

To: Planning Board
From: David Kooris, DSSD
Re: ZB Application 221-25; Transportation Center Design District

Dear Planning Board members:

Stamford Downtown Special Services District generally supports the concept of increasing intensity of development within close proximity of the Stamford Transportation Center, and we therefore are in support of this application.

We would, however respectfully request a second look at some of the permitted uses, particularly retail and hotel uses.

Retail: The proposal narrative indicates that large-scale retail and entertainment uses are prohibited in this application. But the definition of “large-scale retail” is unclear. Over the past few years, there have been several new mixed-use zones developed by staff and proposed by the Zoning Board. Each has generated some discussion of appropriate neighborhood retail uses that would be suitable in each area. DSSD has suggested a more unified approach, in which a list of suitable neighborhood retail uses is developed and applies to all mixed use zones, with appropriate restrictions on size of the retail uses. The list would include retail uses that are necessary for neighborhood support, and not include retail uses that are, by their nature and size, destination retail uses that would be more appropriately located in the center of the Downtown. For example, a 15,000 square foot drugstore, or a 70,000 square foot food store, can be seen as essentially neighborhood uses. On the other hand, while a 3,000 square foot bookstore may well be appropriate, a 15,000 square foot Barnes and Noble really belongs in the Downtown. Size restrictions on retail uses can assure that they are truly neighborhood uses.

In fact, the land use process in Stamford has recently started to deal with the unrealistic retail expectations of the past. Where past zoning has required, or bonused, ground floor retail throughout the Downtown to promote pedestrian interaction, we have seen that lead to empty storefronts along the pedestrian way to the Transportation Center. More recent applications within the Downtown have not encouraged more retail outside of the traditional retail areas. Why would we provide opportunities for destination retail to locate outside of the Downtown? DSSD is not opposed to all retail outside of the Downtown, but wants to be sure that retail outside of existing retail centers or Downtown is primarily neighborhood serving.

Hotels: Some of Stamford’s larger hotels are located outside of the Downtown. That is because they were built at a time when Downtown Stamford was not an attractive place to stay. But that has changed. Today, Downtown Stamford is much more preferable as an overnight location. Hotels bring in a clientele looking for evening activities: restaurants and entertainment, which can be found in Downtown Stamford. A concentration of hotels in the Downtown increases the value of the hotel location, and solidifies Stamford’s reputation as an enjoyable place to stay overnight.

DSSD suggests that all hotel uses be restricted to the Downtown, and that all hotel uses be stricken from the list of uses permitted in this zone. In fact, "Hotel, excluding a banquet use" was permitted in the SRD-S zone, and the land use staff and Planning and Zoning Boards all approved plans for a hotel WITH a banquet facility despite the definition. And there is really no effective zoning difference between a regular Hotel and an Extended Stay hotel. Similarly, there is no zoning definition for Apartment Hotel and Apartment Hotel for the Elderly. Including those uses is likely to lead to manipulation of the regulations to permit a traditional hotel under a different name.

So, what if someone comes up with a unique plan that would include a hotel within an innovative Transportation Center design? When and if that ever happens, the proponents can apply for a change in the zoning regulations that would permit it, and they would have the burden of showing it is appropriate in that specific spot.

We thank the Land Use boards for the opportunity to comment on this application. Again, we in general support the concept of increased intensity and mixed-use immediately south of I-95.

David Kooris
Stamford Downtown Special Services District