RE: TOWN OF GRANVILLE, VERMONT
PLAN REVIEW
CASE # FY 20-6

BACKGROUND

Pursuant to 24 V.S.A., Section 4350, the Town of Granville, Vermont requested TRORC to review and approve the Granville Town Plan adopted on November 13, 2019. The Plan encompasses all land in the Town of Granville, and is referred to hereinafter as the Plan.

Section 4350 provides that prior to approving a Plan, the Regional Commission find that the Plan meets four tests. These tests are that the Plan is:

A. Consistent with the planning goals in Section 4302 of Chapter 117;
B. Compatible with the Regional Plan;
C. Compatible with the approved plans of other municipalities within the Region; and
D. Inclusive of all elements required of a plan as set forth in 24 V.S.A., Section 4382.

Staff reviewed this Plan and offers the following information to the Board. TRORC scheduled and held a Public Hearing on this review on December 11, 2019 in Woodstock, Vermont. This matter is now ready for decision.

This review is based upon the Town Plan as adopted.

FINDINGS

A. Is the Plan consistent with the planning goals?

NOTE: "Consistent with the goals" requires substantial progress toward attainment of the goals, unless the planning body determines that a particular goal is not relevant or attainable. If such a determination is made, the planning body shall identify the goal in the plan and describe the situation, explain why the goal is not relevant or attainable, and indicate what measures should be taken to mitigate any adverse effects of not making substantial progress toward that goal.

General Goals

1. Are municipal decisions guided by a coordinated, comprehensive planning process and policy framework?

Yes. The 2019 Granville Town Plan is a comprehensive planning document to guide municipal decision making that has been divided into 12 distinct chapters that are required under V.S.A. Title 24, Ch. 117, §4382. Required goals of the Plan are under V.S.A. Title 24, Ch. 117. §4302.
2. Is citizen participation encouraged at all levels of the planning process?

Yes. The *Introduction* chapter states that “citizen participation in town planning is vital to producing a Town Plan that reflects and can realize the community’s visions and values” (pg. 2).

3. Is consideration being given to the use of resources and the consequences of growth and development?

Yes. An overarching goal of the Plan is to, “encourage growth but not to an extent that would exceed the town’s ability to provide services” (pg. 3). An additional overarching goal is to “encourage an increase in population while keeping in mind that although an increase in population can ease tax burdens, too large an increase can also adversely affect the uncrowded and rural nature of the town that has been an attraction for many Granville residents” (pg. 3).

4. Is the municipality working creatively together with other municipalities to develop and implement plans?

Yes. The *Regional Context* chapter includes a goal to “work with neighboring towns and the Regional Commission to encourage ‘smart growth’ principles.” It also includes a recommendation to “exchange planning information and development data with neighboring communities” (pg. 38).

Specific Goals

A plan for a municipality may be consistent with the goals established in section 4302 of this title, which are:

1. Planning for development needs to be conducted so as to maintain the historic settlement pattern of compact village and urban centers separated by rural countryside.

   a. Is intensive residential development being encouraged primarily in areas that are identified as community centers, and is strip development along highways being discouraged?

   Yes. The *Land Use* chapter states that “Village Center Areas are intended to act as small community centers with a mix of civic, residential, commercial and small-scale light industrial uses” (pg. 34). In regards to strip development, it is also a policy of the chapter that “commercial strip development – that which occurs in a linear path along a right-of-way and often restricts visual and physical access to interior lands – is inconsistent with this Plan” (pg. 35).
b. Is economic growth being encouraged in locally designated growth areas or being employed to revitalize existing urban or village centers, or both?

Yes. The Town of Granville has two designated Village Center Areas – Upper Granville Village and Lower Granville Village. In the Land Use chapter, it is a policy that “shops and public facilities, as well as businesses and industrial enterprises at a small scale that fit the context of the surrounding area, shall be restricted to the Village Center Areas” (pg. 35). The Economic Conditions chapter also includes a goal to “encourage and facilitate the rejuvenation of Granville’s Village Centers” and a policy to “continue to participate in the Village Designation program” (pg. 5).

c. Are public investments, including the construction or expansion of infrastructure, being made so as to reinforce the general character and planned growth patterns of the area?

