

To the Norwalk Planning Commission
From the Eastern Norwalk Neighborhood Association's Committee for the Norwalk Plan of Conservation and Development (Laurel Lindstrom, Marija Bryant, Gordon Tully, Sarah Hunter, Diane Lauricella)

At the conclusion of the five-hour Eastern Norwalk Neighborhood Association Tuesday, January 17, 2006 special meeting, held to review the Plan of Conservation and Development Planning Principles, the ENNA identified the following overriding concerns:

1. Structure and content of Plan of Conservation and Development

- Consultant to be hired by the city to draft the Plan of Conservation and Development document needs to have knowledge of latest planning strategies and make use of examples of master plan documents from other towns throughout the USA in the drafting of Norwalk's plan. The consultant would work with the Planning Commission, the neighborhood associations and the public to determine the need for changes in the planning principles based on these latest planning strategies and on the statistical information (appendixes) that become available before the plan is approved. Recommendations stated in the planning principles document that are based on statistics and studies not yet available for review by the public need to be removed.
- When possible and where appropriate, the plan needs to present goals and objectives that are specific, measurable, actionable, and have a recommended timeframe. These can then serve as a useful guideline for implementation and a framework for measuring progress.
- The organizational structure of the Plan of Conservation and Development could be improved over the 1990 plan. The ENNA recommends inclusion of a section on the specific neighborhoods of Norwalk based on the neighborhood associations and the plans they submitted. Each neighborhood has unique needs that we strongly recommend be included in the Plan of Conservation and Development.
- The social policies listed in the planning principles document, focusing on issues not within the purview of the Plan of Conservation and Development, need to be removed. The planning principles that arbitrarily support one program/organization, or selectively list specific organizations, need to be eliminated or revised.

2. Oversight of zoning regulation changes

- The planning principles that can only be achieved through zoning regulation changes need to be stated to indicate a support for these changes.

3. Preserving neighborhoods and neighborhood quality of life

- Support for historical preservation, environmental protection and sustainability. Potential changes to local legislation need to be supported. These specific legislative preservation components are essential to protecting and enhancing the quality of life of neighborhoods and for the people who live and work in Norwalk. If the State enabling legislation does not support measures that would benefit Norwalk, the master plan should encourage working with legislators to develop or change the legislation to better protect our valuable historic and natural resources.
- Policies and goals specific to traffic calming measures need to be included as an essential component in all road construction principles and goals. Improving traffic flow should not be done at the expense of neighborhoods that result in the destruction of neighborhoods. Wider roads destroy neighborhoods and increase speeding. Creative alternatives to automatic widening of roads and placement of traffic signals need to be explored. Examples are: neck-downs; striping; landscaped medians; street side parking; sequenced traffic lights; selective turnout lanes; and roundabouts.
- Inclusion needed in Plan of Conservation and Development of unique aspects of neighborhoods within Norwalk, including policies and goals to strengthen their special character, and to help them meet their potential as they develop. While not all neighborhoods qualify for historic designations, many have unique characteristic that would be recognized and better protected with some sort of neighborhood conservation zoning or zoning overlay. This has been done in other cities and should be included in the plan as worth exploring.

We have reviewed the following planning principles document and made comments on several points. We have used “~~strikethrough~~” to delete phrases or goals that we recommend get removed from the list. We have “**bolded**” points that we would like included in the document. And we used a double asterisk ** before our comments about specific points or sections.

PLAN OF CONSERVATION AND DEVELOPMENT PLANNING PRINCIPLES

Draft dated December 13, 2005

GOALS & POLICIES

1. CITY WIDE

Goal

~~Promote the balanced growth of Norwalk to maintain the economic vitality of the city and retain the character of its neighborhoods.~~ **Promote the economic growth of the city without negatively affecting the residential and historic character of Norwalk's neighborhoods.**

Policies

Improve Norwalk's economic base by seeking private investment within the community; encourage diversity in commerce and industry; coordinate capital budget expenditures with commercial and industrial development.

-Promote safe, affordable, quality housing for all segments of the community; ensure that temporary shelters serve as emergency or transitional housing for citizens of Norwalk.

-Protect the city's environment and natural resources for current and future generations.

-Utilize the Plan of **Conservation and Development** for Norwalk to establish municipal priorities, undertake long-term financial planning, **and guide the review and revision of zoning regulations.**

-Provide an efficient and effective system of transportation; improve traffic flow and safety; improve rail and bus services. ****suggest: replace "flow" with "control" ****

-Investigate creative alternatives to manage traffic, such as roundabouts, narrower roads, street side parking, sequenced traffic lights, etc. that improve efficiency while meeting the objectives of the immediate area, recognizing that speed of travel is not always the objective.

-Improve recreational facilities; **including buildings, parks, bridges, surface parking lots, and sidewalks, and** provide programs to serve the varied segments of our population.

-Improve the appearance of Norwalk and the image of the entire city by emphasizing quality design of all public **(including city-owned historical properties)** and private facilities.

-Maintain all public facilities at a high standard; implement systematic programs for their repair and maintenance. **(including city-owned historical properties).**

-Improve the management of all public facilities to maximize their efficiency and effectiveness and to minimize the need for capital expansion.

-Continue to actively seek and listen to public participation in the preparation of future plans for the city or any part thereof; hold at least one public meeting per year to solicit public input, **and hold meetings upon public request.**

-Support an active and ongoing monitoring of the Plan's progress through ongoing meetings, seeking partnerships with neighborhood groups.

-Support neighborhood associations in activities that benefit Norwalk.

- Promote and support sustainable design standards for all private land use applications and municipal building and land use projects.

** Need community design review group to anticipate development and integrate development and roadway construction. **

Goal

Maintain efficient and responsive city government.

Policy

-Implement a continuing program to evaluate city activities and programs to be assured that the city benefits from an efficient government operation; ensure appropriate competition for contracted services.

-Implement a continuing capital budget management program, including a plan of debt reduction.

Goal

Modify specific area plans to conform with the Plan of **Conservation and** Development.

Policy

-Upon the adoption of the Plan of **Conservation and** Development, review and modify as necessary, specific area plans **and zoning regulations** to agree with the goals and policies of the Plan of **Conservation and** Development.

