

Director of Legislative Services
City of New Haven
165 Church Street
New Haven, CT 06510

Attn: Mr. Albert Lucas, Director of Legislative Services

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

Dear Mr. Lucas:

My name is Christopher M. Rousseau, and I am a partner of the law firm Pullman & Comley, LLC. Our firm represents the Housing Authority of the City of New Haven ("**HANH**" or "**Applicant**") in connection with the Amendments (as hereinafter defined). HANH currently owns certain real property located in the City of New Haven (the "**City**") 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) (the "**City Property**" and together with the HANH Property, the "**Property**"). The Property is currently located in the PDD-15 Zone, and HANH desires to amend the City Zoning Map (the "**Zoning Map**") to transfer the Property to the Transit-Oriented Community Zone (the "**TOC Zone**"; the "**Map Amendment**"). Simultaneous with the Map Amendment, HANH also desires to amend certain items of the City Zoning Ordinance (the "**Zoning Ordinance**") relating to the TOC Zone (the "**Text Amendment**" and together with the Map Amendment, the "**Amendments**"). The Amendments are required in connection with HANH and its partners, The Glendower Group, Inc. and Elm City Communities, redevelopment of the Property pursuant to that certain Union Square Choice Neighborhoods Transformation Plan. In connection with the foregoing, please consider this correspondence a "petition" pursuant to Section 64 (d)(1) of the Zoning Ordinance hereby requesting the Amendments. It is requested that this "petition" be transmitted to the Board of Alders (the "**Board of Alders**"). A copy of a revised map for the City Zoning Map is attached hereto and made a part hereof as **Exhibit A**. The Amendments pertaining to certain provisions of the Zoning Ordinance are as follows:

1) Amendment of Section 42, Table 3 (Use Table):

Section 42, Table 3, Use Table, shall be amended as shown on **Exhibit B** attached hereto and made a part hereof.

Please note for Exhibit B, all additions above are shown in bold and in [brackets] and all deletions above are shown in bold with strikethroughs.

Submitted simultaneously with this "petition" are a Checklist for Aldermanic Submissions, an Alder Prior Notification Form, a City Fiscal Impacts Statement and draft Resolutions related to the "petition".

The revisions and additions to the Zoning Map and Zoning Ordinance pursuant to the proposed Amendments are consistent with the City's Plan of Conservation and Development (see **Exhibit C** attached

hereto and made a part hereof). The Applicant believes the proposed Amendments are in the best interests of the City and its residents and respectfully requests that the Board of Alders approve the proposed Amendments to the Zoning Map and Zoning Ordinance. We very much appreciate the Board of Alders consideration of this "petition" and we look forward to presenting its contents to the Board of Alders.

[Signature Page to Follow]

Respectfully submitted this 31st day of December, 2025:

Applicant:

