

ELM CITY LOFTS, LLC
C/O VESTA CORPORATION
175 POWDER FOREST DRIVE
WEATOGUE, CT 06089

December 30, 2025

VIA HAND-DELIVERY

Honorable Tyisha Walker-Myers
President
Board of Alders
City of New Haven
165 Church Street
New Haven, CT 06510

Mr. Michael Smart
City/Town Clerk
City of New Haven
200 Orange Street
New Haven, CT 06510

Re: Petition to Amend the New Haven Zoning Ordinance Map to Change the Zoning Designation of 71 Shelton Avenue and 89 a/k/a 91 Shelton Avenue from Industry H District – Heavy Industry (IH) to Residential General High Density District (RH-2)

Dear President Walker-Myers and Mr. Smart:

Elm City Lofts, LLC, which will acquire 71 Shelton Avenue Map/Block/Parcel 284/0392/0010) and 89 a/k/a 91 Shelton Avenue (Map/Block/Parcel 284/0392/02700)(collectively the “Shelton Avenue Properties”), is pleased to present to the Honorable Board of Alders a Petition to rezone the Shelton Avenue Properties from the IH District to the RH-2 District in order to permit the development of a 240 unit 100% affordable housing project (the “Project”). The Project will be developed in three buildings, one of which is an 125,000 square foot historic mill building that is only partially occupied and is in a state of disrepair. The mill building will be rehabilitated in accordance with the National Park Service guidelines for historic restoration. The other two buildings will be newly constructed on what is currently vacant land. The Project will provide interior amenities for the residents (fitness centers and community gathering spaces) as well as extensive outdoor recreational areas and on-site parking. The new building to be constructed facing Shelton Avenue will also include two retail spaces.

As stated above, the Project is 100% affordable. Occupancy will be restricted to residents whose income is at or below 60% of the Area Median Income, and a minimum of 20% of the units will be set aside for tenants whose Area Median Income is 50% or below. Additionally, the Project will be subject to the City’s Inclusionary Zoning Ordinance.

The existing IH zone in which the Shelton Avenue Properties are currently located does not permit residential development. Elm City Lofts seeks to rezone the Shelton Avenue

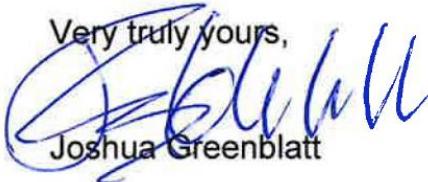
President Tyisha Walker-Myers
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Properties to the RH-2 District, which is the zoning district immediately to the south of 71 Shelton Avenue on which the Axis 201 project is located (201 Munson Street).

This Petition complies with the requirements of Section 64(d)(2) of the Zoning Ordinance for a map change as well as the Charter requirements for a zoning amendment, as set forth in the attached Petition.

Finally, it should be noted that the Project will create both permanent and construction jobs and generate taxes as well as significant building permit fees.

For all of these reasons, we urge approval of this Petition. Enclosed please find a check for the filing fee in the amount of \$1,500.

Very truly yours,

Joshua Greenblatt

Enclosures

cc: Laura Brown, Executive Director of the City Plan Department (*VIA Hand-Delivery*)
Arlevia Samuel, Deputy Administrator of Housing and Development (*VIA Email*)
Mark Wilson, Manager of Neighborhood and Commercial Development (*VIA Email*)
Catherine Schroteter, Deputy Director of Administrative Services (*VIA Email*)

Attachment A: Petition for Zoning Map Amendment

Attachment B: Proposed Ordinance for Zoning Map Amendment

Attachment C: Existing and Proposed Zoning Maps

Attachment D: Legal Description of Parcels to be Released

ATTACHMENT A

CITY OF NEW HAVEN BOARD OF ALDERS

In re: Petition to Amend the New Haven Zoning
Ordinance Map to Change the Zoning Designation
of 71 Shelton Avenue and 89 a/k/a 91 Shelton
Avenue from Industry H District – Heavy Industry (IH)
to Residential General High Density District (RH-2)

