RE: TOWN OF STOCKBRIDGE, VERMONT
TOWN PLAN REVIEW
CASE # 16 - 3

BACKGROUND

Pursuant to 24 V.S.A., Section 4350, the Town of Stockbridge, Vermont Selectboard requested this Commission to review and approve the Stockbridge Town Plan adopted on August 20, 2015 by the Town. The Plan encompasses all lands in the Town of Stockbridge, and is referred to hereinafter as the Plan.

Section 4350 provides that prior to approving or disapproving 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. The Regional Commission scheduled and held a Public Hearing on this review on September 23, 2015 in Woodstock, Vermont. This matter is now ready for decision.

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 Stockbridge Planning Commission utilized a Municipal Planning Grant to conduct a planning process that included a public survey and a series of forums to address key areas of concern in the Plan. The result is a comprehensive planning document that is divided into nineteen discrete chapters, covering the range of topics required by statute as well as other subject matter areas that enhance the overall Plan. The Plan meets the requirements set forth in 24 VSA § 4382.
2. **Is citizen participation encouraged at all levels of the planning process?**

Yes. In addition to regularly warned public meetings (including the statutory public hearings prior to adoption) of the Stockbridge Planning Commission, this Plan’s public process included a survey of residents and several public forums.

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

Yes. The Plan outlines Stockbridge’s vision for the future, which includes an analysis of resources ranging from natural, historic, and energy resources, to municipal resources. The Plan recognizes the consequences of future growth in Stockbridge and its potential impact on resources and provides policy to effectively protect and sustain these resources into the future.

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

Yes. The Plan sets a goal to “work with neighboring towns and the region to encourage sustainable land use and environmental policy that benefits the citizens of Stockbridge” (p. 110). As such, the Town has set policies that encourage continued communication, cooperation, and the exchange of planning information and development data with its neighboring communities.

**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. Single and two family housing is encouraged at high densities within Stockbridge’s Hamlet Areas (pp. 22-24). The Plan seeks to have a “density and distribution of housing throughout the town that allows for continued maintenance of the working landscape,” which furthers the pattern of development indicated in §4302.

This version of the Stockbridge Town Plan has been specifically revised to address concerns about strip development. Instead of a long strip of commercial development as envisioned by the previous plan, the Stockbridge Planning Commission has created
several new clustered commercial areas. The Plan specifically indicates that “it is the policy of this Plan to prohibit the pattern of development most associated with sprawl, which is to allow primary commercial development in a strip along main roads.” (p.23)

b. Is economic growth being encouraged in locally designated growth areas or being employed to revitalize existing urban or village centers, or both?

Yes. Stockbridge does not have a formal central village; instead there are a number of smaller hamlet-sized developments in town (Gaysville and Stockbridge Common), both of which offer limited opportunity for growth. Recognizing the need to focus economic development in compact centers, this Plan creates two new mixed-use land use areas that are intended to guide economic growth into more central locations in the community (Stockbridge School Hamlet and Mixed-Use Light Industrial Areas). The primary purpose of creating these new land use areas is to discourage strip development or sprawl while allowing for orderly economic growth.

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 Town intends to “provide residents with safe, effective, responsive and affordable municipal infrastructure, facilities and services,” (p.45) “without creating an undue burden on taxpayers.” (p.45) The patterns of development proposed in this Plan are clearly intended to reinforce the rural character of the community, while discouraging expansion that outpaces Stockbridge’s ability to provide services. Plan policy indicates the intent to “maintain the existing road system, while discouraging the expansion or addition of new roads.” (p.82)

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. Many policies in the Stockbridge Town Plan focus on improving economic development within the community while ensuring that such development is balanced with the protection of rural character. “It is the policy of the Town to attract diverse and sustainable businesses in Stockbridge which contribute to the small town quality of life.” (p. 36) Likewise, the Plan supports the “development of local enterprises that create markets for locally produced goods and services.” The creation of the Mixed Use Light Industrial Area “is intended to provide an appropriate location for mixed use development with a focus on job-producing light industrial establishments.”

