RE: TOWN OF ROCHESTER, VERMONT PLAN REVIEW
CASE # FY 20-10

#### **BACKGROUND**

Pursuant to 24 V.S.A., Section 4350, the Town of Rochester, Vermont requested TRORC to review and approve the Rochester Town Plan adopted on April 27, 2020. The Plan encompasses all land in the Town of Rochester, 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 May 27, 2020 remotely using the Zoom platform. 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 2020 Rochester Town Plan is a comprehensive planning document to guide municipal decision making that has been divided into 16 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 Plan encourages citizen participation and "welcomes continued input from the

citizens and business community for ideas and expertise to assist in the performance of its duties" (pg. 3).

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

Yes. The Plan includes policies that, "ensure careful review of all development projects to minimize the impact on Rochester's natural and cultural resources," and to "protect unique resources through careful planning" (pg. 65).

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

Yes. The Relationship to Other Plans chapter includes policies to "encourage continued communication and cooperation between Rochester and its neighboring towns," as well as to "exchange planning information and development data with neighboring communities" (pg. 72). Additionally, Rochester has reviewed nearby towns' plans and land use regulations for consistency with their own Plan (pg. 71-72).

#### **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 Plan includes a goal to "encourage new residences and businesses to locate in or adjacent to the village" (pg. 17). Additionally, the Land Use chapter includes a policy to "discourage strip development because it does not align with the vision set forth in this Plan" (pg. 17).

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

Yes. As stated above, the Plan encourages new businesses to locate in or near the village, as the 'Business – Residential' land use area comprises the village and some adjacent areas. It also states that "primary retail development shall be in [the] designated Village Area" (pg. 25). The Plan additionally designates a 'Commercial – Agricultural Area' that

also allows for commercial development along the intersection of Route 100 and 73, provided that it does not negatively impact the main Village Center area (pg. 17).

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 a policy to "ensure growth and density of development does not exceed the town's capacity to provide services, particularly sewage disposal" (pg. 17). The Plan also discusses the Town's capital budget which is in place to "guide investments in community infrastructure," and is therefore guiding development (pg. 32).

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

Yes. The Plan includes many references to smart growth principles including encouraging compact village centers; protecting environmental, natural, cultural and historic features; and balancing growth with the availability of public utilities and services.

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. One of the main goals of the Plan's Economic Development chapter is to "encourage a strong and diverse local economy that provides satisfying and rewarding employment opportunities for residents while maintaining the community's rural character," while also aiming to "strengthen and maintain the town's agricultural, forest and recreational economies." (pg. 25).

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

Yes. The Education chapter discusses the recent school closures and consolidations that are affecting Rochester due to declining enrollment. The chapter does include a policy to "support efforts to keep the Rochester Elementary School open" (pg. 21). Additionally, the chapter discusses nearby adult and continuing education facilities, including Vermont Technical College in Randolph, Middlebury College in Middlebury, and the Vermont Adult Learning Center in Rutland.

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. One of the main goals of the Transportation chapter is to "provide and maintain a safe, energy efficient, and cost-effective transportation system integrating all modes of travel (auto, pedestrian, bicycle, and public transit) and meeting the needs of the public in a manner consistent with the other goals, policies and recommendations of this Town Plan" (pg. 30). The chapter discusses how alternate modes of travel such as bicycles, walkways, public transit, air and rail, are supported both in and beyond town boundaries.

- 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 Natural, Scenic and Cultural Resources chapter identifies a list of significant natural and historic areas (pg. 63-64), and additionally significant areas are discussed in the Flood Resilience, and Agriculture and Forestry chapters. These areas include scenic views and roads, watersheds, wetlands, forests, and historic sites.

- 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 Plan includes policies to "ensure careful review of all development projects to minimize the impact on Rochester's natural and cultural resources" and "protect unique resources by careful planning" (pg. 65), which takes into account the principles set forth in Act 250.

b. Is water quality being maintained and improved on according to the policies and actions set forth in the basin plans?

Yes. The Plan includes a policy to "enact standards that maintain or improve water quality according to the policies and actions developed in the White River Basin Plan (Basin 9)" (pg. 59) as well as recommendations that support this policy.

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

Yes. In the Natural, Scenic and Cultural Resources chapter, forest fragmentation is discussed at length and subsequent policies address its negative impact. This includes one policy that states, "Development is designed to preserve continuous areas of wildlife habitat whenever possible. Fragmentation of habitat is discouraged. Efforts should be made to maintain connecting links between such areas" (pg. 61).

