

JUN 11 2026

Public Hearing: Parking Amendment PZ#26-2ZRA**Land Use Department 06/11/2026**

I recognize that Ledyard is attempting to comply with HB 8002, and I appreciate the effort that has gone into preparing these amendments. I'd like to thank Commissioner Harwood and others for the corrections to the Amendment preserving the landscape protections under Section 9.3.

However, perhaps this is the right moment to ask not whether Ledyard is complying with HB 8002, but whether Ledyard has interpreted HB 8002 more aggressively than is actually required.

The reasoning is this: HB 8002 is not easy to understand. It contains numerous cross-references, exceptions, and provisions that many people—including experienced land-use attorneys—have described as confusing and, at times, internally inconsistent. Some provisions regarding parking needs assessments, parking caps, and the operation of Traffic Mitigation Districts appear susceptible to multiple interpretations - regardless of what experts have told you.

This appears to be one of the central issues raised by Eric Treaster in Exhibit 26. Whether one ultimately agrees with Mr. Treaster's interpretation, I believe the questions he raises deserve thoughtful consideration before the Town commits itself to a particular reading of the statute.

Prior discussions before this Commission support this. As I understand it, other municipalities across Connecticut are struggling with many of the same questions. Different towns may ultimately arrive at different conclusions regarding how these provisions should be implemented.

That raises an important question: Is Ledyard's approach typical, or is it an outlier?

Ledyard may be among the earlier and more comprehensive adopters of a full HB 8002 implementation package. Other municipalities may be taking a more cautious approach—making only those changes clearly required by the statute, waiting for additional legal guidance, or delaying broader regulatory revisions until a clearer statewide consensus emerges.

The dilemma is that because the parking provisions take effect on July 1, 2026, there is not yet a large body of adopted regulations available for comparison. Nevertheless, before finalizing these amendments, it may be worthwhile to take additional time to compare Ledyard's approach to that of comparable semi-rural communities facing similar development pressures, such as East Lyme, Montville, Griswold, Preston, Colchester, Hebron, Killingly, and Woodstock.

Such a comparison could examine how those towns are addressing:

- Developments containing fewer than 16 units
- Parking Needs Assessments
- Traffic Mitigation Districts
- By-right versus Special Permit approvals
- Public health and safety standards for parking-related decisions

That exercise could reveal whether Ledyard's approach is consistent with emerging statewide practice, more restrictive than average, or potentially relinquishing more local authority than HB 8002 actually requires.

The reason it may be prudent to proceed carefully is that once development occurs and parking-related impacts begin to emerge, it may prove difficult—or impossible—to reverse those consequences. Parking demand in Ledyard reflects the practical reality that most households require automobiles for daily life, and our roads were not designed to safely accommodate on-street parking. For that reason, I believe caution is warranted when adopting interpretations of a new and unsettled statute.

I would also note that, regardless of HB 8002, there remain several important policy choices that are entirely within local control. These include how Conservation and Traffic Mitigation Districts are structured, whether large projects receive by-right approval or Special Permit review, and whether additional planning tools such as Village Districts, design guidelines, and building-scale limitations should be employed.

Planning is about anticipating consequences before they occur. HB 8002 may reduce local authority over parking quantities, but it does not eliminate the Town's ability to shape development through other means. If parking regulation authority is being limited by state law, then managing development intensity becomes even more important. Building scale drives parking demand. Reducing maximum building heights and requiring Special Permit review for projects that generate substantial traffic and parking demand are lawful tools that remain available to the Town and may be among the most effective ways to ensure that future development remains consistent with the capacity of Ledyard's roads, neighborhoods, and rural character.

People's health and safety may ultimately depend on getting these decisions right.

I would like to thank the Commission for their time and efforts in addressing these difficult questions.

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