

**RE: TOWN OF TOPSHAM, VERMONT
TOPSHAM TOWN PLAN REVIEW
CASE #FY 13-5**

BACKGROUND

Pursuant to 24 V.S.A., Section 4350, the Town of Topsham, Vermont Selectboard requested this Commission to review and approve the Topsham Town Plan proposed to be adopted on September 25, 2012 by the Town. The Plan encompasses land use for the Town of Topsham 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 26, 2012 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?

The Plan is structured as a comprehensive planning document. As such, it is organized by subject into 13 sections. The Plan's format includes those elements required of a Plan (24 V.S.A. Section 4382). The Plan uses "Planning Principles" to specifically address municipal decisions. The principles do include some planning specific policies.

2. Is citizen participation encouraged at all levels of the planning process?

Development of the Plan was the work of the Planning Commission who provided opportunities for public input. Residents' desires are considered in every aspect of the plan.

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

The first goal in the Plan (page 8) specifically says, “Strive toward sensible development and orderly growth to maintain the rural characteristics of the town.” Throughout the Plan, goals and principles consider development activities impacts on natural, financial, and community resources. The Plan recognizes that “the continued population expansion can greatly affect the character of our town” and while the available services currently handle the slowly growing population, they must be prepared for expanded services should capacity be reached (page 7).

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

“Topsham shares numerous activities and services with surrounding towns” (page 62); therefore, they recognize that it is in their best interest to work cooperatively with adjacent towns. The *Relationship to Other Plans* section notes that “The neighboring plans have been read in the context of the proposed Topsham Town Plan [and] no conflicts exist in the general philosophy or specific development proposals along town borders.”

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?

While the citizens of Topsham have firmly noted that they do not want to initiate land use controls like zoning, the Plan specifically says that the Village Center should be more densely populated than the more rural areas and that residential development “should favor” multi-family and cluster housing when possible (page 39). The principles (page 40) in this section reinforce this goal. However, included in the principles under “Rural Residential Area” (page 42), “The use of planned residential development or the cluster development concept, where intensive settlement is balanced by compensating land for open space, is encouraged.” This principle seems as though it would allow clustered or densely placed housing anywhere in the town, not just the Village Centers, as long as sufficient open land is available for balance. There is no definition of what “compensating land for open space” would be.

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

While there are no designated “growth areas” in the Plan and Topsham does not consider itself an “economic hub” (page 13), it does encourage compatible density, both commercial and residential, in the Village Centers.

The Plan is very sensitive to landowners’ ability to develop their property as they wish wherever that property may be located within the town. Economic growth is encouraged

wherever it fits based on type and scale. For example, the third principle under the “Rural Residential Area” (page 42) states that “small entrepreneurial enterprises are consistent with the general purpose of this area provided that their size, type, appearance, and setting do not significantly or unnecessarily detract for the overall rural character.” The principle also goes on to say that these enterprises should not cause any unnecessary burden to town services.

- 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?**

Public investments are not discussed in detail; however, the Plan calls for all growth to maintain the rural character of the town. And, as mentioned above, the Plan states that growth should not unnecessarily burden town 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?**

The Plan includes several policies (page 15) that support a diverse economy at the home occupation scale, village business scale and expanding business scale while still being aware that such expansion needs to respect and reflect the existing land use pattern and character of Topsham. No specific mention is made of policies directed at areas with high unemployment or low per capita incomes since there are no single, identifiable areas with those particular characteristics in Topsham.

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

Section 7 of the Plan (page 28) discusses the existing educational system (K-8 attends school at Waits River Valley School in Topsham while grades 9-12 are tuitioned out to nine other schools). Vocational training is not addressed and needs to be mentioned in the next iteration of this Plan.

- 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?**

Topsham’s location provides for limited access to public transit. The *Transportation* section of the Plan does have a goal to “support local, regional and statewide efforts to provide transportation systems that meet the needs of all population segments and not just those with automobiles” (page 35).

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

Not specifically, the Plan acknowledges that while their primary mode of transportation is by automobile, when possible, local residents and tourists do utilize the roads for

walking, biking and horseback riding; however, because many roads do not have adequate shoulders these types of activities are limited (page 31). The plan does include a goal “to provide pedestrians with safe areas to travel within the Topsham and Waits River Villages” (page 35). There is also a planning principle that speaks to biking, hiking, snowmobiling, etc. and that “full consideration to preserving Class 4 roads for recreational use by downgrading their status to a legal trail and thus retaining the public’s interest in them.”