PETITION TO AMEND THE NEW HAVEN ZONING ORDINANCE MAP TO CHANGE THE DESIGNATION OF 71 SHELTON AVENUE AND 89 A/K/A 91 SHELTON AVENUE FROM INDUSTRY H DISTRICT – HEAVY INDUSTRY (IH) TO RESIDENTIAL GENERAL HIGH DENSITY DISTRICT (RH-2)

Pursuant to 1925 Special Act No. 490, § 5, Article IV, §§ 3, 4 and 5, Article XIII § 2 of the Charter of the City of New Haven, and § 64(d)(1) of the Zoning Ordinance of the City of New Haven (the "Zoning Ordinance"), Petitioner, Elm City Lofts, LLC ("Petitioner"), hereby petitions the Board of Alders of the City of New Haven to amend the Zoning Ordinance Map to change the designation of 71 Shelton Avenue (Map/Block/Parcel 284/0392/0010) and 89 a/k/a 91 Shelton Avenue (Map/Block/Parcel 284/0392/02700)(collectively the "Shelton Avenue Properties") from Industry H District - Heavy Industry (IH) to Residential General High Density District (RH-2).

In support of this Petition, Petitioner represents as follows:

1. The Shelton Avenue Properties were originally part of the Winchester Repeating Arms Company factory complex. A five-story mill building that was built in 1915 is located on the 89 a/k/a 91 Shelton Avenue property. The mill building is only partially occupied by commercial nonindustrial uses and is in a state of disrepair. The 71 Shelton Avenue property is vacant.

2. The Petitioner wishes to develop a 240 unit affordable housing project on the Shelton Avenue Properties to be known as Elm City Lofts ("Elm City Lofts" or the "Project"). Environmental remediation has been performed on the Shelton Avenue Properties, and the Petitioner will undertake additional environmental work so that the Shelton Avenue Properties can be occupied for residential use.

3. The 125,000 square foot mill building that is currently located on 89 a/ka 91 Shelton Avenue will be rehabilitated to its original configuration, and the windows and other features of the building will be restored in accordance with the National Park Service Guidelines for Historic Restoration. The Petitioner is applying for federal and state historic tax credits for the rehabilitation of this building. The mill building will house 96 apartments on five floors and provide tenant amenities on the first floor.

4. Two new buildings will be constructed on the 71 Shelton Avenue property. The new building to be constructed closest to Shelton Avenue will include 60 apartments, tenant amenities and two retail spaces that will face a small outdoor plaza fronting on Shelton Avenue.

5. The other new building on 71 Shelton Avenue will be constructed adjacent to the Farmington Canal Greenway and will contain 84 apartments as well as tenant amenity spaces.

6. Three hundred and four (304) parking spaces will be provided as part of the Elm City Lofts Project; some of which will be located in garages under the buildings.

7. The Project will provide significant outdoor recreational space for the residents of the Project, which may include a garden, a playground, a plaza, a fire pit, and grills.

8. Studios, one bedroom units and two bedroom units will be offered at Elm City Lofts. All of the units will be set aside for residents whose income is 60% or below the Area Median Income as established for the New Haven area by the United States Department of Housing and Urban Development, and a minimum of 20% of the units will be restricted to tenants whose income is 50% or below the Area Median Income. Additionally, the Project will be subject to the City's Inclusionary Zoning Ordinance.

9. The City recently adopted a new Comprehensive Plan of Development known as Vision 2034. Vision 2034 notes that New Haven is "facing a severe affordable housing crisis" and that as of 2023, half of households in New Haven spend 30% or more of their annual income on housing related costs. Vision 2034 reports that throughout most of New Haven, less than 10% of homes are affordable for families earning 50% of the area median income or less. Vision 2034 lists as its Goal 2 to "Increase housing supply" and states as one of the strategies to accomplish this goal, Strategy 2.3, which reads "[a]mend ordinances and policies to better support housing development." This Petition for a map amendment to rezone the Shelton Avenue Properties to the RH-2 District to enable the development of 240 units of affordable housing directly implements Strategy 2.3.