Goal

~~Protect public health, safety and welfare by encouraging education, enforcement, rehabilitation and other available means to eliminate the sale and use of illegal drugs in Norwalk that threatens the structure of our society.~~ ** these are social policies

Policy

~~Support efforts to prepare, adopt and implement a comprehensive program to combat alcohol, tobacco and substance abuse.~~** these are social policies

2. LAND USE AND ZONING

** Why are there no “goals” in this section?

OVERALL

-Create new Village Districts where appropriate **and ensure consistent application of the regulations in existing Village Districts (Rowayton Avenue and East Avenue).**

-Allow for the future needs of Norwalk to be met as identified in this Plan (i.e. housing, economic growth, community facilities, etc.).

-Allow new development which does not exceed the capacity of infrastructure systems (i.e. roads, sewers, water, etc.); require new development to expand infrastructure capacity where needed; limit new development where this cannot be done; conduct an assessment of infrastructure.

- Preserve and enhance **the unique** character of Norwalk's **neighborhoods**.
- **Examine appropriateness of form-based zoning in Norwalk.**
- Protect the environment. ****This is too vague, what needs to be done? ****
- **Incorporate progressive zoning initiatives, such as River Conservation overlays, that balance land use with environmental impact.**
- Preserve property values. ****This is too vague. Why not increase values? What land use and zoning will do that? – Are these property values relative to inflation? Value is described as monetary, or as value to the homeowner who enjoys the existing character and resources of their neighborhood? ****
- Provide stability in land use and zoning. ****What does this mean? Stability in land use and zoning is not the goal: it is to achieve the desired effect. If anticipatory or reactive changes are necessary, make them as needed. Switch to form-based zoning. ****
- Preserve historically and architecturally significant buildings, ~~where economically feasible.~~ **** Recognizing that economics are only one consideration whereas historic preservation adds to neighborhood character, property value, and the cultural and aesthetic value of the city as a whole. The master plan needs to take the same unequivocal stance on historic preservation as on natural resources, neighborhood character, open space and other quality of life issues. ****
- **Encourage urban/suburban open spaces be set aside throughout the city, especially in inner city neighborhoods.**
- Establish design guidelines that improve the appearance of residential, commercial and industrial areas. ****Who decides what is meant by improve? ****
- Encourage the use of mass transit **and incorporate bike and pedestrian-friendly design into all private and public land use projects.**
- Provide a guide to the Zoning Commission in their review of the zoning regulations and map. ****Need explanation. ****
- Use ~~streets~~, the railroad, natural features or property lines as boundaries between different land uses. ****Using streets as boundaries is not a good idea – street is the object that needs to be maintained. ****
- Minimize the number of nonconforming uses. ****Too vague, need this to be defined. ****
- Establish and maintain **effective zoning by adequately funding staffing needs including legal assistance.** ~~an effective program of zoning enforcement; support the adoption of state legislation to strengthen the enforcement powers of zoning officers.~~ ****Need MONEY for zoning enforcement. They have the power.****
- ~~Minimize variance requests to the Zoning Board of Appeals.~~ ****If Master Plan does its job in providing effective guidelines for zoning changes, ZBA variance requests will be limited to anomalies. It is not the city's objective to keep citizens from applying for variances.****

RESIDENTIAL

-Modify zoning regulations to reduce height and bulk of single family residences (height, setbacks, coverage).
 **Too limited and may not solve the problems that have made local headlines. Should recommend some of the more innovative zoning tools such as FAR, neighborhood preservation zones, form-based zoning, etc. "Reduce height and bulk of SF residences" is not the goal. Good design is the goal. Perform a form-based inventory to rewrite zoning requirements area by area in order to maintain and enhance and exaggerate differences. **

-Encourage "New Urbanism" design by reducing front setbacks and providing bonuses for front porches and other architectural features. **Too limited in thinking, similar to above.**

-Encourage appropriate occupations **home-based businesses while protecting the neighborhoods** as a means to reduce commuter traffic.

~~-Minimize social programs and businesses allowed in residential zones.~~ **In some cases, social programs in neighborhoods could be good. This is not a good generalization to make. Minimizing social programs and business in residential zones is not the goal: it is to provide creative mix of uses. **

-Encourage the adoption a light ordinance that applies to residences, i.e. automatic spot lights. ** No one's light beams should extend over the property lines. **

** Why not extend East Avenue village district to below Route 95? **

-Preserve the character of residential neighborhoods by:

-preventing encroachment from incompatible land uses

-minimizing traffic impacts from surrounding uses

-Maintain protection of residential uses which abut commercial or industrial uses by strengthening requirements for landscaped buffers so as to minimize adverse effects from light, noise, visibility, etc.

-Provide for additional housing opportunities to meet the needs of Norwalk's changing population and to balance economic growth. ****NEED DATA TO SUBSTANTIATE POPULATION ESTIMATES****

COMMERCIAL

-Minimize impact of businesses on adjoining residence zones through a light ordinance.

-Maintain requirements for landscaped buffers where commercial uses abut residential uses so as to minimize adverse effects from light, noise, visibility, etc.

-Retain the portion of East Avenue zoned East Avenue Village District and maintain it primarily for small-scale professional offices.

-Strengthen the revitalization of the West Avenue and Reed Putnam areas by encouraging mixed-use development (i.e. offices, stores, services, restaurants and theaters together with housing, parks and cultural facilities). ** Without a context of economic and demographic changes expected in Norwalk, one cannot determine if this principle is appropriate. Need data. **

-Restrict large-scale development to the West Avenue and Reed Putnam areas and to the vicinity of Main Avenue, immediately north of the Merritt Parkway; exclude large-scale commercial development elsewhere.
 ** Without a context of economic and demographic changes expected in Norwalk, one cannot determine if this principle is appropriate. Need data. **

INDUSTRIAL

~~-Implement recommendations of the Industrial Zones Committee report.~~ **Cannot recommend implementation of report until report is reviewed, so this item should come out. **

MISCELLANEOUS

-Parking garages are encouraged in urban centers.

**Need to clarify that parking garages are preferred over surface parking. We recommend adding that parking garages should be as small as possible to maintain economic viability and located through the developed area instead of one mega-garage. Minimize the size of parking garages – provide “pocket” parking. Break up large parking expanses. Be more specific about hiding garages. **

~~-Encourage water-dependent uses in appropriate locations along the waterfront.~~ **that do not adversely impact environmental resources.**

3. ENVIRONMENT AND NATURAL RESOURCES

INLAND AND TIDAL WETLANDS

Goal

Protect and restore inland and tidal wetlands.

Policies

-Utilize conservation developments as a means to preserve natural resources and protect environmentally sensitive areas.