THE HOUSING AUTHORITY OF THE
CITY OF NEW HAVEN

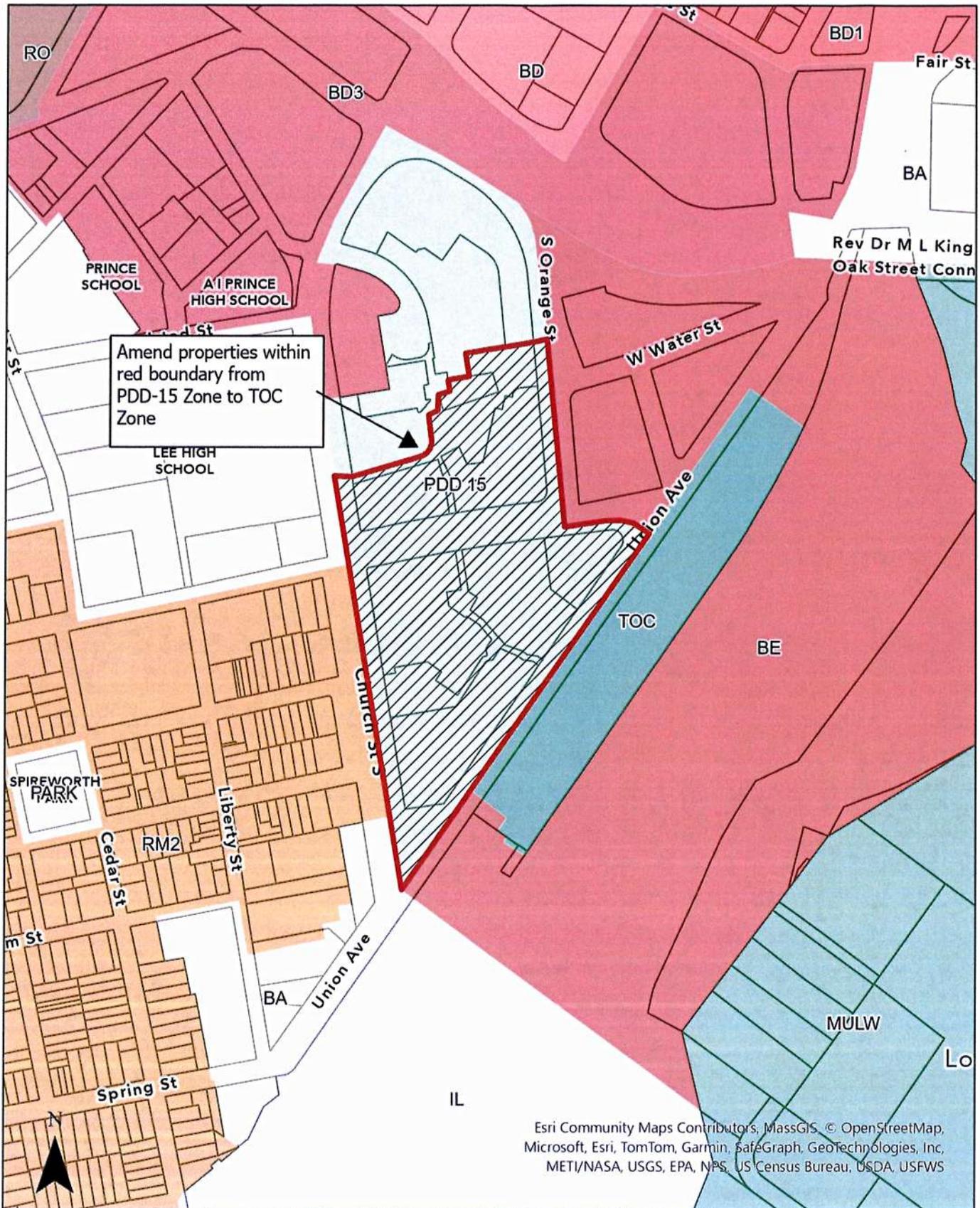
A handwritten signature in blue ink, appearing to be 'C. M. Rousseau', written over a horizontal line.

By: Pullman & Comley, LLC, its attorneys
Christopher M. Rousseau, Esq.

EXHIBIT A

Zoning Map Amendment

(attached)



**Housing Authority of New Haven Proposed Zoning Map
Amendment for Union Square**

Map created by Kaelie Moran, Planner II on December 23, 2025



Esri Community Maps Contributors, MassGIS, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS

EXHIBIT B

Amendments to Section 42, Table 3, Use Table

Please note, all additions below are shown in bold and in [brackets] and all deletions above are shown in bold with strikethroughs.

TABLE 3. USE TABLE																	
Key: R - Permitted As-of-Right SP - Special Permit SE - Special Exception X - Not Permitted NA - Not Applicable																	
In case of conflict between this Table 3 and the text of the Zoning Ordinance, the text shall prevail.																	
Use	BA	BA-1	CGD	BA-2	BC	BD	BD-1	BD-2	BD-3	BE	MUL W	TOC	IL	IM	IH	Parking	Loading
<i>A. Residential Uses</i>																	
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	R	R	R	R	SP	R	R	R	R	X ⁴	SP	SP [R]	NA ⁵	X	X	c	y

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																		
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	SP	SP	SP	R/SP ₁	SP	SP	SP	SP	SP	X ⁶	X	✗ [SP ⁹]	NA ⁷	X	X	c	y	

the above density limitation																			
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Notes:

