

## **XIV. RELATIONSHIP OF REGIONAL PLAN TO NEIGHBORING AND AGENCY PLANS**

### **A. Regional Plans of Adjoining Vermont Commissions**

Outlined below are five Vermont Regional Commissions which adjoin the Two Rivers-Ottawaquechee Regional Commission (TRORC) region and reported are the respective dates of adoption or amendment of their Regional Plans. Each of the Vermont regional commission plans discussed below will expire eight years from date of adoption, unless readopted or amended. Each plan has been revised or amended ~~purposefully~~ to be consistent with the planning goals. It is the intent of this Regional Commission to consult and coordinate with neighboring regional commissions as their planning processes mature.

#### **(1) Southern Windsor County Regional Planning Commission: ~~6/2009~~ Adopted June 16, 2009;**

##### Land Use

The Southern Windsor County Regional Planning Commission (SWCRPC) forms the southern and south-west border of our region. The SWCRPC-region towns of Reading, Windsor, West Windsor, Cavendish and Ludlow abut the TRORC-region towns of Plymouth, Woodstock and Hartland. TRORC has classified the future land use of the towns within its region as rural or conservation/resource areas. Similarly, SWCRPC has classified the border towns within its region as being mostly rural and conservation areas, with minimal development or designated village or town centers.

According to the SWCRPC's Future Land Use map, the Towns of Ludlow and Windsor both have designated regional centers, areas which support the highest densities of development in the SWCRPC region. To help maintain the historic settlement patterns in Vermont, the SWCRPC's Regional Plan specifies that "regional centers should be immediately surrounded by medium-density neighborhoods, and then by a low-density, rural working landscape."<sup>i</sup>

North of the regional center in the Town of Ludlow is a designated village center, located along Vermont Route 100, just north of Vermont Route 103. SWCRPC's Regional Plan explains that this area in Ludlow is one of "emerging strip development." SWCRPC encourages that future development be clustered in a "mix of land uses consistent with the village center category description."<sup>ii</sup> Should some strip development occur in this area, it is not expected that it would have a significant impact on the TRORC region.

Overall, there are no significant future land use inconsistencies between the SWCRPC region and the TRORC region.

### Watersheds—Connecticut, White and Black Rivers

The TRORC and SWCRPC regions are connected and bordered on the east by the Connecticut River. The major water body in the TRORC region, the White River, empties into the Connecticut in the Town of Hartford. As a result of draining a large portion of the TRORC region, pollutants in the White River are likely to enter the Connecticut River and may have an impact on the SWCRPC region or New Hampshire towns bordering the Connecticut River. The flooding that occurred as a result of Tropical Storm Irene serves as an example of the White River impacting downstream water quality. During this flooding event, the White River was flowing at an estimated 90,000-120,000 cubic feet/second (cfs), and transported significant amounts of silt, pollutants and debris, which ultimately entered the Connecticut River and impacted towns downstream. Some of the more memorable debris floating down the White River and later found in the Connecticut were propane tanks of various sizes, some spurting their contents out as they floated downstream.

Another tributary of the Connecticut River that connects the TRORC and SWCRPC regions is the Black River, which begins at Black Pond in the Town of Plymouth. From Plymouth, the Black River continues south into Ludlow and then in a general south-east direction through Cavendish, Weathersfield and Springfield, before it empties into the Connecticut River. The headwaters of the Black River are located in the TRORC region, however the majority of the watershed is fed by towns located in the SWCRPC region. Some of the water quality issues found in the Black River watershed include, elevated levels of *E.coli* due to the presence of combined sewer overflows and phosphorus loading from a wastewater treatment facility.<sup>iii</sup>

Both the TRORC Regional Plan and the SWCRPC Regional Plan seek to protect and improve water quality to enable a variety of uses, and to engage in watershed planning efforts.

### Economics, Housing and Transportation

The Hartford, Vermont and Lebanon, New Hampshire area is considered to be the economic center of the Upper Valley region. The 2010 Housing Needs Assessment prepared as part of TRORC's HUD Sustainable Communities project, ECVermont, indicated that the percentage of households in the Town of Hartford burdened by their housing costs (paying more than the federal guideline of 30% of income spent on housing) was 38.3%, indicating that house prices and monthly rents are high in Hartford. For some households, the housing costs in Hartford (and adjacent towns such as Norwich and Pomfret) may be prohibitively high and prevent families from living in the immediate area. As a result, some SWCRPC towns, such as Reading, West Windsor and Windsor, may be impacted by the difficulties associated with housing further north and experience greater housing/development pressures.

