

Testimony by the New Haven Preservation Trust

Legislation Committee, New Haven Board of Alders

April 2, 2024

My name is Michael Waters and I am resident of Ward 1, and I am here tonight on behalf of the New Haven Preservation Trust, with offices located at 922 State Street. The mission of our organization is to rally our diverse city to embrace and champion its historic places and spaces, and we aim to be an example of how historic preservation can be a relevant force for economic, social, and cultural progress for everyone.

The Preservation Trust wholeheartedly supports the development of more affordable housing in New Haven. Along with its residents and institutions, historic buildings and neighborhoods make the City an appealing place to live and work. We are confident that Accessory Dwelling Units can co-exist with the City's architectural heritage and also deter the destruction of historic structures.

The current ADU zoning recognizes that Local Historic Districts require different treatment. The Preservation Trust urges your honorable committee to recognize, as other cities have done, that ADUs in State and Federal historic districts also need to be specifically addressed.

There are 19 National Register Historic Districts and 6 State Historic Districts in New Haven. Within these districts, approximately 6,000 properties have designations.

There are two ways that these historic designations and ADUs intersect.

First, the City is a Certified Local Government (CLG) under the National Historic Preservation Act of 1966. This status is conferred to enhance the role of local governments in historic preservation. As a CLG, the City acknowledges responsibility for the protection of properties with historic designations.

Second, under the New Haven's current Vision 2025 comprehensive plan, three key policies apply. These elements are so important that we encourage the continuation of them in the upcoming 2034 plan. Specifically, in this document the City pledges to:

- Maintain the City's status as a Certified Local Government and utilize available funding streams.
- **Adhere to a preservation-based philosophy** to ensure high quality efforts across a broad spectrum of uses.
- Educate property owners about Secretary of Interior's design standards for all renovations/new constructions proposed within the historic districts.

The Comprehensive Plan affirms the use of the Federal Secretary of the Interior's Standards, which recommends that *"new additions should be designed and constructed so that the character-defining features of the historic building, its site, and setting are not negatively impacted."*

In order to **adhere to a preservation-based philosophy**, the Preservation Trust urges your Honorable Board to adopt special guidelines for ADUs on properties with State and Federal historic designations.

We note that the City's ADU Toolkit already states that: *"ADUs can provide more housing for the growing population without disrupting the historic look of neighborhoods."*

The Preservation Trust strongly supports this statement and recommends the following amendments to the current proposed text to further this aim.

- **For each ADU application, the building permit shall state if the primary structure is listed individually on the National or State Register of Historic Places or is a contributing structure in a State or National Historic District. Such buildings shall be referred to in this section as Historic Properties.**
- **To accommodate possible projecting or overhanging architectural features, no part of a new detached ADU shall be closer than 15' to the exterior of a Historic Property.**
- **ADUs attached to a Historic Property shall be compatible in size, scale, and materials with the primary structure. To ensure the property's historic integrity, the connecting wall of the ADU shall be built so as to cover (not remove) the existing exterior walls and architectural features of the primary structure.**
- **To retain the character of the Historic District, no part of a new attached or new detached ADU shall project beyond the street façade wall(s) of a Historic Property.**

We respectfully ask your Honorable Committee to add these four terms to the proposed ADU zoning language before it is acted upon by the full body.

Thank you very much.