

Comments and Suggested Revisions for Milford POCD

| Commenter | Page # of Draft | Comment | Recommendations | Change Location |
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| Goman + York | | Milford's Zoning Regulations are large (397 pages), cumbersome, repetitive, and not very user friendly . | The plan should be updated to reflect this comment. | 74 |
| Goman + York | | The Zoning Regulations would benefit from a comprehensive updating: <ul style="list-style-type: none"> - eliminating duplication, - reorganize sections, - better naming and defining of uses, - utilizing tables for use and dimensional requirements, - reducing required parking requirements to account for modern utilization and consistency with best practices, and - to create swift, simple, and certain permitting processes to encourage investment. | The plan should be updated to reflect this comment. | 75 and 59 |
| Goman + York | | Permitted and Conditional Uses: Review use by district, create consistency in terminology, and evaluate permitted versus conditional uses reduce reliance on conditional uses. | The plan should be updated to reflect the need to create consistency in terminology. A zoning revision should evaluate the need to reduce reliance on conditional uses, where appropriate. | 75 |
| Goman + York | | Master Plan Overlay Zone (MPOZ): Adopt a Master Plan approach that favors redevelopment of existing sites and mixed use. <ul style="list-style-type: none"> - Favoring mixed use development as the preferred approach to the redevelopment of existing sites. - Connecticut Post Mall is the most suitable site for mater plan approach. | This recommendation is consistent with the plan's approach to encouraging more mixed use development at strategic locations. The plan should be updated to suggest that a zoning update explore the approach to encouraging mixed-use redevelopment. | 34 |

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| Goman + York | Restaurants: Review use by district, redefine use terminology, and evaluate permitted versus conditional uses. | The Plan should suggest a review of regulations impacting restaurants as part of a comprehensive review and update. | 75 |
| Goman + York | Drive Thru Service: Review use by district, redefine use terminology for consistency across district, and evaluate permitted versus conditional uses | The Plan should suggest a review of regulations impacting drive-throughs as part of a comprehensive review and update. | 75 |
| Goman + York | Milford's Zoning Regulations are restrictive and act as an impediment when it comes to restaurants. - Restaurants require conditional use permits in many cases as do outdoor dining and alcohol sales. - Alcohol service is further constrained by antiquated separation requirements. | See above comments. | 75 |
| Goman + York | Milford's Zoning Regulations are restrictive regarding drive thru service, prohibiting drive thru service many commercial zones, limiting drive thru service to banks in other zones, and requiring conditions uses when drive thru service is allowed in some zones. Milford's zoning regulations for drive thru service need updating. | See above comments. | 75 |
| Goman + York | Multi-family has been one of the strongest real estate asset classes. Multi-family has regularly been used to reposition marginal and functionally obsolete commercial development commercial office and retail. | No change | -- |

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| Goman + York | <p>Multi-family is allowed in commercial zones standalone and part of mixed use development yet requirements are restrictive and impediments. For example:</p> <ul style="list-style-type: none"> - maximum height of 3-stories, - large minimum unit size (which are now illegal per PA 21-29), - low limit building coverage 25% and lot coverage 60%, - dictating the percent of residential use in mixed use developments, and - large minimum lot size requirements. <p>Milford's zoning needs to be updated to encourage and allow more multi-family uses and at a greater density.</p> | <p>The document should be updated to include a recommendation that the multi-family standards for height, coverage ratios, and minimum lot sizes should be examined as part of a comprehensive zoning update that looks to expand access to housing opportunity.</p> | 34 |
| Goman + York | <p><u>Use Tables - Existing</u></p> <p>These use tables demonstrate, first, the redundancy in how uses are described and allow. Many uses have multiple descriptions with nuanced differences. Many of the nuanced differences do not result in a material difference in the actual use or development impacts. It is suggested that all uses are reviewed, consolidated, and the conditional uses are used sparingly. Mixed use should be consolidated into two categories, those with and without residential.</p> | <p>This comment should be included in the discussion of a need to make the zoning ordinance easier to use.</p> | |
| John Mortimer | <p>8</p> <p>Beachfront areas are ID'd only near Milford Point but not near Walnut / Silver and points further east?</p> | <p>The identification is based on available data. No updates.</p> | -- |

