

Memorandum of Findings

To: David Waters, Building and Land Technology (BLT)
From: Francisco Gomes, Fitzgerald & Halliday Inc. (FHI)
Date: 3/11/20
Re: Review of BLT Development Proposal at Glover Avenue

Purpose

Building and Land Technology (BLT) requested that Fitzgerald & Halliday (FHI) review their proposed development project on Glover Avenue in Norwalk, CT for consistency with best planning and design practices and Norwalk's Citywide Plan: 2019-2029.

Background

BLT's proposed development includes multiple mid-rise multifamily residential buildings located on the west side of Glover Avenue immediately west of the Merritt 7 corporate park and the Merritt 7 Metro-North Station. Ground floor retail space is proposed in three of the buildings in proximity of the Merritt 7 Station. Parking is proposed within structured parking facilities at the base of the residential structures. Parking structure roofs are proposed to be occupied by functional open space and green spaces.

The development site is comprised of several parcels which are currently occupied by a low intensity of light industrial, commercial and office uses, large parking areas, and vacant land.

The project spans three of Norwalk's zoning districts. Most of the proposed project area is zoned Business 2 (B2). The purpose of the B2 zone is to permit retail stores, service shops, mixed-use development, artist workspace and other compatible uses at a scale appropriate to the commercial, employment and housing needs of this city. The northernmost development parcel is located within the Executive Office zone (EO). The purpose of the EO zone is to permit major office buildings and other compatible uses which will contribute to the economic base of the city and will constitute a harmonious and appropriate part of the physical development of the city. The project also includes land purchased from the State of Connecticut's Route 7 right-of-way. That land is zoned AAA Residence. This zone encompasses the entire Route 7 corridor; the purpose of this zone is to provide areas for single-family dwellings and other compatible uses on large lots. Its application to the Route 7 corridor suggests that the City intended to exercise a high measure of control over the Route 7 corridor should state-owned properties be redeveloped.

Findings: Planning and Design

The best planning and design practices in an urban setting seek to provide a mixture of uses such as residential, retail, office, open space, etc. within proximity of one another to maximize walking and bicycling trips and minimize automobile trips. The location of mixed-use development in walking distance of transit is also a best practice referred to as transit-oriented development. Mixed-use and transit-oriented development have been at the forefront of progressive urban planning for more than two decades.

The proposed development will provide 1,303 housing units and 27,865 sf of retail space. A total of 2,154 parking spaces are proposed, almost entirely within structured parking. This parking resource will also serve the Merritt 7

Station, providing a minimum of 83 spaces for rail commuters. Additional parking capacity could be used to accommodate demand from The Towers at Merritt on the River and possibly the Merritt 7 Corporate Park. While the project is expected to have a lower daily demand on the automobile for commuting trips and errands versus other development types, residents are still likely to own vehicles at rates that are comparable to the region.

The project is a transit-oriented development which includes housing within a five-minute walk of the Merritt 7 Station. The project is located immediately north of The Towers at Merritt on the River and west of the Merritt 7 Corporate Park. These office parks are home to more than 7,000 jobs¹. By contrast, this area has only 211 residents with only 12 people both living and working within the area¹. The colocation of housing, retail, the existing corporate parks, and the train station is likely to attract existing commuters to the corporate parks and station (approximately 6,000 of the corporate parks' workers commute from outside of Norwalk¹). The project, as planned, places emphasis on bicycle and pedestrian connectivity and functional open space. As such, a significant share of residents are likely to make commuting and other daily trips via non-automobile modes of travel. This reduces the amount of automobile traffic that the development would generate if not co-located with transit, retail, and employment.

With respect to land use, the project provides a transitional use between low and mid-density residential development on Oakwood Avenue and the Merritt 7 Corporate Park. The project includes a proposal for a pedestrian connection between Oakwood Avenue and the Merritt 7 Station. The project also proposes construction of a pathway that could accommodate and/or connect to the Norwalk River Valley Trail.

Findings: POCD Review

FHI conducted an extensive review of Norwalk's Citywide Plan: 2019-2029 including a review of the Plan's vision and recommended policies, goals, strategies, and actions. **We find the proposed development to be highly supported by, and consistent with, the Plan.**

The Plan describes a vision for Norwalk as a place with a dynamic economy, varied housing choices, and opportunities for bicycling and walking. Fiscal and economic impact studies conducted by the City are referenced in the Plan, these studies have found that residential and commercial development has had a significant positive fiscal and economic impact in Norwalk. The Plan references a school system facilities plan that has found that apartment projects constructed over the last decade do not have major impact on school enrollment projections. The Plan also references sections of RPA's Forth Regional Plan and WestCOG's Long Range Transportation Plan that are supportive of transit-oriented and mixed-use development.

