

July 5, 2016

Union Station Parking Garage, New Haven Connecticut State Project 301-114

Comments Regarding the Environmental Impact Evaluation Prepared in April 2016 by the Connecticut Department of Transportation

Summary

The Environmental Impact Evaluation (EIE) does not establish a strong case for building an additional single-use parking garage on Union Avenue. The central weakness in the EIE is the conflation of a single and inaccurately defined problem - that parking supply is insufficient in the area - with a single and inappropriate solution: to build more parking in an area already saturated with parking that is provided in both large structured parking garages and on surface parking lots.

The concentration of industrial scale parking warehouses in this area, which abut residential and office uses, already harms the quality of life of people who live and work in the area and spoils the urban landscape. The people who live here now, are, as the EIE describes, primarily low income, minority, elderly, families with young children, people with limited English proficiency, and people who do not drive.

The State's plan to add another massive 1,000 space garage adjacent to the current 884 car garage overburdens an area which currently is saddled with traffic congestion, poor air quality, a degraded street grid, failing storm water infrastructure, outdated traffic signals, a lack of bike lanes and complete streets, "no man's lands" which compromise pedestrian safety, and most critically to transportation planning, insufficient public transit.

If the CT DOT considered these most salient facts as a point of departure for the EIE analysis, very different priorities for the investment of State funds would have been recognized and alternatives beyond "No Action" or "Build Alternative" developed.

The following comments, organized to follow the outline of the EIE, will summarize defects and oversights in the document, and offer some ideas for stronger and more sustainable transportation solutions, including parking.

1. Background and Purpose and Need (Justification for the Action) (Executive Summary 1.2 - 1.3)

The idea for building an additional parking garage on Union Avenue has been very long in development, about 20 years. During this time, the concept for the project evolved

from being a single-use car warehouse, to being a mixed-use, multi-modal building with a “transit depot.” But now the project has devolved back to being a single-use parking garage. The proposed garage is out of step with standards for Transit Oriented Development, standards articulated by the State in its transportation plans, which are based on creating walkable mixed-use environments. The proposed garage is also out of step with current transportation research, which shows that building more parking induces more demand for parking, just as adding travel lanes to roadways induces more driving.

Considering these outcomes, the CT DOT’s purpose of “expanding the availability of parking at Union Station ... to the greatest extent practicable” (p. ES-6) is akin to racing to a dead end, and bypasses the State’s own comprehensive plans to build a flexible multi-modal transportation system. Building parking to the “greatest extent practicable” by-passes any rational measure of need or purpose. Best practices have been set aside for a simpler purpose - to generate income for operations at Union Station and other transportation projects.

The EIE states (p.ES-6) that in nine years, the demand for additional parking will increase by 294 spaces. If these spaces will not be needed until 2025, the State has time to reduce demand through Parking and Traffic Demand Management strategies. It would be feasible and prudent to set a goal of reducing demand by at least 500 spaces by 2025.

During the 2015 session of the Connecticut General Assembly, the State proposed legislation to create a Transportation Authority to finance and manage train stations. The principal source of new income for the Authority was parking fees. The League opposed this legislation because it created a conflict of purpose between an income source and the State’s transportation goals. In actuality, there is no need for the development of the Union Avenue site to be in conflict with State and local planning goals. (See page 3 for a discussion of alternatives.)

The Union Station area is highly congested and functionally obsolete. Indeed, the EIE mentions (p.ES-6) that the project was put on hold in 2012 due to concerns about “conflicts between the proposed garage operations and the adjacent taxi staging, intercity bus and passenger pick-up and drop-off activities in front of the station.” Since 2012, some *temporary* solutions to managing the multiple users of Union Station have been put in place. The New Haven Parking Authority has sponsored a workshop to examine permanent solutions for the location and operation of bus stops, “kiss and ride,” taxi stands and shuttle stops. But no final plan has been adopted and no funding is in place to effect a plan. The need for an overall plan for the Union Station area is still unaddressed, which makes proceeding with a major parking garage an imprudent action.

