particularly interested in partnering with the City and Land Bank to pilot multi-use conversions that house food production, arts and culture, and small-scale fabrication under one roof—models that have proven successful in comparable cities and may align with aspects of the recommended Cultural Community Center.

Response: We feel that reuse of underutilized spaces, creative mixed-use projects and districts, and support for early-stage businesses with an emphasis on food and the creative sector are covered thoroughly in the plan and are excited to explore some of these specific action steps through implementation, in collaboration with EDC.

III. Advance Innovation Districts and Bioscience Workforce Pipelines New Haven is uniquely positioned to lead in inclusive innovation. We strongly support Economic Development Goal 1.3, which calls for expanded bioscience and tech career ladders, and the continued development of district-scale innovation hubs. The City’s proximity to Yale, its biotech cluster, and its community college and university partnerships give it a comparative advantage in cultivating homegrown talent pipelines. EDC recommends that future planning efforts: Prioritize physical space for startup labs, maker spaces, and collaborative R&D. Ensure innovation spaces are geographically dispersed and connected to jobseekers in Dixwell, Fair Haven, and the Hill through transit and workforce partners. Establish pre-apprenticeship and microcredential programs aligned with employers in climate technology, biotech, and food innovation. We welcome continued collaboration with the City and partners like Southern Connecticut State University and Gateway Community College to advance this work.

Response: We added EDC/REX as a partner in the Implementation Guide.

IV. Prioritize First-Floor Retail and Micro-Retail Opportunities EDC strongly supports Goal 4.8 to prioritize first-floor retail, as well as Arts & Culture Goal 3.6 and the proposed use of vendor carts, kiosks, and vending machines in public and transportation spaces. These tools lower the barrier to entry for entrepreneurs and are essential to activating the public realm in mixed-use and residential neighborhoods. We recommend the following actions: Require first-floor retail in all new high-density mixed-use zones, with zoning flexibility for local-serving uses like grocers, cafés, and corner stores. Support “pop-up to permanent” pipelines through master-leased vending locations and startup grants for mobile and pop-up retail. Articulate a goal of identifying and supporting micro-retail opportunities in city properties and city-supported projects, increasing accessibility for local entrepreneurs. This could include micro-retail options in future RFPs for City-owned parcels and City-financed development projects. Prior requirements for first-floor retail have built vibrant streets with community amenities and local jobs. EDC would be happy to partner with the City to promote the importance of these first-floor retail requirements and provide education about the cycles of retail markets and absorption expectations.

Response: We added EDC/REX identified as a partner in the Implementation Guide and strongly suggest these shared strategies be part of the implementation plan as it develops.

Holistic Consideration of Affordability and Anti-Displacement Measures In addition to the



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many actionable strategies described in Vision 2034, we encourage the City to consider expanding the definition of affordable housing to consider factors beyond household income, particularly for those units included in new construction of market-rate housing through the inclusionary zoning policy or other city-supported efforts. Income thresholds alone can be an incomplete proxy to target the high-need population seeking housing in New Haven. Average graduate student stipends, for example, may qualify many for 80% AMI designated units, while being more transient and economically mobile than the population intended to be served by project subsidies. Further factors to consider could include participation in public housing wait lists or measures of residency.

Response: This is a good point and one that has been raised in critique of the Inclusionary Zoning Ordinance. This is something that should be reviewed as part of that broader policy evaluation. In the plan, student housing is addressed in strategies 6.6 and 6.7.

VI. Options for the Functions of a Community Land Trust Having provided support and incubation infrastructure for the creation of the New Haven Land Bank, EDC is particularly supportive of “Great Places to Live” Strategy 4 to expedite the transfer of neglected properties to the Land Bank for reuse and revitalization. Considering the investment in a new entity, staff, and organizational infrastructure, we would encourage the City to consider if the additional functions of a Community Land Trust require a separate entity. While distinct in the strategy of providing long-term land stewardship, a Community Land Trust would align with the New Haven Land Bank in many functions, including property identification, acquisition, and management, as well as resident services that may include financial education and homebuyer assistance. In other markets with housing oversupply, Land Banks have a more clearly distinct role to play from a Community Land Trust’s function to stabilize housing costs and prevent displacement. However, in New Haven’s tight housing market, these functions are more closely aligned and could benefit from the savings (in time, funding, and energy) from not launching a new entity. As an example for timeline, the New Haven Land Bank was approved in September 2021 and seeded with ARPA funding, with important powers approved in 2023 and became operational in 2025. I’d like to emphasize that this suggestion is entirely my own personal contribution, but it may be helpful to leave flexibility in the document recommendations whether the goal is a new function or new entity.