-Create a natural resource inventory including an update to the inland and tidal wetland maps.

~~-Continue a policy of no net loss of wetlands and enact mitigation measures for the disturbance of wetlands.~~
Springly enact wetland re-creation measures as one mitigation technique.

- Support adequate qualified staffing of inland wetland department and Tidal wetland Zoning Department. **This could be offset by consultant services utilized when needed on specific projects. **

-Encourage conservation developments that minimize the disturbance of wetland areas.

-Update the mapping and evaluations of inland and tidal wetlands by the Conservation Commission and the Department of Environmental Protection as soon as possible and provide Capital Budget funding.

-Encourage the increase of local and state penalties for wetland violators to discourage illegal activities.

-Protect environment by implementing progressive zoning initiatives by staying current with environmental issues, and use of environmental experts to recommend up-to-date strategies.

COASTAL AREA**Norwalk Harbor/Waterfront****Goal**

Implement the goals and policies of the Coastal Management Act and the Coastal Area Management Plan for Norwalk.

Policies

-Increase **environmentally friendly** public access to the waterfront, **when appropriate and only after an environmental impact evaluation has been completed**, by the following methods:

-encourage public walkways **where feasible** as part of developments along the Norwalk and Five Mile Rivers and their harbors

-provide capital budget funding to fill in "gaps" in the Riveredge Park and Bikeway along the Norwalk River, **in sections that won't compromise or negatively impact environment, safety or security, and only if appropriately sited after a professional environmental impact assessment.**

-preserve and enhance public views of coastal waters

-improve street ends for public access to the waterfront and provide Capital Budget funding

-Encourage all marinas to join the CT Department of Environmental Protection's "Clean Marina" program that reduces polluted runoff of anti-fouling paints, oils, etc.

-Continue upgrading the sewage treatment plant; provide a cost/benefit analysis of sewer separation of combined sanitary and storm sewers before continuing to separate; limit extension of the sanitary sewer system solely to areas where septic systems are not viable. **** Hasn't cost/benefit analysis been done already? ****

-Require sanitary pump out facilities at marinas or implement alternatives including expanding boater's education to increase usage of pump out facilities and promoting the proper use of holding tanks and pump out facilities; enforce state regulations for the disposal of waste on boats.

-Continue monitoring the water quality of Norwalk Harbor and perform a study of water quality at storm outlets to assess the environmental impact of this pollution source.

-Incorporate vegetative buffer systems in all land use projects as an additional alternative means of providing natural filtration and reducing polluted runoff.

-Support regulations for waterfront property owners to maintain and clean up shorelines to prevent materials and debris from entering the harbor, including monitoring the condition of seawalls.

-Evaluate and protect coastal and other fragile natural resources. ~~by securing conservation easements as part of development of a property.~~ **** Why are we saying "securing easements" here, shouldn't it be case-by-case? Conservation easement is just one of many tools. ****

Islands**Goal**

Preserve the Norwalk Islands in their natural state and protect them from incompatible development.

Policies

-Support the objectives of the national wildlife refuge designation.

Shellfish

Goal

Improve the quality of coastal waters and encourage **environmentally responsible** water-dependent uses along the waterfront so as to enable a continuation of shellfishing.

Policies

-Support a commercial fishermen's wharf in Norwalk Harbor south of the Stroffolino Bridge.

FLOOD HAZARDS

Goal

Prevent loss of life and minimize property damage during periods of flooding.

Policies

-Enforce code and zoning requirements for properties in flood zones.

-Grind down (lower) roadways to older heights when repaving to improve urban street drainage,

-Maintain Federal Flood Insurance.

-Maintain the Federal Flood Insurance Program to provide insurance for property owners in flood hazard areas.

-Continue to support the Federal Emergency Management Agency's policy of restricting development within floodways.

- Incorporate natural vegetative buffers as a means of flood and erosion control technology.

-Increase funding for zoning enforcement so as not to jeopardize Federal Flood Insurance.

AQUIFERS

Goal

Protect the quality of the groundwater system that supports the public water supply and private wells.

Policies

-Implement a local aquifer protection program which will result in:

-support continued remedial action by the United State Environmental Protection Agency for the Kellogg-Deering Wellfield Superfund Site to protect the wellfield from further contamination, provide qualified staff member to the Conservation Commission

-protection of the Betts Pond Brook, Five Mile River, **Silvermine River**, and other aquifers to guarantee quality groundwater for future generations

-Encourage DEP **and 1st Taxing District** to provide a detailed map of aquifer recharge areas by 2007

-evaluation of potential groundwater systems to determine the feasibility of implementing protection standards which will insure the quality of future water supplies

-zoning regulations for mapped recharge areas with a concentration on the existing wellfield's recharge area. The regulations will limit land uses in such areas to those compatible with aquifer protection standards.

-Encourage conservation measures to insure our public **and private** water usage does not exceed safe yield standards.

-Be more aggressive about finding and remediating underground pollution.

POLLUTANTS

Air Quality

Goal

Achieve the Clean Air Act ambient air quality standards.

Policies

-Support construction of new Route 7 from Norwalk to Danbury to reduce air pollution caused by traffic congestion **** Some ENNA board members would like to see this removed from Norwalk Master Plan.****

-Encourage use of Danbury line, Metro North, and other mass transit to minimize need to drive.

-Assess air pollution effect from existing industries and enforce adherence to clear air standards.

-Support creation of vegetative buffers and urban open space preservation as a means to upgrade air quality.

-Support a comprehensive program to alert the public to the possibility of existence of radon gas in certain geologic sections of the city.

-Support incorporation of mass transit and bike/pedestrian planning elements in all private and public land use projects as a means of reducing air pollution.

~~-Encourage~~ **Support** a citywide tree planting and maintenance program.

-Support the Connecticut Department of Environmental Protection's implementation plans to achieve ambient air quality standards.

Noise/Light ****We suggest these be separated into two sections, not combined. ****

Goal

Improve the standards for noise and light pollution to ~~maintain~~ **improve** -the health and quality of life our residents enjoy.

Policies

****Include residential in lighting ordinance.****

-NOISE: Support recognition of noise pollution as a true public health enforcement issue and adequately staff and supply equipment for the reduction of noise sources.

-LIGHT: Incorporate elements of the dark skies initiative which requires methods of drastically reduce light pollution.

-Encourage screening of street lights, **and improve directional spot lights.**

-Modify city specifications to require that street lights have a residential character.