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| John Mortimer | 32 | Housing Affordability. Passage states that we currently have not reached the 10% bar for aff housing stock (5.26% in 2021, down from 6.08% in 2011). If these figures are correct how was the moratorium achieved? Was it reached in 2022? | In CT, unless you have 10% you are not exempt from 8-30g. You can also have a moratorium that adds up to a particular number of points, which gives you a 4 year moratorium to plan for affordable housing. Milford has the moratorium but it is expiring in August. No change in the document is needed. | -- |
| John Mortimer | 37 | Historical Preservation Recommendations – add plaques to indicate historical buildings and sites | This recommendation should be included. | 37 |
| John Mortimer | 41 (Figure 28) | Figure 28 has an incomplete legend to the map (teal & grey boxes are unidentified). | The map should be updated. | 40-49 |
| John Mortimer | 44 | CDD-1 writeup neglects to mention the recent additions of the Big Y and Subaru dealership in relevant passages. | The plan should be updated to reflect this comment. | 44 |
| John Mortimer | 46 | Map also seems to have missed these recent additions. (<i>referencing comment above</i>) | The map should be updated. | 44 |
| Donna Dutko | 15 (Figure 9) | The flood map used doesn't appear to properly reflect the flood zones. | The data should be checked and updated, if appropriate. | |
| Donna Dutko | | <u>TOD:</u> There is a really nice map in the 2022 POCD depicting the TOD areas, at ½ mile and at ¾ mile radius along with walking times to these points. I am recommending the POCD commission put that map back in the new draft. | There are many TOD opportunities within Milford and the inclusion of specific locations is not consistent with the approach in this POCD. The Housing Recommendations include a specific actoin to undertake a Transit-Oriented Development Plan. | -- |

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| Donna Dutko | <u>Gateway to Downtown Milford:</u> | The language for the CDD-4 (page 47) should be updated to reflect that this is a gateway to the Downtown. The zoning already reflect that this is a transitional area. | 47 |
| | I have discussed New Haven Ave with Julie Nash in the past. It is an "coastal drive" that feeds right into downtown Milford. In otherwords, it is one of the main "Gateways" into the Downtown, especially when cruising our coastline. I think the POCD commission should recognize it as such, adding signage similar to other "Gateways" to Downtown that have signage. | | |
| Donna Dutko | 20-23 <u>Parking</u> | The plan includes a recommendation for a parking study in the Commercial Corridor sections (see page 48). The plan should be updated to make reference to the Milford Downtown Plan. | 48 |
| | There have been a lot of shifting of public parking in downtown Milford. Wondering of the commission could do a public parking space "headcount" to see how many spaces we have gained/lost and where they are located since the last downtown plan was issued. Obviously, they should only count city owned parking, state owned rail station parking or parking spaces on written leases to the City. If leased, they should note if and when the lease expires. Consider adding the "Milford Downtown Plan" to the POCD or at least "with reference" to that plan Consider adding the parking plan maps from the "Milford Downtown Plan" to the POCD, pp 20-23 | | |
| Donna Dutko | <u>"Whiting out" the properties abutting any district in the POCD - as requested by Jim Quish</u> | No change is recommended. | |
| | Currently the abutting properties are in a pale yellow shade. It's my opinion, keeping abutting districts visible adds a critical dimension and decision making tool to the plan. It would enable those reviewing the draft of the POCD to visualize where the planned direction for a given district may or may not be appropriate. | | |

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| Donna Dutko | | <u>Expanding the MCDD</u> To Jim Quish's point, it makes sense to expand the MCDD both East and West. | No change is needed to address this comment. | |
| Donna Dutko | | | The future land use map should updated to reflect that this area is a mixed residential, commercial, and industrial area. | 73 |
| Jeremy Grant | 2 | The last paragraph states: "Beaches, shoreline protection, and coastal access have been moved to the element on the Long Island Sound." - The coastal access map has not yet been moved into the Long Island Sound section. | The plan should be updated to remove this comment. | |
| Jeremy Grant | 3 (Figure 1) | Figure 1 - Under the Naturalized Open Space Properties section, change the name of Red Root Lane Nature Trails to Red Root Nature Park | The plan should be updated to reflect this comment. | |
| Jeremy Grant | 4 (Figure 2) | Figure 2 doesn't include Solomon Woods. There may be others not listed. Can you email me the GIS layer? | This should be reviewed and updated, as necessary | |
| Jeremy Grant | 6 | Beaver Brook Corridor - The Boardwalk was reconstructed after the fire. | The plan should be updated to reflect this comment. | 32 |
| Jeremy Grant | 29 (Figure 17) | Figure 17 lists 2011 to 2011 | The plan should be updated to reflect this comment. | 29 |
| Jeremy Grant | 67 | Milford's Energy Plan - "The plan establishes a goal of reducing all net carbon emissions in Milford by 2050." - Should read "The plan establishes a goal of eliminating all net carbon emissions in Milford by 2050." | The plan should be updated to reflect this comment. | 67 |
| Jeremy Grant | 69 | "Goal: Reduce all net carbon emissions in Milford by 2050." - Should read: "Goal: Eliminate all net carbon emission in Milford by 2050." | The plan should be updated to reflect this comment. | 69 |