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?**

Since the prior plan, Topsham has added a section (page 51) that speaks directly to this. The goals and principles in this section support the preservation of the town as it currently exists (page 52).

However, while the Plan states that residents would like to see the town remain the same, there are no safeguards in place to ensure that this happens.

While the town has no town-owned recreational lands or facilities, residents make full use of each other’s property and the State-owned Pine Mountain Wildlife Management Area in their pursuits of recreation.

There is a recommendation in this section (page 52) that says, “The Town should consider conducting an inventory of important scenic or recreational areas in the community.”

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?**

All major components of the Plan are directed by the purposes of Act 250 [10 V.S.A., Section 6086(a)]. Water resources, soil erosion, air quality, wetlands, energy and water conservation, and agricultural soils have been addressed.

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

The Plan’s *Energy* section (pages 54-17) is much more extensive than in the previous plan and does a fairly thorough analysis of energy efficiency and renewable energy resources. While they recognize that they are unable to make much impact on the national level, the town realizes that they could do more to inform their citizens and that they do have control over their own energy

impact (page 57). Many towns in Vermont have established Energy Committees who advise the planning commission and Selectboard with regard to energy issues. Energy Committees and/or an Energy Coordinator can organize energy audits and ultimately make recommendations that could save energy and money. The recommendations at the end of the *Energy* section (page 61) include direction that the Selectboard should both consider creating an Energy Committee as well as a Capital Budget and Program that considers energy efficiency and conservation measures.

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?

Growth is not being specifically planned with regard to recreational activities; however, the plan says, “There is no intention to restrict development, provided that it is consistent or similar to the type and scale of development that already exists in the area. It also goes on to say that “residents only want to ensure that the community remains much as it is now” (page 51).

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

The town owns no public recreational areas or facilities; however, one of the planning principles in their *Transportation* section (page 36) recommends consideration should be given to downgrading some Class 4 roads for recreational use to legal trail status to keep public interest.

There is a goal within section 12 that says the Town wishes to “preserve the community’s scenic, historic and recreational resources” (page 52); however, no specific strategies are mentioned and this should be addressed in the next iteration of this Plan.

As mentioned previously, there is also a recommendation that an inventory of important scenic and recreational areas should be considered (page 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?

Nothing specific to forest industries is addressed. The Plan does encourage agriculture in the Agricultural Valley Areas subsection (page 40) of Proposed Land Use. Agricultural uses are proposed to be the dominant uses in the area, with a focus on maintaining the rural character of the town. Both goals and principles are in place in the plan (page 41) to encourage this.

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

The Plan does not directly address the manufacture and marketing of agricultural and forest products. However, the establishment and operation of small entrepreneurial enterprises that are consistent with the rural agrarian character of the town are encouraged (page 38).

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

No, not specifically; however, as mentioned above support of small entrepreneurial enterprises that are consistent with the rural agrarian character of the town are encouraged. Also, in the *Economic Base* section there is a policy “to support the development of local enterprises that create markets for locally produced goods and services” (13).

d. Are sound forest and agricultural management practices encouraged?

There is a general goal (page 8) that says, “Maintain conservation and proper management of our natural resources” in the Plan’s *Introduction*. Also in the *Implementation* section under “Vegetation Management” (page 65), there is a reference to timber harvesting; however, this specific section is generic to other town plans and a more specific management plan supported by goals and policies throughout the Topsham Town Plan for both agriculture and forestry needs to be included in the next Plan update.

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

Major public investments are minimally mentioned and, when mentioned, not in reference to development pressure on agricultural and forest land. In the *Current and Future Land Uses* section of the Plan (page 40), however, one of the principles says that major public investment “should be encouraged and endorsed only on finding that they will not unreasonably or unnecessarily jeopardize or endanger the character of the Village Center.” “Major Public Investments” are also mentioned in the *Energy* section under principles: “Major public investments . . . need to be situated within or in close proximity to the villages of Topsham” (page 60).

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?

The Plan contains goals and principles to allow extraction of mineral resources (page 50) when utilization of these resources do not conflict with planned land uses or other stated goals of the Plan. The Plan does have a principle (page 50) that states that the re-vegetation of these sites should be managed, but no direction as to the quality of restoration is given.