10. Vision 2034 also lists as its Goal 4 "to [t]ransform empty and run-down properties into affordable housing and other community resources." Petitioner's plans to rehabilitate the mill building on 89 a/ka 91 Shelton Avenue and to construct two new apartment buildings on 71 Shelton Avenue, which is currently empty, directly advances Goal 4 of the Comprehensive Plan of Development.

201 residential development, which is comprised of 398 dwelling units, is located at 201 Munson Street on approximately 13 acres.

12. 201 Munson Street had also historically been part of the Winchester Repeating Arms Company factory complex and was zoned in 2018 from the IH District to the RH-2 District to permit residential development.

13. This Petition seeks to extend the RH-2 District immediately north from 201 Munson Street to include the Shelton Avenue Properties and thereby enable the development of the Elm City Lofts Project.

14. This request for a map amendment complies with the requirements for a zoning amendment under § 64(d)(2) of the Zoning Ordinance. A map amendment is needed because the Shelton Avenue Properties were zoned IH many years ago and heavy industrial uses have not been present on the Shelton Avenue Properties for many years. The IH zoning is no longer appropriate for the Shelton Avenue Properties, which are surrounded on two sides by residential uses and residential zoning districts. Accordingly, the requested map amendment is required because changes have taken place in the City, in the patterns of land use, in the supply of land and in its peculiar suitability for residential use, which makes the requested map amendment appropriate under § 64(d)(2) of the Zoning Ordinance.

15. Additionally, in compliance with § 63(d)(2) of the Zoning Ordinance, no negative effect of the requested map change on the surrounding area is anticipated, because the surrounding area is largely residential and zoned RH-2 or another residential district.

16. As stated above, the map amendment being sought in this petition furthers the purposes of the City's Comprehensive Plan of Development and the

Comprehensive Plan as required by § 63(d)(2) of the Zoning Ordinance and Article XIII, §2C of the City Charter. This petition seeks to extend an adjacent zoning district, the RH-2 District, to the Shelton Avenue Properties, so that the requested map amendment is in accord with the City's Comprehensive Plan (i.e. its other zoning districts and maps). Moreover, other zoning districts have been considered for the Shelton Avenue Properties, as required by § 63(d)(2) of the Zoning Ordinance, including the IH District, which is not appropriate for the Shelton Avenue Properties because the IH District does not permit residential use, and a possible Planned Development District, which is not necessary because the Elm City Lofts project can be developed in accordance with the requirements of the adjacent RH-2 District. Finally, the size of the area involved in this Petition is 5.032 acres, which is in excess of the minimum required acreage for a zoning map amendment under § 64(d)(2)c of the Zoning Ordinance.

17. As also required by Article XIII § 2C of the City of New Haven Charter, this Amendment is designed to lessen congestion in the streets, secure safety, promote health and the general welfare, provide adequate light and air, prevent the overcrowding of land, avoid undue concentrations of population, provide adequate provisions for transportation and other public requirements, reflect the character of the applicable zoning district and its peculiar suitability for the uses to be allowed in such district, conserve the value of existing buildings, and encourage the most appropriate use of land in the City.

18. As additionally required by Article XIII § 2B of the City of New Haven Charter, the proposed Amendment is uniform for each class of buildings or structures throughout the RH-2 District.

WHEREFORE, Petitioner requests that the Board of Alders amend the Zoning Map in the manner set forth in Attachment C, page 2.

Respectfully submitted

Petitioner

Elm City Lofts, LLC



By: Joshua Greenblatt

ATTACHMENT B

ZONING ORDINANCE MAP AMENDMENT APPROVING A CHANGE IN THE DESIGNATION OF 71 SHELTON AVENUE AND 89 A/K/A 91 SHELTON AVENUE INDUSTRY H DISTRICT – HEAVY INDUSTRY (IH) TO RESIDENTIAL GENERAL HIGH DENSITY DISTRICT (RH-2)