Yes. The Land Use chapter includes goals that “ensure that future development and parcel subdivisions do not further fragmentation of forest blocks and maintain forest connectors” as well as to “formulate land use policies – regulatory and/or non-regulatory – that... will retain clear evidence of the community’s history; preserve the community’s identity and its existing qualities of scale and form” (pg. 35).

d. Is development being undertaken in accordance with smart growth principles?

Yes. A goal of the Regional Context chapter is to “work with neighboring towns and the Regional Commission to encourage ‘smart growth’ principles” (pg. 38). Additionally, the Economic Conditions chapter includes a goal to “support business opportunities that are compatible with the quality of life and values of Granville’s citizens” (pg. 5).

2. Does the Plan provide for a strong and diverse economy; provide satisfying and rewarding job opportunities that maintain high environmental standards; and expand economic opportunities in areas with high unemployment or low per capita incomes?

Yes, in part. The Economic Conditions chapter includes a goal to “ensure that any economic development in Granville protects the environment, and preserves and fosters the ‘working landscape’ of Granville” (pg. 5). It does not explicitly discuss the expansion of economic opportunities in areas with high unemployment or low per capita incomes. The Housing chapter does this to a very small extent by including a recommendation to, “encourage developers to utilize the federally funded Low-Income Housing Tax Credit (LIHTC) administered by the state” (pg. 28).

3. Does the Plan broaden access to education and vocational training opportunities for residents identified in the Plan?

Yes. The Utilities, Facilities, and Services chapter in the Plan includes goals to “ensure Granville provides safe, secure and high quality educational options for all students at the
most equitable cost to the Town's taxpayers” and “support continued adult education” (pg. 18). The chapter also discusses the educational and vocational opportunities that are available in the surrounding towns but does not necessarily include any specific policies or recommendations on how the Town will continue to support educational options for students, including adult education and training.

4. Planning needs to provide for safe, convenient, economic and energy efficient transportation systems that respect the integrity of the natural environment, including public transit options and paths for pedestrians and bicyclers.

a. Does the Plan provide that highways, air, rail, and other means of transportation be mutually supportive, balanced and integrated?

Yes. The Transportation chapter discusses highway, air, rail and other means of transportation that are available and most heavily utilized by those within the Town of Granville. This chapter also includes a goal to “support local, regional, and statewide efforts to enhance public and private transportation systems that meet the needs of all population segments and not just those who use automobiles” (pg. 12).

5. Planning needs to identify, protect, and preserve important natural and historic features of the community’s landscape.

a. Have special areas been identified, including significant natural and fragile areas; outstanding water resources, including lakes, rivers, aquifers, shorelands and wetlands; significant scenic roads, waterways, and views; and important historic structures, sites, or districts, archaeological sites and archaeologically sensitive areas?

Yes. The Significant Cultural, Historic and Scenic Resources chapter includes a detailed accounting of the various historic buildings and scenic byways, rivers and forests, including the White River and the Route 100 Scenic Byway (pg. 24-25).

6. Planning needs to maintain and improve the quality of air, water, wildlife and land resources.

a. Are air, water, wildlife, mineral and land resources being planned for development and use under the principles set forth in Act 250?

Yes. The Physical Conditions and Natural Resources chapter discusses how air, water, wildlife, mineral, and land resources are being planned for within the Town and also includes goals and policies that promote development and use of these resources that is in alignment with Act 250.

b. Is water quality being maintained and improved on according to the policies and actions set forth in the basin plans?
Yes. A goal of the *Physical Conditions and Natural Resources* chapter is to “preserve and protect Granville’s natural environment, both for its own sake and for its contribution to the Town’s economic well-being by: maintaining and improving surface and ground water quality…” (pg. 9). It also includes a policy for “continued participation in the White River Partnership in coordination with the state’s White River Basin Plan” (pg. 10).

c. Are forestlands managed so as to maintain and improve forest blocks and habitat connectors?

