

**RE: TOWN OF RANDOLPH, VERMONT
PLAN REVIEW
CASE # FY 20-2**

BACKGROUND

Pursuant to 24 V.S.A., Section 4350, the Town of Randolph, Vermont requested TRORC to review and approve the Randolph Town Plan adopted on August 8, 2019. The Plan encompasses all land in the Town of Randolph, 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 September 25, 2019 in Woodstock, Vermont. This matter is now ready for decision.

This review is based upon the Town Plan as adopted. While we understand that there are ongoing, future, or past efforts that may modify the plan (for example the work being done on energy planning), those efforts are not embodied in the plan itself. Plans stand on their own and this review is based on the Plan as adopted.

FINDINGS

A. Is the Plan consistent with the planning goals?

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

General Goals

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

Yes. The 2019 Randolph Town Plan is a comprehensive planning document to guide municipal decision making that has been divided into 11 distinct chapters that are

required under V.S.A. Title 24, Ch. 117, §4382. Required goals of the Plan are under V.S.A. Title 24, Ch. 117, §4302.

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

Yes. The Introduction chapter states that “citizen participation is encouraged at all levels of the planning process” (pg. 7).

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

Yes. The Land Use chapter includes multiple goals and policies that address the consideration of resource use with respect to growth and development. The third goal listed within the Land Use chapter states to, “plan for orderly growth while preserving the essential rural character and livelihoods that are central to Randolph’s beauty, traditions, and quality of life. Maintain a rural landscape and lifestyle” (pg. 8).

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

Yes. The Relationship to Other Plans chapter includes language and actions that support working creatively with other municipalities. Example actions include “encourage continued communication and cooperation between Randolph and its neighboring towns” and “exchange planning information and development data with neighboring communities” (pg. 36).

Specific Goals

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

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

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

Yes. The Land Use chapter includes a goal to “encourage a compact, efficient pattern of settlement” (pg. 8). The Plan includes two land-use districts, Randolph Village High Density and Medium Density (RVHD and RVMD) that have the intent to “allow for continued growth and development of Randolph’s main village as a pedestrian-friendly center...”, and to, “...preserve the medium to high-density residential neighborhoods...” (pg. 10). The Plan additionally states that the “intent of creating two types of gateway

commercial districts is to discourage strip development in areas outside of the CB [Central Business] District” (pg. 11).

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

Yes. Economic growth is encouraged in areas that align with the existing Downtown Designation and Village Center Designation. For example, the Central Business (BD) District is intended to closely follow the Downtown Designation boundary.

- 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. A goal of the Plan is to “Plan for orderly growth while preserving the essential rural character and livelihoods that are central to Randolph’s beauty, traditions, and quality of life” (pg. 8).

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

Yes. It is not directly stated but the Plan does include goals and policies that align with smart growth principles. For example, the Land Use chapter includes a goal to “encourage a compact, efficient pattern of settlement” and a policy that states “growth and density of development which relies heavily upon services should be targeted primarily to those areas served by existing municipal infrastructure...” (pg. 8).

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

Yes, in part. The Economic Development chapter includes an overarching goal to “retain and enhance Randolph as an economic hub for residents and neighboring communities.” It also includes policies that “enhance economic stability and resilience through a diversity of business types” and “support existing businesses and foster high quality development/redevelopment that strengthens the economy, respects the environment and compliments the community’s larger goals” (pg. 32). Although the Plan includes data and discussions around population income and employment, there are no goals, policies or actions that specifically mention unemployment or low per capita incomes. It is important to note that the Town of Randolph was recently designated as an Opportunity Zone and is therefore engaged in expanding economic opportunities in these particular areas.

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

Yes. A policy within the Economic Development chapter states to “Retain and enhance

those “quality of life” assets that are major factors in attracting businesses to Randolph, including: housing; education and vocational training; cultural institutions; rural environment; health and human services; and recreation” (pg. 32).

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. A goal of the Transportation chapter is to “provide a safe, energy-efficient, well-maintained, and cost-effective transportation system integrating all modes of travel (auto and, where appropriate, pedestrian, bicycle and public transportation), to meet the needs of Randolph residents and businesses and the general public” (pg. 14). The Plan also includes language that supports Amtrak and Statecoach as “not only amenities but as energy-efficient modes of transportation” (pg. 15). Air transportation is discussed in Appendix B as well but there are no goals, policies or actions that include air travel.

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. Natural and historic areas are discussed in both the Land Use chapter and Appendix D: Natural Resources. Various significant natural areas are listed within Appendix D as well.

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. There are multiple goals and policies within the Natural Resources chapter that discuss limiting development near the above listed resources.

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

Yes. Maintaining and improving water quality in relation to basin planning is discussed within the goals and policies of the Natural Resources chapter. (Important note: The Plan

incorrectly states that TRORC writes the Tactical Basin Plan. Although TRORC participates extensively in the draft review process, it is solely DEC that ‘writes’ Tactical Basin Plans.)