WHEREAS, pursuant to 1925 Special Act No. 490 §5, Article XIII §2 of the Charter of the City of New Haven, and § 64(d)(1) of the Zoning Ordinance, City of New Haven (the "Zoning Ordinance"), Elm City Lofts, LLC ("Petitioner") filed with the New Haven City Clerk for transmission to the Board of Alders a Petition (the "Petition") requesting that the Board of Alders amend the New Haven Zoning Ordinance Map (the "Zoning Map") to indicate that 71 Shelton Avenue and 89 a/k/a 91 Shelton Avenue located in the Newhallville section of New Haven, which property is to be conveyed to the Petitioner and is currently located in the Industry H District – Heavy Industry (IH), be designated on the Zoning Map as being located in the Residential General High Density District (RH-2) (the "Map Amendment"); and

WHEREAS, on _____, 2026 pursuant to the City of New Haven Charter and the Zoning Ordinance, the Board of Alders referred the Petition to the New Haven City Plan Commission for a public hearing and for their advice; and

WHEREAS, on _____, the City Plan Commission following its public hearing rendered an advisory report to the Board of Alders after considering the factors set forth in § 64(d)(2) of the Zoning Ordinance recommending _____ of the Petition, City Plan Commission Report No. _____; and

WHEREAS, following the public hearing of the Board of Alders Legislation Committee on _____, the Committee issued a _____ report; and

WHEREAS, the Board of Alders finds that the Map Amendment to the Zoning Ordinance requested in the Petition is in accordance with the Comprehensive Plan of Development and the Comprehensive Plan for the City of New Haven as such Amendment will facilitate the development of affordable housing, a priority of Vision 2034, the City's Comprehensive Plan of Development, and will extend an existing adjacent zoning district; and

WHEREAS, the Board of Alders further finds that the Map Amendment to the Zoning Ordinance requested in the Petition is designed to lessen congestion in the streets, secure safety, promote health and the general welfare, provide adequate light and air, prevent the overcrowding of land, avoid undue concentrations of population, provide adequate provisions for all forms of transportation and other public requirements, reflect the character of the applicable zoning district and its peculiar suitability for the uses to be allowed in such district, conserve the value of existing buildings, and encourage the most appropriate use of land in the City; and

WHEREAS, the Board of Alders further finds that the Map Amendment to the Zoning Ordinance requested in the Petition is uniform for each class of buildings or structures within the RH-2 district and exceeds the minimum size required for a map amendment..

NOW THEREFORE BE IT ORDAINED by the Board of Alders of the City of New Haven that the Petition of Elm City Lofts, LLC for an Amendment to the Zoning Map to designate 71 Shelton Avenue and 89 a/k/a 91 Shelton Avenue from