Yes. The *Land Use* chapter discusses the importance of forest blocks and habitat connectors in relation to the Town of Granville. The chapter includes a goal to “ensure that future development and parcel subdivisions do not further fragmentation of forest blocks and maintain forest connectors” as well as a policy that “any development that fragments existing forest blocks shall be discouraged, unless such development provides and maintains viable connection(s) between newly divided sections” (pg. 35).

7. Planning needs to make efficient use of energy, provide for the development of renewable energy resources, and reduce emissions of greenhouse gases.

a. Are general strategies included for achieving these goals to include increasing energy efficiency of new and existing buildings; identifying areas suitable for renewable energy generation; encouraging the use and development of renewable or lower emission energy sources for electricity, heat, and transportation; and reducing transportation energy demand and single occupancy vehicle use?

Yes. The *Energy* chapter details strategies that the Town and its residents should use in order to be more energy efficient and reduce overall energy consumption. Some of the strategies include weatherization of buildings, installing energy efficient appliances, carpooling, and “encouraging new construction to employ passive solar, net zero, and other energy-saving building practices” (pg. 20-21).

b. Are specific strategies and recommendations for achieving these goals identified in the State energy plan included in the Plan?

Yes. Specific strategies include “promoting the use of advanced wood heating systems, cold climate heat pumps, electric vehicles, and Energy Star appliances” and “encouraging carpooling, alternative transportation, telecommuting, and home businesses” (pg. 24). The *Energy* chapter also includes recommendations that “the town should make thermal improvements and consider electric vehicle charging station infrastructure and renewable energy generation facilities when building or renovating public facilities” (pg. 24).

8. Planning needs to maintain and enhance recreational opportunities for residents and visitors.
a. Is growth being planned so as not to significantly diminish the value and availability of outdoor recreational activities?

Yes. The Utilities, Facilities and Services chapter includes a policy to “discourage development in the private sector that would significantly diminish the value and availability of outdoor recreational activities” (pg. 19).

b. Has public access to non-commercial outdoor recreational opportunities, such as lakes and hiking trails, been identified, provided, and protected wherever appropriate?

Yes. The Utilities, Facilities, and Services chapter discusses both completed and proposed efforts to improve outdoor recreation within the Town of Granville. The Transportation chapter also includes a policy to “give full consideration to preserving Class 4 Highways (roads) for recreational use by downgrading their status to a legal trail and thus retaining the public’s interest in them,” due to the community’s interest in “biking, hiking, snowmobiling, cross-country skiing, and similar outdoor recreational activities” (pg. 13).

9. Planning needs to encourage and strengthen agricultural and forest industries.

a. Have strategies to protect long-term viability of agriculture and forestlands been encouraged, including maintaining low overall density?

Yes. The Land Use chapter includes a policy that states, “contiguous forest and significant agricultural areas should remain largely in non-intensive uses unless no reasonable alternative exists to provide essential residential, commercial, or industrial activities for the Town’s inhabitants” (pg. 35).

b. Has the manufacture and marketing of value added agricultural and forest products been encouraged?

Yes. The Economic Conditions chapter includes a goal to “support the development of value-added farm and forestry products in Granville” (pg. 5).

c. Is the use of locally-grown food products encouraged?

Yes, in part. Although it is not directly stated, the Plan does encourage this through the inclusion of a recommendation to “seek to develop a space within the Village Center available to local farmers and craftsmen for selling their goods” (pg. 6).

d. Are sound forest and agricultural management practices encouraged?

Yes. The Land Use chapter includes a policy that states, “Farmers, loggers, and foresters should use Accepted Management Practices (AMP) and are encouraged to implement Best
Management Practices (BMP) in their operations and to minimize point and non-point source pollution” (pg. 35).

e. Are public investments planned so as to minimize development pressure on agricultural and forest land?