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| Richard Platt | <p>Richard Platt questioned the MCDD zone, which encompasses much of the north-side of West Main Street from First Church to High Street. He referred to the proposed apartment and office-complex at 67 Prospect Street - the Peter Prudden property - and recalled some Board members stated they voted in favor reluctantly because the property was zoned MCDD. He is requesting that area be removed from the MCDD. He is concerned about the lack of movement to restore the existing historic house at 67 Prospect Street. Asked for protection of historic areas.</p> <p>He said some very historic areas are part of the MCDD and should be taken out of the district. He recalls 20 years ago, his commission began asking for their removal, but no action occurred. He believes First Church, Plymouth Building, Lauralton Hall, and 67 Prospect Street – home of Peter Prudden and where early settlers were buried without permanent landmarks – should be excluded from the district.</p> | <p>The removal of these properties from the district is unlikely to have an impact on the development of the properties. It is recommended that no change be made to the POCD.</p> | -- |
| Emmeline Harrigan | <p>She said the reformat makes it easier to find goals and policies. She addressed Zone CDD-3 and notes it still does not allow for residential use. As a corridor which has evolved over time, she stated it should reintroduce residential use, due to apartments adjacent to the zone and proximity to train station.</p> | <p>The housing recommendations already include this direction. No changes are necessary.</p> | -- |

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| Emmeline Harrigan | She believes the Sea Level Rise section should include language noting specific resiliency planning efforts and project funding opportunities, including acquisition where available. Ms. Harrigan is Assistant Planning Director for the City of Fairfield and noted that Fairfield is realizing there is not enough room to implement resiliency projects easily. | The plan should be updated to include language to support resiliency planning and implementation. | 20 |
| Emmeline Harrigan | She stated both Milford wastewater treatment facilities are not yet completely protected. She strongly suggests we add language for any funding opportunities available for that project. She stated these projects tend to be favorable for funding sources. | The plan should be updated to note the importance of protecting critical facilities, including wastewater treatment facilities. | 20 |
| Emmeline Harrigan | Given the recent increase in pedestrian fatalities, the POCD language should very strongly indicate the necessity of working with State DOT on future planning studies to find ways to introduce better multimodal and pedestrian crossings in the future as well as room for bicycle infrastructure. | The plan should be updated to address this comment. | 59 |
| Emmeline Harrigan | She found the crash data map is startling but more specifically our state roads have been ignored in terms of providing required safety improvements. | No change is recommended. | |
| Emmeline Harrigan | Within the Multi Family section, she suggests an inclusionary requirement based on income for private developers. She noted developers remain profitable and even a 10 percent inclusionary requirement for projects over 10 units provides necessary affordable housing. | The plan should include recommendation that the City examine expanding the use of inclusionary zoning requirements above current levels for projects over 10 units and leverage the Affordable Housing Plan. | 34 |
| Joseph Simoncek | 72 Sometimes, infill tears down an old house and replaces it with 6 living units in its place. He believes that is an infill which is not a 1:1 replacement but expanding from a single neighbor to a big apartment building. He said suddenly a side yard now has 6 or 7 apartments in it. | The zoning standards were evaluated and re-written in 2004 and buffer standards were created. No changes are recommended. | -- |