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

Yes. The Natural Resources chapter includes goals and policies that maintain and enhance forest blocks and habitat connectors including a goal to “maintain or enhance the natural diversity, population, and migratory routes of wildlife, including natural predators, in proper balance” (pg. 24).

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 overarching goal of the Energy chapter is to “conserve energy, increase efficiency, and switch fuel types to renewable sources in order to meet goals of reducing overall energy use by 35% in 2050 and have 90% of the energy supplied by renewable sources by 2050” (pg. 27). There are additional policies and actions listed within the chapter that support this goal and the strategies listed above.

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

Yes. The Energy chapter includes specific strategies and recommendations to support the above listed goals. For example, an implementation action in the Energy chapter is to “support the continued operation of active freight and passenger service to Randolph, and state and regional transportation transit programs serving Randolph” (pg. 28).

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. One of the goals within the Natural Resources chapter is to “safeguard natural resources and maintain and enhance open space and recreational “infrastructure” important for long-term health and quality of life for the Randolph community” (pg. 8).

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

Yes. Recreational areas are identified in Appendix C: Utilities & Facilities and the Natural Resources and Utilities & Facilities chapters include policies and actions to protect, maintain and expand recreational opportunities.

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. A goal within the Natural Resources chapter is to “maintain and enhance Randolph’s heritage of working farm and forest lands as part of a sustainable, environmentally sound, local, resource-based economy” (pg. 26). An implementation action within the Natural Resources chapter also states that “Randolph Land Use Regulations should continue to promote clustering, allow density bonuses and to have zones where the needs of agriculture and forestry are given precedence” (pg. 26).

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

Yes. This is encouraged within Policy D of the Forest Blocks and Habitat Connectors section of the Natural Resources chapter and is also mentioned in several implementation actions within the Productive and Working Landscapes section of the Natural Resources chapter. Value-added agricultural products are also discussed within Appendix D.

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

Yes. An implementation action within the Natural Resources chapter is to “encourage local agriculture-based products and outlets from Farmer’s Markets to larger cooperative efforts” (pg. 26).

- d. Are sound forest and agricultural management practices encouraged?**

Yes. The main goal in the Productive and Working Landscapes section of the Natural Resources chapter is to “maintain and enhance Randolph’s heritage of working farm and forest lands as part of a sustainable, environmentally sound, local, resource-based economy” (pg. 26). The Utilities & Facilities chapter also includes implementation actions that encourage up to date forest management plans.

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

Yes. An implementation action within the Natural Resources chapter states that

“Randolph Land Use Regulations should continue to promote clustering, allow density bonuses and to have zones where the needs of agriculture and forestry are given precedence” (pg. 26).

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. A goal of the Natural Resources chapter is to “support extraction and processing of mineral resources only where such activities are appropriately managed, and the public interest is clearly benefitted” (pg. 25). The Natural Resources chapter also includes a policy that states “earth resource extraction and processing facilities shall be planned, constructed and managed” (pg. 25) and subsequent implementation actions that discuss considerations that should be taken into account when “planning, constructing or managing an extraction project,” including minimizing adverse impacts to “water quality, fish and wildlife habitats, viewsheds, and adjacent land uses” (pg. 25).

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 first goal of the Housing chapter is to “encourage the development and maintenance of safe housing to meet the needs of Randolph’s residents, while at the same time ensuring that the pace and pattern of housing growth is compatible with other Town goals and does not strain the community’s ability to provide adequate and affordable public services.” This is followed by another goal to provide “additional affordable owner-occupied and/or rental housing units for low and moderate incomes” (pg. 30).

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, see the above referenced goals. The Housing chapter also includes multiple policies and actions that support housing development near employment and commercial centers, as well as public services.

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 Plan includes implementation actions that encourage multi-family and manufactured housing in Randolph. These actions include, “encourage the development of multi-family and manufactured housing within existing neighborhoods” and “Land Use Regulations should be revised to allow multi-family and manufactured housing in residential areas” (pg. 31).

- c. 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 Housing chapter includes a goal to “plan for anticipated future housing needs for the elderly and disabled” (pg. 30) and an implementation action to “maintain provisions in the Land Use Regulations that:... b. allow accessory apartments and other creative housing solutions where appropriate; c. allow manufactured, elderly, disabled, subsidized, affordable, and multi-family housing” (pg. 30-31). There is not a direct connection between accessory apartments and cost-effective care/supervision, however. Making this connection is encouraged in the next update of the Plan.

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

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

Yes. The Utilities and Facilities chapter addresses the above services in various goals, policies and implementation actions and Appendix C provides additional details on specific areas of utilities and facilities. For example, the Utilities and Facilities chapter includes a policy to, “provide residents with safe, effective, responsive, and affordable municipal infrastructure, facilities and services consistent with other town goals, and, whenever possible, to encourage and work with other public and private utility or service providers to do the same” (pg. 16).