Yes. A policy is included within the Land Use chapter which states, “the construction of utilities, roads or other physical modifications should skirt tracts of productive agricultural land rather than divide them” (pg. 35). An additional policy maintains that, “Pursuant to Act 171, any development that fragments existing forest blocks shall be discouraged, unless such development provides and maintains viable connection(s) between newly divided sections” (pg. 35).

10. Does the plan provide for the wise and efficient use of natural resources and to facilitate the appropriate extraction of earth resources and the proper restoration and preservation of the aesthetics of the area?

Yes. The Physical Conditions and Natural Resources chapter includes a detailed policy that states, “existing and proposed mineral extraction and processing facilities shall be planned, constructed, and managed so as to: not adversely impact existing or planned uses within the vicinity of the project site...[and] reclaim and re-vegetate sites following extraction” (pg. 10).

11. Planning needs to ensure the availability of safe and affordable housing.

a. Is housing encouraged to meet the needs of a diversity of social and income groups, particularly for those citizens of low and moderate income?

Yes. The Housing chapter includes a policy to, “allow for growth of housing for all income levels at a rate consistent with the community’s ability to provide services in a fiscally sound manner and in a manner consistent with the other goals and policies expressed in this Plan” (pg. 28). There is also a recommendation to “encourage developers to utilize the federally funded Low-Income Housing Tax Credit (LIHTC) administered by the state” (pg. 28).

b. Does the plan provide for new and rehabilitated housing to be safe, sanitary, located conveniently to employment and commercial centers, and coordinated with the provision of necessary public facilities and utilities?

Yes. It is a goal of the Housing chapter to “encourage safe and sanitary housing” (pg. 27). It is also a policy within the Plan that “various types of housing such as multi-family, manufactured, accessory dwelling units and subsidized housing should be encouraged within or adjacent to existing Village Center areas where municipal services are most readily available” (pg. 28).
c. Are sites for multi-family and manufactured housing readily available in similar locations to those generally used for single-family conventional dwellings?

Yes. The Plan states that “various types of housing such as multi-family, manufactured, accessory dwelling units and subsidized housing should be encouraged within or adjacent to existing Village Center areas where municipal services are most readily available” (pg. 28). The Housing chapter also states that “although Granville has no zoning bylaws, it is these village areas that are the most suitable for additional housing of all types,” including single-family conventional dwellings (pg. 27).

d. Does the plan provide for accessory apartments within or attached to single family residences allowing close proximity to cost-effective care and supervision for relatives or disabled or elderly persons?

Yes. The Plan includes a goal to “encourage the creation of accessory dwelling units to provide additional housing options for the community” and separately to “encourage the provision of housing for special needs populations, such as the elderly and people with disabilities” (pg. 28). The Housing chapter also includes a discussion on the use of accessory units as an affordable housing option that can encourage the elderly or persons with disabilities to stay close to relatives.

12. Planning needs to plan for, finance, and provide an efficient system of public facilities and services to meet future needs.

a. Do public facilities and services address plans for such services as fire and police protection, emergency medical services, schools, water supply and sewage and solid waste disposal?

Yes. Within the Utilities, Facilities, and Services chapter, fire, police, and emergency services as well as school and vocational services are addressed and discussed. The Town of Granville does not own or operate any public water supply or wastewater disposal systems but this is stated as such within the chapter.

b. Does the rate of growth exceed the ability of the town and the area to provide facilities and services?

No. An overarching goal of the Plan is to “encourage growth but not to an extent that would exceed the town’s ability to provide services” (pg. 3).

13. Does the plan ensure the availability of safe and affordable child care and integrate child care issues into the planning process, including childcare financing, infrastructure, business assistance for child care providers, and child care workforce development?