1. In the BA-2, first floor dwelling units are permitted by Special Permit along Whalley Avenue between Fitch Street and Harrison Avenue. First floor dwelling units are permitted as of Right in other locations.
2. Parking lots and structures located entirely on parcels subject to a development agreement with the City of New Haven entered into prior to June 1, 2007 require only site plan approval.
3. Only where part of a mixed-use development of 500,000 or more square feet.
4. In the Downtown for All Overlay District where the BE District is the underlying zone, dwelling units in multi-family dwellings that are located above the first stories of structures shall be permitted as-of-right.
5. In the Downtown for All Overlay District where the IL District is the underlying zone, dwelling units in multi-family dwellings that are located above the first stories of structures shall be permitted by Special Permit.
6. In the Downtown for All Overlay District where the BE District is the underlying zone, dwelling units in multi-family dwellings that are located on the first stories of structures shall be permitted by Special Permit.
7. In the Downtown for All Overlay District where the IL District is the underlying zone, dwelling units in multi-family dwellings that are located on the first stories of structures shall be permitted by Special Permit.
8. Permitted by Special Permit in the Downtown for All Overlay District. Where the underlying zone permits rooming and boarding houses as-of-right, that use shall remain as-of-right in the Downtown for All Overlay District.
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.]**

* This Use is "R - Permitted as of right" in the MULW Light Industrial Coastal Overlay.

A clean version of the foregoing proposed amendments reads as follows:

TABLE 3. USE TABLE																	
Key: R - Permitted As-of-Right SP - Special Permit SE - Special Exception X - Not Permitted NA - Not Applicable																	
In case of conflict between this Table 3 and the text of the Zoning Ordinance, the text shall prevail.																	
Use	BA	BA-1	CGD	BA-2	BC	BD	BD-1	BD-2	BD-3	BE	MUL W	TOC	IL	IM	IH	Parking	Loading
A. Residential Uses																	
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	R	R	R	R	SP	R	R	R	R	X ⁴	SP	R	NA ⁵	X	X	c	y

Land Disposition Agreements involving the City of New Haven shall not be subject to the above density limitations																	
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	SP	SP	SP	R/SP ₁	SP	SP	SP	SP	SP	X ⁶	X	SP ⁹	NA ⁷	X	X	c	y

Notes:

1. In the BA-2, first floor dwelling units are permitted by Special Permit along Whalley Avenue between Fitch Street and Harrison Avenue. First floor dwelling units are permitted as of Right in other locations.
2. Parking lots and structures located entirely on parcels subject to a development agreement with the City of New Haven entered into prior to June 1, 2007 require only site plan approval.
3. Only where part of a mixed-use development of 500,000 or more square feet.
4. In the Downtown for All Overlay District where the BE District is the underlying zone, dwelling units in multi-family dwellings that are located above the first stories of structures shall be permitted as-of-right.
5. In the Downtown for All Overlay District where the IL District is the underlying zone, dwelling units in multi-family dwellings that are located above the first stories of structures shall be permitted by Special Permit.
6. In the Downtown for All Overlay District where the BE District is the underlying zone, dwelling units in multi-family dwellings that are located on the first stories of structures shall be permitted by Special Permit.
7. In the Downtown for All Overlay District where the IL District is the underlying zone, dwelling units in multi-family dwellings that are located on the first stories of structures shall be permitted by Special Permit.
8. Permitted by Special Permit in the Downtown for All Overlay District. Where the underlying zone permits rooming and boarding houses as-of-right, that use shall remain as-of-right in the Downtown for All Overlay District.
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.

* This Use is "R - Permitted as of right" in the MULW Light Industrial Coastal Overlay.

EXHIBIT C

Statement with Respect to City's Plan of Conservation and Development

The City's Plan of Conservation and Development, effective as of October 15, 2025 (the "POCD") places *great* emphasis on housing within the City. The POCD states that "housing was the number one issue identified by residents throughout the planning process." (POCD Page 57). The POCD goes on to state: "Participants [of Workshop #6 – Housing] stressed the need for diverse, affordable options...There was strong support for mixed-use and transit-oriented development..." (POCD Page 57). Further, the vision statement of the Great Places to Live Section of the POCD is particularly important: "Foster safe, diverse, and vibrant communities in New Haven by ensuring access to affordable dignified housing for all residents; enhancing community spaces to create beautiful and inviting environments; promoting sustainability through pedestrian-friendly design with strong interconnections between neighborhoods and shared resources." (POCD Page 61). The goals of the Great Places to Live Section of the POCD echo its vision statement as they include:

- Increase the number of deeply affordable housing units.
- Increase housing supply.
- Transform empty and run-down properties into affordable housing and other community resources.