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| Joseph Simonecek | 72 | He stated the Industrial area drives good tax income and good jobs; are there things that could be added to the report that would encourage industrial development? He believes there has been encroachment into industrial areas by dense housing, and subsequent complaints from those residents regarding noise or other issues from the industrial businesses. He recommends guidance on how to encourage industrial installations. The commentor also submitted an email comment that suggested that the plan should encourage maintaining industrial zones and buffering of residential development near these zones. Industrial zones provide good tax revenue and well as good paying jobs for Milford. | The plan preserves existing industrial zoning which allows for the growth and expansion of industrial businesses in those areas. No change is recommended. | -- |
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| Joseph Simonecek | 72 | He said that regarding sustainability, we have done good work planting trees, but we need a very large effort to increase our tree planting to maintain the character of the City. He stated the City has had a large die-off of trees and the City can jump start planting new trees in those areas to enhance beauty. The same commenter submitted a comment via email that suggested that the plan should encourage the large scale replanting of trees on city properties and along roadways as a way to decrease pollution, decrease blacktop heating, and increase aesthetics of the town. | The plan should be updated to include recommendation for increased tree planting. | 69 |
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| Joseph Simoncek | 72 | He referenced POCD Page 72 which talks about residential areas, which states “every effort should be made to preserve the prescribed density of the underlying zone and promote and preserve the commonly found single-family home...” yet the City just passed an ordinance that every single-family home can have an accessory apartment. He believes that is a conflict. | The accessory-dwelling unit zoning change was required by State statute regarding in-law apartments. The language should be updated to reflect the need to provide housing choice and opportunity while maintaining the core characteristics of the City's neighborhoods. | 72 |
| Donna Dutko | | She sees CDD-4 as a good opportunity to move the MCDD. She stated New Haven Avenue between Gulf Street and Buckingham Avenue is residential; the area includes the natatorium and is 15 minutes to downtown. She further said the area has a lot of waterways and opportunities for walking trails. She stated the small neighborhoods off New Haven Avenue which abut Gulf Pond would be complemented by more residential development along the waterways there. She agrees with Mr. Quish’s suggestion that the MCDD be extended down New Haven Avenue toward Pond Point. | See previous comments | -- |
| Cheryl Cappiali | | She is the Conservation Commission Chair. She feels there is not enough emphasis on conservation in the document. Schools need some access to gardens in their areas or at least an introduction to nature. She said this is currently forgotten in the education program. She believes the City should include teachers and students in outreach. She indicated her commission would like to participate in more City planning activities. | The plan includes several sections that directly address conservation, including the Open Space & Recreations, Coastal Resources & Long Island Sound, and Agriculture sections. The plans agriculture recommendations should be updated to include a recommendations that schools be engaged as part of the process. | 27 |

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| Paige Miglio | She is the Director of the Arts Council downtown. She backs up what Ms. Cappiali said about open space and gardens. She feels more densely populated areas along the shoreline would appreciate open space for local community gardens and more livable open space. She said the North Street area, where the current community garden is located, already has large properties which "don't need community gardens." | This comment is addresses in recommendation 3 of the Agriculture Recommendations, "Where property may be acquired in the high-density neighborhoods, the City should work with the communities in those areas to determine the demand for community gardens." | -- |
| Paige Miglio | She expanded on Ms. Harrigan's comments regarding the Traffic and Accidents section, saying she works downtown and sees the rise in population and new buildings and TOD developments affecting the traffic patterns immensely. She sees speeding has been a huge issue and suggested raised crosswalks to make areas for pedestrian traffic more visible. | The plan includes a recommendation for creating a complete streets ordinance and design guide which would address these issues. No change is recommended. | -- |
| Cheryl Cappiali | She said the swimming pool at 67 Prospect Street is now a mosquito breeding ground that needs to be addressed. She noted there are no fences around the pool for safety. | This is not a topic to be addressed in a POCD. No change is recommended. | -- |
| Emmeline Harrigan | She supports the additional housing comment within the plan that talks about re-reviewing housing at the CT Post Mall. She noted larger retail properties are struggling and need to diversify. She stated the City needs to make sure the property has long-term viability as it is one of the City's largest taxpayers. | No change is needed to address this comment. | -- |
| Emmeline Harrigan | Regarding traffic, the Orange Avenue/North Street double intersection has been problematic, and she would like to see a roundabout. | The plan should be updated to call attention to this location for further study. | 59 |

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| Donna Dutko | She echoed Ms. Harrigan's recommendations for roundabouts, as they buffer the massiveness of the state highways going through the area. She added that decorative stones, gardens, etc. create a focal center for that road. She agrees the CT Post Mall should be considered for diversification with housing; they are one of our biggest taxpayers and we want to protect our tax base. | No change is needed to address this comment. | -- |
| William Silver - Milford Historic Preservation Commission | I attended and spoke at the public hearing on May 17 regarding the Milford's dearth of traffic calming strategies that have been embraced and successfully deployed in numerous communities throughout Connecticut and elsewhere, especially since Milford's last POCD was adopted. The proposed POCD language addresses the need for pedestrian ways and protection, but does not mention controlling/modifying the other half of transportation.....'cut-through' vehicular traffic flow that affects neighborhood identity, environment and safety. We have been asked by City staff to keep our comments and recommendations brief and succinct (written as if ready for inclusion in the POCD), so I will not repeat our comments or reasoning for the below recommendations, that are already part of the public hearing record. | The plan should be updated to identify this issue. | 59 |