Yes. A goal of the Plan is to “encourage the creation of safe and affordable childcare facilities that meet the needs of residents in Granville” (pg. 18). The Plan also
recommends the Town consider “providing a tax incentive for one childcare business in
town or working with neighboring towns on increasing the number of childcare units.”
Additionally, the Town “should work with surrounding towns to increase the availability
for work force development training for the region’s childcare employees” (pg. 19).

14. Planning needs to encourage flood resilient communities.

a. Is new development in identified flood hazard, fluvial erosion, and river corridor
protection areas avoided? If new development is to be built in such areas, it
should not exacerbate flooding and fluvial erosion.

Yes. The Flood Resilience and Hazard Mitigation chapter states that, “Granville
prohibits all new fill and construction of buildings in mapped floodways (mapped
areas, unless amended by FEMA)” (pg. 30). Additionally, “Permitted land uses
within Granville’s River Corridor Areas shall be limited to non-structural outdoor
recreational and agricultural uses due to the dangerous erosive risk in these areas”
(pg. 31).

b. Is the protection and restoration of floodplains and upland forested areas that
attenuate and moderate flooding and fluvial erosion encouraged?

Yes. The Flood Resilience and Hazard Mitigation chapter includes a policy that
encourages the “prioritization of maintaining Granville’s upland forests and
watersheds predominantly in forest use to ensure high quality valley streams and to
ensure that flood flows are reduced” (pg. 31).

c. Are flood emergency preparedness and response planning encouraged?

Yes. The Plan includes policies and recommendations that support the maintenance
and updating of Local Emergency Management Plans (LEMP), Local Hazard
Mitigation Plans (LHMP) and Flood Hazard Bylaws. Additionally, the Flood
Resilience and Hazard Mitigation chapter contains a policy that states, “after flood
events, recovery and reconstruction within the river area shall be managed according
to the Vermont River Program’s best practices in order to avoid negative impacts
downstream” (pg. 31).

B. Is the Municipal Plan Compatible with the Regional Plan?

The Two Rivers-Ottauquechee Regional Plan was adopted on July 26, 2017 and it will
remain in effect until August 31, 2025.

The Granville Town Plan is found to be compatible with the Two Rivers-Ottauquechee
Regional Plan. As used in this review, the term "compatible with" has been defined (in
Section 4302) as meaning: that the Plan in question, as implemented, will not significantly
reduce the desired effect of the implementation of the other plan (emphasis added). If a Plan,
as implemented, will significantly reduce the desired effect of the other Plan (in this case, the Regional Plan), the Plan may be considered compatible if it includes the following:

(a) a statement that identifies the ways that it will significantly reduce the desired effect of the other Plan;
(b) an explanation of why any incompatible portion of the Plan in question is essential to the desired effect of the Plan as a whole;
(c) an explanation of why, with respect to any incompatible portion of the Plan in question, there is no reasonable alternative way to achieve the desired effect of the Plan; and
(d) an explanation of how any incompatible portion of the Plan in question has been structured to mitigate its detrimental effects on the implementation of the other Plan.

C. Is the Plan Compatible with Approved Plans of other Municipalities in the Region?

At the time of review of this Granville Town Plan, the following municipalities have Plans approved by the Two Rivers-Ottauquechee Regional Commission that are in effect:


These approval decisions and Plans have been reviewed in the context of the above question. Based on this, we find the Granville Town Plan to be compatible with these Plans.

D. Municipal Plan Elements - Are They Included?

A plan for a municipality shall include the following required elements. These elements or components are, in summary:

(a) a statement of overall objectives and policies;
(b) a land use plan;
(c) a transportation plan;
(d) a utility and facility plan;
(e) a statement of policies for "special resources";
(f) an education plan;
(g) an implementation program;
(h) a statement on relationship of plan to trends and plans for adjacent towns and the region;
(i) an energy plan; and
(j) a housing plan.
(k) an economic development plan
(l) a flood resiliency plan

1. A statement of objectives, policies and programs of the municipality, to guide the future growth and development of land, public services and facilities, and to protect the environment.
Yes. The *Introduction* chapter includes five long-term goals for the Town of Granville, which include sustainability, affordability, preservation, community, and connectivity. Objectives, policies, and programs related to specific elements of the Plan are included in subsequent chapters.