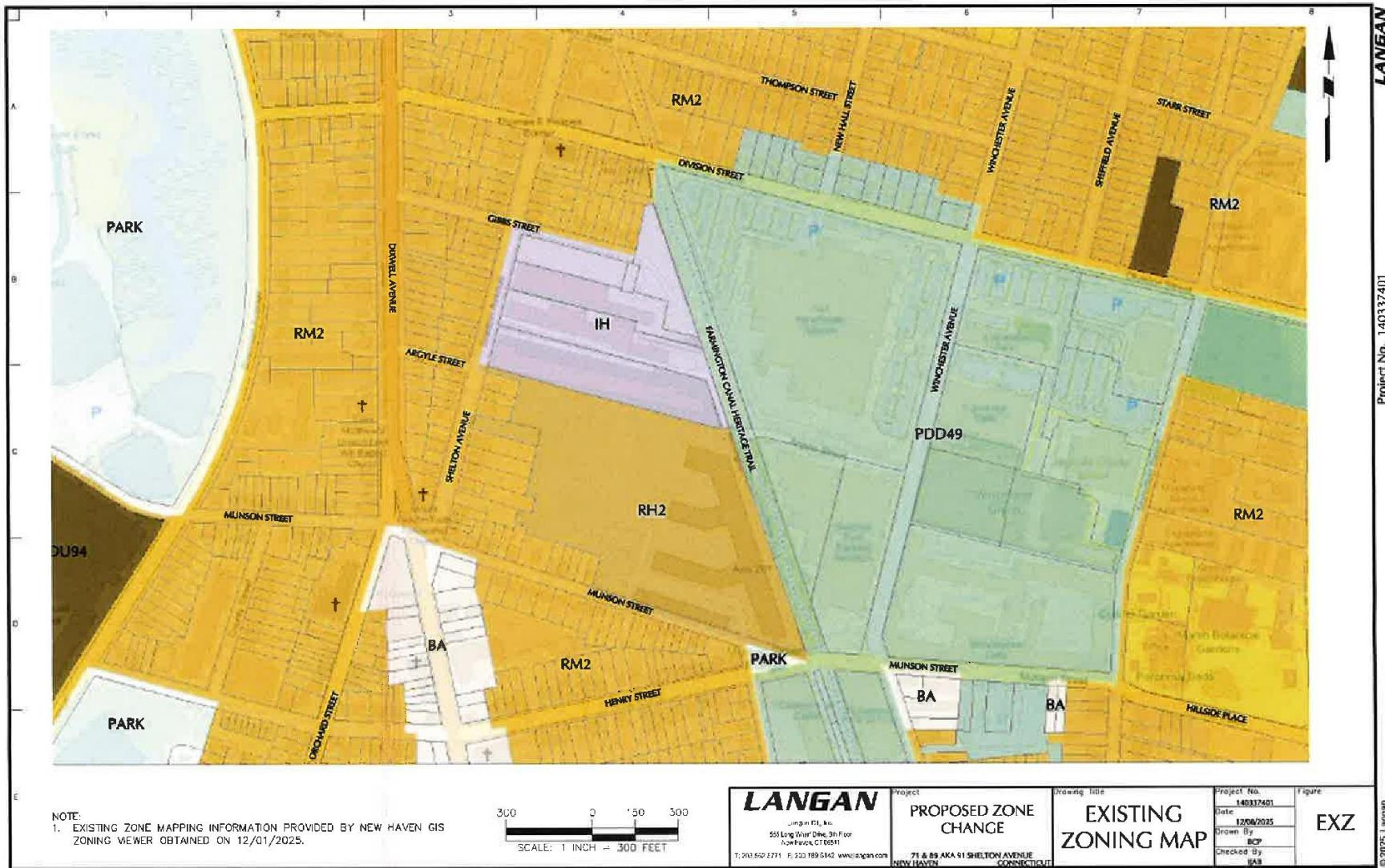
Industry H District – Heavy Industry (IH) to Residential General High Density District (RH-2) is granted and the Zoning Map shall be amended to designate 71 Shelton Avenue and 89 a/k/a 91 Shelton Avenue as being located in RH-2 District. This Ordinance shall be effective on the day after the date of publication of notice of the adoption of this Ordinance.