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| <p>William Silver - Milford Historic Preservation Commission</p> | <p>I recommend the following changes/additions to page 59, Transportation and Circulation Recommendations:</p> <p>GOAL: Prioritize roadway improvements in areas of high (numerous?) crashes and injuries.</p> <p>2. Working with the traffic authority of the City and within 1 year, identify a few residential neighborhoods that are affected and/or degraded by vehicular traffic ‘throughput’ and recommend design standards for traffic calming that can be adopted, budgeted for and deployed on a trial basis within 2 years of the adoption of the POCD.</p> <p>2a. Within 5 years create a ‘Traffic Calming Program Manual (or Standards)’ that can educate the public about these measures in Milford and how to effectively plan for their use in Milford.</p> <p>Thanks for sharing these with the P+Z Board and for considering them for inclusion in the 2023 POCD. Please don’t hesitate to contact me with any questions, etc. And let me know if you need a hard copy of these comments/Recommendations before the submission deadline of 6/9/23.</p> | <p>The plan should be updated to include recommendations for traffic calming.</p> | <p>59</p> |
| <p>Joseph Simoncek</p> | <p>Zone laws should be maintained, enforced, and strengthened as needed to maintain our historic downtown neighborhoods. We should work to prevent further loss of older homes and yards. We should strengthen zoning to prevent detrimental effects where development zones butt up against single-family neighborhoods.</p> | <p>See previous comments. No change is recommended.</p> | <p>--</p> |

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| Tim Chaucer | Fowler Field is the heartbeat of Milford. On any given hot summer night one can hear people dancing, tennis balls bouncing, baseballs cracking at the bat, kids playing, boaters loading and unloading their boats, basketballs bouncing and on and on. It is a magical community place. Please remove Fowler Field from the Milford Center Design District. (MCDD) Fowler Field must never be developed for private business gain. It is a Milford gem where citizens of all ages gather on beautiful nights to celebrate life. There are other areas in historic downtown Milford which should not be included in a modern fancy design district. People come to Milford to savor the historic character of this 400 year old city. Please give historic preservation the highest priority in the City Plan of Conservation and Development. | Fauler Field occupies an important space within the Downtown and the current zoning designation reflects the Town of Milford's view that it has potential to redevelopment to support the Towns housing, economic, and sustainability goals. The fact that the Town currently owns the property means that any redevelopment would require Town approval. No change is recommended. | -- |
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| Jeremy Grant | I wanted to suggest that we add a section in the Sustainability Section that addresses trees, tree protection, urban forestry, and increasing the canopy cover. The city has been doing a lot over the past few years to plant trees but it's hard to keep up with the number of mature trees removed. It could also be beneficial for future grant funding to include a section that talks about reducing/eliminating invasive species in our open spaces and throughout the city as a whole. | The plan should be updated to include a recommendation that the City increase canopy cover. | 69 |
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Robbie
Silver

2. True affordable housing: For years communities across CT have had to comply with the ratio established by the state to have a certain percentage of housing be "affordable." However, this law has only allowed developers to cram apartments/condominiums/ houses into areas that would not normally have been zoned for or allowed such projects but the few required units have not actually been affordable. Milford needs to develop a long term housing plan that truly addresses affordable units (not market value!) and yet remains true to historical considerations and doesn't randomly infill established neighborhoods. Not an easy task but one of significant importance as it would allow people of all economic levels to thrive in our community (the community with the big heart). It would take a task force of committed and conscientious people, with experience and expertise across building/homelessness/economic needs/zoning, and more, to thoroughly consider all the options but it is a mission that many people support.

The City currently has an affordable housing plan ("Milford Affordable Housing Plan Final Draft – March 2022") which is referenced in the POCD as is the City's Five-Year Consolidated Plan, which addresses housing issues. No change is recommended.

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Patricia
Houser,
Milford
Environmental
Concerns
Coalition

As you know, the POCD then explains that widespread multimodal travel is currently impossible here, citing Milford's extremely dangerous street designs. The map of "Pedestrian and bicycle crashes" offers further evidence of the problem. This is a helpful scenario for future decision-makers to consider, as far as it goes.