3. Does the Plan broaden access to education and vocational training opportunities for residents identified in the Plan?
Yes. The Town has set a goal to “provide opportunities and environment that will enable our students to investigate, master and apply the knowledge, skills, values and behaviors necessary for lifelong learning and meaningful participation in a global society.” (p. 90). The Plan addresses the needs of adult and vocational education opportunities in the narrative of the “Education” element.

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. **Has the need for public transit been addressed?**

   Yes. The Plan discusses Stockbridge’s limited public transit options (pp. 81-82), calling out the “need for an affordable source of public transportation that can bring the elderly to major medical facilities like Dartmouth Hitchcock and larger commercial centers for day-to-day shopping.”

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

   Yes. The Stockbridge Town Plan specifically sets a goal “to provide and maintain a safe, energy efficient and well maintained transportation network, in a cost-effective manner, integrating all modes of travel (auto, pedestrian, bicycle, and mass transit).” (p. 82).

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 Plan’s “Natural, Scenic and Cultural Resources” element covers the following resource areas: water resources, flood hazard areas, floodplains, groundwater, surface water, wetlands, flora, fauna, natural communities, habitats, and mineral resources. (pp. 58-68). The “Significant Natural and Historic Areas” section includes a discussion on historic properties and structures of significance throughout the Town (pp. 68-69).

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. While the Plan does not specifically address efforts to curb adverse impacts to air quality from proposed land development activities, the goals and policies stated within the “Natural, Scenic and Cultural Resources” element do directly address development impacts to water, wildlife, mineral, and land resources throughout the Town (pp. 58-71). If all of these impacts are mitigated, the net effect ought to yield cleaner air and other natural resources for residents.

7. Does the Plan encourage the efficient use of energy and the development of renewable energy resources?

Yes. The Plan sets a goal to “ensure the long-term availability of safe, reliable and affordable energy supplies, to increase energy efficiency, and to promote the development of renewable energy resources and facilities in the Town of Stockbridge.” Additionally, the Plan seeks to “promote the construction of energy efficient residential and commercial buildings and increase awareness and use of energy conservation practices through educational outreach to the public.” (p.105)

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. It is Town goal to “maintain, enhance and expand recreational opportunities in Stockbridge” by encouraging “patterns of land use that maintain and enhance opportunities for outdoor recreation.” (p. 39) The overall pattern of development proposed in this Plan is consistent with the state goal of compact villages and urban centers surrounded by open countryside, a pattern that is specifically designed to maintain Stockbridge’s rural recreational opportunities.

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

Yes. It is Town goal to “maintain, enhance and expand recreational opportunities in Stockbridge” by encouraging “patterns of land use that maintain and enhance opportunities for outdoor recreation.”

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 Plan encourages “the conservation, wise use, and management of the town’s agricultural and forestry resources, to maintain its environmental integrity, and to protect its unique and fragile natural features.” (p. 76) Further, the Plan promotes clustered or peripheral development as a means to protect agricultural and forestry resources “and prevent fragmentation and sprawling settlement patterns” (p. 77).

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

Yes. It is Town policy to “support the development of value-added farm and forestry products” (p. 77).

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

Yes. The Town has demonstrated support for locally-grown food products through its support of value-added industry as well as its effort to keep high value agricultural or silvicultural lands open.

e. **Are sound forest and agricultural management practices encouraged?**

Yes. It is Town policy that “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” (p. 77).

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

Yes. Per the Plan, it is Town policy that “contiguous forest and significant agricultural areas should remain largely in non-intensive uses unless no reasonable alternative exists to provide essential residential, commercial and industrial activities for the Town’s inhabitants,” and that developments generally do not fragment agricultural and forest lands (p. 77).