The Plan provides multiple specific references to the Merritt 7 area as a location that is desirable for the development of mixed-use and transit-oriented development. The Plan's Future Land Use Map identifies the project area as a Mixed-Use Center. The Plan also provides extensive support for the development of multifamily housing and the provision of housing options. The Plan emphasizes the need for a more balanced and comprehensive transportation system. The proposed development is aligned with this need considering its location within walking distance of the Merritt 7 Station and the proposal for sidewalks and pathways throughout the project area and connecting to the Norwalk River Valley Trail.

The Plan does include content relative to concerns about traffic congestion and environmental issues that present a potential conflict with the Plan's recommendations for mixed-use development and the expansion of housing. The primary point of conflict presented by the proposed development (and other development in Norwalk) is the traffic impact of development. This impact is mitigated by the proposed development's location in proximity to the Merritt 7 Station and the Merritt 7 Corporate Park, and the provision of sidewalks and pathways within the development that connect to the city's network. The project will also provide local roadway and intersection improvements as a means of mitigating the local traffic impacts. Other points of conflict surround environmental

1. US Census LEHD Origin-Destination Employment Statistics (LODES), 2015 data, onthemap.ces.census.gov

issues related to development such as stormwater runoff and urban heat island effect. It should be noted that the existing project area is comprised of multiple buildings and paved parking areas that do little to mitigate against these effects. The proposed development will present an opportunity to employ Low Impact Development (LID) techniques such as green roofs and pervious pavements that can mitigate these effects and potentially improve upon the existing conditions.

The proposed development requires the modification of zoning in the project area. The Plan supports revision of Norwalk's zoning ordinance to promote desired development.

POCD References

Below are multiple references from Norwalk's Citywide Plan: 2019-2029 that support our findings.

Plan Vision

The Plan provides a vision for Norwalk including the following statement:

- *“By 2029, the City of Norwalk has become a national example of a small city that boasts a thriving and dynamic economy; varied housing choices for all income levels; many safe and convenient ways to get around the city, including walking and biking; connected, accessible and beautiful open spaces; an active and resilient coastline; and the highest levels of public safety and emergency services. Norwalk is the center of art, culture and entertainment for our region. We combine the character of a historic New England community on the coast of Long Island Sound with a thriving city in the county's largest metropolitan area.” (p.10)*

Fiscal and Economic Impact Findings

The Plan documents the following findings:

- *“A 2016 fiscal and economic impact analysis of redevelopment projects analyzed seven redevelopment projects containing 1,149 housing units and 250,000 sq ft commercial. It concluded that, over the ten-year period from 2005 to 2014, these projects generated a current net new benefit of \$3.68 million annually and a ten-year cumulative total of \$18.12 million, accounting for both net new annual property tax levies (revenue) and public service burdens (costs). 625 new jobs are directly attributable to these projects and another 370 new jobs were “induced” by new resident spending.” (p.20)*
- *“Analysis for the school system facility plan found that the apartment projects built and permitted over the last decade do not have a major impact on ten year enrollment projections.” (p.68)*

Plan Content Specific to the Merritt 7 Area

- The Plan states that: *“The Merritt 7 area on Main Ave and Glover Avenue is critical to the economic and fiscal (tax revenue) success of Norwalk, and its continued vibrancy must be a priority for the city.” (p.17)*
- The Plan states that: *“Norwalk's recent growth is a function of the multifamily development in the city's urban core and Merritt 7 area, and of immigration. The residential development has provided new tax income (and will provide more with the sunset of tax incentives) and has attracted young professionals and empty-nesters to live in the city. It has created a foundation for the revitalization of Norwalk's urban core.” (p.20)*
- The Plan identifies the Merritt 7 area as an opportunity for transit-oriented development (TOD) and acknowledges the expansion of residential development in this area:

- *“Recognizing that the suburban office park model has lost its luster in comparison to walkable urban districts, the owners have been investing in interior and exterior renovations and new amenities. Approximately 1,000 apartments nearby and amenities such as a bike route connected to the NRVT will create a transit-ready center.” (p.18)*
- *“The State in 2017 funded a new Merritt 7 station with a footbridge, a raised platform and an expanded shelter that will serve employees in the office buildings as well as residents in apartments on Glover Ave and adjacent to Merritt 7.” (p.18)*
- The Plan acknowledges that there are *“multiple competing priorities for economic development, which makes it difficult to be fully successful at all of them”* including *“strengthening the Merritt 7 area as a live-work ecosystem with better rail transit”*. (p.49)
- The Plan recommends actions such as: *“Advocate for increased service on the Danbury Line to support improvements to the Merritt 7 station and reopening of a Wall Street station.” (p.205, 295)* The addition of housing and expansion of population in this area will provide additional demand and support for increasing service.