My only critique is that the proposed remedy for the lack of bikeability here is so vague ("safe bicycle infrastructure" is the term used in the current document) as to be useless; even worse, it will lead to decades more of dangerous conditions for bicyclists and low numbers of citizens opting to take a bicycle over driving. Please know that this is an area of research I have recently revisited in depth, and the research is overwhelming that the ONLY bicycle infrastructure that can deliver a significant number of bicyclists and added safety for bicyclists AND pedestrians AND drivers, is protected bike lanes.

I am suggesting that if protected bike lanes are not specifically recommended in the POCD, our decision-makers will feel as if they can opt to recommend more painted lanes and sharrows (the research critique on both of these is devastating).

~~The current lack of specificity of design recommendation~~

The designation of specific bicycle facility types is beyond the scope of the POCD. The plan recommends the creation of a complete streets ordinance and design guide. It would be during the development of that document that the City would determine what would be the most appropriate way of creating a safe and comfortable bicycle network. No change is recommended.

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| <p>All In for Milford: Rachel Merva Therese Eke Charles Montalban o Jennifer Paradis Sarah Bromley Jamie Rude</p> | <p>51</p> | <p>Keeping this goal in mind, it is important to acknowledge the issues that challenge our residents today and to highlight opportunities for change in the 2023 POCD update. As we know from the City of Milford Affordable Housing Plan published last summer, we are worse off now than we were in prior years. Market rents and home prices have gone up dramatically and demand for more affordable housing is even higher. Milford’s American Rescue Plan Act (ARPA) projects proposal did not allocate funding for the development, repair, and/or operation of affordable housing. The moratorium for Milford that is set to expire in August 2023 not only failed to produce additional affordable housing but resulted in a lower overall percentage of affordable housing from the start of the moratorium four years ago.</p> <p>The POCD does not address the 5,066 households in Milford that earn less than 50% of the Area Median Income (AMI), as referenced in the Affordable Housing Plan. The strategies in that plan should be embedded in the POCD, as was recommended in the Housing Plan (see p. 51 “Amend POCD...”). With a 3-year wait list for existing public housing in Milford, some of which was built decades ago, the POCD should envision how this program will evolve over the next 10 years, as well as how other municipal-owned property in Milford, such as the consolidation of the public health department will evolve</p> | <p>The Affordable Housing Plan and the POCD are in alignment and a direct duplication of the recommendations in that plan in the POCD is unnecessary. The POCD includes several recommendations that would advance the plan including exploring increased density through hybrid form-based approaches, reviewing the zoning ordinance to reduce restrictions on multi-family housing, and examining how to improve safe access to parks, open spaces, schools and active transportation options. The Plan should be updated to explicit state the implementation of the recommendations of the Affordable Housing Plan without reproducing all recommendations in the plan.</p> | <p>32 and 34</p> |
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| William Silver - Milford Historic Preservation Commission | 36/37 | <p>Goal: To foster recognition of and protection of Milford's historic properties.</p> <p>5. Incorporate an historic review process early in the building process BEFORE notification of impending demolition. Such a review would save a potential buyer or developer both time and money and would achieve both clarity and efficiency. It could also spare the City costly litigation.</p> | No change is recommended. | -- |
| | | <p>As detailed below, there were several request made by the Historic Commission members to include the names of the historic districts. The recommendation have been included here in response to all such comments.</p> | The plan should be updated to name each historic commission. | 35 |
| Michelle Kramer | | <p>She is the current President of Milford Preservation Trust, and Vice Chair of Milford Preservation Commission. She would like to see much more robust and specific language regarding historic preservation, including naming each Commission. She said the commissions are the first line of defense. Most commissions are notified of considered demolitions. The demolition delay is mentioned but the historic ordinance is not. She referenced design standards are the MCDD design standards; is there inclusion of the Secretary of Interior standard? If not, can that be linked?</p> | See above comment. | -- |
| Bill Silver | | <p>He is Chair of the Milford Historic Preservation Commission and an architect. He said he has worked with many POCDs throughout the state and almost all name their historic commissions in the Historic Preservation section; he asks that Milford do the same as they are here to serve the citizens.</p> | See above comment. | -- |

