

EX#20

**Anna Wynn**

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**From:** milton schroeder <mltnschroeder@yahoo.com>  
**Sent:** Wednesday, June 10, 2026 1:09 PM  
**To:** Anna Wynn  
**Subject:** Public Comment from Feb 12 2026  
**Attachments:** 2\_12\_2026 Public Comment - Schroeder.pdf

JUN 10 2026

Land Use Department

Hi Anna,  
Below please find attached my public comment from 02/12.2026 regarding parking. Please include it in the record for the PZ#26-2ZRA parking ammendment.

Thank you. Sincerely,  
Dave Schroeder

## Public Comment – HB 8002 and Parking Impacts

Good evening Commissioners,

I want to speak briefly about HB 8002 and what it means for a semi-rural town like Ledyard. The law is largely one-size-fits-all. It assumes conditions that exist in urban or inner-suburban environments — like public transportation, sidewalks, structured parking, meaningful on-street capacity.

Ledyard does not have those conditions. We have no public transit, limited sidewalks, and roads — including state routes — that were never designed for on-street parking. In that context, limiting our ability to require adequate off-street parking creates real risk: shifting parking into neighborhoods, pushing impacts from developers onto residents, and creating unsafe conditions on roads that cannot absorb overflow.

Right now, Ledyard does not have a parking problem — because developments have historically provided enough off-street parking to keep cars off the roads. That did not happen by accident. Planning is about anticipating impacts before they occur. It is far easier and less expensive to prevent a problem on paper than to retrofit a built environment after it fails.

HB 8002 does limit your discretion. But it also allows you to exceed the parking caps if you make specific written findings, supported by substantial evidence, showing that applying the state-mandated cap at a particular location would harm public safety or infrastructure.

So I urge you to act proactively:

1. Require traffic and parking studies, especially in the Development Districts, so that you build an evidentiary record before problems arise. Commission third-party review when necessary so you are not relying solely on applicant-paid engineers.
2. Identify areas where documented traffic or safety concerns already exist and evaluate whether conservation or traffic mitigation districts are appropriate — particularly in places like historic Gales Ferry, where narrow streets and dense development patterns are not well suited to absorbing significant increases in vehicle volume. When proposals introduce hundreds of additional vehicles onto already constrained road networks, that is precisely the type of scenario the statute contemplates when it allows municipalities to make safety-based findings supported by evidence.
3. Revisit building height allowances. A 50-foot limit can allow very large buildings, and scale drives parking demand. Given the limitations imposed by HB 8002, one effective way to mitigate future parking problems is to reduce building scale, ensuring it does not exceed what our rural infrastructure can realistically support.
4. Reconsider by-right approvals for projects that generate substantial parking demand. The special permit process allows you to apply site-specific conditions and maintain leverage over design and safety outcomes.
5. And consider whether a temporary pause on large parking-intensive projects is warranted while you adjust regulations to this new statutory framework.

Finally, scale is one issue — design is another. In large parking areas, design matters. We have a local example in the Walmart site on Route 184, which replaced what had once been an unsightly paved expanse. Through landscaping, traffic islands, and tree plantings, it demonstrates that even large lots can be responsibly re-designed and significantly improved over time.

In addition, because many residents rely on aquifers for well water, the Commission should consider requiring a percentage of parking surfaces to be permeable — such as concrete turf pavers or similar systems — to reduce runoff and protect groundwater.

As Councilor St. Vil recently said, the worst thing we can do as stewards of the town's well-being is wait for something to break and then try to fix it. When applicants are willing to work collaboratively, good outcomes are possible. But regulations should not depend on goodwill alone. I encourage you to approach HB 8002 proactively — using the authority you still retain, building strong records, and planning deliberately to protect public safety and the long-term character of Ledyard.

Thank you for your time and your continued service to our town.

Dave Schroeder Jr  
290 Whalehead Rd.

## Public Comment – HB 8002 and Parking Impacts in Ledyard

Good evening Commissioners,

I would like to speak about the implications of HB 8002 and what it means for a semi-rural town like Ledyard.

The framework of HB 8002 is largely one-size-fits-all. It is built around assumptions that fit urban and inner-suburban environments far better than communities like ours. In places with public transportation, structured parking, sidewalks, and meaningful on-street capacity, reduced parking mandates may function as intended. But Ledyard is not that environment.

We have no public transit system. We have very limited sidewalks. Most of our roads — including state routes — were never designed for on-street parking. In that context, limiting a town's ability to require adequate off-street parking creates real risk:

- Shifting parking off-site into surrounding neighborhoods.
- Moving parking impacts from the developer onto existing residents.
- Creating unsafe conditions along town and state roads not designed for overflow parking.
- Undermining older centers that were never engineered to absorb spillover vehicles.

Currently, Ledyard does not have a parking problem. Why? Because, historically, developments have provided sufficient off-street parking so cars are not routinely spilling into roadways or neighborhoods. Therefore it is concerning to hear the suggestion that “on-street parking is not the Commission's problem.” Planning, by definition, is about anticipating impacts before they occur. It is far easier and far less expensive to prevent a problem on paper than to retrofit a built environment after it fails.