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

No. Throughout the Plan, it is mentioned that growth should be with due consideration of the Town’s ability to provide facilities and services. For example, a goal of the Housing chapter is to “encourage the development and maintenance of safe housing to meet the needs of Randolph’s residents, while at the same time ensuring that the pace and pattern of housing growth is compatible with other Town goals and does not strain the community’s ability to provide adequate and affordable public services” (pg. 30).

- 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 Utilities & Facilities chapter includes a goal to “ensure the availability of safe and affordable childcare that meets the needs of residents” as well as policies and implementation actions that discuss the integration of child care issues into the planning process (pg. 20).

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. Several policies within the Flood Resilience chapter support this including one to “encourage limited activities in mapped river corridor areas to reduce the risk of erosion” (pg. 34).

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

Yes. There are various policies and implementation actions within the Flood Resilience chapter that relate to the protection and restoration of floodplains and floodways. The Forest Blocks and Habitat Connectors section of the Natural Resources chapter also includes an implementation action to “encourage the protection of upland forests to reduce erosion and increase flood resilience” (pg. 24).

- c. Are flood emergency preparedness and response planning encouraged?**

Yes. Flood emergency preparedness and response planning are encouraged throughout the Flood Resilience chapter in both policies and implementation actions. An example is to “maintain and update hazard mitigation plans and emergency preparedness and recovery procedures” (pg. 35).

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

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

The Randolph 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 this Randolph Town Plan, the following municipalities have Plans approved by the Two Rivers-Ottawaquechee Regional Commission that are in effect:

Barnard, Bethel, Bradford, Braintree, Bridgewater, Brookfield, Chelsea, Fairlee, Hartford, Hartland, Newbury, Pittsfield, Pomfret, Rochester, Royalton, Sharon, 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 Randolph Town Plan to be compatible with these Plans.

D. Municipal Plan Elements - Are They Included?

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

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

1. A statement of objectives, policies and programs of the municipality, to guide the future growth and development of land, public services and facilities, and to protect the environment.

Yes. Objectives, policies and programs addressing each of the aforementioned topics are included throughout the Plan within respective chapters.

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

are important as forest blocks and habitat connectors and plans for land development in those areas to minimize forest fragmentation and promote the health, viability, and ecological function of forests.

This is present in the Land Use chapter, Natural Resources chapter, and maps #1 – 4, & 7. A Water Conservation Overlay District is mentioned in the Land Use chapter but it not illustrated on any of the provided maps.

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

This is present in the Transportation chapter and map #5.

- 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.**

This is present, in part. A map of Utilities, Facilities and Education is included in Appendix I but this only includes public facilities and utilities. Power generating plants and transmission lines are not included. The priority of *some* needs can be implied through the timeline of the method of financing but overall, more explicit discussion is needed to truly indicate an explicit prioritization of needs.

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

This is present in the Natural Resources chapter and in Appendix D.

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

This is present in the Utilities & Facilities chapter, Appendix C, and in map #6.

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

This is provided in the Implementation chapter as well as an implementation table in Appendix H.

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

This is present in the Relationship to Other Plans chapter.

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

This is present in the Energy chapter and in Appendix E.

- 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.**

This is present in the Housing chapter.

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

This is present in the Economic Development chapter and in Appendix A.

- 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.**

This is present in the Flood Resilience chapter and in Appendix G.

CONCLUSION

Based upon the above findings, it is the conclusion of TRORC that the Randolph 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 Randolph 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 Randolph Town Plans maintain their currency as Plans that have been found to be vague, unclear, or ambiguous do not carry much weight in Act 250 permit proceedings.

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

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

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

The 2019 Randolph Town Plan is an improvement from the 2018 Town Plan. The Plan now includes goals, policies, and actions regarding the extraction of earth resources. It also discusses tactical basin planning and includes actions that support participation in Basin 9 planning. Significant updates have also been made in regards to housing, including discussions, goals, policies, and actions specifically relating to multi-family, manufactured, elderly, and disabled housing. Child care is also discussed within the Economic Development chapter as well.

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

1. Utilities & Facilities: Continue to expand upon the goals, policies and actions related to childcare. This section could also benefit from additional discussion and more specific data related to childcare services in Randolph and in the surrounding Region.
2. Utilities & Facilities: Include a more explicit prioritization of future investments in the Town's utilities and facilities.
3. Economic Development: More discussion is needed on how the Town is working to expand economic opportunities in areas with high unemployment or low per capita incomes.

4. Transportation: Integrate air travel into the goals, policies and/or actions of the Transportation chapter.

Dated this 25th day of September, 2019 at Woodstock, Vermont.

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