The EIE rests upon unsupported assumptions about the need for the project: “If it is assumed the parking need at Union Station includes current parking demand... (p.ES-7). During the twenty years the idea of a parking garage has been under

consideration, public transit access to the train station has been reduced (the M-bus no longer stops there) and the many CT DOT studies for transit improvements, such as the excellent study of sub-hubs and cross town routes for New Haven, have not gone into effect. Into this gulf, many local institutions and companies have established private shuttle services to the train station. The high volume of private shuttles demonstrates the need and demand for transit services to Union Station. This demand as a clear sign the public will use alternatives to Single Occupancy Vehicles. The Alternatives Analysis leaves SOVs and parking as the only viable choice for many people. It is reasonable to see some part of the current demand for parking as being a product of the lack of investment in transit.

The City of New Haven and Yale University are each undertaking major transportation studies. The City's Transportation Alternatives Study will look at improving City-wide transit operations including reorganizing transit services at Union Station. Both of these studies will be based on Traffic and Parking Demand Management tools, and will provide a reliable basis for calculating parking needs, which is not a feature of the EIE. Committing valuable land and public funds to a major parking garage prior to the completion of these studies of transportation needs would be imprudent.

2. Alternatives Considered (Executive Summary p. 7, and Sections 2.1 - 2.2)3

The EIE limits the study of alternatives to a "No Action" and a "Build Alternative." This limitation is a fundamental flaw in the EIE.

If more permanent parking is needed, there are other sites in New Haven (Long Wharf adjacent to the rail yard) and at suburban train stations which would better serve transportation and community development goals, while not sacrificing the opportunity to put the Union Avenue site to other uses which could generate greater revenues for the State and the City, and not incur the negative and perpetually externalized costs of congestion, pollution, diminished public safety, and of deficient urban design on the City.

A complete and sufficient EIE Alternatives Analysis for a parking garage would include consideration of ways to reducing parking demand, studying alternate sites for a garage, and reviewing alternate uses for the Union Avenue site which fulfill TOD objectives, as follows:

1. *Reducing Demand for Parking.* The EIE does not address the ways by which parking demand can be reduced through both transit improvements and re-zoning the area for TOD. The EIE fails to do this, in part, because the purpose of the proposed garage is to maximize income, not reduce demand;
2. *Study alternate sites for parking garages.* Other sites could allow building at lower costs, avoid lost opportunity costs, and reduce externalized costs. (The EIE does not address externalized costs.) Building parking at suburban stations which have less potential for bus service is logical, and would encourage drivers to consider using the commuter and regional trains. If there is a need for more parking to serve Union

Station, the State should consider locating a garage on the Long Wharf side of the rail yards, and making fuller use of the planned pedestrian bridge over the tracks and to the platforms and Union Station. Locating a parking garage in this zone would:

- a. Permanently avoid pushing additional commuter traffic into the Union Avenue neighborhood and street system, and allow the area to be rebuilt, as planned, as an attractive high density, mixed use, mixed income place. All the features planned for this area – a public park between Union Station and Church Street, housing, retail and offices – would be saved from harms generated by unnecessary commuter traffic.
 - b. Commuters from I-91 and I-95 would not have to drive through congested city streets. The CT DOT could consider offering lower price points to monthly parkers at a Long Wharf garage (or suburban garage) than in the current Union Station garage.
 - c. Eliminate all construction-related disruptions for businesses, residents, pedestrians, cyclists, buses, and cars on Union Avenue.
 - d. Eliminate the impacts of noise and pollution from construction equipment on people who live and work in the Union Avenue area.
 - e. Allow other projects under development for the area, such as the rebuilding of Church Street South, to move forward with less conflict involving train station users;
 - f. Allow greater flexibility in design features. While a garage on Long Wharf would need to be designed in a manner that would be a credit to the State, and present an attractive “front door” to the city, building in this area would obviate the need to use the same high-cost materials and construction detailing that would be necessary on Union Avenue in order for the garage to be congruent with historic Union Station
3. *Study alternate uses for the Union Avenue site which are supportive of the economy and TOD.* This prime downtown site should be reserved for uses consistent with TOD planning, such as an office or biomedical headquarters. Locating a major business adjacent to the train station could, through a long-term land lease, provide higher revenues to the State than a parking garage. (New York City’s Metropolitan Transportation Authority develops and manages many properties to fund transportation systems and support transportation goals. See: <http://web.mta.info/mta/realestate/>). In addition to potentially greater fiscal benefits to the State, a business or office use would create more jobs for residents of the city and region. The City could benefit from taxes on equipment and perhaps also PILOT funds. Now, as the State needs to cut back on contributions to local governments, it is especially important to pursue sound, mutually beneficial development.

