

February 24, 2024

Esteemed Chairs Kavros Degraw and Rahman,
Members of the Planning and Development Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to write in **strong opposition to Raised Bill 7061**, *An Act Concerning Mandatory Minimum Parking Requirements*, which would prohibit off-street parking minimums for any development in the state. This bill would have significant and far-reaching consequences for traffic congestion, public safety, emergency response, and municipal infrastructure across Connecticut.

WestCOG serves as the regional planning agency for 18 municipalities in Western Connecticut, representing a range of urban, suburban, and rural communities. As the entity responsible for regional land use and transportation planning, we recognize the importance of balancing land use efficiency, economic development, and transportation functionality. While parking requirements should be appropriately tailored to local conditions, eliminating municipal authority over parking minimums removes a critical planning tool that ensures orderly development and mitigates the risks associated with inadequate parking provisions.

I. THE ROLE OF PARKING REQUIREMENTS IN RESPONSIBLE PLANNING

Parking demand is a quantifiable, well-established element of land use planning. It is routinely assessed using professional methodologies, including those outlined by the Institute of Transportation Engineers (ITE), and is a standard consideration in traffic impact studies and development review processes. Municipalities already have the ability to adjust parking requirements based on local conditions, including public transit availability, surrounding land use patterns, and anticipated demand.

In addition to setting parking standards, municipalities can offer developers alternative compliance mechanisms, such as “fee in lieu of parking” programs, which allow developers to contribute to municipal parking facilities rather than building parking on-site. This approach enables municipalities to manage parking resources efficiently while allowing for flexibility in development.

By removing local authority over parking regulations, Bill 7061 disregards professional planning and engineering practices and creates unnecessary challenges for municipalities that must manage transportation demand effectively.

II. IMPACTS ON TRAFFIC FLOW AND CONGESTION

The elimination of parking minimums will not eliminate the need for parking. Instead, vehicles will be displaced onto public streets, many of which were not designed to accommodate parked vehicles. In suburban and rural areas, where on-street parking infrastructure is largely nonexistent, the result will be increased traffic congestion, circulation delays, and safety risks.

When off-street parking is insufficient or unavailable, drivers will resort to ad hoc or haphazard parking in undesignated areas. This includes parking on road shoulders, in fire lanes, across

driveways, on sidewalks, in front of hydrants, and in spaces reserved for businesses or residents. These behaviors create obstructions, sightline hazards, and unnecessary conflicts between pedestrians, cyclists, and other motorists.

In addition, drivers searching for parking will increase vehicle miles traveled, contribute to roadway congestion, and create additional conflict points as vehicles stop, reverse, or perform U-turns to secure a parking space. The unpredictability of vehicles entering and exiting informal or makeshift parking locations further disrupts traffic flow and increases the likelihood of collisions.

Where parking is insufficient for a given land use, spillover parking will impact adjacent residential streets, commercial corridors, and municipal lots, creating conflicts between property owners, businesses, and local enforcement agencies. Without minimum parking standards, the responsibility for managing these externalities will shift to municipalities, imposing additional administrative and financial burdens.

III. PUBLIC SAFETY CONSIDERATIONS

Ensuring adequate parking is also a matter of public safety. The absence of designated parking facilities increases the likelihood of pedestrian-vehicle conflicts, particularly in areas where sidewalks and pedestrian infrastructure are limited. Unlike purpose-built parking lots, which include designated walkways, lighting, and accessibility features, roadsides lack such protections.

Where on-street parking is used in areas without proper infrastructure, pedestrians—including those with limited mobility—may be required to walk along active travel lanes or on unpaved surfaces to reach their destinations. In winter conditions, these risks are exacerbated as snowbanks and ice accumulation further limit safe walking space, forcing individuals into the roadway and increasing the potential for accidents.

Cyclists will also be affected by increased roadside parking, as unregulated vehicle placement can obstruct bike lanes, increase the risk of “dooring” incidents, and force cyclists into vehicle travel lanes. The cumulative effect of these conditions is a decline in overall roadway safety and an increased burden on local enforcement agencies to regulate and respond to parking-related hazards.

IV. EMERGENCY ACCESS AND RESPONSE DELAYS

Emergency vehicle access is a critical factor in transportation and land use planning. The introduction of unregulated or spillover parking onto public roadways can significantly impede emergency response times, particularly in narrow streets or areas without designated emergency access lanes.

Blocked access points, obstructed hydrants, and reduced lane widths can prevent fire trucks, ambulances, and law enforcement vehicles from reaching critical locations in a timely manner. The potential consequences of delayed emergency response—whether due to fire suppression challenges, medical emergencies, or law enforcement interventions—underscore the importance of ensuring adequate off-street parking provisions where necessary.

V. OPERATIONAL AND MAINTENANCE CHALLENGES FOR MUNICIPALITIES

Municipal public works departments are responsible for maintaining safe and functional roadways, including seasonal snow removal, pavement maintenance, and stormwater management. The increased reliance on roadside parking, rather than designated off-street parking facilities, complicates these operations in several ways.

During winter months, snow removal is significantly hindered by vehicles parked along roadways, leading to narrower plowed lanes, obstructed drainage, and increased ice hazards. In turn, this affects overall roadway capacity, pedestrian safety, and long-term pavement conditions.

Similarly, the presence of unregulated or informal parking on road shoulders or unpaved areas can contribute to erosion, sedimentation issues, and water quality impairment, requiring additional municipal expenditures to mitigate these impacts. Over time, these maintenance challenges result in higher costs for local governments and greater inefficiencies in roadway operations.

VI. DEVELOPERS MAY NOT PROVIDE ADEQUATE PARKING WITHOUT REQUIREMENTS

The assumption that developers will consistently provide sufficient parking without municipal requirements is inconsistent with experience. Parking infrastructure is expensive to build and maintain, and developers have a clear financial incentive to minimize parking construction to maximize developable land area.

Without minimum parking standards, many projects will underprovide parking, assuming that vehicles will simply find alternative spaces on nearby public streets, in municipal lots, or on adjacent properties. This approach externalizes the burden of parking provision onto municipalities and neighboring property owners, creating ongoing conflicts over access and enforcement.

Parking minimums do not exist to impose unnecessary burdens on development. Rather, they exist because experience has demonstrated that, without them, parking needs are frequently offloaded onto the public realm, creating operational challenges and avoidable conflicts.

VII. CONCLUSION: RAISED BILL 7061 SHOULD NOT ADVANCE

WestCOG strongly urges the Committee not to advance Bill 7061. The elimination of municipal authority over parking requirements ignores established planning and engineering principles and introduces significant risks related to traffic congestion, roadway safety, emergency response, and municipal infrastructure management.

Rather than imposing a statewide mandate that prohibits municipalities from requiring parking, the legislature should recognize the role of local planners, zoning commissions, and professional engineers in determining context-sensitive parking policies. Municipalities must retain the ability to evaluate and set parking requirements based on actual conditions and community needs rather than a blanket prohibition that disregards these considerations.

Should you have questions or require additional information, please do not hesitate to contact me. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Francis Pickering". The signature is written in a cursive style with a horizontal line underlining the name.

Francis R. Pickering
Executive Director