- 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 includes various strategies for achieving energy efficiency, including ways to maximize the energy efficiency of new and existing buildings through effective maintenance and operation policies (pg. 50). The Plan also identifies areas suitable for renewable energy generation, which are illustrated on the associated town plan maps. Additionally, the Plan supports the development of renewable energy sources and aims to reduce transportation energy demand and single occupancy use through promoting public transportation services and opportunities (pg. 49).

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

Yes. The policies and recommendations listed in the Energy chapter align with the goals identified in the State Energy Plan (pg. 49-50).

- 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 Plan includes a policy to "maintain a pattern of development that supports and maintains access to public recreation" (pg. 52) and also includes a robust discussion on the importance the outdoor recreation to Rochester's economy.

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

Yes. An overarching goal of the Town Plan is to "maintain public recreation facilities and encourage open space, both public and private" (pg. 2). The Recreation chapter also includes a goal to "enhance and maintain public access to recreation for Rochester's

residents and visitors alike" (pg. 52).

## 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 supports maintaining a "pattern of development in the more rural areas of town that is low density, allowing for larger amounts of open land" (pg. 52) and encourages "clustered or peripheral development where high value agricultural and forested land is identified, to protect such resources and prevent fragmentation and sprawling settlement patterns" (pg. 70).

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

Yes. The Plan encourages "the economic growth of agricultural and forest operations at a scale that is appropriate for Rochester" and supports "the development of value-added farm and forestry products in Rochester" (pg. 69-70).

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

Yes. The Agriculture and Forestry chapter includes a goal to "encourage the use of locally-grown food products" (pg. 69).

#### d. Are sound forest and agricultural management practices encouraged?

Yes. A policy of the Agriculture and Forestry chapter is to "encourage farmers, loggers, and foresters to 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. 70).

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

Yes. The Plan includes a policy to "limit development in contiguous forest and significant agricultural areas to non-intensive uses unless no reasonable alternative exists to provide essential residential, commercial, and industrial activities," in addition to numerous other policies that set to minimize development pressure on the aforementioned lands (pg. 70).

# 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 Mineral and Gravel Resources sub-chapter of the Natural, Scenic and Cultural Resources chapter discusses the use and management of earth resources in Rochester. It includes an overarching goal to "support extraction and processing of mineral resources only where such activities are appropriately managed, and the public interest is clearly benefited. Any support shall be balanced against the need to maintain the rural character valued by the citizens of Rochester" (pg. 63).

- 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 include a goal to encourage "suitable and affordable housing of all of Rochester's residents" and makes a specific policy point to "encourage housing that is affordable for a mix of households having moderate, low, and very low incomes" (pg. 13).

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. The Housing chapter lists seven goals that discuss the need for housing in Rochester to be safe, sanitary, and include orderly growth that takes into consideration the location of public services and facilities (pg. 13).

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 permits multi-family housing in all zones within the Town and especially encourages the development of multi-family housing in the Village (pg. 8, 13). It also considers manufactured homes to be 'single-family' homes and encourages the community as a whole to "maintain diverse types of housing stock" (pg. 13).

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 encourages the "creation of accessory dwelling units for providing additional housing for the community" and also "encourages the provision of housing for special needs populations" (pg. 13). It also addresses the benefits of encouraging accessible apartments and housing within the Village Center Area, as residents will "benefit from being able to access community services and facilities" (pg. 13).

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. Plans for water supply, sewage and solid waste management are all addressed in the Utilities and Facilities chapter (pg. 34-36), whereas fire, police and emergency services are addressed in the Health and Emergency Services chapter (pg. 37-39).

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

No. The Plan aims to ensure that "the timing and rate of new housing construction or rehabilitation does not exceed the community's ability to provide adequate public facilities" (pg. 13). Likewise, it also encourages "new business development in appropriate locations where services such as roads, fire protection and power supply are available or planned" (pg. 25).

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 work force development?

Yes. The Education chapter discusses current licensed childcare services in town, of which there are two, and includes goals and policies that encourage the additional creation and development of affordable childcare facilities so that the Town may meet the needs of its residents. It also aims to "ensure that Rochester zoning regulations continue to support increasing childcare capacity" (pg. 21).

- 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 chapter addresses the issue of new development in identified flood hazard areas and lists many policies and recommendations that support avoiding development in these areas. It also recommends revising Rochester's Flood Regulations in order to reflect the policies stated in the Flood Resiliency chapter (pg. 56-57).