There are a number of transportation routes connecting the TRORC and SWCRPC regions, including Interstate 91, and Vermont Routes 12, 100, and 106. The major route is I-91.

Interstate 91 parallels the Connecticut River through both regions and makes travel between the two regions relatively quick and easy. The Town of Hartford is located at the intersection of I-91 and I-89 and is a source of jobs and commercial/shopping opportunities. According to SWCRPC's Regional Plan, commuting has increased between the Upper Valley and the Town of Springfield, one of SWCRPC's regional centers, since 2000.

**(2) Rutland Regional Planning Commission: ~~4/2008~~ Adopted April 15, 2008;**

Land Use

The Rutland Regional Planning Commission (RRPC) comprises the western border of the Two Rivers-Ottawaquechee region. The RRPC towns making up this border include: Mount Holly, Shrewsbury, Killington and Chittenden. The proposed future land uses are consistent along the majority of the border between the RRPC region and the TRORC region. In the RRPC region, "low density development" is the proposed future land use for the eastern side of three of the four border towns—Mount Holly, Shrewsbury and Chittenden. According to RRPC's Regional Plan, this type of development encourages "agricultural and silvicultural activities to continue to dominate the Region's low density areas, and development should be unobtrusive and maintain the rural character and scale of the locale." The future land use for the western border of the TRORC region is classified as "conservation and resource area." Therefore, the future land uses are consistent for the two RPC regions along the towns of Mount Holly, Shrewsbury and Chittenden.

However, there is the potential for conflict in the future land uses proposed between the Town of Killington, in RRPC's region, and the Town of Bridgewater in the TRORC region. U.S. Route 4 is the major east-west route in the region, and passes through Killington and into Bridgewater when traveling east. The Route 4 corridor and surrounding areas in the Town of Bridgewater, and more specifically, the hamlet of West Bridgewater have been designated as either a rural, or a conservation/resource area by TRORC.

Watershed—White and Ottawaquechee Rivers

The White River drains a significant portion of the TRORC region, and its tributaries stretch to the west from Granville and Hancock, to the north from Braintree, Chelsea and Brookfield, and to the east from Tunbridge. Some of the small tributaries enter the watershed from the Town of Chittenden, the southwest portion of the watershed. The tributaries arising in Chittenden include; Michigan Brook, Caryl Brook, and the headwaters of the West Branch of the Tweed River. Despite the fact that it is a tributary of the White River, the Tweed River is a sizable river in its own right and passes through Pittsfield and Stockbridge before converging with the West Branch of the White River in Stockbridge. Land use and activities in north-eastern portion of the Town of Chittenden could affect water quality in our region, by impacting the Tweed River and ultimately, in the White River. Fortunately, there are currently no river or stream segments

from the Tweed River sub-watershed on either Vermont's impaired water list or on any other priority water lists identifying known or potential water quality issues.<sup>iv</sup>

The other major watershed spanning the TRORC and RRPC regions is the Ottauquechee River. The Ottauquechee River originates in Killington on the eastern slopes of the Green Mountains from a source near Kent Pond. The western-most tributaries of the Ottauquechee begin in the Town of Killington and include Kent Brook, Taylor Brook, Roaring Brook (its major headwater stream<sup>v</sup>), and Falls Brook. These bodies of water flow through the Town of Bridgewater and eventually become the Ottauquechee River. The headwaters of the Ottauquechee in Killington include two large wetland complexes along US 4 and River Road that are important in slowing flood waters. As a result, activities or issues in the headwaters may directly impact water quality along the length of the Ottauquechee. For example, according to the Basin 10 Water Quality Management Plan covering both the Black and Ottauquechee Rivers, Kent Pond has a 10-acre infestation of the invasion aquatic plant, Eurasian watermilfoil. Other water quality issues found along the length of the Ottauquechee include: sediment loadings from land development, erosion and road runoff and; nutrient loading from agricultural operations.<sup>vi</sup>

Both the TRORC Regional Plan and the RRPC Regional Plan seek to protect and improve water quality.

