

July 12, 2022

To: Chairman, Planning and Zoning Commission tcapon@pitt.edu

Cc: Town Planner, Juliet Hodge

Re: PZC application 22-7RA Public Comments for the record

Public Hearing July 14, 7pm

From: Karen Parkinson. 55 Rose Hill Rd, Ledyard 860-464-1559 email karen@thepaddockinc.com

Owner: Rose Hill Farm (horse farm) and The Paddock Tack Shop. 40+ year resident of Ledyard, retired social worker LCSW, and dedicated Ledyard volunteer,

The following comments are in regard to proposed Zoning revisions/changes about Agriculture

First, let me commend Juliet Hodge, Town Planner, in undertaking this monumental revision. I have the utmost respect for her professionalism. She is such an asset to the Town of Ledyard. But she needs our help in making correct, accurate, and workable zoning changes. There are many well-educated, civic-minded Farmers in our community who could be utilized in writing a "gold standard" of Agriculture definitions and zoning regulations. We should not have to rely on cut and paste from other towns. Also we should follow the excellent guidance of the State of Connecticut. In its publication specifically written to address zoning. "Zoning Regulations for Livestock: Best Practices" (attached) Following state guidance will lessen any errors in zoning that could result in litigation. Why should the taxpayers of Ledyard be at risk for paying for expensive litigation, if proper zoning regulations can be written?

As an example, the above cited reference states "Zoning regulations should not attempt to distinguish between "commercial" and non-commercial" farms and "for-profit and non-profit farms" In the proposed regulations there is a definition of "farm" and a definition of "commercial farm." The definition of "commercial farm" states the farm can only sell wholesale, can sell products retail only in a location off the farm and cannot sell at a farmers market. The definition of "farm" is totally vague, not defined at all. This seems like litigation waiting to happen! Most farms sell both wholesale and retail right on their farms, including hay, sweet corn, pumpkins, etc. Horse farms (boarding of horses, training, lesson programs) do not sell a product.....are they Commercial or just a farm, per proposed regs. This is just one example where a team of farmers could review and catch these errors as they have actual "working knowledge" of how farming as a business works.

Please follow the good guidance of the State, as spelled out in the above reference, that the first order of zoning changes related to agriculture is to have a meeting with farmers for their input. This has yet to happen! What makes this so difficult? There must be some explanation; could you provide the Ledyard farmers a reason why we have not been asked to help. Again, with input from farmers, we could help write a "gold standard" set of regulations that would benefit us all.

Yes, you will say that you already did that with the ad hoc committee. Sorry, that was NOT a group of farmers.....but was a cherry-picked group, of mostly non-farmers, who played follow the leader, Yes. Rus Holmberg was on the committee and owns an orchard and the Chair of the ad hoc committee is a vegetable/fruit farmer who said she had worked on a pig farm. As a follower of that process, I

requested each member visit a livestock farm.....only Rus Holmberg accepted. So, no, there has been no meeting with (working /livestock) farmers.

There are innumerable errors throughout this document, but for this letter I am only discussing a few.

Ag-tivities talks about “including but not limited to.....” but in 3.7 it says “Any use not expressly permitted in a district is prohibited” Should 3.7 be deleted? How can the term “use” be used both as a noun and verb in different context. Confusing.

There is no workable, measurable definition of “FARM” The definition of “commercial farm” is lacking.....does not even include farms that only “board horses” and do not sell a product. Solution: delete commercial farm as recommended by the State. In the proposed regulation, all farms, not “commercial” would come under home husbandry, would require site plans and permits, etc, could not graze animals on wetlands, could not utilize land for animals on land unless it was “buildable”(written by those who have no understanding of the concept of farming).

The whole attempt to describe and limit Agri-tourism should be deleted until there is some consensus of what this is. And to “limit” farms to six small scale events per year? Including educational events? So if a small farm has educational events with the high school ag students, has 4-H activities, has a corn maze, or hayrides, they would quickly use up their quota.....and by the way, they pay an insurance premium for being open to the public for 365 days a year.

Let’s be honest here. ALL Ledyard businesses need to be supported. There are way too many empty store fronts... Agri-tourism (in fact, all tourism) should be embraced and encouraged as a way to provide more revenue for all Ledyard business. When folks visit a local vineyard, they often visit a local restaurant. When they visit a farm, they may shop at the local hardware store.

Ledyard is about the people of Ledyard.....The government is to serve the people of Ledyard. I know we can do better and I am here to help.