Just as the limits of the Alternatives Analysis of the EIE are problematic, so too are some of the claims and arguments for features for the proposed garage, as described in the Alternatives section of the EIE..

The Bus Depot and Bus Pull Offs

The EIE rejects the City's request that a bus depot be developed inside the new garage, citing use conflicts between the cars, pedestrians, and taxis which would all use the garage, and buses. The EIE also posits that the a higher first floor needed for bus clearance would make the building incongruous with the *parti* of Union Station, when in fact, a building with a taller first floor could be more harmonious with the architectural *parti* of Union Station.

The City of New Haven requested a bus depot be developed as part of the plan. There is little information available at this time regarding how a bus depot might work and whether it would improve the function and reliability of the transit system. Many transportation experts see investment in bus depots as being less helpful to riders than investments to create new routes, provide greater frequency, and minimize transfer waiting times. We are unlikely to know whether a bus depot has value until the Transportation Alternatives Study is completed, so the League has not supported or opposed the concept at this time. It is fair to say that the discussion of the bus depot is just as premature as the CT DOT's plans for where to locate bus stops, as outlined in the EIE.

The EIE indicates that bus stops might remain at their current locations. "*Consideration*" is also being given to a bus pull-off in front of the new garage (p.ES-8) and perhaps also in front of the existing garage (p.2-2 - 2-3). Which buses would stop where? The sidewalks in front of the current and proposed garage are narrow (too narrow even for trees) and have little room for bus shelters. Locating bus stops this far from the front door of the station is not a "transit first" solution. Clearly, the EIE proposals are arbitrary - there is not a real plan for how bus service will function at the train station.

Leaving bus planning as an afterthought demonstrates a lack of holistic and systematic analysis being directed to this project. It was exactly these types of concerns which lead planners to delay the project in 2012. At this point, both the City of New Haven and Yale are in the process of completing studies which could clarify alternative plans for how not only buses, but other modes of transportation, would use the area while reducing conflicts. It is not prudent to proceed with building a new garage on Union Avenue until these studies are completed.

Bicycle facilities

Bicycle facilities are not mentioned in the "Alternatives Considered" section of the EIE.

Curb Cuts

The "Alternatives Considered" section of the EIE describes many new and wide curb cuts, which will make travel in this area more dangerous and difficult for all users of the road, and pedestrians. The curb cuts do not align with current intersections or proposed changes to the road network.

Internal Circulation in the Garage

The plan for circulation in the combined garages (shown in Figure ES-2) is exceedingly complex and inefficient. Drivers will take long routes to find spaces and to drive out. Use conflicts between private cars, taxis, pedestrians and buses are not resolved.

3. Existing Environment and Impact Evaluation

3.1.1 Existing Conditions; 3.1.1.1. Land Use

It is difficult when reading the EIE to imagine that the area described is the one that residents of the city know. On page ES-1, the EIE describes the site as being bounded by a parking garage, the UI substation, Union Avenue, and the rail yard. The EIE cites percentages of various land uses, but does not describe the character of the place. The EIE states that most of the “project study area lies mostly within the Long Wharf neighborhood.” No neighborhood exists in Long Wharf. The EIE proposes an inaccurate “1/2 mile walk shed” which includes properties on the opposite side of the rail road tracks. To walk to these places, a circuitous route would be required, and entail more than a 1/2 mile walk. Unless a pedestrian bridge is built, this area is not within the 1/2 mile walk shed.

