

June 26, 2025

Marty Wood, Chairman,
Ledyard Planning and Zoning Commission
Town Hall
741 Colonel Ledyard Highway,
Ledyard, CT 06339

Re: Text Amendment Application PZ #25-2ZRA

Dear Mr. Wood:

The Ledyard Planning and Zoning Commission (the “Commission”) has continued the public hearing with respect to its review and consideration of a text amendment application, (Application PZ #25-2ZRA), submitted by Eric Treaster, which proposes changes to the Ledyard Zoning Regulations (the “Zoning Regulations”) that would modify the mass, height, and population density of multifamily developments.

As stated in my June 12, 2025 letter that was previously submitted to you. This firm represents C.R. Klewin LLC, owner of 19, 29 and 39 Military Highway in the Ledyard Gales Ferry Development District (GFDD). C.R. Klewin, LLC which currently has an application under review by the Ledyard Inland Wetlands and Watercourses Commission (IWWC #25-5SITE) related to the construction of a multifamily residential housing development on such properties.

The purpose of this follow-up letter is not to repeat the points made in my June 12th letter but rather to provide this Commission with information why certain comments made by Mr. Treaster on June 12th as well as those made by some members of the public that night, are inaccurate and or are not appropriate for good planning practice necessary to encourage multi-family housing developments in the zones where it is currently permitted by right.

RESPONSE TO MR. TREASTER’S JUNE 12 TESTIMONY

Mr. Treaster suggests that each building have no more than a 5,000 square foot footprint and a reduced maximum height. His amendments would not allow for structured parking and requires

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one parking space per bedroom. He claims that this is not reducing the density of development but that is simply not true. The Town of Ledyard, like much of Connecticut, has a significant amount of land that contain inland wetlands and watercourses. The fact that an individual may hold title to a 10-acre parcel does not take into account such environmental constraints. His changes coupled with a developer's reasonable desire to maximize the apartment unit count would result in an increase in the amount of impervious coverage on a parcel since it is subject to a less generous height allowance. Why? Because a developer would need to construct more numerous 5,000 square foot structures but have no opportunity to build structured parking to minimize the sprawl these amendments would create. Passage of these amendments would remove the thoughtful flexibility currently built into the Ledyard Zoning Regulations to allow developers to provide multi-family housing, minimize sprawl, and preserve the environment.

CONCERNS RAISED BY THE PUBLIC

Following the June 12th, 2025 hearing regarding the text amendment application, further research was conducted on three key areas of concern raised by members of the public: fire safety, school system capacity, and traffic impact. We respectfully submit that the text amendments proffered by Mr. Treaster are not necessary or are, in fact, counterproductive to addressing the concerns raised by the public at the June 12, 2025 public hearing. Overall, the findings summarized are:

1. There are no outstanding fire safety concerns that would prevent the Town of Ledyard from adequately responding to emergencies in a multifamily development such as proposed by C.R. Klewin LLC.
2. Proposed developments are unlikely to overwhelm the school system, which is currently experiencing a decline in student enrollment.
3. Research indicates that multifamily developments tend to generate fewer automobile trips than single-family homes.

I. Fire Safety

On June 16th, 2025, Derek Fauntleroy, a career firefighter with Ledyard Fire Department ("Fire Department") was interviewed by Nayeli Contreras, a second-year law student at the University of Connecticut School of Law who is employed as a "summer" associate with our firm and working under my supervision. Mr. Fauntleroy assessed the Fire Department's ability to handle a potential fire at a five or six-story building.

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According to Mr. Fauntleroy, the Fire Department is fully equipped to handle situations in buildings of this scale. The Fire Department operates a 75-foot ladder truck, sufficient to reach the upper stories of a five-story or six story building. In addition, the Fire Department carries ground ladders that are 35 feet and higher. Lastly, the Fire Department also partners with neighboring fire departments such as Mystic, Sub-Base Groton, North Stonington, Mashantucket, and Mohegan Sun.

Mr. Fauntleroy added that the Ledyard Fire Department did not foresee any concerns with a new development of such height, especially since newer buildings will have standpipes and sprinklers that would facilitate putting out a fire.

Developers must comply with Connecticut State Building Codes which enforces the implementation of sprinklers and standpipes, necessary to effectively handle any fire events.