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

Yes. The Plan includes policies that "encourage property owners to maintain vegetated buffer strips in riparian zones" and "ensure all wetlands which provide flood storage functions remain undeveloped" (pg. 57). It also states that the Town should "maintain Rochester's upland forests and watersheds predominantly in forest use to ensure high quality valley streams and to ensure that flood flows are reduced" (pg. 57).

#### c. Are flood emergency preparedness and response planning encouraged?

Yes. A recommendation of the Flood Resiliency chapter is to "continue working to update hazard mitigation plans and emergency preparedness and recovery procedures" (pg. 57).

### 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 Rochester 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 Rochester Town Plan, the following municipalities have Plans approved by the Two Rivers-Ottauquechee Regional Commission that are in effect:

Barnard, Bradford, Braintree, Bridgewater, Brookfield, Chelsea, Corinth, Fairlee, Granville, Hartford, Hartland, Newbury, Norwich, Pittsfield, Plymouth, Pomfret, Randolph, Rochester, Royalton, Stockbridge, Strafford, Tunbridge, Vershire, West Fairlee, and Woodstock.

These approval decisions and Plans have been reviewed in the context of the above question. Based on this, we find the Rochester 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
- (i) 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.

A statement of objectives, policies and programs for the Town is contained in the Introduction chapter of the document (pg. 1-3).

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.

A land use plan is located in the Current and Future Land Use chapter (pg. 14-19). A subsequent map of both present and future land use is included as Map #3 and a map illustrating forest blocks and habitat connectors is provided as Map #5.

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.

A transportation plan is included within the Transportation chapter and includes a discussion on both current and prospective transportation systems as well as their priority of need (pg. 27-31). Map #1 illustrates the current transportation systems in place in Rochester.

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.

A utility and facility plan is included within the Utilities and Facilities chapter and addresses both current infrastructure and future needs of the town (pg. 32-36). It also references the Town's capital budget which provides a prioritization of capital investments. A map of current utilities and facilities is included in Map #2.

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

A statement of policies on the preservation of rare and irreplaceable natural areas, scenic and historic features and resources can be found in the Natural, Scenic and Cultural Resources Chapter of the Plan (pg. 58-65). A natural resources map is also included as Map #4.

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

An educational facilities plan can be found under the Education Chapter (pg. 20-21). A map of educational facilities is provided in Map #2.

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

The Town Plan Implementation Chapter outlines the various entities that should be involved to help achieve the Plan's stated goals and policies. The Implementation Matrix featured in Appendix A also includes information on who can take responsibility for implementation actions noted in the Plan (pg. 73-79).

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 chapter successfully indicates how the Rochester Town Plan

relates to the town plans of nearby municipalities as well as the TRORC Regional Plan (pg. 71-72).

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.

A robust energy plan is included in the Energy chapter and includes an analysis of resources, needs, scarcities, and costs, as well as policies to address energy conservation, renewable energy resources, and land use patterns (pg. 41-50). This information is also illustrated in Maps #7-11.

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.

A housing element is included within the Housing chapter and addresses both low and moderate income housing needs for the Town (pg. 8-13).

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.

An economic development element is included in the Economic Development chapter of the Plan and details current economic conditions, the type of desired economic development and ways the Town can foster economic growth (pg. 22-26).

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.

A flood resilience plan is included in the Flood Resiliency chapter and identifies hazard areas, designates areas to be protected, and recommends policies and strategies to protect these areas and mitigate risks (pg. 53-55). A flood map is also included as Map #6.

#### **CONCLUSION**

Based upon the above findings, it is the conclusion of TRORC that the Rochester 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 Rochester 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 Rochester 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 2020 Rochester Town Plan is an improvement from the 2018 Town Plan. The most significant updates were made to the Energy chapter. It now includes references to the most recent Vermont Comprehensive Energy Plan and its long-term renewable energy goals. The Plan is also supported by additional municipal energy data as well as new renewable energy potential maps. The 2020 Plan also includes an updated Implementation Matrix within the Town Plan Implementation chapter.

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

- 1. Inclusion of information about archaeological sites and archaeologically sensitive areas.
- 2. Consider reinstating brief, general information on the various regulatory and non-regulatory implementation tools under the Town Plan Implementation chapter. While some of this information may already be mentioned in earlier chapters of the Plan, it is

often chapter or subject specific, and the Plan could benefit from a general discussion of these resources.

Dated this 27th day of May, 2000 at Woodstock, Vermont.

By: All Acquire Pirector