#### *Economics, Housing and Transportation*

As a result of the popularity of the Killington Ski Resort, a significant amount of development has occurred on U.S. Route 4 in Killington. In order to promote additional development in the area, RRPC has designated a large part of Route 4 and adjacent areas through the Town of Killington as "high density development." While the "high density development" land use area in the Town of Killington does not abut the Town of Bridgewater, the future land use planned for the Town of Killington has the potential to impact the south-western part of our region. Additional development associated with the Killington Ski Resort may place greater development pressures along the Route 4 corridor and surrounding areas in the Town of Bridgewater. This development pressure may impact the low-density land use areas there. Furthermore, additional development in Killington may influence land use patterns on Route 4 corridor heading east to I-89, potentially impacting the towns of Woodstock and Hartland.

The southern part of the TRORC region is located within a reasonable driving distance from the area's major ski destinations including Killington, Pico Mountain, and Okemo Mountain Resort. As a result, the housing market in towns like Plymouth is focused in large part on vacation or secondary homes (62% of the homes in Plymouth in 2010 were for "seasonal, recreational, or occasional use"). According to the Plymouth Town Plan, the "majority" of the houses in Plymouth are of "recent construction." It is not clear how many "recent construction" homes were built for use as a second or vacation home. In Bridgewater, the number of vacation homes makes up 32% of the total housing units. Vacation homes make up 40% of the housing

units in the Town of Pittsfield. The high percentage of vacation homes in Plymouth, Bridgewater, Pittsfield and surrounding towns may not be influenced solely by the close proximity to ski resorts. However, the continued popularity of ski areas like Killington may place greater housing development pressures in these nearby communities.

As previously mentioned, the major east-west transportation route the middle of Vermont is U.S. Route 4. First running through New York, Route 4 enters Vermont from the west and into RRPC's region, bringing east-bound traffic into the TRORC region. Route 4 also intersects with I-89 in the TRORC region, bringing west-bound traffic into the RRPC region. Thus, Route 4 brings heavy traffic through the region coming from both directions. In the fall and winter months, traffic along Route 4 can become particularly heavy. Route 4 is a popular drive for enjoying the fall foliage season, and the ski resorts likely generate a large proportion of traffic in the winter. Woodstock and Hartford also generate tourist traffic. Recently, there has been commercial growth in Hartford, but Woodstock has lost economic opportunities with the closing of a number of businesses in the village. Overall, the RRPC and TRORC regions have a reciprocal relationship—sharing both transportation patterns and economic development opportunities.

**(3) Addison County Regional Planning Commission: ~~5/2008~~ Adopted December 14, 2011;**

Land Use

The Addison County Regional Planning Commission (ACRPC) forms the north-west boundary of the Two Rivers-Ottawaquechee region. Located within the ACRPC region, the towns of Lincoln, Ripton and Goshen border the TRORC region's towns of Granville, Hancock and Rochester. All of these towns have a major unifying characteristic in that the Green Mountain National Forest is located within their borders.

For most of these towns, the percentage of the town's land area that is Green Mountain National Forest (GMNF) is substantial: in Lincoln about 40% of the land area is part of the GMNF; in Granville, 46% of the land is part of GMNF; more than half of the Town Goshen lies within the GMNF; in Ripton, the GMNF is 68% of the land area; and approximately 85% of Hancock is part of the GMNF. As a result, the land use amongst these towns is very similar. TRORC and ACRPC have designated the future land uses within these towns very similarly—as either rural/agriculture or forestland and conservation for ACRPC towns and as conservation/resource areas for the TRORC towns. Therefore, the future land uses proposed by both RPC's are consistent.

Watersheds—Hancock Branch of the White River

Towns in the ACRPC region are located on the west side of the Green Mountains, while towns in the TRORC region are located on the eastern side of the Green Mountains. Consequently, the Green Mountains act as a physical barrier to drainage, and ultimately stream formation, as streams are unable to flow up and over the Mountains. For this reason, the eastern side of the

Green Mountains forms the upper reaches of the White River—the Hancock Branch of the White River and portions of the White River in Granville— and the western side of the Mountains give rise to some of the tributaries of the Otter Creek. Although towns bordering the ACRPC and TRORC regions do not necessarily share watersheds, some headwater streams of the White River originate in Goshen and Ripton, mostly due to their location the eastern side of the Green Mountains.

Both the TRORC Regional Plan and the ACRPC Regional Plan seek to protect and improve water quality to enable a variety of uses and to engage in watershed planning efforts.

### *Housing and Transportation*

Due to their small population and very rural character, the towns of Granville and Hancock may be considered bedroom communities for the Middlebury area. Potential homeowners may also choose to live in Granville or Hancock instead of the surrounding towns for any number of reasons. There has been moderate activity in the construction of homes in Granville, but the number of homes in Hancock actually decreased between the years of 2000 and 2010. In any case, housing pressures from the Middlebury area or surrounding towns are not likely to have a substantial impact in Granville or Hancock. The same is true for the Town of Rochester.

