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Land Use Department

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Public Comment: PZ#26-2ZRA - Proposed Amendments to Ledyard Zoning Regulations for Parking

Good evening Commissioners,

I did make an effort and try my best to understand the proposed amendments in their entirety:

Landscape Design Standards

One issue that stood out to me, as reflected in Exhibits 12 and 13 included in tonight's agenda materials, is the proposal to delete Sections 9.3.B.3, 9.3.B.4, and 9.3.B.5 under "Landscape Design Standards and Requirements." These are the portions of the regulations that specifically protect existing natural landscape features. Since my letters analyzing this issue in greater detail are already part of the written record, I will only briefly summarize those concerns tonight.

The provisions proposed for deletion have little to do with parking requirements specifically. In fact, they would apply even in situations where no parking is involved at all. That raises an important question: why are these broader landscape protection standards being removed as part of a parking amendment package?

While I do understand the argument that some concepts were relocated into proposed Section 9.4.6 regarding parking lot landscaping, the language is not equivalent. The new language is narrower in scope, applies primarily to parking areas, and no longer clearly protects many of the natural landscape features currently identified in Section 9.3.

I am also concerned that removing these provisions may be inconsistent with portions of the Plan of Conservation and Development that emphasize preservation of Ledyard's rural and natural character. Those are significant policy issues that deserve broader public discussion and careful review before being removed or substantially narrowed.

Traffic Mitigation Districts

I do want to acknowledge that I support the creation of Conservation and Traffic Mitigation Districts. Those will likely become an important tool for addressing potential future on-street parking impacts resulting from the state-imposed parking limitations under HB 8002, especially in places like Gales Ferry villages' narrow streets.

Mitigate the Problem Before it Arises

However, I would encourage the Commission to take a more holistic approach and address the root causes of potential parking problems, not just the symptoms.

Ledyard does not currently have a widespread parking crisis. Our existing parking lots are generally sufficient for the level of development we currently have. The concern is that the town is now under increasing pressure to accommodate multifamily developments on a scale not previously seen here. Those larger-scale developments are what could eventually create spillover parking and infrastructure pressures.

If the goal is to avoid future parking problems, then the town should also revisit the zoning framework that allows such large-scale buildings in the first place. A fifty-foot height limit can permit very large structures that are out of scale with much of Ledyard's existing development pattern. Scale drives parking demand.

I would encourage the Commission to consider reducing allowable building heights to something more consistent with a three-story maximum, particularly in areas where infrastructure and roadway capacity are limited. Given the constraints imposed by HB 8002, one of the most effective mitigation strategies available to the town is ensuring that development intensity does not exceed what our rural infrastructure can realistically support.

I would also encourage reconsideration of by-right approvals for projects that generate substantial parking demand. The Special Permit process gives the Commission the ability to apply site-specific conditions and maintain oversight regarding safety, circulation, buffering, and design impacts.

Village Districts

As a segway into my prior presentation tonight, I also would like to note that, similar to HB 8002, CGS §8-2j is a state statute, and that is legally significant. While HB 8002 limits municipal discretion over parking quantities, it does not eliminate municipal authority over site design. That is where Village Districts and Village District Design Guidelines can play a major role.

HB 8002 reduces the town's leverage over the number of parking spaces. Village District regulations increase the town's leverage over how parking and development are designed and integrated into the community context. Even where parking quantities cannot legally be increased, the town can still regulate how parking functions spatially and visually through Village District authority granted under state statute.

Closing the Public Hearing

Finally, I respectfully request that the Commission not close the hearing tonight, or otherwise provide an opportunity for Eric Triester to respond in person to any questions regarding the presentation he prepared for this hearing. He has invested a tremendous amount of time researching HB 8002 and analyzing the implications of these amendments. Anyone who has read the statute understands how difficult it can be to interpret, given the complexity of the language and cross-references involved.

Mr. Triester is currently in transit from an international flight and unfortunately could not be here tonight, but I believe the Commission would benefit from hearing and considering his perspective before concluding the public hearing.

Thank you all for volunteering your time in service to the town.

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