Signed

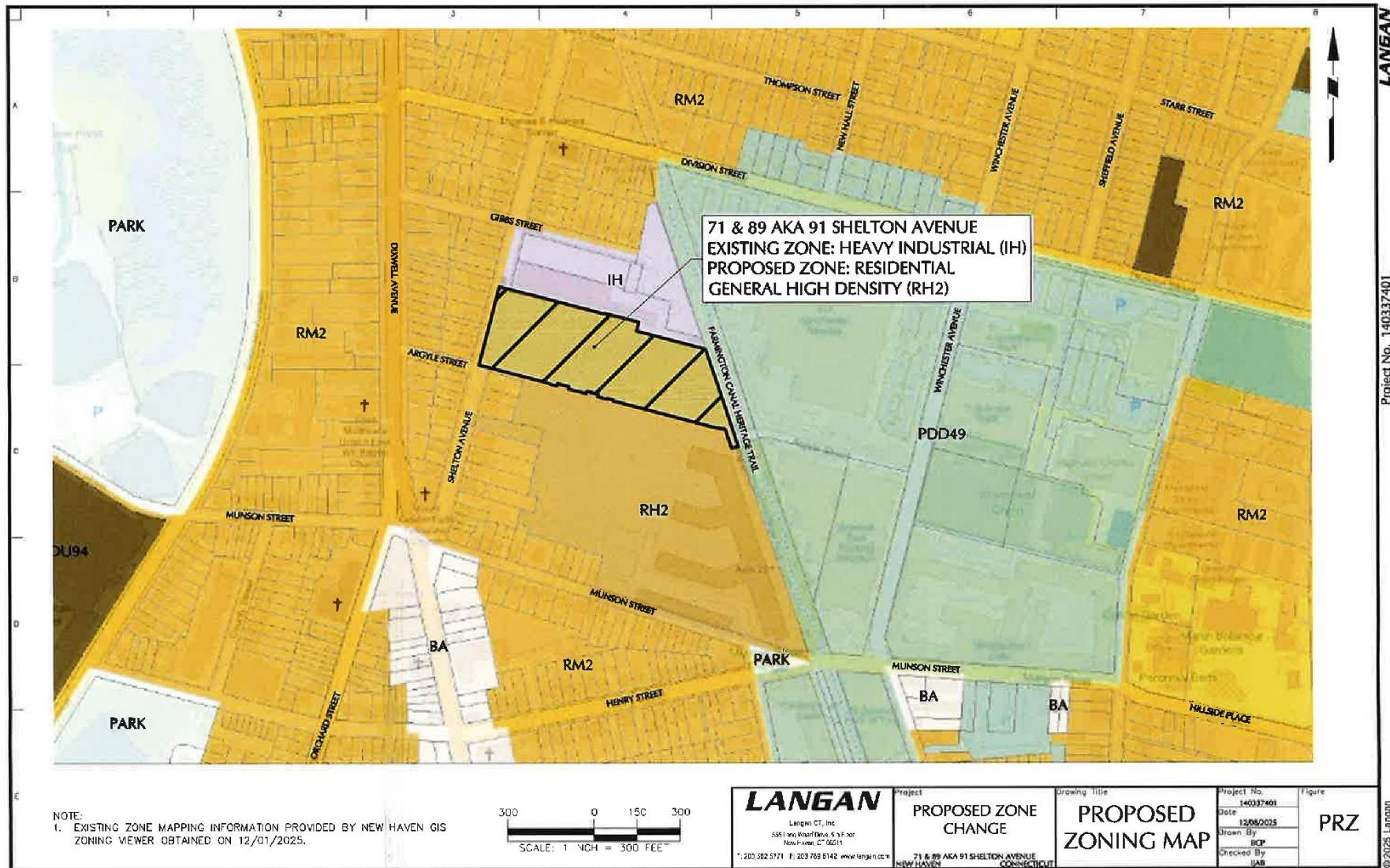
Date

ATTACHMENT C

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ATTACHMENT C
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ATTACHMENT D



Technical Excellence
Practical Experience
Client Responsiveness

December 5, 2025
140____01

ZONE CHANGE DESCRIPTION IH TO RH2

Beginning at a point marking the centerline of Shelton Avenue, said point being 224 feet more or less southerly from the intersection of Gibbs Street and Shelton Avenue;

Thence running southeasterly in part through the Shelton Avenue and in part along the northerly boundary line of land now or formerly of The New Haven Business Center, LLC a distance of 505 feet more or less to a point;

Thence running southwesterly along the easterly boundary line of land now or formerly of The New Haven Business Center, LLC a distance of 32 feet more or less to a point;

Thence running southeasterly along the northerly boundary line of land now or formerly of The New Haven Business Center, LLC a distance of 248 feet more or less to a point on the westerly side of the Farmington Canal Trail;

Thence running southeasterly along the westerly boundary line of the Farmington Canal Trail a distance of 360 feet more or less to a point;

Thence running southwesterly along the southerly boundary line of land now or formerly of The New Haven Business Center, LLC a distance of 25 feet more or less to a point;

Thence running northwesterly along the westerly boundary line of land now or formerly of The New Haven Business Center, LLC a distance of 70 feet more or less to a point;

Thence running northwesterly in part along the southerly boundary line of land now or formerly of ZYS Development LLC and in part through Shelton Avenue a distance of 923 feet more or less to a point in the centerline of Shelton Avenue;

Thence running northeasterly along said centerline of Shelton Avenue a distance of 283 feet more or less to the point of beginning.