Response: We specifically worded Great Places to Live strategy 1.1 to provide the flexibility that would allow implementation of a Land Trust for these purposes.

VII. Alignment with Zoning Reform and Small-Scale Development Goals The zoning ordinance overhaul is a critical step toward achieving the Plan’s vision. We endorse Goals 3.3 and 4.2, which call for aligning zoning with modern uses and small-scale development needs. The revision of the use table and Neighborhood Convenience Use regulations should allow greater flexibility for ground-floor businesses, food production, and creative uses in residential and transitional zones. The proposed “Future Land Use Categories” provide a helpful roadmap to the direction of the zoning ordinance overhaul. As we learn more about the growing demand for space from the pipeline of local entrepreneurs, we would encourage the consideration of light fabrication, lab, food production, and creative economy uses as part of the “Coastal Mixed-Use” and “High-Density Mixed-Use” categories – and I look forward to opportunities in the process to demonstrate the impact of those uses on employment and tax revenues. Additionally, we support



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the proposal for standardized pre-approved development plans and streamlined permitting. These tools will enable greater participation by local developers and nonprofits in small-scale infill development, closing critical gaps in the commercial real estate market.

Response: We agree that Neighborhood Convenience Uses and other area of the Zoning ordinance are in dire need of revision. We added EDC/REX identified as a partner in the Implementation Guide.

C

Conclusion Vision 2034 charts a strong path toward an inclusive, opportunity-driven New Haven. EDC looks forward to working alongside City departments and community partners to implement this vision. Our organization is ready to support neighborhood economic development plans, convene stakeholders, activate underutilized buildings for multiple uses, and build innovation and cultural spaces that reflect each community's vision. Thank you for your leadership and commitment to equitable growth.

Comment 16

Residential License Program - as a two family house owner I've found the exemption process a bit much. Why can't the city use voter roles, tax notices, and I'm sure the city has access to state records like driver's license information to relieve of exempt owners of filing for an exemption every two years? The most recent renewal was especially problematic since my wife and I had changed from joint ownership to her as sole owner. All of the utility bills were in my name and she had little record of her 31+ year occupancy. she ended up taking multiple trips downtown to sort it out.

If the city is going to require licenses for residential properties and exempt 2 and 3 family owner occupied properties it should not be a burden to stay exempt.

Response: We shared this with staff at the Livable Cities Initiative.

Transportation - I did not see discussion on developing lanes that separate pedestrians from scooters and bikes. Also, are electric bikes not considered motorized vehicles? East Rock Park walkways and the Farmington Rail Trail have seen tremendous increases in motorized traffic. As a jogger it is disconcerting to be on alert for these motorized scooters and bikes going much faster than regular bikes on trails marked "NO MOTORIZED VEHICLES". Personal transportation options must be integrated into transportation planning.

Response: Separated and protected on-street bicycle lanes are addressed in Move Together strategy 3.5. Additional feedback passed on to the Department of Transportation, Traffic and Parking

Parking - If anything I think the city should plan to make parking more difficult for private single occupancy automobiles. Transportation is shifting towards smaller personal transportation, possibly safe and reliable autonomous vehicles (in my dreams), and should move away from our current model.

Response: Move Together Goal 6 is designed to address right-sizing parking for current conditions and as the transportation landscape evolves.



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The numbering needs formatting beginning at pdf page 127 the chapter or section numbers don't correspond with the table of contents.

Response: Checked this and found no error. Looped back with the commenter and they agreed.

This is an amazing document and took so much work from so many of us. Thank you for your continued effort. The work delivered and your role are greatly appreciated.

Comment 17

There needs to be more explicit statement that parking is available to enable people to access commercial & municipal activities, not just move around a geographically wide city. Requiring residents to pay as much to park as eat is not a winner.

There is no forward thinking on safe parking for e-bikes; the Vision appears to allow only for touring/movement not using them to access destinations in lieu of a car. For some walking to attend city meetings etc is not an option.

Buying e-bikes will become more wide spread with lower prices. Storing them in a garage will be doable once batteries are safer, but destinations need to have options that minimize theft.

The Vision did not seem to reflect the changes that are coming. The consultants should have at least suggested options that are on our horizons & should be thought about & considered.

Response: We added some text to Move Together Strategy 3.5 on secure bicycle parking, agree this is very important. We feel that Move Together Goal 6 adequately covers vehicle parking needs.