2. A land use plan, consisting of a map and statement present and prospective land use, indicating those areas proposed for forests, recreation, agriculture, (using 6 VSA Section 8), residence, commerce, industry, public and semi-public uses and open spaces reserved for flood plain, wetland protection, or other conservation purposes; set forth the present and prospective location, amount, intensity and character of such land uses and the appropriate timing or sequence of land development activities in relation to the provision of necessary community facilities and services; and indicates those areas that are important as forest blocks and habitat connectors and plans for land development in those areas to minimize forest fragmentation and promote the health, viability, and ecological function of forests.

Yes. This is addressed in three respective chapters: *Land Use, Physical Conditions and Natural Resources*, and *Significant Cultural, Historic and Scenic Resources*. In addition, this is indicated on the Current Land Use (#1), Future Land Use (#2), Natural Resources (#5), and Forest Blocks (#6 & #7) maps.

3. A transportation plan, consisting of a map and a statement of present and prospective transportation and circulation facilities showing existing and proposed highways and streets by type and character of improvement, and where pertinent, parking facilities, transit routes, terminals, bicycle paths and trails, scenic roads, airports, railroads and port facilities, and other similar facilities or uses, with indications of priority of need.

Yes, in part. A transportation plan is included within the *Transportation* chapter and includes both present and prospective facilities. Current transportation uses are also outlined on the Transportation (#3) map. There is not, however, an indication of priority of need in regards to transportation improvements.

4. A utility and facility plan, consisting of a map and statement of present and prospective community facilities and public utilities showing existing and proposed educational, recreational and other public sites, buildings and facilities, including hospitals, libraries, power generating plants and transmission lines, water supply, sewage disposal, refuse disposal, storm drainage and other similar facilities and activities, and recommendations to meet future needs for community facilities and services, with indications of priority of need, costs and methods of financing.

Yes, in part. A utility and facility plan is included within the *Utilities, Facilities and Services* chapter which includes both present and prospective facilities. This is also illustrated on the Utilities & Facilities (#4) map. While some costs and methods of financing are discussed within the Plan, there in minimal indication of priority of need related to future utilities and facilities.
5. A statement of policies on the preservation of rare and irreplaceable natural areas, scenic and historic features and resources.

Yes. This is addressed in both the Physical Conditions and Natural Resources chapter as well as the Significant Cultural, Historic and Scenic Resources chapter.

6. An educational facilities plan consisting of a map and a statement of present and projected uses and the local public school system.

Yes. The present and projected uses of educational facilities is addressed in the Utilities, Facilities and Services chapter. There are no public schools displayed on the Utilities & Facilities map as the Town does not currently have a public school within its boundaries.

7. A recommended program for the implementation of the objectives of the development plan.

Yes. This is addressed within the Implementation: Putting the Plan into Action chapter.

8. A statement indicating how the plan relates to development trends and plans for adjacent municipalities, areas and the region developed under Title 24.

Yes. This is addressed within the Regional Context chapter.

9. An energy plan, including an analysis of energy resources, needs, scarcities, costs and problems within the municipality, a statement of policy on the conservation of energy, including programs, such as thermal integrity standards for buildings, to implement that policy, a statement of policy on the development of renewable energy resources, a statement of policy on patterns and densities of land use likely to result in conservation of energy.

Yes. This is included within the Energy chapter.

10. A housing element that shall include a recommended program for addressing low and moderate income persons' housing needs as identified by the regional planning commission pursuant to Section 4348a (a) (9) of Title 24.

Yes. This is addressed in the Housing chapter.

11. An economic development element that describes present economic conditions and the location, type and scale of desired economic development, and identifies policies, projects, and programs necessary to foster economic growth.