Future Land Use

- The Plan states that *“Healthy, vibrant cities are constantly evolving in big and small ways to remain desirable by meeting changing demands. In healthy cities, new uses emerge, old buildings are renovated and repurposed, and new buildings are built.” (p.223)*
- The Future Land Use Map (p.240) identifies the project area as a *“Mixed Use Center”*.
 - *Mixed Use Centers are defined in the Plan as: “Medium- to high-density office, residential, retail, hotel, and entertainment areas that create vibrant 18-hour, 7-day-a-week live-work-play-learn environments. Small scale boutique manufacturing, clean tech, and artisan space are also allowed uses provided they meet performance and design standards. Accessible by transit (bus and train) as well as by pedestrians and bicyclists. Walkability improvements should be integral to all development proposals.” (p.238)*
- The Future Land Use Policy Map (p.236) identifies the project area as an *“Activity Center”*. These areas are characterized by a mixture of uses located within walkable areas near transit.
- The Future Land Use Plan Policy Map is described within the Plan as identifying key land use issues and changes that emerged from the recommendations of other master plan elements. This includes the following elements, the last of which demonstrates the Plan’s intent to shift industrial uses away from residential areas and rail stations:
 - *“Support for major walkable mixed-use centers in Wall Street/West Avenue, SoNo, and Merritt 7 employment centers. These areas are transit-served and could support additional walkable mixed-use development with more residential growth and density.” (p.235)*
 - *“Transformation of underutilized industrial areas near transit into walkable mixed-use neighborhoods that leverage existing assets.” (p.235)*
 - *“Concentration of industrial uses in a few major locations such as parts of South Norwalk separate from residential neighborhoods and along rail tracks (and further from stations)” (p.235)*
- The Plan identifies the following policies in support of goals for future land use, urban design, and zoning:
 - *“Implement transit-oriented design (TOD) principles promoting density, walkability, and mix of uses for development near transit stations (rail and high-frequency bus).” (p.241)*

- *“Support revision of the zoning ordinance to promote desired development and design patterns.” (p.248)*

Housing

- The Housing Choice & Healthy Lifestyle section of the Plan states the following:
 - *“The multifamily housing development over the last decade in SoNo, Norwalk Center, and the Merritt 7 area is helping to enhance or create mixed-use activity centers valued by businesses because they attract employees. These live-work-play centers bring young adults to Norwalk and provide local options for empty-nesters who want to downsize.” (p.68)*
- The Plan identifies the following policies supporting housing goals:
 - *“Support housing policies that provide housing for Norwalk’s households across a range of preferences and household incomes.” (p.73)*
 - *“Support housing policies that promote higher-density housing near existing and future employment centers and availability of public transportation.” (p.60,73)*
- The Plan identifies the following strategy in support of its housing goals:
 - *“Promote diverse housing types, such as townhouses, condos, live-work units, and rental apartments in Norwalk’s urban core, at transit-oriented locations and in mixed-use clusters on major corridors, in village districts when appropriate, and through redevelopment.” (p.76)*
- The Plan identifies the following action item in support of the above strategy:
 - *“Continue to encourage the development of vibrant transit-oriented districts within walking distance of the South Norwalk, East Norwalk, and Merritt 7 train stations. Housing near transit is important for Norwalk’s economic development and revitalization goals.” (p.76)*

