

**132 FLAX HILL LLC NARRATIVE DESCRIPTION OF
AMENDED TEXT CHANGE AMENDMENT AND SPECIAL PERMIT
APPLICATION**



I. Background¹

Workforce Partners, LLC, through one of its entities, 132 Flax Hill LLC (“Workforce Partners”), is the owner of approximately .23 acres of property located at 132 Flax Hill Road (the “Property”). The Property is located in the D Residential Zone and is listed on the local historic resources inventory.

The Property currently consists of a multifamily building in need of updating which contains 3 units. Workforce Partners would like to renovate and rehabilitate the historic existing structure and add two additional units by reconfiguring the interior of the existing home. Under existing zoning regulations, within the D Residential Zone, certain of the zoning requirements may be waived or modified to encourage preservation of historic structures – such as the home located at the Property. Unfortunately, as presently written, the regulation only applies to a small number of parcels located on larger lots whose minimum lot area is 12,000 square feet or larger. Therefore, Workforce Partners makes this special permit and text amendment application in order to eliminate the 12,000 sq. ft. lot

¹ This amended narrative amends Workforce Partners’ special permit and text change applications.

area requirement in Section 118-360 (B)(2)(y)(i) of the zoning regulations and to permit the proposed development.

II. Workforce Partners Promotes Housing in Norwalk For Its Workers

Workforce Partners is an owner-operator of workforce housing units. It purchases dilapidated properties in need of capital improvements, updating and modernization and then leases the revitalized units back at modest rents to the working class of Norwalk. It specializes in filling the housing gap for those that can't afford luxury market rate units but also don't qualify for affordable/deed restricted housing. Typical units owned by Workforce Partners are provided to those earning 60 to 100 percent of the average area median income. Rents are always discounted for everyday heroes including teachers, firefighters, police, EMTs, municipal employees and others.

Workforce Partners concentrates its operations in Norwalk where it owns numerous multifamily properties including, 204 Flax Hill, 30 West Ave, 50 Connecticut Ave., 138 Flax Hill Road, 35 Clay St. 104 and 143½ South Main St., 8 Union Ave., 21 Clinton Ave., 14 Bedford Ave. and 29 Ferris Ave.

III. The Proposed Improvements To 132 Flax Hill

The Property currently consists of a nearly 3,000 square foot 3-unit multi-family historical home. The applicant proposes to reconfigure the interior space of the home with smaller units and, thereby, increase the unit count from 3 units to 5 units. The increase in units will not require an expansion of the footprint or of any new structures being created.

The exterior of the historic home will be substantially restored. Most notably the front porch, posts and handrails will be reconstructed with period-appropriate elements and design. Additionally, Workforce Partners will install new windows and make substantial

ADA improvements to make the structure handicap accessible. Additionally, the unsightly fire escape will be removed and the home will be sprinklered. See attached Civil Plans, Architecturals and narratives from Todd Bryant and Crosskey Architects.

An existing garage will be removed and new parking and drive aisles will be installed allowing for 6 parking spaces onsite (including 1 handicap vehicle space). Recreation areas, including a picnic table, will be installed and the ¼ acre site will be extensively landscaped with trees, shrubs and perennials, grasses and groundcovers of various types. See attached Landscaping Plan.

The project will also include numerous drainage improvements. Currently there are no stormwater features at the site, no catch basins etc. Rain sheet flows to the back of the property or to Flax Hill Road where it enters the City's storm system. The drainage will be improved with a catch basin and stormwater infiltration chambers system resulting in decreases to the peak runoff rate and runoff volume. See attached Stormwater Management Plan.

A traffic impact study was performed by Tessera Engineering which, unsurprisingly, concludes that a mere 2 unit increase from a 3-unit home a 5-unit home will only result in 1 or 2 additional trips per day during peak hours and will not have a significant impact on traffic operations. See attached Traffic Impact Study.

We are pre-existing non-conforming with respect to lot width but compliant with all other regulations. Under the historic preservation regulation in the D Residence Zone Workforce Partners may seek from this Commission a waiver or modification of the minimum area or dimensional requirements (such as yard setback, buffer, width, or recreation area) or a reduction of parking requirements or increase in height, residential density or maximum building area. In this case, Workforce Partners seeks:

- (i) To maintain its existing nonconforming lot width – which requires a reduction from the minimum lot width under present regulations;
- (ii) A reduction from the required 200 sq. ft. per unit recreation area to 154 sq. ft. per unit recreation area (i.e a total reduction of recreation area by 231 sq. ft.)
- (iii) To eliminate the 5’ buffer strip required on all sides of the property;
- (iv) To reduce the required parking from 7 spaces to 6 spaces.

Notably, additional parking is available on-street, directly in front of the Property. This parking is not included in the proposed 6 spaces. The applicant is the owner of the adjacent parcel at 138 Flax Hill. As part of the reconfiguration of the parking and drive aisle at 132 Flax Hill a joint drive aisle will be created with 138 Flax Hill. This will result in a decrease in impervious area at 138 Flax Hill by 441 sq. ft. (which mitigates the reduction in recreation area at 132 Flax Hill.