The main transportation routes between the TRORC and ACRPC regions are Vermont Routes 73 and Scenic Route 125. Route 73 runs through the Goshen and into Rochester, traversing part of the GMNF. Route 73 terminates in the Town of Rochester at the intersection with Vermont 100. Scenic Route 125 is located north of Route 73 and also runs through GMNF, connecting Ripton and Hancock. Due to the remoteness of these roads, they are unlikely to move a significant amount of traffic between the TRORC and ACRPC regions.

**(4) Northeastern Vermont Development Association, Inc.: ~~8/2006~~ Adopted March 28, 2013;**

### *Land Use*

The Northeastern Vermont Development Association (NVDA) borders the Two Rivers-Ottawaquechee region on its most northeastern boundary. Topsham and Newbury border the towns of Groton and Ryegate, both in NVDA's region. The proposed future land use is designated as either rural or conservation/resource areas for both Topsham and Newbury. According to the Town Plan, Groton is zoned rural residential and for conservation along the border with Topsham. These future land uses are consistent.

The Town of Ryegate is forested along a significant portion of its border with Newbury. There is also some development along the border between the Towns of Ryegate and Newbury, likely due to the location of I-91, Route 302 and other significant roads in the area. Although the future land use patterns in the Town of Newbury are mostly rural and conservation/resources

areas, the TRORC’s Regional Plan designates an interchange area in Newbury which may impact the Town of Ryegate. This interchange area is located at the intersection of Route 302 and I-91. Newbury’s Town Plan also calls out this specific “Highway Interchange Area” as an area where development pressures may cause undesired consequences, but also as an area where “manufacturing, industrial and highway oriented commercial or retail businesses would be appropriate either as permitted or conditional uses...”<sup>vii</sup>

In addition, the Newbury Town Plan recommends that the “Highway Commercial Area” be expanded “west of the interstate interchange to the Ryegate town line.”<sup>viii</sup> While the Town of Newbury recognizes the importance of mindful planning, the expansion of the Town’s “Highway Commercial Area” and the promotion of more development in this area may impact the Town of Ryegate and the very southern tip of the NVDA region. As a result, development in the TRORC region may impact NVDA’s region. Therefore, the potential for future land use inconsistencies among the two Regional Planning Commission regions exists.

### *Watershed—Wells River*

Shared between the towns of Groton, Ryegate, Topsham and Newbury is the Wells River watershed. The Wells River begins in the Groton State Forest in the Town of Groton, and continues in a south-easterly direction through Ryegate and into Newbury before emptying into the Connecticut River at the village of Wells River. A few tributaries of the Wells River originate in Topsham and in Newbury, notably Scott Brook in Newbury. Non-point source pollution from developed land, agricultural lands and logging operations all represent challenges to water quality in the Wells River watershed.<sup>ix</sup> There are also leachate concerns from landfills along the length of the River in Newbury and Wells River.

Both the TRORC Regional Plan and the NVDA Regional Plan seek to protect and improve water quality to enable a variety of uses and to engage in watershed planning efforts.

### *Housing and Transportation*

As mentioned, the northern most area of the TRORC region and NVDA are linked together by the area’s transportation system. The main roads in this region are I-91, U.S. Routes 5 and 302 and Vermont Route 25. There is a considerable amount of commuter and truck traffic on U.S. Route 302, which connects Woodsville, New Hampshire to the Barre-Montpelier area. This traffic flows through the Town of Newbury and into the Towns of Ryegate and Groton to destinations between the Barre-Montpelier area and into New Hampshire, and to areas beyond. As with many roads in the state, some improvements or maintenance to the area’s transportation system is needed. A bridge on U.S. Route 5 crossing Wells River north into Ryegate may be candidate in the Town Highway Bridge program. Work on the pavement of U.S. Route 5 in Newbury is set to begin in the next 5 years. These and other maintenance/upgrades to the road network in this area may impact travel between the TRORC

and NVDA regions in the future. Due to their location and (relatively) close proximity, Newbury, Topsham, Groton and Ryegate likely serve as bedroom communities to the Barre-Montpelier and St. Johnsbury areas and to New Hampshire.