Transportation & Mobility

- The Transportation & Mobility section of the Plan identifies the following principle:
 - *“Connect people and places. Provide safe and efficient transportation choices, including pedestrian, bicycle, and transit opportunities, along with well-maintained streets, to connect people to each other, to city destinations and the region.” (p.184)*
- The Plan also includes the following statements regarding transportation and mobility:
 - *“Mixed-use neighborhoods provide opportunities for even those without convenient transit access to also reduce car trips by multiple destinations in one stop. By placing housing, jobs, shopping, dining, and entertainment in close proximity and connected by safe, attractive sidewalks and an engaging public realm, the number of short local car trips can be reduced.” (p.193)*
 - *“Transit-oriented development (TOD) can reduce car trips by focusing mixed-use development near high-frequency transit stations, usually rail but sometimes frequent bus routes (especially bus rapid transit, known as BRT). Due to its proximity to convenient transit, more people are likely to use it and not need a car on a daily basis. TOD features higher densities closest to the station, reduced parking requirements, and an emphasis on creating an inviting public realm and pedestrian environment.” (p.193)*

- The Plan identifies the following goals in support of transportation and mobility:
 - *“Norwalk has a comprehensive and balanced transportation system, with safety and multimodal accessibility the top priority of citywide transportation planning.” (p.184,195)*
 - *“Norwalk advocates for improvement of regional transportation connections—including regional trails, traffic flow on regional routes, and commuter rail—to reduce traffic congestion, pollution, and greenhouse gas emissions.” (p.184,205)*
- The Plan identifies the following actions in support of transportation and mobility goals and strategies:
 - *“Make land use decisions that support walking, bicycling, and public transit use. Incorporate multimodal considerations into comprehensive land use policies to guide decision-making.” (p.196)*
 - *“Maintain and enhance existing trails and footpaths. Invest in sidewalk repairs and consider adding new sidewalks or walking paths in consultation with residents. Prioritize completing the Harbor Loop and Norwalk River Valley Trail.” (p.198)*

Prosperity and Opportunity

The Prosperity and Opportunity section of the Plan identifies the following opportunities:

- *“Residential development reinforces business development in transit-served locations. Transit-oriented development (TOD) starts with multifamily and mixed-use development to provide employee housing near transit and urban amenities.” (p.18)*
- *“Continue implementation of transit-oriented development (TOD) and a range of mixed-use opportunities for sustainable live/work/play communities in the city.” (p.57)*

Regional Plans

The Plan references the following regional plans:

- *The focus of the [RPA Fourth Regional Plan] plan is on investment in transit and transit-oriented development as a way to reduce per capita energy consumption and greenhouse gas emissions and to support jobs and housing in downtowns and neighborhoods. (p.21)*
- *[WestCog's Long-Range Transportation Plan] emphasizes the connection between transportation, land use, and economic development, promoting efficient higher density and mixed use development which reduces congestion; support for increase transit use; and support for bicycle and transportation initiatives. (p.21)*

Potential Areas of Conflict

Development of the Glover Avenue site as proposed will require the relocation or discontinuance of existing commercial/light industrial uses at the site. The proposed development is a more intensive use of the site and will generate more traffic than existing uses and has potential to increase demand for City services. The proposed development also has environmental implications such as stormwater runoff and urban heat island effects that are addressed in the Plan. The Plan includes the following content that emphasizes concerns about traffic, demand for city services, and the value of industrial land uses:

Traffic

- *“Throughout the interview, focus group, and community input process, traffic congestion was consistently mentioned as a challenge to city and neighborhood quality of life and economic development in Norwalk. This includes growing highway congestion on major highway routes (I-95 and Merritt Parkway) which are*

critical for commuting and freight transportation (and which the city does not directly control), as well as internal roadway congestion on arterial roads when getting around Norwalk.” (p.17)

- *“Some residents who live outside the urban core have expressed concerns that the apartments have negative impacts on city infrastructure and services (such as traffic and schools), or that they will not be fully occupied.” (p.20)*
- *“Traffic concerns were frequently heard during the public outreach process: spillover traffic due to congestion on I-95, cut-through traffic in neighborhoods (especially during school drop-off and pick-up periods), and perceptions of increased traffic due to new residential and mixed-use developments downtown.” (p.189)*

Industrial Land

- *“The city should continue to reserve industrial land and seek out niche industrial opportunities to fit Norwalk’s strengths.” (p.19)*
- *“Many stakeholders would like to protect the remaining industrially-zoned property in Norwalk for new industrial activities.” (p.49)*

Environmental

- *“Although Norwalk is most at risk from flooding, increasing heat can have insidious effects. Extreme heat causes more deaths every year in the United States than hurricanes or floods. Urbanized areas have higher average temperatures than rural areas because of more impervious surfaces, more dark surfaces that absorb more solar radiation, less vegetation and evapotranspiration, and more energy use. This is the “urban heat island” effect.” (p.162)*