IV. Text Change and Historic Preservation

A number of Workforce Partners’ properties contain historic structures. Workforce Partners values the historic architecture and believes these buildings contribute to Norwalk’s character. However, they are expensive to rehabilitate and were not designed with modern zoning regulations in mind. As a result, demolition is often more cost-effective than preservation. One way to make preservation cost-effective is to allow waivers of certain of Norwalk’s Zoning Regulations when historic structures are preserved. Workforce Partners has previously worked with the Historic Commission, Planning Commission and Zoning Commission to revise Norwalk’s regulations which allow for certain waivers or modifications of zoning requirements when historic structures are preserved. Last year, this Commission approved such regulation changes in connection with the revitalization of Workforce Partners’ property at 204 Flax Hill Road, shown here:



Original Mansion



Current Mansion



Proposed Mansion

Unfortunately, the revised regulations utilized at 204 Flax Hill Road only apply to the largest lots within the D Zone, those 12,000 square feet or larger even though the D Zone permits much smaller sized lots. The proposed text amendment would allow all lots less than 12,000 square feet to take advantage of the historic preservation waivers within the D Residence Zone.² Specifically, it is requested that the minimum lot requirement of 12,000 sq. ft. in Section 118-360 (B)(2)(y)(i) of the zoning regulations be eliminated, as set forth below.

- i. ~~the subject property has a minimum area of twelve thousand (12,000) square feet;~~

The Historic Commission has already considered a reduction from the existing 12,000 sq. ft. minimum and unanimously supported it. See attached minutes.

² There are 30 historic structures within the D Residence Zone that are located on lots less than 12,000 square feet. An inventory of these structures is attached.

V. The POCD and Assessment of the Text Change.

The 2019-2029 Norwalk Citywide Plan of Conservation and Development (“Norwalk POCD”) supports the proposed project and text change. Specifically, Chapter 6 of the Norwalk POCD sets forth the following goal: Norwalk protects its most important historic resources and encourages adaptive reuse of historic sites to maintain and enrich the city’s character. Norwalk POCD, Pg. 106. To achieve that goal, the Norwalk POCD sets forth the following strategies:

- Preserve the integrity and character of historic structures, historic landscapes, and cultural resources sites within the City of Norwalk.
- Develop a Historic Preservation Plan to establish policies, practices, and criteria for preservation of buildings and site important to the history of Norwalk.
- Revise zoning and development regulations to promote preservation and adaptive reuse of historic structures.

Norwalk POCD, Pg. 106-107. The proposed project and text change fulfills the goals of the Norwalk POCD by preserving historic structures located on smaller lots.

VI. The Project Meets All Norwalk’s Special Permit Criteria.

In addition, the application complies with the standards for special permit as set forth in § 118-1450 as follows:

- (a) Density of use and bulk of buildings. The density of use of the proposed building, as well as the bulk of the building, comply with Norwalk’s Zoning Regulations.
- (b) Stable Traffic Flow. As demonstrated by the traffic report of Tessera, the proposed construction - which increases the residential density from 3 units to just 5 units - shall not adversely affect traffic operations.

- (c) Availability of mass transit facilities. The South Norwalk Train Station is less than .5 miles (6-minute walk) from the Property. The Property is approximately 0.6 miles from an entrance ramp to I-95.
- (d) Availability and compatibility of utilities. The Property is served by city water and sewers.
- (e) Adverse impact from noise, odor, fumes, dust and artificial lighting. The proposed development - which increases the residential density from 3 units to just 5 units – will not cause any greater potential for noise, odor, fumes, dust, and artificial lighting than other developed properties in the immediate neighborhood and will not adversely impact those properties.
- (f) Size of signs and design that are in harmony with the neighborhood. No signage is proposed.
- (g) Adequacy of yards and open space, screening and buffering. Yards and open space, screening and buffering comply with Norwalk’s Zoning Regulations for the Residence D zone, except that historic relief from the required 5’ buffer and reduction of the recreation area are sought as part of the application
- (h) Impact on neighborhood properties, as compared to uses and structures permitted as a matter of right. The Residential D zone allows uses such as single and two-family dwellings and multifamily dwellings with less than 12 units as of right. Therefore, a multifamily property with 5 units permitted by Special Permit will have a similar, if not less, of an impact on neighborhood properties than many of the uses allowed as of right.
- (i) Existing land use in the area. The areas surrounding the property is generally developed multifamily residential homes.

- (j) Proximity of community facilities. Flax Hill Park is located just .3 miles away. Lockwood Matthews Mansion, Oyster Shell Park, Veterans' Park and the Maritime Aquarium area are all located within a 1-mile walk.
- (k) Compliance with the Zoning Code and POCD. The proposed uses comply with the Zoning Code and POCD. The proposed use addresses direct actions requested in the POCD as discussed above.
- (l) Conservation of wetlands, watercourses and other ecologically viable lands. There are no wetlands at the Property, and;
- (m) No zoning violation exists on the property. There are no known zoning violations on the property.

VII. Conclusion.

The proposed zoning amendment promotes historic preservation and should be granted. Upon granting of the zoning amendment, the application will comply fully with Norwalk's Zoning Regulations including all the Special Permit criteria. For all the reasons set forth herein, we respectfully request the Commission grant the zoning amendment and special permit application.

THE APPLICANT,
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