Rather than reacting after problems emerge, I suggest the Commission take proactive steps now:

1. The statute does significantly limit a town's ability to require parking above the caps. However, it does allow a municipality to exceed those caps if it makes specific written findings, supported by substantial evidence in the record — such as traffic studies or capacity analyses — demonstrating that applying the cap at a particular location would adversely impact public safety or create identifiable congestion or infrastructure harm. I suggest you start to require such studies for every project in Ledyard, especially within the Development Districts, so that you build a record of written analyses for when they are needed. Commission 3rd-party studies if needed so that you are not relying upon developers who bring their own engineers.
2. Identify areas where documented traffic or safety concerns already exist and evaluate whether conservation or traffic mitigation districts, as allowed under the statute, are appropriate. The Gales Ferry and Ledyard Center Development Districts — where density and parking demand are most likely to concentrate — would be logical areas for study.
3. Revisit building height allowances. A 50-foot height can potentially allow five-story structures. Reducing allowable height to a scale more consistent with our infrastructure

capacity could indirectly limit the scale of projects that generate excessive parking demand.

4. Reevaluate by-right approvals for large-scale projects that generate substantial parking demand. Requiring special permits for projects with large parking lots gives the Commission the ability to apply site-specific conditions and ensure stronger design, traffic, and safety standards.
5. Consider whether a temporary pause on projects generating unusually large parking demands is warranted while the Commission evaluates how best to adapt local regulations to this new statutory framework.

Finally, if we are concerned about large parking lots becoming visual liabilities, we do have local examples of how good design mitigates impact. For anyone who remembers Railroad Salvage, the Walmart site on Route 184 replaced what had been a large, unsightly paved parking lot. Through landscaping islands, tree plantings, and screening, it demonstrates that even large parking areas can be designed responsibly and attractively. Scale alone is not the only issue — design matters greatly.

In the words of Councilor St. Vil, “The worst thing we can do as stewards of the town’s well-being is wait for something to break and then be forced to try and fix it.” I encourage the Commission to approach HB 8002 not passively, but proactively — identifying where we still retain lawful authority and using it carefully, deliberately, and based on evidence to protect public safety and the long-term character of our town.

Thank you for your time.

The framework of HB 8002 is **one-size-fits-all**, built around assumptions that fit urban and inner-suburban contexts far better than places like Ledyard. In semi-rural towns such as our own with no public-transit and effectively no proper street parking, the consequence of HB 8002 is that it creates the risk to:

- Shift parking off-site into neighborhoods.
- Shifts parking risk from the developer to the surrounding neighborhood.
- Encourages under-designed parking lots even where car ownership is unavoidable.
- Create unsafe conditions along town and neighborhood roads not designed for on-street parking.
- Undermine older village centers and streets that were never designed for overflow parking

“HB 8002 significantly limits a town’s ability to require off-street parking, even in semi-rural communities like Ledyard where public transportation and on-street parking are largely unavailable. While the bill allows parking reductions based on studies, it provides no meaningful exemption for auto-dependent towns, shifting parking impacts onto existing neighborhoods and state roads not designed for overflow parking.”

Currently Ledyard does not have a parking problem. Why? because there's enough parking spaces for people to park off the streets. It's upsetting when the town planner's advice to the commission is “on-street parking is not your problem”.

The whole point of planning is to bring a vision while trying to preempt problems, because it's much easier (and cheaper) to change something on paper than it is to change something that's built. So what do we do when the State passes a law that's basically telling towns that they're not allowed to plan for their vision, but rather it's the developer that gets to call the shots? Developers that don't necessarily have any interest in what's good for the town they're just looking to pull a profit on the land they bought.

In the words of counselor St.Vil: “The worst thing we can do as stewards of the town’s well-being is wait for something to break and then be forced to try and fix it.” I suggest as a proactive measure to mitigate future parking problems rather than waiting for reactionary solutions once the problems manifest is to:

- the statute does allow a municipality to require more parking than the cap if it makes specific written findings supported by substantial evidence (traffic studies, capacity analysis, etc.) in the record that demonstrate that applying the statutory parking cap at the particular location would adversely impact public safety, OR create a specific, identifiable harm related to traffic congestion, infrastructure capacity, or other site-specific conditions.
- Identify where documented traffic and safety concerns may justify conservation and traffic mitigation districts, and create the two districts allowed by the statute. The most logical areas would be Gales Ferry and Ledyard Center Development Districts: where the densest building and therefore parking needs are most likely.
- Reduce allowable building heights from 50ft, which can potentially be a 5-story building, to a height that limits building to 3-stories max; so that the buildings themselves cannot

be so big that they end up requiring such an over-abundance of parking spots that it creates a problem.

- Get rid of by-right project approval, and make projects that require large parking lots mandatory for requiring special permits. The special permit process gives the Commission the conditional bargaining chip that encourages developers to meet higher standards.
- Declare a moratorium on projects that require large parking lots until the state of Connecticut either repeals HB8002, or at least carves out provisions for semi-rural towns that don't have public transportation or lack properly designed on-street parking, so that they can responsibly plan.

If you're looking for examples of large parking lots that are not unsightly, I suggest looking at the Walmart parking lot up on Rt 184 behind the Super Stop & Shop. anyone who lives in the town long enough to remember Railroad Salvage store that occupied that site before the Walmart, this was a large unsightly paved surface a definite eyesore as you look down onto the site from the road. Walmart Put in traffic Islands planted trees and hedges, and now several decades later even though the parking lot is the same size as it was before it's about as attractive a parking lot it comes to mind of anything nearby.