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| Michelle Kramer | | Asking if we could include the two local historic commissions in our outreach. She is a member of the First Local Historic District but was not clear if South of the Green had been made aware. | See above comment. | -- |
| William Silver - Milford Historic Preservation Commission | 36/37 | Milford enacted the Milford Historic Preservation Ordinance in 2016 and resulted in the subsequent formation of the Milford Historic Preservation Commission which is a resource for listed properties other than found in the two district maps listed above. | See above comment. | -- |
| William Silver - Milford Historic Preservation Commission | 36/37 | Goal: To foster recognition of and protection of Milford's historic properties. 7. The Local Historic District #1 and South of the Green Historic District are two commissions that are resources for the properties in the accompanying/respective maps (add their specific maps after page 37 of the draft POCD) | See above comment. | -- |
| Eric Johnson | 37 | He has been a Commissioner on the Milford Historic Preservation Commission since 2016. He seconded Mr. Platt's comments on the MCDD. He pointed out language in the POCD, "...to ensure better contextual compatibility of new construction with existing structures" (page 37) and hopes the Board keeps that in mind. He pointed out Milford has taken several steps to add ordinances referencing historic preservation. He would like those City ordinances added to the POCD. | The plan should be updated to note the formation of the Historic Preservation Commission. | 35 |

As detailed below, there were several request made by the Historic Commission to address **infill** as it relates to historic preservation. The recommendation have been included here in response to all such comments.

The City has two historic districts. It is inappropriate to control infill development on non-historic properties outside of those districts if such infill is consistent with the goals of the POCD. No change is recommended.

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Bill Silver

The commission has found that infill has represented the greatest threat to the historic character of our neighborhoods. Preservation is not only the listed historic properties, but also those properties adjacent to them. He referenced page 37 of the Plan, under Goals, and asked that we add language that guides and manages infill of properties in or around historic districts and properties. He stated the goal is to protect neighborhoods, not just individual registered properties. He feels some properties in the upper duck pond area are at risk of infill that could be uncontrolled.

See above comment.

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William Silver -
Milford
Historic
Preservation
Commission

36/37

10. Expand the regulations for zones/districts involving historic properties and neighborhoods to mitigate inappropriate, disproportionately-scaled or visually (historic aesthetics) inconsistent infill projects. The enabling legislation for Zoning doesn't allow for this in zoning.

See above comment.

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| William Silver - Milford Historic Preservation Commission | 37, 75 | <p>Goal: To foster recognition of and protection of Milford's historic properties.</p> <p>11. Develop design standards for infill of historic districts and properties that address the issue of compatibility, that ensure that the height and bulk of the new or renovation infill project does not negatively impact the area's historic structures. These design standards must address building height, mass and site setbacks for compatibility, and new construction must address the design principles of the historic districts' size, scale, proportion, color and materials. New construction should allow for modern technology and material usage, but in a manner sensitive to surrounding historic structures.</p> | See above comment. | -- |
| John Kranz | | <p>His home is the former parsonage of First Church. He is a member of the Milford Historic Preservation Commission. He echoed previous comments. He said one important thing regarding historic preservation is to include scale and define what that means. He has seen at times, new developments may save one historic property, then dwarf it by large scale development directly adjacent to it. He said protecting history and character in the downtown area and historic districts could benefit from that.</p> | See above comment. | -- |