-Create design guidelines for all street lights.

-Evaluate all city-owned sites to mitigate adverse impact from light.

Solid Waste***Goal***

Implement a citywide solid waste management program that achieves a minimum of 25 percent reduction in the solid waste stream by 2015.

Policies

~~-Increase the number of household hazardous waste disposal days.~~

-Investigate possibility of a regional household hazardous waste facility as a better economic and convenient alternative to increasing the number of local collection days.

-Support and implement a component to hazardous and electronic collection days that will support reduced usage and promote use of alternatives.

-Encourage the establishment of “bulky items” pick up once or twice a year to minimize unlawful dumping of appliances, furniture, etc., under bridges and in vacant lots.

-Encourage energy-efficient “Green Buildings” **as defined by CT Green Building Council. (or USGBC)**

-Evaluate the feasibility of using rail or barge for the shipping of solid waste to resource recovery or other appropriate points.

-Encourage the use of recycled materials for construction, paving and other high volume uses, where technically and economically feasible.

-Promote use of all state available incentives for “green building”.

Hazardous Materials***Goal***

Protect public health and the environment by the proper handling and disposal of hazardous materials.

Policies

~~-Encourage the implementation of remedial measures at sites contaminated with hazardous wastes as identified in the state's January, 2000 inventory.~~

-Support a proactive cooperative effort by state and local officials to review and seek implementation of appropriate remedial measures at sites identified in states 2000 inventory.

-Explore, eliminate and remediate existing hazardous waste discharges.

4. ECONOMIC BASE

ECONOMIC DEVELOPMENT

Goal

Maintain a diverse local economy to ensure that the opportunities, benefits, and responsibilities of the economic system are shared fully by all Norwalk citizens.

Policies

- Work with our State Representatives toward property tax reforms. ****Be specific about the nature of property tax reforms.****

-Maintain a skilled labor force to meet the needs of local employers by creating a partnership among local industry, public and not-for-profit agencies, educational institutions and the Redevelopment Agency. This includes college level, high school, and other specialized job training programs, including those for the unemployed.

-Support sustainable building and land use design standards in all private and public land use projects.

-Provide and maintain essential infrastructure to retain and attract desirable businesses. ****Please define "desirable businesses" Be specific about what "essential infrastructure" is to support business. ****

**** Include making Norwalk an interesting urban area that is not car-dominated.****

-Promote access to job opportunities for all citizens by encouraging improved public transportation, before and after school programs, child care facilities, and job placement services.

~~-Support programs that will promote tourism in Norwalk; support legislation that will provide sufficient funding for the Coastal Fairfield County Convention and Visitor Bureau.~~

-Provide zoning that allows a wide range of housing opportunities to ensure that the housing needs of all segments of the labor force are met.

-Encourage diverse job opportunities for various employment sectors within Norwalk.

-Support tax incentives, grants and state and federal programs, such as the Connecticut Enterprise Zone Act **and other similar programs** which encourage investment in Norwalk.

-Encourage business community sponsorship of activities, underwriting improvements **and public/private partnerships** that enrich Norwalk and the lives of its residents (~~i.e. concerts, historical buildings, "Clean and Green", educational support, Norwalk Health Care and other social service and cultural organizations, etc.~~).

**** Until Industrial Zones Committee report is complete and available for public review, we reserve comment, but encourage recruiting clean industry as a source of economic vitality and well-paying jobs. ****

OFFICE

Goal

-Encourage office development and adapt the capacity of infrastructure systems, to expand employment opportunities.

Policies

-Restrict large-scale office development to the West Avenue and Reed Putnam areas and to the vicinity of Main Avenue, immediately north of the Merritt Parkway.

RETAIL/SERVICE

Goal

Expand economic growth in the retail and service sectors to capture a larger share of the regional market and to maximize employment opportunities. ****Need data on regional market's opportunities to assess statement.****

Policies

-Preserve the character of neighborhood businesses. ****Be more specific about "preserving the character" of neighborhood business. Should be major program to encourage and enhance neighborhood business.****

-Encourage the location of a neighborhood market in South Norwalk and a new supermarket on Westport Avenue.

~~-Expand the parking supply in Norwalk's downtowns.~~ ****No need to expand parking supply. Provide a little less parking than seems needed. Provide jitney service to avoid over-programming parking. ****

-Strengthen retail activity in the West Avenue/Wall Street and Reed Putnam areas and place emphasis on people-oriented uses.

-Direct retail and service sector growth along Routes 1 and 7 where the infrastructure system can adequately support development. **** Retail expansion along Route 1 and 7 is not a good idea per se. Be more specific. Expansion should be tied to overall design and traffic solution.****

INDUSTRIAL

Goal

Implement the recommendations in the Industrial Zones Committee report. ****Cannot recommend that it be implemented without assessing what is in the study.****

Policies

- Implement the recommendations in the Industrial Zones Committee report. ****Cannot recommend that it be implemented without assessing what is in the study.****

** Consider development of area along inlet in SoNo as “green” industrial area. **

-Encourage small-scale start-up entrepreneurship associated with housing – home industry.

5. HOUSING

Goal

Maintain a diverse housing stock and rehabilitate Norwalk's existing inventory of public, private non-profit housing. **Need explanation. Should this also include any historic rehabilitation tax credits? **

Policies

-Assist elderly residents in remaining in their homes by promoting the use of accessory apartments, property tax relief and other available programs.

-Protect residential neighborhoods from incompatible development. **What does “incompatible development” mean? Who decides? **

-Improve enforcement of zoning, building and health codes to protect the public from unsafe and unsanitary housing conditions. **“Improve Enforcement” means funding additional staff; include as major budget priority.**

-Encourage private housing rehabilitation through the use of the Phased Increased Assessment Program, low interest loans, grants and other municipal programs targeted to older neighborhoods. **What is Phased Increase Assessment Program? **

**Add emphasis on green housing and energy conservation. Tie to growing state funding for energy savings. Could committee be established to assess all developers plans for potential ‘greening’? If a committee, perhaps AIA, or LEED members got a review of plans where they could pinpoint opportunities for green roofs, gray-water systems, etc, and developers would come to know that this is important to Norwalk. Perhaps even provide incentives other than state’s, for green building? **

**What “deed restrictions” are contemplated for accessory apartments? **

Goal

Provide quality rental housing, elderly housing, and low and moderate income ownership housing, according to the projected needs of Norwalk residents.