II. School System Capacity

Public concerns about the potential strain on the school systems were evaluated using nationwide research and local enrollment projections. According to a study conducted by the Joint Center for Housing Studies at Harvard University¹, single-family home-owners typically generate more school-aged children than multi-family housing. Specifically, for every 100 single-family homes, approximately 51 school-aged children are expected. In contrast, 100 apartment units tend to yield only 31 school-aged children, due to their appeal to single residents or couples without children.

Additionally, *DesegregateCT* has reported that multifamily housing brings in fewer kids than one-family homes showcasing results from apartment complexes in Trumbull.² Generally, apartment complexes in Trumbull have projected above the current statistics of school-aged children. In contrast, apartment complexes in Trumbull and East Lyme that are marketed as children-friendly with playgrounds see an increase of school-aged children.³

However, even if a proposed apartment complex were to bring in new students, local trends have suggested that Ledyard will not be overburdened with new students. In the 2024-2025 academic

¹ https://www.jchs.harvard.edu/sites/default/files/rr07-14_obrinsky_stein.pdf

² <https://www.desegregatect.org/faqs>

³ https://www.ctinsider.com/news/ctpost/article/How-are-apartments-affecting-Trumbull-schools-16143106.php?cmpid=fbsocialflow&fbclid=IwAR0wAg0TfejE8_SN1QG4J2WRT4plUP0CJpnAH039hvhUVemFOdMVbF-WXnY

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year, enrollment in grade K-5 was approximately 184 students. Ledyard projects that enrollment for the 2025-2026 academic year will decline to 163 students in those same grades.⁴

Overall, the public concern regarding education should not be considered a reason to minimize the density of needed multi-family residential development as the projection for enrollments of the Ledyard Public Schools is that they will decrease.

III. Traffic Impacts

Traffic concerns for multi-family residential developments townwide were reviewed considering research conducted by the Joint Center of Housing Studies of Harvard and the American Planning Association. Evidence suggests that apartment residents tend to own fewer vehicles and generate fewer car trips than occupants of single-family homes. The research specifically states:

- On average, residents of apartments own fewer vehicles than residents of single-family homes.
- Single-family homes generate 42% more trips per day than apartment units on weekdays.
- On weekends, that gap widens with 58% more trips on Saturdays and 50% more trips on Sundays.
- The American Planning Association (the “APA”) further notes that single-family housing patterns encourage higher rates of automobile usage, which correlates with increased emissions. (See attached APA excerpt)

While precise traffic impacts will depend on various site-specific factors, these findings suggest that any proposed multi-family residential development is unlikely to generate traffic volumes exceeding those from a single-family development on a per unit basis.

⁴ Pages 22-23 include charts that demonstrate the projections for Ledyard Public Schools. [https://cdnsms5-ss7.sharpschool.com/UserFiles/Servers/Server_111100/File/LPS%20BOE%20Adopted%20FY26%20Budget%202024.2024%20\(1\).pdf](https://cdnsms5-ss7.sharpschool.com/UserFiles/Servers/Server_111100/File/LPS%20BOE%20Adopted%20FY26%20Budget%202024.2024%20(1).pdf)

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CONCLUSION

In summary, the concerns raised at the June 12th hearing regarding fire safety, school capacity, and traffic impacts are not reasons to grant the proposed text changes to the existing Zoning Regulations with respect to multi-family residential development townwide. Though some members of the public dislike the development my client is proposing, taking a sledgehammer to your 2022 amendments is not supported by these expressed fears.

The Ledyard Fire Department is fully prepared to handle emergencies in a development as such is proposed by C.R. Klewin, LLC. The local school system is not projected to be overburdened by new enrollment stemming from the proposed development, especially given its declining student population. Finally, while some traffic impact is to be expected by all development, multi-family developments are likely to generate less, on per unit basis, than would be generated if single-family homes are developed in these areas instead.

We understand that additional amendments to the proposed text changes may have been or will be offered by Mr. Treaster and we reserve the right to comment on those at the June 26 public hearing.

Based on the foregoing and the points we made in our June 12 letter and in oral testimony, C.R. Klewin LLC remains confident that this Commission will see that none of the proposed zoning regulatory changes, as currently drafted or further amended, are worthy of passage at all.

On behalf of C.R. Klewin, LLC we respectfully reiterate our request that the Commission deny Mr. Treaster's petition to amend the zoning regulations, with prejudice. Thank you.

Sincerely,



Brian R. Smith

cc: Eric Treaster, Petitioner

Elizabeth Burdick, Director of Land Use and Planning for the Town of Ledyard

Nayeli Contreras, Law Student Associate, Robinson & Cole LLP