10. **Planning needs to 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.**

a. **Have strategies to facilitate the appropriate extraction of earth resources and the proper restoration and preservation of the aesthetic qualities been addressed?**

Yes. The Plan supports the “extraction and processing of mineral resources only where such activities are appropriately sited..., managed, and where the public interest is clearly benefited” (p. 68). Furthermore, it is town policy that existing and proposed mineral extraction and processing facilities be planned, constructed, and managed to reclaim and
re-vegetate sites following extraction while minimizing impacts to adjacent uses, the environment, habitats, and the overall rural character of the Town (p. 68).

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. It is the policy of Stockbridge that “the Town should allow for growth of housing for all income levels” and to “encourage innovative planning, design and construction of primary housing which minimizes the cost, energy consumption and environmental impacts of housing.” (p.57)

   b. **Are sites for multi-family and manufactured housing readily available in similar locations to those generally used for single-family conventional dwellings?**

      Yes, in part. The Plan explicitly discourages the location of affordable housing “into only selected areas” of the community, instead encouraging the Town and private developers to work together to locate housing in different areas to meet the needs of residents within the community. Multi-family housing is not explicitly mentioned in the Plan, but affordable housing is mentioned in many locations.

   c. **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. The Plan clearly indicates that it single and two family housing is encouraged at high densities within Stockbridge’s Hamlet Areas (pp. 22-24). It is a goal of the Plan to “encourage safe and affordable shelter for present and future populations in Stockbridge. (p. 56) Growth in housing should be “at a rate consistent with the community’s ability to provide services in a fiscally sound manner.” (p. 57)

   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?**

      No. Accessory dwelling units are not specifically mentioned in the Stockbridge Town Plan, but the Plan does allow for growth of housing for all income levels, and encourages the location of housing to meet the needs of residents. (p. 56-57) Future iterations of this Plan should clearly discuss accessory dwelling units.

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. The Plan does address the needs for public facilities and services throughout both the “Public Facilities and Utilities” element and the “Health and Emergency Services” element (pp. 41-50).

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

No. The Plan’s “Overarching Goals” encourages the “appropriate use of all lands in the Town of Stockbridge in such a manner as will promote the public health, safety, prosperity, comfort, convenience, sustainability, self-sufficiency, economy and general welfare of the town.” The Plan further seeks to “promote development within the Town of Stockbridge consistent with the ability of the Town to provide services.” (p. 10)

13. Planning needs to 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 work force development.

The Plan outlines the existing level of childcare service available in the community, noting that many families/parents opt to utilize other family members or childcare opportunities outside of the Town for their childcare needs. The Town “supports the development of additional local childcare facilities, as is needed, and may assist with seeking funding to develop these facilities.”

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

The Two Rivers-Ottauquechee Regional Plan was adopted on June 25, 2014 and it will remain in effect until July 25, 2022. Using the statutory definition of “compatible with,” we find the Stockbridge town Plan to be compatible with the Two Rivers-Ottauquechee Regional Plan.

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

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

Barnard, Bethel, Braintree, Bridgewater, Brookfield, Chelsea, Corinth, Fairlee, Granville, Hancock, Hartford, Hartland, Norwich, Pittsfield, Plymouth, Randolph, Rochester, Royalton, Sharon, Strafford, Topsham, Tunbridge, Vershire, West Fairlee, Woodstock
These approval decisions and Plans have been reviewed in the context of the above question. Based on this, we find the Stockbridge 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.**

The Plan, in its entirety, serves as a statement of objectives, policies, and activities that will guide future growth and development while also ensuring environmental protection of Town resources and landscapes. Included in the Plan’s appendix is a list of specific action items (programs) that allow the Town to implement the Plan.

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; and setting 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.**

The “Land Use” element serves as a land use plan (pp. 18-30). Future Land Use and Current Land Use maps can be found in the appendix.

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.

The “Transportation” element serves as a transportation plan (pp. 78-82). It is accompanied by a Transportation map that can be found in the appendix.

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.

The “Public Facilities and Utilities” element in conjunction with the “Health and Emergency Services” element serves as a utility and facility plan (pp. 41-50). They are accompanied by a Utilities, Facilities, and Education map that can be found in the appendix.