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| William Silver - Milford Historic Preservation Commission | 36/37 | Goal: To foster recognition of and protection of Milford's historic properties. 9. Clarify the design standards in the MCDD for a consistent approach with the Secretary of the Interior standards which are part of the 2016 Milford Historic Preservation Ordinance. The link for these standards is https://www.nps.gov/orgs/1739/index.htm | District-wide historic preservation design standards should only be applicable to areas that have been designated historic districts. The City has two designated historic districts with processes in place for evaluating proposals in those areas. No change is recommended. | -- |
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| William Silver - Milford Historic Preservation Commission | 75 | <p>A reminder that conservation applies to all historic resources as well as environmental, as both are nonrenewable In nature and deserving of protection in the best interests of the city’s residents. A redrafting of the city’s Zoning Regulations is long overdue, particularly with regards to the MCDD District and its treatment of historic properties. The MCDD District includes the most dense collection of historically listed properties in Milford, but its language is long outdated with regards to city ordinance and the standards upheld by the Department of the Interior. For example, Appendix B states “Construction of additions should seek to minimize the loss of historic materials on exterior walls (B-3).” It also uses terminology such as “should be,” with no mention of the codified C.O.A. application process established by city ordinance with regards to historic preservation within the purview of the three Historic Preservation Commissions. As we have become all too familiar, the MCDD regulations have failed to protect the integrity of Milford’s historic properties. For example, on the same page, the regulations MCDD call for the appropriateness of scale, however with no more regulation or enforcement than “should be,” “should match,” or “discouraged.” The previous examples are all covered within the Secretary of the Interior’s Standards, which is a set of guidelines almost exclusively used across the United States with regards to the treatment of historic</p> | <p>This process already exists for designated historic district. That process is established through state Statue and by adoption of the district standards. The City's permitting document software flags the need for a Certificate of Appropriateness. Section 2.5.8 provides the procedures for certificate of appropriateness approval. The language should be updated to reflect that there are two historic districts.</p> | 35 |
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| William Silver - Milford Historic Preservation Commission | 75 | As it currently stands, Milford’s Zoning Regulations (2019) make only one mention of Historic Preservation, located within the definitions section (X1-13) under “Historic Structure.” It does fail to connect Historic Preservation to any specific zone or location within the city, such as the MCDD or the River Park Historic District. Therefore, the MHPC recommends the following change/addition to page 75, Land Use and Zoning Recommendations: Within the next 12 months, redraft the City of Milford Zoning Regulations to include the process for Application for a Certificate of Appropriateness for making any repairs or modifications to historic properties as falls under the purview of the city’s three Historic Preservation Commissions. These modifications should occur wherever appropriate, but particularly within Appendix B (The Milford Center Design & Development District). | See above comment. | -- |
| | | As detailed below, there were several request made by the Historic Commission to address MCDD as it relates to historic preservation.The recommendation have been included here in response to all such comments. | The board has previously examined removing prospect street from the MCDD, but it was determined that because of its commercial mixed use nature, it cannot go back to a single family zone. The removal of a zoning designation does not preserve a property that is historically significant. | -- |
| Tim Chaucer | | Prospect Street is the most historic street in Milford. Please remove it from the Milford Center Design District (MCDD). | See above comment. | -- |

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| William Silver - Milford Historic Preservation Commission | 36/37 | <p>Goal: To foster recognition of and protection of Milford's historic properties.</p> <p>6. Undertake further review of the MCDD, both for design standards and for the inappropriate inclusion of historic properties in the MCDD. (For example, Lauralton Hall, First Church, the Plymouth Building, Fowler Field and Wilcox Park are located in MCDD. Furthermore several buildings are in a local historic district, the National River Park Historic District or both.)</p> | See above comment. | -- |
| Joseph Simoncek | | <p>Consideration should be given to re-examining the MCDD zone. There are clearly many properties where business uses and housing density allowed in this zone would be inconsistent with the historic neighborhood character of this area (esp. along Prospect/Plymouth/West Main/North St.). For example: it would be a great loss of green space in town if the Lauralton School or Harborside schools closed and these properties were given over to development. Some spaces like the Wilcox park, and park area between the Wepawaug the River along Prospect St. are in this zone. Could these properties be developed? The meaning of this zone should be better described and carried out.</p> | See above comment. | -- |
| Joseph Simoncek | | <p>The plan should encourage implementation of traffic calming measures to maintain walkability of the city and to increase safety of both pedestrians and motorists.</p> | <p>Traffic calming measures would be an important part of a complete streets ordinance and design guide. A subpoint to that recommendation should include a focus on traffic calming.</p> | 59 |

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| Bill Silver | <p>Regarding Traffic, he said that while it is part of the Police Department's responsibility, he would like our POCD to encourage strategic installation of passive speed controls throughout the City. Milford has very few passive speed controls that are prevalent in other parts of the region.</p> <p>Regarding passive traffic controls; he clarified islands and vehicle traffic lane narrowing was what he was picturing, but not speed bumps. He said speed humps are also a goal.</p> | The plan should be updated to reflect the need to improve safety on State roads. | 59 |
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| Robbie Silver | <p>1. Traffic calming: Milford likes to present itself as a pedestrian friendly city but despite this there appears to be no long term plan to calm the traffic which has increased in amount and speed (as well as traffic violations). Numerous neighboring towns have investigated and invested in a variety of passive and EFFECTIVE traffic devices which don't necessitate increased police enforcement/time and still allow emergency vehicles and plows to safely and efficiently traverse their city streets. This should be a time-lined commitment of Milford. Not only would this produce safer streets it would also encourage more pedestrian activity throughout our community, which would result in economic and health benefits.</p> | Traffic calming measures would be an important part of a complete streets ordinance and design guide. A subpoint to that recommendation should include a focus on traffic calming. | 59 |
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