The EIE does not describe or acknowledge the specific features of the actual impact zone, which is a real urban place, including housing at Church Street South, the Robert T. Wolfe development for senior and disabled people, the senior community at Tower One/Tower East, the City’s Police Headquarters, the Health Department, and the Board of Education. Considering these uses, locating a single use 1,000 car parking garage, adjacent to the existing 884 car garage is inappropriate.

This is a busy and active area, but one which lacks any retail activity on the street - a very serious deficit affecting both public safety and quality of life. The City hoped to partially remedy this deficit by having retail uses on the first floor of the garage. CT DOT has decided not to include retail activities in the garage, in favor of maximizing parking.

The EIE is not situated in the realities of the site. While it mentions that about 35% of the land in the area is used for transportation, it does not look to mitigate impacts. The EIE notes that 186 acres of land (about 30%) is vacant or underdeveloped, but does not address how current city plans for developing of these lands will change transportation demands and needs and the use of the roadways around the proposed garage.

3.1.1.2 Zoning

While the City’s current zoning does not prohibit the development of a single use parking garage on this site, City plans, including the Hill-to-Downtown Plan, have articulated the need for new zoning in the area to support TOD and mixed-use development. Re-zoning to form-based code standards is a key implementation strategy

of the Hill-to-Downtown Plan, which looks to require active uses on the first floors on Union Avenue. By not supporting these goals, the proposed garage would violate the City's Comprehensive Plan for Development.

The strategy to create supportive zoning for TOD is also articulated in *Transit Oriented Plan for the South Central Region* (June 2015). The claim in the EIE that a parking garage represents a continuation of the current use of the land as a parking lot, and therefore is not "in conflict with zoning" is a vacuous argument, especially in light of the thoughtful and comprehensive and consistent plans for the area developed by the City and the South Central Council of Governments.

3.1.1.3 Local and Regional Development Plans

Contrary to the claims in the EIE, the "No Action Alternative" would better serve planning efforts in the area, because it would not establish a 50-year use which is incompatible with TOD plans for the Union Avenue vicinity.

3.2 Consistency with State Plan for Conservation and Development

The proposed new parking garage would violate the Growth Management Principles (GMP) articulated in the State Plan for Conservation and Development. The proposed garage does not enhance transit, improve air and water quality, revitalize this regional center, support housing investments through compatible uses, concentrate TOD (as opposed to Transit Adjacent Development) near the train station, protect historic resources such as Union Station, improve the visual environment, or improve public safety. The proposed garage fails to "coordinate the functional planning activities of state agencies to accomplish long term effectiveness and economies in the expenditure of public funds."

3.3 Air Quality

New Haven is an Environmental Justice community. Environmental leaders have worked consistently to reduce air pollution, or at least establish that any new source of pollution is offset by pollution reductions so there is no net increase in pollution. This standard has guided the League's work and the successful negotiations it undertook with other community organizations and the City when PSEG proposed a peaker plant in New Haven.

This approach is equally important in this location, where exhaust from the interstate highways and local roads, the trains, and the repair yard activities all contribute to high levels of air pollution. The DEEP letter included in the EIE cites the use of trains rather than cars as reducing pollution is true on a regional basis (just as a new gas-fired peaker plant is less polluting than an older combined fuel plant), but it fails to acknowledge the specific concentration of additional pollution at the source – in this case a city neighborhood where vulnerable populations of both children and elderly people live. The EIE states, for instance that "the project will not contribute to any new

violations of CO standards” (p.3-25), it omits stating that the entire area is considered a “higher impacted area” by NEPA to start with. Studies by the Connecticut Fund for the Environment find the train station area to be one of two diesel hot-zones in the city (the other being the port and Q-bridge area). Under these circumstances, it is unreasonable to build the largest garage possible on the site, and to offer no plans for pollution reductions through, for instance changes in repair yard procedures or increased bus services.

The EIE air quality study repeatedly notes areas of concern, for instance ambient levels of formaldehyde, acetaldehyde and manganese, but brushes these facts aside by saying they were at concentrations also found in other parts of the United States (p. 3-16). There is no assessment of what effects these pollutants could have on human health in this particular and specific environment.