Policies

-Encourage deed restrictions on accessory apartments to provide affordable housing.

-Direct the South Western Regional Planning Agency to elicit greater regional cooperation in solving the housing crisis with every town accepting a share of this responsibility, as soon as possible.

-Continue to provide capital budget funds to the Housing Sites Development Agency for the acquisition and improvement of sites for affordable rental and ownership housing. **Need data on past outcomes to substantiate policy.**

-Maintain existing residential densities and mixed-use development incentives in the downtown areas and along commercial corridors to encourage a balance between new jobs and housing opportunities.

****Why “maintain existing densities?” How is this going to add housing? ****

-Urge the continued support of Norwalk's local, state and congressional representatives in securing state and federal housing funds and/or excess properties for public and nonprofit housing projects.

-Support state and local programs that increase opportunities for first time homebuyers, including the CT. Housing Finance Authority's (CHFA) Home Mortgage Program, Norwalk's Moderate Income Housing Regulation and the State Department of Economic and Community Development's Down Payment Assistance Program.

-Encourage the construction of a diversity of housing types and sizes to meet the varied needs of the marketplace.

~~Encourage~~ **Develop new zoning regulations that require** a minimum of ten percent (10%) affordable units in all developments over 12 units.

Encourage energy conservation and energy efficient housing renovations and new construction in private and public housing.

-Continue to provide capital budget funds to redevelop the West Avenue and Reed Putnam areas with new housing and mixed-use developments. Encourage at least 20 percent of such housing to be affordable to families with incomes at or below the Connecticut Housing Finance Authority's (CHFA) income limits.

-Provide affordable housing in accordance with the guidelines set forth in the “Affordable Housing Strategy Options for the City of Norwalk, Connecticut.

Goal

Encourage housing for people with special needs, including the homeless, the mentally ill and physically and developmentally handicapped persons.

Policies

-Continue to support public and private efforts to provide emergency shelter to Norwalk's homeless families and individuals.

6. INFRASTRUCTURE

SANITARY SEWER SYSTEM

Goal

Provide a sewer system that protects the public health and environment.

Policies

-Extend sanitary sewers only where it can be demonstrated that septic systems are not viable.

****Connection to sewers should be limited to lines that have required capacity.****

****What are standards for “non-viable” septic systems? Consider a moratorium on sewer extensions? Goals for innovative systems need to be defined? ****

~~Require that all properties with sewers available connect to those sewers.~~ **Do not require that all properties connect if they have viable septic that is maintained and functions properly.**

-Increase enforcement and fines for illegal discharges into sewer lines.

-Provide capital funding to accomplish the following needed improvements:

-continue the Department of Public Work's programs to rehabilitate the existing sanitary sewer network including trunk lines, interceptors, force mains and pump stations

-limit the extension of the sanitary sewer system solely to areas where existing sanitary facilities are not viable

STORM SEWER SYSTEM

Goal

To prevent flooding and the threat to health welfare and property.

Policies

-Continue to provide Capital Budget funds for drainage projects to solve small, localized drainage problems.

-Adopt a systematic maintenance program for catch basins to prevent the transport of silt, sediments and road pollutants into the aquatic environment.

-Minimize storm water runoff from new development by ensuring compliance with the Department of Public Works Storm Drainage Manual.

-Encourage addition of pervious building and paving materials and other forms of innovative storm water retention and control systems. **minimize asphalt*

-Encourage use of porous paving, vegetated wetlands, other forms of underground retention/detention.

-Grind down streets as they are repaved to restore original drainage.

-Prevent industrial wastes and effluent generated from septic and sanitary systems from going into the city's storm drainage system.

-Use natural drainage areas in lieu of structures wherever possible; maintain natural drainage systems and wetlands to the greatest extent possible.

-Require use of dry wells and slotted pipes for all new construction as a means of ground-water recharge.

ROAD SYSTEM

Goal

Maintain a system of streets and bridges to facilitate safe and efficient vehicular movement ~~through~~ **within** Norwalk.

Policies

- The Department of Public Works should provide a plan for the evaluation and repair of roads including capital budget funds.
- Identify streets for traffic calming and provide capital budget funds.
- Investigate the creation of a one-way street system in some neighborhoods and identify methods other than speed humps to slow traffic.
- Restrict through trucks in residential areas.
- Create a City plan for bikeways linking residential areas with downtown and provide capital budget funds. (or Transportation section)
- Evaluate opportunities for east/west and north/south bike commute systems when repaving roads.**
- Create a plan for construction of sidewalks and provide capital budget funds.
- Continue to implement the Road Evaluation and Pavement Management program by providing Capital Budget and Operating Budget funds for the 4R Paving Program (rehabilitation, recycling, repaving, and reconstruction).
- Improve traffic flow and safety at intersections with high accident experience.
- Require the use of roundabouts wherever possible.** **Consider making roundabouts default first approach at new intersections, following the lead of New York State. **
- Support the completion of new Route 7 to the Route 33 intersection by 2015 and to Danbury by 2015 and complete construction of Route 7 in its entirety by 2015. ** Some ENNA board members do not support inclusion of this item in the Norwalk Master Plan. **
- Adopt a local bridge inspection and rehabilitation/ replacement program; support Capital Budget requests for local bridge (maintenance) program and the use of the State and Federal "Local Bridge Revolving Funds" minimize impact upon neighborhoods and develop designs that are sensitive to the community **and environment** when replacing bridges.
- ~~-Encourage the Connecticut Department of Transportation to reconstruct Route 1 from Exit 14 to Westport to a four lane arterial with left turn lanes at major intersections; begin with Cross Street and North Avenue to Westport Avenue.~~ **We do not support the expansion of Route I to four lanes for a number of reasons including the impact on the historic homes along the route and the increase in traffic that results. There are other and better solutions to the traffic congestion. In addition, since the properties are being studied for addition to the National Register, the DOT will be required to offer alternatives and accept the alternatives that have the least impact on the area. The Master Plan should support alternatives and protect the neighborhoods in the area. Use creative solutions, including roundabouts. **
- Participate in the formulation of regional transportation policies. Support traffic management measures and improvements to mass transit as a first priority.