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?**

Since there are no single, identifiable areas of citizens of low and moderate income in Topsham, no specific mention is made of housing policies directed at these particular income groups.

The *Housing* section has goals and policies (page 21) that encourage affordable housing that meets the needs of the community. That said, the plan does refer to the fact that residents feel that there is a lack of rental housing as well as a lack of elder care and elder housing; however, no strategies are included in the Plan to specifically address any of these issues. One of the goals (#4) does say, "To encourage the creation of additional rental properties throughout town, provided that they do not put an undue burden on Town services and facilities." Strategies and/or policies on how this encouragement can occur within the parameters set in this goal would strengthen this section.

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

Yes. The 2010 Census reports that while more than three-quarters of the housing units in Topsham were single-family residences; the second largest percentage of housing units was mobile homes. There is no restriction on where these types of housing would be allowed; in fact, development in general, as long as it fits in size and scale, is encouraged throughout the town. The *Current and Future Land Uses* section, does mention that in accordance with state planning goals, residential development should favor multi-family housing in the Village Center areas; however, no strategies are in place to specifically support this.

- 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. While the Plan does not specifically use the words "safe" and "sanitary;" the goals in the *Housing* section (page 21) addresses access to decent, affordable housing and retention of existing and construction of new housing. There are also policies in place that encourage location of future housing that complements employment patterns and the Plan also discusses within its goals and policies that housing should grow along with the population and that it should not overburden town services and facilities.

- 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?**

The *Housing* section does have a policy to plan for accessory apartments (page 21). As mentioned above, specific planning strategies are needed and would strengthen this area.

- 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?**

All of the above are addressed in the Plan.

There is mention of deficiencies related to both fire and police services (pages 26 and 27), but no strategies on how to correct or fund these issues are in place.

Topsham does not own or operate any public water supply or wastewater disposal systems.

The Plan acknowledges (page 23) that the lack of a Solid Waste Implementation Plan (SWIP) precludes them from using an in-state facility. This could potentially negatively impact the town in the event that the New Hampshire Solid Waste facility that currently takes their solid waste were to close or cease taking out-of-state trash.

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

While there are no specific goals and polices in the *Utilities and Facilities* section, the plan states throughout the various other sections that growth should occur only in accordance with the town's ability to provide services.

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 acknowledges that there are few options (page 21) within the town for childcare. There is a goal within the *Housing* section that encourages the creation of affordable childcare facilities; however, there are no specific policies or strategies in place within the Plan to support this goal.

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

The Two Rivers-Ottawaquechee Regional Plan was adopted on June 27, 2012 and it will remain in effect until July 27, 2020.

The Topsham Town Plan is found to be compatible with the Two Rivers-Ottawaquechee 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 the Topsham Town Plan, the following municipalities have Plans approved by the Two Rivers-Ottawaquechee Regional Commission that are in effect:

Barnard, Bradford, Bridgewater, Brookfield, Chelsea, Granville, Hancock, Norwich, Pittsfield, Pomfret, Randolph, Royalton, Sharon, Strafford, and Tunbridge.

These approval decisions and Plans have been reviewed in the context of the above question. Based on this, we find the Topsham 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 (page 8);
- (b) a land use plan (page 37);
- (c) a transportation plan (page 31);
- (d) a utility and facility plan (page 22);
- (e) a statement of policies for "special resources" (page 50);
- (f) an education plan (page 28);
- (g) an implementation program (page 63);
- (h) a statement on relationship of plan to trends and plans for adjacent towns and the region (page 62);
- (i) an energy plan (page 54); and
- (j) a housing plan (page 16);
- (k) an economic development plan (page 13).

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 includes statements of purpose and planning philosophy. Most elements contained within the Plan include goals and planning principles that encourage the overall philosophy. However, the Plan does lack various implementation techniques to assure plan conformity.

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 *Current and Future Land Uses* section of the Plan sets forth current and future land use patterns for the community. The element generally identifies a preferred pattern of land use intent on attaining those goals of Section 4302.

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 Plan contains a *Transportation* section consisting of an inventory and plan addressing transportation's probable impacts on land use and community welfare.

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 Plan provides a good description of utilities and facilities as they currently stand; including improvements made since the last town plan update. However, the Plan does not adequately offer recommendations for future needs or how future needs will be financed and this needs to occur in the next Plan.