It is also worth noting that the air quality modeling for the EIE was based on current lane configurations, which are planned to change. The EIE recognizes that use of Union Station will increase, but does not look at the air quality impacts of the projects which will increase that use, such as the rebuilding of Route 34.

3.5 Local Transit Considerations

The “Build Alternative” might provide some new locations for bus stops, but these are not coordinated with any holistic plan for transit in the area. Nor is there any current plan by CT DOT to add new routes, or reduce delays and transfer waiting times to make transit a more viable option for more people. CT DOT has not supported efforts to create a Universal Transit system for the city by combining bus and shuttle services into a single stronger system, which would also improve the viability of transit for more people and reduce demand for parking. It is not true that building an additional parking garage will have no adverse effect on transit, as suggested in the EIE (p. 3-29). Buses and riders will need to negotiate a more congested area with increased roadway conflicts. The choice to spend \$40 - \$60 million in public funds on a facility to serve 1,000 cars, rather than make any increased investment in the bus system which now serves 30,000 people a day, will lead to worsening service as costs of operations increase.

3.7.1.2 Bicycle Facilities

The EIE notes that the existing bike parking and storage area will be removed, and replaced by sidewalk and driveway changes. Nonetheless, the EIE claims that the garage plan would have “no other impacts on bike facilities” — other than removing them. Mitigation plans are vague. There is no specific plan for the location of new bike parking or for the number of spaces which will be provided. This casual approach to evaluating and planning for a basic, low cost, environmentally sound, and vital transportation option is as negligent in its own way as the plan to simply maximize the number of cars which can be loaded onto a site.

3.8.1.2 Architectural Resources; 3.9 Visual Resources

The EIE claims that by building with materials similar to those used by Union Station, and building with height and massing similar to Union Station, that the garage would be compatible and would have no adverse effect on the historic resource. What this does not consider is the importance of a hierarchy of uses, where the “keystone” building should maintain visual prominence and distinction. Rather than focus on similar massing and materials, a subsidiary building, such as a garage should have less prominence, subtle details, and scale elements to quiet its presence on the street. Matching size and materials only makes the incongruities stand out.

The designs shown at the Public Hearing on June 6, 2016 are not included in the EIE. Both designs amplified, rather than minimized, the impact of the massive buildings on the street. Neither design improved its context, particularly for pedestrians walking by long monolithic facades, broken only by wide curb cuts. It is not clear what designs the State will use, and it is premature for any office to claim that they will have no adverse impact on historic resources. But it is clear that the plan for monolithic buildings, with out active uses, spoils the visual environment of Union Station.

It is worth noting that should the State consider another use for the site, such as an office or biotechnology building, a much taller building could fit the area, and a number of architectural designs would be appropriate.

3.10 Socioeconomic Resources Demographics, Environmental Justice, Unemployment

The EIE notes that 6% of the City’s population lives in the study area. It is important to understand that block groups include areas like Long Wharf where no people live. This means that the 6% of the population specified live in a concentrated area close to the train station. The City’s Hill-to-Downtown Plan, and other projects such as the Live Work Learn Play project on the former Coliseum site, will expand the population of people within walking distance of the train station.

While the EIE notes that this is an area which has “a concentration of EJ populations” (p.59) there is no discussion of mitigation factors to reduce the impact of the planned garage on these residents. Reducing pollution levels would be a significant and needed effort. Expanding local jobs and shopping opportunities by adding retail in the garage structure would be another. Most critically, expanding transit options is critical, as rates of car ownership are low. The EIE notes that unemployment rates are “notably higher” in the area. Studies by the New Haven NAACP have found that the lack of access to transportation is the greatest barrier to employment. An additional parking garage will not help people who do not own a car get to a job. The State needs to invest first in better transit options for this area. Perhaps by building a new garage in less costly areas (Long Wharf or the suburban stations), funds could be available for transit improvements.

3.11 Safety and Security

The plan for the new garage provides no active uses on the street, which will reduce both people's feeling of safety and their actual safety. The area close to the Route 34 overpass is dangerous, despite the nearby location of the Police Headquarters.