**(5) Central Vermont Regional Planning Commission: ~~9/2008~~ Adopted September 9, 2008;**

Land Use

The Central Vermont Regional Planning Commission (CVRPC) comprises the majority of the northern boundary of the Two Rivers-Ottawaquechee region. Located in the CVRPC region, the towns of Warren, Roxbury, Northfield, Williamstown, Washington and Orange border the TRORC-region towns of Granville, Braintree, Brookfield, Chelsea, Corinth and Topsham. Among these border towns, three CVRPC towns lack zoning altogether, including: Roxbury, Williamstown, and Orange, and three Two Rivers-Ottawaquechee towns lack zoning: Granville, Corinth and Topsham. The TRORC Regional Plan has designated the majority of the future land uses within the towns in the TRORC region will be rural areas or conservation/resources areas.

While the CVRPC's Regional Plan does not include a regional future land use map, the towns along boundary of CVRPC and Two Rivers-Ottawaquechee regions are similar in that they are all quite rural and have similar topography. Therefore, there are no striking future land use inconsistencies between the two regions.

Watershed—Waits River

The Waits River originates in the southern part of the Groton State Forest. Generally speaking, the Waits River flows in a southeasterly direction through the towns of Topsham, Corinth and Bradford, before converging with the Connecticut River. Its tributaries originate in Newbury, Orange, Washington, Vershire and West Fairlee. The East Orange Branch of the Waits River is fed by tributaries originating in the towns of Orange and Washington. Approximately 4% of the watershed is permanently conserved as part of the Groton and Washington State Forests, the Bradford, Fairlee, and Orange Town Forests, and the Washington Wildlife Management. In addition, the Orange County Headwaters project has worked to conserve lands. <sup>x</sup> Like the Wells River, the Waits River is impacted by non-point source pollution from developed land, agricultural lands and logging operations. Due to the historic copper mining that took place along the Waits River, parts of the river are also impacted by elevated levels of metals, particularly the Pike Hill Brook.<sup>xi</sup>

Both the TRORC Regional Plan and the CVRPC Regional Plan seek to protect and improve water quality.

Economics, Housing and Transportation

The northern TRORC region towns provide housing opportunities to individuals working in the CVRPC region, notably in the more developed areas of Montpelier, Barre and Waterbury. In



this way, towns like Brookfield, Braintree, and Chelsea function as bedroom communities to commuters traveling to work in the CVRPC region. As a result, there may be some additional housing pressures placed on towns located within a reasonable commuting distance to the more densely developed areas in the CVRPC region.

In addition, the TRORC and CVRPC region are inexorably connected due to the presence of I-89, which bisects both regions. This major highway makes travel between the two RPC regions easy and fast, and helps spur economic development opportunities in each region. However, the more densely developed areas of Montpelier and Barre are likely to attract individuals living in the TRORC region for shopping, dining and other opportunities.

### **B. Upper Valley Lake Sunapee Regional Planning Commission**

The Connecticut River forms the Vermont-New Hampshire state border, and also forms the boundary between the Two Rivers-Ottawaquechee region and the Upper Valley Lake Sunapee Regional Planning Commission region. The Upper Valley Lake Sunapee Regional Planning Commission is based in Lebanon, New Hampshire. Not long ago, four towns in our region which border the Connecticut River—Thetford, Norwich, Hartford, and Hartland— were actually part of the Upper Valley Lake Sunapee Regional Planning Commission (UVLSRPC).

New Hampshire towns located in the UVLSRPC region and that border our region include, from north to south: Piermont; Orford; Lyme; Hanover; Lebanon; and Plainfield. Vermont and New Hampshire towns located across the Connecticut River are often closely connected. Examples of this interconnectedness include Norwich and Hanover; Thetford and Lyme; and Hartford and Lebanon, specifically, the White River Junction and West Lebanon areas.

TRORC and UVLSRPC have worked on projects together in the past, and intend to continue to do so in the future. Examples of these projects include transit coordination, HUD-sponsored Sustainable Communities efforts and climate change adaption planning. The Two Rivers-Ottawaquechee's Executive Director sits on the UVLSRPC Board of Directors, and the Executive Director from UVLSRPC is a Member-At-Large on the TRORC Board of Directors. Close coordination with the Upper Valley Lake Sunapee Regional Planning Commission is critical and is ongoing.

