

Anna Wynn

From: Elizabeth Burdick
Sent: Tuesday, May 12, 2026 4:13 PM
To: Anna Wynn
Subject: FW: Sharing Dave's email

Anna, Please add the below email written by Dave Schroeder as an exhibit for PZ26-2ZRA. Thanks.

Liz Burdick, Director of Land Use & Planning
Town of Ledyard
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From: Gales Ferry District <galesferrydistrict@gmail.com>
Sent: Tuesday, May 12, 2026 3:32 PM
To: Elizabeth Burdick <planner@ledyardct.org>
Cc: Mike Cherry <mj.cherry@comcast.net>
Subject: Sharing Dave's email

Liz, sharing Dave's, maybe there's helpful information.

Hi Lee Ann,

Liz's email is correct that some concepts from former §9.3.B.3–5 were relocated into the new proposed §9.4.6 parking lot landscaping section. However, the actual regulatory language is not fully preserved, and important protections were either narrowed, weakened, or deleted altogether. Here is a side-by-side breakdown:

Former §9.3.B.3

“To the extent possible, existing trees, vegetation and unique site features such as stonewalls, ledge faces, kettle holes, and boulder trains shall be retained and protected.”

What replaced it?

New §9.4.6.D:

“Parking areas shall be designed to preserve existing native vegetation to the greatest extent practicable.”

What changed? This is not equivalent. The old regulation protected:

- existing trees
- vegetation
- stonewalls
- ledge faces
- kettle holes
- boulder trains
- unique site features generally

The new language only references: “existing native vegetation”. So protections for stonewalls, geological features, ledge, kettle holes, boulder trains and non-native mature trees were removed entirely. It also narrows applicability specifically to parking areas, whereas the old language applied more broadly to disturbed areas/site design.

Former §9.3.B.4

“Any disturbed area of a lot or property which is not being used for the location of buildings, accessory structures or uses, parking, loading, storage areas, or other similar purposes shall be landscaped and maintained in such a manner as to minimize stormwater runoff.”

Was this relocated?

Not really. I do not see an equivalent replacement in §9.4.6.A–G. The new section discusses:

- landscaped islands
- trees
- aesthetics
- shade
- biodiversity
- maintenance

But it does not contain the former explicit requirement that disturbed areas be landscaped to minimize stormwater runoff. That appears to be a substantive deletion.

Former §9.3.B.5

“The retention of existing topography and vegetation in the buffer areas is preferable to regrading and new plantings...”

Was this relocated?

Only partially and indirectly. The closest analogue is: **§9.4.6.D preservation of native vegetation**

But the following concepts disappeared:

- preservation of existing topography
- buffer areas
- preference against regrading
- preference for retaining existing vegetation instead of replacement landscaping

Those ideas are not clearly preserved in the new text.

Additional important point

The new §9.4.6 applies specifically to: “Any lot that contains parking facilities for more than ten (10) cars...”

So even where concepts were retained, they are now tied specifically to parking lot landscaping requirements, not to landscape/site design standards generally. That is a major narrowing of scope.

Bottom line

The statement: “the sections weren’t removed. They were relocated” is only partially accurate. A more precise characterization would be:

Some concepts relating to vegetation preservation were relocated into the new parking lot landscaping section.

However, several substantive protections and site-design standards from former §9.3.B.3–5 were either narrowed considerably or removed entirely.

The new language focuses primarily on parking lot landscaping rather than broader site preservation and stormwater-management objectives.

So our concern that substantive protections disappeared or were weakened is well-founded. And Mike Cherry concurs!

Best,
Dave S.

Respectfully,
Lee Ann Berry
President,
Gales Ferry District