- Support the Transportation Improvement Program projects
 - Encourage the Connecticut Department of Transportation to improve maintenance of state-owned roads and bridges within Norwalk.
 - Adopt a workable repair and maintenance program for sidewalks and footpaths.
 - DPW and DOT should coordinate road construction throughout Norwalk to minimize traffic disruption from occurring, including evaluation of traffic calming measures, accommodations for walkers and bikers with due consideration for safety and property values.
- ** Insist on involvement of citizens in planning in all major roadway improvements. ****

UTILITIES (*water, gas, electric, telephone, cable*)

Goal

Require public utilities to meet the present and future demands of the business and residential community.

Policies

- Plan for proper location of sites for cell towers
 - Provide needed electricity by a system of underground power lines
 - Encourage underground electric, cable television and telephone lines to minimize service disruptions due to inclement weather and to improve the appearance of Norwalk.
 - Support the adequate provision of natural gas and the expansion of natural gas transmission lines as needed, to meet projected demand within Norwalk only.
 - Continue to demand an adequate supply of electricity to meet projected needs. ****What is an “adequate supply” of electricity? Be specific, and tie to conservation****
- **Assess electrical and water needs with first consideration to making improvements in conservation. Conservation should be the initial remedy, whether by creating incentives or educational programs or other innovative techniques, additional infrastructure to be assessed after conservation strategies are implemented.****
- Encourage incorporation of onsite generation of energy, heat, ventilation and air conditioning technologies in all future public land use and building projects.**
 - Encourage the use of energy efficient fixtures and appliances; adopt educational programs which will promote resource conservation and discourage waste, including encouraging development of “Green” buildings as recommended by the Leadership in Energy and Environmental Design (LEED) program of the Connecticut Green Building Council.
 - Encourage native forms of vegetation in landscaping to minimize water requirements; discourage invasive species.
 - Support the Long Range Water Supply Plans of the First and Second Water Districts, to meet the future water supply needs of Norwalk.

PARKING***Goal***

Provide and maintain municipal off-street parking facilities to minimize street congestion and other detrimental effects on adjoining land uses.

Policies

-Survey the parking provided for existing buildings and uses to evaluate the adequacy of existing parking standards.

~~-Build municipal parking garages when needed at: Main and High Streets, Isaac's Street (mixed use), Webster Street, and Washington Street; require designs that blend in with the surrounding area.~~

~~**Public hearings related to specific applications will deal with these issues.**~~

Encourage minimizing available parking and use of jitneys/shuttles/trolleys.

-Encourage centralized parking in the Norwalk and South Norwalk downtowns which allows shared parking by uses with complementary demands in both daytime and evenings.

-Support continued use of fee-in-lieu of parking in the Wall Street area and in South Norwalk.

**Need to clarify that parking garages are preferred over surface parking. We recommend adding that parking garages should be as small as possible to maintain economic viability and located through the developed area instead of one mega-garage. Minimize the size of parking garages – provide “pocket” parking. Break up large parking expanses. Be more specific about hiding garages. **

Note that current thinking sees value to on-street parking in terms of making streets more walkable (by creating a barrier between pedestrian and traffic) and by providing natural traffic calming as people pull into and out of spaces. Should not immediately default to off-street parking facilities without examining the aspects of the area. For Wall Street, for example, on street parking would be a plus and garages would handle the additional parking needs.

7. TRANSPORTATION**RAIL*****Goal***

Support convenient and reliable rail service to satisfy the needs of commuters and to encourage greater rail ridership.

Policies

-Encourage Metro-North to continue to review and adjust train schedules to meet the needs of residents and the businesses they serve.

-Support increased train service and improved facilities on the Danbury Line, as recommended in a November 2004 Feasibility Study on Danbury Line Electrification by the Connecticut Department of Transportation.

-Anticipate the need for two new stations on the Danbury Line as per the Reed-Putnam Urban Renewal Plan (north of the Maritime Aquarium) and on Wall Street at Commerce Street.

-Provide adequate parking at train stations.

-Incorporate secure bike and motorbike lock-up facilities at all train stations.

BUS AND DISPATCH-A-RIDE

Goal

Support convenient, reliable, and efficient bus, shuttle, Dispatch-A-Ride and other door-to-door transportation services.

Policies

-Evaluate and adjust as necessary the Wheels bus service, Dispatch-A-Ride, shuttles and inter-regional services, such as the Coastal Link to Milford and the Route 7 Link to Danbury, to reflect changes in population and land use and to maximize efficiency.

-Expand the hours of operation of Wheels bus service to later in the evening and on Sundays, encourage additional State and Federal funding to support such expanded service

-Continue design and construction of a new Wheels pulse point **geared to safety, convenience, aesthetics and pollution control** on Burnell Boulevard as part of the redevelopment of Norwalk Center

-Redevelop the east side of the South Norwalk Train Station into an efficient mini Pulse Point and multi modal center for trains and buses serving South Norwalk; coordinate Wheels bus service with train arrivals and departures, including provision of reverse commute rail shuttles.

TRAFFIC

Goal

Provide a safe and efficient vehicular transportation system to serve the city ~~and minimize delays.~~ ****Wording seems to encourage road widening and other strategies that may not be optimum for Norwalk and the neighborhoods.****

Policies

-Encourage major employers to prepare and implement a traffic management plan (i.e. flextime, vanpools, etc.).

-Support Police Department efforts to improve traffic safety by increasing enforcement measures to curtail traffic infractions (i.e. speeding, running stop signs, driving while intoxicated, etc.).

-Expand computerized traffic signal coordination to expedite traffic flow. **** Tie to traffic calming. Speed is not the goal – even flow is the goal. ****

-Continue to implement the traffic safety and accident reduction program in all areas. Make priority improvements at high accident locations.

- Incorporate alternative traffic management methodologies including roundabouts into traffic planning.

MISCELLANEOUS

Policies

-Create a plan for bikeways linking residential areas with downtown and provide capital budget funds in Parks and Recreation budget.

-Explore the need for a wharf or dock open to the public for passenger boats. ****Should include caveats regarding pollution, boat noise, water traffic congestion.****

-Provide capital budget funding to complete a network of bicycle routes.

-Encourage walking by providing a pedestrian circulation system of sidewalks, footpaths and crosswalks, especially in high traffic areas and encouraging participation in the “Become a NorWALKER” program of the Norwalk Healthy Partnership’s Healthy Lifestyles Cardiovascular Project.

~~Encourage the retention~~ **Explore the need and encourage the building of a** of a bus/limousine terminal that serves New York metropolitan airports.

-Explore and support opportunities for water transportation commuter facilities providing that it is compatible with harbor uses and does not add to noise or water pollution.