Yes. This is addressed in the Economic Conditions chapter.

12. A flood resilience plan that identifies flood hazard and fluvial erosion hazard areas and designates those areas to be protected, including floodplains, river corridors, land
adjacent to streams, wetlands, and upland forests, to reduce the risk of flood damage to infrastructure and improved property; and recommends policies and strategies to protect the areas identified and designated and to mitigate risks to public safety, critical infrastructure, historic structures, and municipal investments.

Yes. This is addressed within the *Flood Resilience and Hazard Mitigation* chapter.

**CONCLUSION**

Based upon the above findings, it is the conclusion of TRORC that the Granville Town Plan be approved. This approval shall remain in effect until the date that the Plan expires, or until it is amended or readopted and reviewed pursuant to these provisions, whichever occurs first.

**DISCUSSION**

TRORC appreciates the opportunity to formally evaluate the Granville Town Plan. The Plan is all-inclusive, reflecting the community’s planning capabilities and the import that they assign to issues around development.

Prior to issuing a Permit under Act 250, the District Environmental Commission or Environmental Court must find that the project is in conformance with the duly adopted Town Plan. This Plan includes clear, unambiguous language regarding current and proposed land use that can be reviewed by these bodies as part of an Act 250 project application. It is important that future Granville Town Plans maintain their currency as Plans that have been found to be vague, unclear, or ambiguous do not carry much weight in Act 250 permit proceedings.

The 2004 Vermont State Legislature passed Act 115 that made significant amendments to the Vermont Municipal and Regional Planning and Development Act. The most notable changes, in the context of this review, are that Town Plan and Zoning Bylaws are now held to a higher standard of consistency. From 24 V.S.A. §4303 Definitions:

“*Conformance with the Plan*’ means a proposed implementation tool, including a bylaw or bylaw amendment that is in accord with the municipal plan in effect at the time of adoption, when the bylaw or bylaw amendment includes all the following:

(a) Makes progress toward attaining, or at least does not interfere with, the goals and policies contained in the municipal plan.
(b) Provides for proposed future land uses, densities, and intensities of development contained in the municipal plan.
(c) Carries out, as applicable, any specific proposals for community facilities, or other proposed actions contained in the municipal plan.”

The 2019 Granville Town Plan is an improvement from the 2014 Town Plan. The Plan now includes discussion on additional modes of transportation including air and rail. It also includes a new chapter on *Significant Cultural, Historic and Scenic Resources*, which was previously
lacking in prior iterations. This latest Plan also contains additional discussion and added improvements to language regarding forest blocks and habitat connectors. Other significant improvements include new child care policies and recommendations as well as addressing accessory dwelling units in relation to affordable housing.

Comments and suggested improvements for the next iteration of the Granville Town Plan:

1. **Transportation:** The current transportation plan discusses both present and prospective facilities but does not include an indication of priority of need in regards to transportation improvements. Including this prioritization in the next iteration of the Plan would be beneficial.

2. **Economic Conditions:** The *Economic Conditions* chapter discusses how the Plan provides for a strong and diverse economy but does not explicitly discuss the expansion of economic opportunities in areas with high unemployment or low per capita incomes. These areas should be further expanded upon in the next iteration of the Plan.

3. **Utilities, Facilities and Services:** The *Utilities, Facilities and Services* chapter discusses the educational and vocational opportunities that are available in the surrounding towns but does not necessarily include any specific policies or recommendations on how the Town will continue to support educational options for students, including adult education. Creating policies and recommendations around future educational opportunities would strengthen the Plan.

4. **Utilities, Facilities and Services:** The *Utilities, Facilities and Services* chapter discusses both present and prospective facilities, and does address some costs and methods of financing but there in minimal indication of priority of need related to these prospective facilities and improvements. Including this prioritization in the next Plan would be valuable.

Dated this 11th day of December, 2019 at Woodstock, Vermont.

By: [Signature]

Peter G. Gregory, AICP, Executive Director