For example, in 2008, the school district commissioned an architectural firm to do a facility condition report and a financial analysis. Several suggestions regarding repairs and upgrades were made, but the town sees the funding for those repairs as challenging.

There is a recommendation (page 57) that "the Selectboard should consider creating a Capital Budget and Program that considers energy efficiency and conservation measures as part of the long-term municipal facilities improvements." The next Plan update should include a management plan for future needs that demonstrate where the needs are and how the town intends to implement and finance these needs.

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

Goals and policies on the preservation of scenic and historic resources are addressed under the *Natural Resources* section of the Plan (page 44). This section also incorporates language addressing flood hazard areas and floodplains. However, while a Flood Hazard Ordinance has been adopted; the Plan notes that the Flood Hazard Bylaw should be re-evaluated.

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

School facilities are addressed as part of the *Education* section (page 28) and the only school that exists in Topsham is shown on the *Utilities, Facilities & Education* map.

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

Section 13 of the Plan (page 63) provides a discussion on plan implementation; however, implementation methods and strategies specific to Topsham would strengthen this section.

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 Plan includes discussion of its relationship to adjacent municipalities in Section 12.

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.

All of the above is addressed in the town plan. The *Energy* section has been extensively reworked since the prior plan. This section (page 54) includes an analysis of energy uses and energy sources, along with an implementation policy (page 57). The final recommendations (page 61) refer to the establishment of a Town Energy Committee and a Capital Budget Program. The Town Energy Committee (as established in other Vermont towns) advises the Selectboard and Planning Commission on all things energy related. If the Town Energy Committee is established as recommended; the next town plan update should include results, policies and recommendations of this committee.

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 Plan does include a *Housing* section (16). This section does contain goals to keep housing affordable by planning for appropriately sized lots, accessory apartments and clustered developments. No specific mention is made of policies addressing low and moderate income person's housing needs since there are no single, identifiable areas with those particular characteristics in Topsham.

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 Base* section (page 13) does a good job of stating the present economic conditions and locations. Topsham considers itself a bedroom community and plans on remaining so; therefore, travel to other larger towns for professional and commercial services is expected to continue. The town is a strong proponent of "right-sized" entrepreneurial endeavors and the Plan reflects this throughout.

CONCLUSION

Based upon the above findings, it is the conclusion of the Regional Commission that the Topsham 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 Topsham Town Plan. The Plan reflects 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 does lack clear, unambiguous language regarding current and proposed land use that can be used for review by these bodies as part of an Act 250 project application. It is important that future Topsham Town Plans strengthen their currency as to what type of development they want and how that development should occur, 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.”

Overall Topsham has done a good job of updating their Town Plan. In future updates, recommendations and policies for actual implementation of goals throughout the plan would strengthen the Town's ability to meet their own goals.

When the town plan is next updated, specific areas that need strengthening as previously mentioned in this review, are as follows:

1. The “General Goals” refer to an “attitude survey” that was taken in 1974; a newer, updated survey would better inform the Plan.
2. The Plan does an excellent job of describing what the town wants with regard to growth; however, stronger language (e.g., use of the word “shall” in place of “should”) would better ensure the desired development pattern. There is a statement in the Plan that “encourages” planners to check with the town before moving forward with any development; but a mandate to do so would better serve the goals of the town.

3. There is a goal within section 12 that says the Town wishes to “preserve the community’s scenic, historic and recreational resources;” therefore, specific strategies to do so should be addressed in the next iteration of this Plan.
4. The next Plan update needs to encourage and strengthen agricultural and forest industries through strong policies and recommendations.
5. Policies with regard to the quality of restoration after mineral resources are extracted would strengthen the Plan. “Re-vegetation of these sites” should be defined.
6. While the plan supports the goal of safe and affordable housing, it acknowledges that there is a lack of rental and elderly housing, but provides no policies or strategies that would or could provide this in the future.
7. Strategies for improving the availability of childcare would also better serve the town residents.
8. The next Plan update must include a management plan for future needs that demonstrate where the needs are and how the town intends to implement and finance these needs. A Capital Budget and Program as mentioned in the *Energy* section that applies to all current and future needs would make a stronger overall plan for growth.
9. The Plan mentioned that the current Flood Hazard Bylaw should be reviewed and updated; therefore, the town should consider doing this by the next required Plan update.

Dated this 26 th day of September, 2017 at Woodstock, Vermont.

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