8. COMMUNITY AND CULTURAL FACILITIES

SCHOOLS

Goal

Provide sufficient school facilities which afford all citizens the opportunity to obtain a quality education.

Policies

-The Board of Education in consultation with the Facilities Construction Committee should provide a five-year Capital Improvement Plan for the school system and provide Capital Budget funds.

-Continue to maintain and improve existing public schools through modernization and additions, as needed to accommodate projected school enrollments. Continue to monitor and project school enrollments in order to make the most efficient use of all school facilities.

-Expand the use of schools to better serve the community. Recreation facilities, auditoriums and classrooms should serve adult education, before and after school programs, pre-kindergarten programs and other structured uses when not in use by the school system.

-Continue to support, by legislative action and other means, quality academic, technical, and vocational training in Norwalk with emphasis on satisfying local labor needs and employment opportunities. Post high school and other public and non-profit educational programs are encouraged.

-Assure the safety of our children, and others by preparing an inventory of pedestrian routes and, where needed, install new sidewalks or footpaths. Maintain all in good condition.

-Plan and implement “Green Building” design principles on all future school construction and renovation projects, as well as all community-use buildings.

HOSPITAL AND HEALTH CARE FACILITIES

Goal

Continue to provide high quality health care facilities in the community and access to these facilities by all citizens.

Policies

-Encourage the continued upgrading and modernization of Norwalk Hospital to meet the needs of the greater Norwalk area.

-Expand and maintain residential/health care facilities including extended stay facilities for the elderly by encouraging the development of a life care facility within the southwestern region of Connecticut, including at Strawberry Hill.

~~-Encourage complete cardiac care at Norwalk Hospital~~

PUBLIC BUILDINGS

Goal

Provide Norwalk citizens with efficient, well-kept buildings and reuse or dispose of public buildings that no longer serve the community.

Policies

- Inventory and evaluate surplus land and buildings for possible disposal.

-Initiate an inspection program to evaluate the condition of city-owned buildings and implement a maintenance program to protect the city's investment.

-Evaluate and incorporate all opportunities for sustainable energy design, retrofit and alternative energy sources for all future building and land use projects .

-Include East Norwalk Library in overall city library system.

COMMUNITY CENTERS

Goal

Provide and maintain non-profit community centers that offer services to a wide segment of Norwalk residents. ****Further definition of these centers needed.****

Policies

- Encourage the creation of neighborhood community centers.

EMERGENCY SERVICES AND CIVIL PREPAREDNESS

Goal

Protect the public's health, safety, and property by providing police and fire stations in strategic locations throughout Norwalk.

Policies

- Study and recommend a new fire station in the northern section of Norwalk adjacent to Rte 7.
- ~~-Encourage the Police Department to work with and maintain a balanced approach to provide services to all sections of the City.~~
- Support funding for the police department to establish substations (satellite stations) in key parts of the city to improve the safety of those areas (for example: Liberty Square.)**
- Need thoroughly tested plan for evacuation and crisis management. Public involvement is crucial.**

HUMAN CARE AND SOCIAL SERVICES***Goal***

Provide human care and social service facilities and programs as needed for all citizens.

Policies

- Continue to encourage the provision of housing and transitional residential care for special population groups such as the elderly, the mentally ill, and physically or developmentally handicapped persons.
- Continue to encourage the establishment of infant and toddler day-care facilities, as needed.
- Encourage the Board of Ed and Health Department to promote education programs to warn of the hazards of drug abuse; promote education and rehabilitation programs for drug abusers; continue to support strong penalties for the use or sale of illegal drugs, smoking and alcohol. ** Should social service programs be in the Master Plan? **

** If social services programs are to be included in Master Plan: Encourage experiments that serve more than one demographic: as older people helping young mothers; young mother training/baby-sitting/work opportunities.**

CULTURAL FACILITIES***Goal***

Provide cultural attractions through a network of public and private facilities that contribute to education, tourism and the high quality of life in Norwalk.

Policies

- Encourage development within the Reed-Putnam Design District and at the South Norwalk Inter-modal Pulse Point to complement the Maritime Aquarium and the Washington Street Historic District.
- Support the Maritime Aquarium and city museums as educational facilities and tourist attractions.
- **We all questioned this policy. What is this about exactly?*
- Continue to support public access to Sheffield Island Lighthouse.
- Create the voluntary position of Officer of Cultural Affairs, appointed by the Mayor, to promote the arts including the Norwalk Concert Hall and to plan for a facility for working studios and artists in residence.

-Support programs that will promote tourism in Norwalk; support legislation that will provide sufficient funding for the Coastal Fairfield County Convention and Visitor Bureau. ****We all questioned this policy. What is this about exactly?*****

****Need more emphasis on artists in residence, more Art Space projects. ****

- Encourage neighborhood events.

HISTORIC DISTRICTS AND PRESERVATION

Goal

~~Protect the historic character of Norwalk through the designation and preservation of historic landmarks, structures and districts.~~

Protect and preserve the historic character of the city.

Policies

- Preserve historic landmarks, structures, and districts by designating and listing on local, state, and national listings of historic resources. ** Do not limit preservation to listed buildings. ******

-Promote Norwalk as a historic tourism destination.

-Support and, where appropriate, initiate changes to State legislation to encourage historic preservation on private and public structures.

-Create and implement a comprehensive historic preservation plan for Norwalk.

-Update the current inventory of Norwalk's historic assets and ensure it's availability to the public.

-Establish Norwalk as a Certified Local Government under the National Park Service program.

-Establish Neighborhood Preservation Zones in areas that do not qualify for state, local, or national historic designation but possess a unique physical character worthy of retention.

-Create zoning incentives for historic preservation through creation of a special zoning designation for historic properties that encourages reuse and rehabilitation.

-Establish design or site plan review for new construction in areas designated as history or as neighborhood conservation zones.

-Enact a demolition by neglect ordinance to ensure that Norwalk's historic assets receive proper maintenance from owners.

-Encourage the preservation of historic buildings.

-When a building is added to the National Register of Historic places, the notice should be added to the Norwalk Land Records by the applicant.

-Use historic preservation as a tool for economic revitalization and to promote tourism.