5. A statement of policies on the preservation of rare and irreplaceable natural areas, scenic and historic features and resources.

The “Natural, Scenic and Cultural Resources” element, serves as a statement of policies on the preservation of rare and irreplaceable natural areas, scenic, and historic features and resources in the Town (pp. 58-71). It is accompanied by a Natural Resources map and a Habitat Blocks map, both of which can be found in the appendix.

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

The “Education” element serves as an educational facilities plan (pp. 85-90). Its mapping needs are contained in the Utilities, Facilities, and Education map that can be found in the appendix.

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

The “Town Plan Implementation” element and related appendix serves as a recommended program for the implementation of the objectives of the development plan (pp. 111-115).

8. A statement indicating how the plan relates to development trends and plans for adjacent municipalities, areas and the region developed under Title 24.
The “Relationship to Other Plans” element serves as a statement of how the plan relates to adjacent municipalities and the region as a whole (pp. 108-110).

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.

The “Energy” element serves as an energy plan for the Town (pp. 92-105).

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.

The “Housing” element addresses the Town’s needs for low- to moderate-income housing opportunities (pp. 52-56).

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.

The “Economic Development” element describes Stockbridge’s present and desired economic conditions along with the programs necessary to foster additional economic growth (pp. 32-36).

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.

Flood resilience is addressed in the Natural, Scenic and Cultural Resources chapter (Floodplains, section B, pp. 61-64), which addresses floodplains, river corridor areas and severe flooding events. The Emergency Management (pp. 48-51) component of Health and Emergency Services, further discusses hazard mitigation. The need for municipal investments in transportation improvements that will mitigate against future damage is discussed in the Culverts and Bridges (p. 79) section of the Transportation chapter.

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

**DISCUSSION**

The Regional Commission appreciates the opportunity to formally evaluate the Stockbridge 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 Stockbridge 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.”

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.

It is evident from a thorough review of the newly adopted Stockbridge Town Plan that a great deal of effort was placed in addressing the areas of concern enumerated in the 2014 TRORC Enhanced Consultation.

- Significant changes were made to the pattern of development in the Land Use chapter, eliminating the previous pattern of strip development in favor of a series of compact centers which are consistent with state planning goals and the Regional Plan.
- The utility and facility plan information provides more specific information related to anticipated projects, associated costs, and prospective financing mechanisms for the Town, where information was available. The need for a Capital Budget and Program is discussed.
- A much broader discussion of the Town’s rare and endangered species has been presented, along with corresponding goal, policy, and action statements.
- The Plan now includes a list of important scenic, historic and cultural resources.
- A clearer, more specific set of recommendations to implement the Plan has been constructed, delineating responsible parties and projected timelines for completing each activity.
- The Energy element has been substantially re-written and is now much more comprehensive.
- The Housing element provides a more robust discussion on the need to provide more affordable housing, and, read with the Land Use element, also helps more clearly direct where affordable housing ought to be located.
- The Economy element includes an analysis on future economic development in the town along with more thorough discussions on the existing economy.

On balance, the Plan could be improved with greater consideration of the following items:

- The “Utilities and Facilities” element should include a prioritization of future needs for Stockbridge’s facilities that includes any anticipated costs and potential funding sources to complete modifications, upgrades, or repairs. This information could be incorporated from a Capital Plan and Budget, as and when such a document is created for the Town.
- While the Plan clearly supports the development of more affordable housing, it neglects to specifically identify where multi-family housing or accessory dwelling units are appropriate. Such housing should be allowed wherever residential housing is permitted, particularly within the Village Area or anywhere in close proximity to town services and care facilities. Additionally, the Plan must include a discussion on mobile and manufactured homes in the Town, presenting them as another affordable housing opportunity for residents.
Dated this 23rd day of September, 2015 at Woodstock, Vermont.

By: Peter G. Gregory
Peter G. Gregory, AICP, Executive Director