The assertion that lighting improvements and clearly marked crosswalks will "avoid vehicular conflicts" is an empty one. Without a Complete Streets plan for Union Avenue, and separate bike lanes, the increased vehicular traffic induced by the new garage will pose serious safety risks for cyclists and pedestrians, and the many vulnerable users of the public rights of way who live in the area.

3.13 Endangered, Threatened, or Special Concern Species and Habitats

The EIE limits the discussion of street trees to this section of the EIE, noting that their removal could potentially impact the Red Knot bird, an endangered species. To mitigate the potential impact on birds, the State would remove the trees in Winter. There is no plan to plant replacement trees in the area because the narrow sidewalks do not allow space for tree wells. The EIE's reductive argument on trees is preposterous. Trees provide key environmental and aesthetic benefits, including protecting asphalt, a material the new garage would use in abundance: <https://www.treepeople.org/resources/tree-benefits>

The City's Hill-to-Downtown plan takes a broader view of the value of trees in an urban environment, and looks to rebuild Union Avenue as a shaded urban boulevard, with trees planted in long rectangular planting strips. The trees would help cool the air, and filter pollutants from the air, and help control storm water run-off. The trees would also provide aesthetic pleasure, shade, and wind protection for people, the dominant species in the area.

3.14 Water Resources and Water Quality; 3.15 Wetlands

The Union Avenue area is subject to periodic flooding when high tide and full moons coincide – basements in the area regularly flood. In major storm events, the streets flood. The storm water control system in the area is insufficient, and needs to be re-engineered. The City has not found funding to undertake this project. The EIE describes a plan to filter and clean run-off water on the site, and to discharge it into the sanitary sewer system, a system which is already failing. Under the circumstances, retaining storm water on the site of the new garage is the only reasonable action. Flooding is both dangerous and inconvenient for people using the train station. In addition to not providing measures to prevent flooding, this plan pushes the costs of storm water control on to the Greater New Haven Water Pollution Control Authority (GNHWPCA) and its customers. Increased volume at the GNHWPCA plant has often lead to sewage system overflows, contaminating the Harbor and Sound.

See: City Bails Out after a Downpour: <http://www.newhavenindependent.org/index.php/archives/entry/downpour/>

The EIE states that the project “will adversely impact” the Coastal Flood Hazard Area (p. 3-75), but offers no specific mitigation plan, and states only that in the future, a plan will be developed in order to receive a Flood Management Certificate for CT DEEP. The flood management plan should be part of the EIE.

The EIE notes that the plan is subject to Executive Order 11988, which requires all federal agencies to avoid building in the flood plain, unless no other practical alternative exists (p. 3-75). The EIE has not considered alternatives outside the floodplain, such as some suburban stations. The combination of not considering alternatives outside the flood zone, and not creating on-site storm water retention systems is negligent.

3.22 Secondary and Cumulative Impacts

The total volume of land in Downtown New Haven devoted to parking is enormous, as a 2008 study by the University of Connecticut has shown. The UConn study has also shown that excessive parking is directly correlated with job loss and reductions in tax revenues. The CT DOT’s stated, and backward-looking, goal of “expanding the availability of parking at Union Station ... to the greatest extent practicable” (p. ES-6) will have significant cumulative impacts in a city already overburdened with parking. A problem can never be solved by making it bigger. Investing in parking to the exclusion of transit will push to some unknown future time the transit service improvements we critically need now.

The EIE claims that “no City investment is required” (ES-6), but it does not acknowledge the externalized costs borne by the City due to health impacts, traffic congestion, the lack of job development, the lack of revenue development, and the harm from a project which vitiates urban planning standards, such as Complete Streets, and depreciates its environment. The City is looking to HUD to grant \$30 Million dollars to rebuild Church Street South, and follow the Hill to Downtown plan recommendations. The City is focused on long term benefits, such as requiring affordable housing units to remain for 55 years. In this context, the State pursuit of a plan for a garage with an expected 50-year life span is clearly unreasonable, and will negatively impact at least two generations of people living and working in the neighborhood and the region.

####

Contact:

Anstress Farwell, President

urbandesignleague@att.net

203 624 0175