- Establish local historic districts in South Norwalk Washington Street area, in the area surrounding the Norwalk Green and in the Silvermine area; consider additional district designation based upon historical and architectural significance.
- Encourage private preservation efforts to encourage the rehabilitation and adaptive reuse of historic structures; encourage the dedication of facade easements as a means to preserve the exterior facades of privately owned historic structures.
- Increase fines for violations of the city's demolition ordinance and require approval of final site plans prior to the demolition of an historic structure. ****Since the fines for willfully demolishing a historic building under the 90 day delay are set by the state, might want to reword this to reflect that. Separate the second point as a separate policy.****
- Continue to provide funding in the Historic Commission's capital budget to maintain and rehabilitate public historic structures.
- Develop a comprehensive preservation plan to guide the maintenance and rehabilitation of public historic structures.**
- Continue to promote public awareness of historic properties by posting plaques upon historically significant structures. **** Not sure this is needed. The plaque program is not a city program so not sure if master plan is the right place to have this. There are a lot of other ways to raise the public awareness. ****
- Evaluate the zoning regulations to encourage the retention and reuse of historically significant buildings ~~that are listed in the local or state register of historic places, if economically feasible.~~ ****too limiting.****

9. PARKS, RECREATION AND OPEN SPACE

PARKS

Goal

Provide and maintain an attractive park system that gives people of all ages the opportunity to pursue leisure time interests.

Policies

- Incorporate MASTER PLAN OF PARKS AND OPEN SPACES into this plan and have available to officials and public to reference in all land use decisions.**
- Fund a Natural Resource Inventory of all city parks.**
- Support and fund a Natural Resource Inventory of Andrews Field.**
- Maintain and support the State Heritage Park including Oyster Shell Park north of the Maritime Aquarium.

-Support the construction of a new Route 7 Linear Park within the Route 7 right-of-way. ****Depending upon outcome of Route 7 development.****

-Support the creation of new bikeways in Norwalk and complete the implementation of the Riveredge Park and Bikeway along the Norwalk River. (see Environment Norwalk Harbor)

-Support additional water-dependent uses in Veterans Memorial Park.

-Set a high standard for the maintenance and security of all parks.

-Encourage Parks & Recreation to prepare a new Cranbury Park Master Plan to maximize open space and implement and conduct a resource inventory.

-Maintain a standard of twelve acres of parkland per one thousand as a guideline for acquiring parkland.
****Data needed to confirm this calculation.****

-Provide for parks within easy walking distance in all neighborhoods, including “pocket parks”.

-Encourage spaces for public use within the Norwalk and South Norwalk downtowns. ****Zoning regulations should be changed to require public spaces in downtown developments. ****

-Use park and recreation impact fees to assist with the acquisition and improvement of parks and recreation facilities and public spaces.

-Continue to provide equipment and facilities, which encourage better utilization of neighborhood parks.

RECREATION

Goal

Provide and maintain a greater diversity of recreation facilities and programs to meet the needs of user groups.

Policies

-Encourage the building of an ice skating rink.

-Where feasible, increase public access to the waterfront **after environmental impact study** including the Norwalk, Silvermine and Five Mile Rivers (except for single family houses).

-Expand user fees to partially defray the expense of providing recreational facilities and programs. The funds collected should be designated for improvement of these facilities.

~~-Encourage the building of a municipal golf driving range..~~

OPEN SPACE

Goal

Acquire and maintain open space as natural areas which preserve neighborhood character and ecologically valuable land.

Policies

-Encourage creative financing tools for additional funding for identification and purchase of open space.

- Maintain an Open Space Fund.
- Support the Conservation Commission's plan for open space preservation and selection.
- Support the creation of a restored wetland and nature center at Andrews Field.**
- Continue to use conservation easements, acquisition by a non-profit land trust or other means to preserve open space with valuable natural resources, such as Peach Island, Betts Pond Brook, etc.
- Designate open space parcels, per State Statute 12-107e, to encourage open space preservation via tax incentives.
- Encourage the amendment of State Statute 12-107e to provide municipalities the right of first refusal for parcels designated as open space by the city, and where the property owner has applied for and obtained an open space classification for tax purposes, to require that designated open space be maintained for a minimum period of time, and to require the payment of abated taxes if the property is developed.
- Require that a ninety day right of first refusal be given to the city before a parcel designated as open space by the city and classified as open space for tax purposes can be sold for development.

10. URBAN DESIGN

COMMUNITY CHARACTER & ARCHITECTURAL DESIGN

****We'd like to see this section expanded.****

Goal

Strengthen the character of Norwalk's neighborhoods and commercial areas and improve the quality of architectural design.

Policies

- Create Village Districts where appropriate.
- Encourage the Chamber of Commerce to continue their annual awards program for the best architectural design of the year that will increase public recognition of quality building design. ****Get independent assessment of quality architecture for awards. COC is not the proper agency for recognizing design quality. Local architectural community, AIA, others can do the job.****
- Maintain requirements for landscaping to improve appearance from the street and provide for effective maintenance.
- Create an ordinance to require the demolition or rehabilitation of abandoned or burned-out structures within a certain period of time after fire or code inspections have been completed.
- Continue to review and improve sign regulations.
- Maintain & expand village districts to preserve the character of the districts, to improve the design of buildings and their relationship to the streetscape, and to protect resources of historical and architectural significance.

****As well as Village Districts, should include Neighborhood Conservation zones and other innovative neighborhood preservation incentives.****

PUBLIC PLAZAS & STREETS

Goal

Improve the appearance of public plazas, streets and right-of-ways.

Policies

- Implement a program to clean-up city streets and reduce trash and garbage.
- Continue to encourage the designation of scenic roads.
- ~~Create~~ **Support** a citywide street tree planting and maintenance plan and provide capital budget funds.
- Improve the design of city street signs and public signs.
- Provide **adequate** funding for a street tree planting program to replace diseased trees, plant new trees and improve street tree maintenance.
- Adopt a tree preservation ordinance to encourage the preservation of trees on private property
- Improve the appearance of public plazas and streets by continuing to support capital budget funding for street improvements; particularly the West Avenue/Wall Street and Reed Putnam areas.
- Consider a percent-for-art ordinance to promote the display of works of art in public places and as amenities in large commercial projects.
- Continue to promote volunteer beautification efforts, such as Clean & Green's Programs, neighborhood clean-ups and tree plantings and d continue to support these efforts with an annual awards program.
- Enact an ordinance to require the visible display of street.

**** Is this complete? ****

BECAUSE THE IMPLEMENTATIONS ARE NOT COMPLETED, WE HAVE NOT BEGUN TO REVIEW THIS SECTION.