The Great Places to Live Section of the POCD goes on to include the following as important factors in making the City a great place to live:

- "Increasing the supply of affordable housing units is crucial to fostering economic stability, social equity, and community resilience in New Haven." (POCD Page 62)
- "Prioritize the development of housing units affordable to households at or below 30% of the Area Median Income (AMI) in development of mixed-income housing." (POCD Page 62)
- "Support expansion and redevelopment of public housing projects." (POCD Page 63)
- "...the City should continue to repurpose small, City-owned "sliver" lots across the City as well as larger sites, to support infill development, redevelopment, or expansion of residential properties..." (POCD Page 64)
- "A comprehensive zoning overhaul is needed, with an emphasis on lowering barriers to the creation of diverse housing options. The City should review and amend the New Haven Zoning Ordinance and other relevant policies to better support the development of workforce, mixed-income, multi-family and high-density housing types." (POCD Page 64)
- "Increase affordable, accessible housing options for people with disabilities...The City should encourage, incentivize, or require the development of more affordable units that are accessible..." (POCD Page 65)
- "Converting vacant and run-down (blighted) properties into productive housing assets revitalizes neighborhoods, stabilizes property values, and expands housing opportunities

throughout New Haven.” (POCD Page 69)

Approval of the Amendments and, ultimately, the construction of the proposed redevelopment, meets the goals and aspirations of the POCD in a way that greatly benefits the City. The approval of the Amendments will:

- Allow HANH to bring a transformational number of new rental units (many/most being affordable) to the City (up to 2,500 rental units being phased in over a construction timeline). The new rental units will greatly assist in replacing the distressed Robert T. Wolf Public Housing Development that was located on a portion of the Property with high quality mixed-income housing that is well managed and responsive to the needs of the surrounding neighborhood.
- Create conditions necessary for public and private investment in the Union Square neighborhood. The proposed redevelopment will offer amenities and assets, including enhanced safety measures, excellent schools and commercial activities, all of which are important to families’ choice regarding their communities.
- Allow for the calming of traffic, ensure pedestrian and bicycle safety, and improve connections within and outside of the Hill neighborhood.
- Allow the Property to be transformed from a vacant, run-down area of the City, into a vibrant community affording many City residents (current and future) a safe, convenient and beautiful place to live.
- Accomplish the goals of the POCD by adding a tremendous mixed-use and transit-oriented development right next to Union Station, which also benefits the residents of the Hill neighborhood and beyond.

CHECK LIST FOR ALDERMANIC SUBMISSIONS

X	Cover Letter
X	Resolutions/ Orders/ Ordinances
X	Prior Notification Form
X	Fiscal Impact Statement - Should include comprehensive budget
X	Supporting Documentation
THE FOLLOWING ITEMS ARE TO BE SUBMITTED WITH GRANTS	
N/A	Notice of Intent
N/A	Copy of Grant Application
N/A	Budget Summary
N/A	Executive Summary (not longer than 5 pages without an explanation)
Date Submitted by City Agency:	
	12/31/2025
BOA Meeting Submitted For:	
	1/5/2026
Indicate Regular or Suspension Agenda:	
	Regular
Submitted By:	
	Housing Authority of New Haven Through its Attorneys, Pullman & Comley, LLC
Title of Legislation:	
Legislation Resolutions/ Orders/ Ordinances Language	
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	
Additional Comments:	
Department Head or Deputy Dept Head Signature:	
Coordinator or Deputy Coordinator Signature:	
Office of Management and Budget (for Grants)	
Mayor's Office Signature:	

Call 946-7670 with any questions.

PRIOR NOTIFICATION FORM

**NOTICE OF MATTER TO BE SUBMITTED TO
THE BOARD OF ALDERMEN**

DATE:	12/31/2025
TO (list applicable alders):	Carmen Rodriguez

FROM:	Applicant	Housing Authority of New Haven		
	Contact	Christopher M. Rousseau, Esq. (Agent)		
	Phone	860-424-4378	Email	crousseau@pullcom.com

This is to inform you that the following matter affecting your ward(s) will be submitted to the Board of Alders.