### **C. Other Organizations**

There are a number of local organizations in the Upper Valley area, both in Vermont and New Hampshire, which TRORC collaborates and partners with to achieve a more holistic perspective in our work. A good example of this is through our work on the HUD Sustainable Communities grant, ECVermont. The ECVermont project requires, and is made stronger by, the combined efforts of organizations participating in many separate but related fields, including; transportation, health care and healthy living, housing, economic development, and energy. Our efforts on the ECVermont project and on other projects have led to collaboration with

other organizations, and have helped to infuse our work with a bi-state, microeconomic, perspective.

#### **CD. Municipal Plans within the TRORC Region**

There are thirty member municipalities which comprise the region. All municipalities have duly appointed planning commissions generally charged with the responsibility of planning for the future growth and development of their respective communities. As is the case in many areas of Vermont, the extent or nature of these local planning programs is varied. Several communities have had planning programs in existence since the late 1960s. As a result, these programs are relatively advanced. Other towns, particularly those removed from development pressure, are somewhat inactive and may have allowed their plans to expire. Implementation programs, including zoning bylaws, subdivision regulations, or capital budget and programs exist for approximately two-thirds of the municipalities comprising the region.

In conducting a formal review of these municipal plans, the Regional Commission was charged with determining whether these plans:

- (1) are consistent with the goals in 24 VSA §4302;
- (2) are compatible with the Regional Plan;
- (3) are compatible with approved plans of other municipalities in the region; and
- (4) contain the elements of a Plan as required by law.

Twice in an eight-year period, Regional Planning Commissions are required to meet with communities to discuss their municipal planning process and how effectively the municipality's plan is meeting state planning goals. The process of reviewing each municipality's plan and subsequently, meeting with them to discuss areas of improvement is called an "Enhanced Consultation." TRORC began its Enhanced Consultation process in 2012 and finished the first review cycle in 2013. The Enhanced Consultation process was successful in helping to pinpoint which areas of a municipality's plan should/could be reworked or expanded to better comply with state planning goals. The strong portions of a municipality's plan were also called out in the Enhanced Consultation process. As a result, the Enhanced Consultation process may make the process of updating of a municipal plan quicker and easier, as the weaknesses and strengths of the plan are specifically discussed. Some municipalities in our region have already used the results of their Enhanced Consultation to improve their municipal plan and better comply with state planning goals.

The Regional Commission was organized by its member communities to serve the interests of its members and the citizens of the region. Primary responsibilities include providing technical and legal assistance in the preparation and maintenance of plans and related implementation activities. Experience has indicated that these services are valuable resources to local planning

efforts. Professional assistance has and will continue to provide the Regional Commission members and the general public with opportunities to more fully integrate planning goals, policies, and practices to minimize development conflicts.

To the extent feasible, this Plan has been developed to reflect the general planning goals and policies expressed in plans of its member municipalities while ensuring consistency with state planning law. During the preparation of this Plan, Commissioners and staff attempted to maintain a close and coordinated working relationship with local public officials and the general public on matters relating to the purpose and application of this Plan.

---

<sup>i</sup> Southern Windsor County Regional Planning Commission. Regional Plan. Adopted June 16, 2009. Page 25-26.

<sup>ii</sup> *Id.* Page 26.

<sup>iii</sup> Basin 10 Water Quality Management Plan—Black and Ottauquechee Rivers. May 2012. Page 36-37.  
[http://www.vtwaterquality.org/mapp/docs/mp\\_basin10final.pdf](http://www.vtwaterquality.org/mapp/docs/mp_basin10final.pdf)

<sup>iv</sup> White River Tactical Basin Plan, July 2013. Page 37.

[http://www.vtwaterquality.org/planning/docs/pl\\_WhiteRiverTacticalPlan.pdf](http://www.vtwaterquality.org/planning/docs/pl_WhiteRiverTacticalPlan.pdf)

<sup>v</sup> Basin 10 Water Quality Management Plan—Black and Ottauquechee Rivers. May 2012. Page 15.

<sup>vi</sup> *Id.* Page 37.

<sup>vii</sup> Town of Newbury Town Plan. Adopted September 26, 2005. Page 24-25.

<sup>viii</sup> *Id.*

<sup>ix</sup> Basin 14 “Little Rivers” Water Quality Management Plan. June 2008. Page 30-45.

[http://www.vtwaterquality.org/planning/docs/pl\\_basin14.final\\_plan.6-30-08.pdf](http://www.vtwaterquality.org/planning/docs/pl_basin14.final_plan.6-30-08.pdf)

<sup>x</sup> *Id.* Page 46-47.

<sup>xi</sup> *Id.* Page 56-58.