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

Check one if this an appointment to a commission

- | | |
|--------------------------|--------------------------------|
| <input type="checkbox"/> | Democrat |
| <input type="checkbox"/> | Republican |
| <input type="checkbox"/> | Unaffiliated/Independent/Other |

INSTRUCTIONS TO DEPARTMENTS

1. Departments are responsible for sending this form to the alder(s) affected by the item.
2. This form must be sent (or delivered) directly to the alder(s) **before** it is submitted to the Legislative Services Office for the Board of Alders agenda.
3. The date entry must be completed with the date this form was sent the alder(s).
4. Copies to: alder(s); sponsoring department; attached to submission to Board of Alders.

FISCAL IMPACT STATEMENT

Date	12/31/2025	City Agency	
Contact Name	Christopher M. Rousseau	Phone	(860) 424-4378
Contact Email	crousseau@pullcom.com		

(Title of Legislation)

Legislation Resolutions/ Orders/ Ordinances Language

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

Revenue

Will this Generate Revenue	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>		
Revenue Generation	<input checked="" type="checkbox"/>	N/A		<input type="checkbox"/>	One Time	<input type="checkbox"/>	Annual
Revenue Total	\$0.00						
Revenue Funding Source	<input type="checkbox"/>	General	<input type="checkbox"/>	Special	<input type="checkbox"/>	Bonding	

Expenditures

List Cost: List the total cost by Funding Source

	GENERAL	SPECIAL	BOND	ENTERPRISE	OTHER
A. Personnel					
1. Initial start up	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2. One-time	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
3. Annual	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
B. Non-personnel					
1. Initial start up	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2. One-time	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
3. Annual	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Resolution

Order

Ordinance Amendment

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

WHEREAS, the Housing Authority of the City of New Haven (“**HANH**”) has filed a “petition” pursuant to Section 64 (d)(1) of the City of New Haven Zoning Ordinance (the “**Zoning Ordinance**”) requesting Zoning Map and Zoning Ordinance amendments (the “**Amendments**”) to transfer that certain real property located in the City of New Haven and 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); (vii) 1 Tower Lane (MBLU: 238 0110 00300); (viii) No # Union Avenue (MBLU: 237 0086 00500); and (ix) 90 South Orange Street (MBLU: 238 0110 00404 (the “**Property**”) from the PDD-15 Zone to the Transit-Oriented Community Zone (the “**TOC Zone**”) and to amend certain items of the Zoning Ordinance as they relate to the TOC Zone; and

WHEREAS, prior to filing the “petition” related to the Amendments, HANH, along with contributions from its affiliates, The Glendower Group and Elm City Communities, and other local organizations, business and residents of the City, produced the Union Square Choice Neighborhoods Transformation Plan (the “**Plan**”); and

WHEREAS, the Plan outlines a clear road map for positive change, prioritizing safe, high-quality housing and fostering a thriving community in and around Union Square; and

WHEREAS, the Board of Alders have reviewed and endorsed the Plan and the re-development of the Property; and

WHEREAS, the Amendments are in material compliance with the goals of the City’s Plan of Conservation and Development, adopted as of October 15, 2025 (the “**POCD**”) and the recent passage of the “Downtown for All” overlay district, as the extensive rehabilitation or development of City properties is critical to the need of the City as a means of improving the City’s affordable housing stock and increasing employment opportunities; and

WHEREAS, the redevelopment of the Property will assist in accomplishing the critical needs of the City related to housing and employment opportunities, which is desirable and in the public interest of the residents of the City.

NOW, THEREFORE, BE IT RESOLVED by the New Haven Board of Alders that:

Adoption of the Amendments is in the public interest of the residents of the City and are found to be in material compliance with the goals of the POCD and the “Downtown for All” overlay district; and

AND BE IT FURTHER RESOLVED by the New Naven Board of Alders that:

The Zoning Map of the City is hereby amended to re-zone the Property from the PDD-15 Zone to the TOC Zone; and

AND BE IT FURTHER RESOLVED by the New Naven Board of Alders that:

The Zoning Ordinance of the City is hereby amended to revise certain allowable residential uses in the TOC Zone, as contained in Section 42, Table 3 (Use Table) of the Zoning Ordinance.