RE: TOWN OF BETHEL, VERMONT
PLAN REVIEW
CASE # FY 21-2

BACKGROUND

Pursuant to 24 V.S.A., Section 4350, the Town of Bethel, Vermont requested TRORC to review and approve the Bethel Town Plan adopted on November 23, 2020. The Plan encompasses all land in the Town of Bethel, 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 an online Public Hearing on this review on December 9, 2020. This matter is now ready for decision.

This review is based upon the Town Plan as adopted. Plans stand on their own.

FINDINGS

A. Is the Plan consistent with the planning goals?

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

General Goals

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

Yes. The 2020 Bethel Town Plan is a comprehensive planning document to guide municipal decision making that has been divided into 17 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, community input was sought prior to the start of plan updates through a community survey. Input was solicited from key community stakeholders throughout the update process, and all plan edits were discussed at Planning Commission meetings, which were open to the public. Upon completion of the draft plan, a public forum was held to gather additional public input. (For more information, see pp. 7-8 of plan.) The Town also met all statutory requirements for public outreach during the plan adoption process.

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

Yes, this is evident in various chapters throughout the plan and in the overarching goals and objectives outlined on pp. 6, for example:

- “To establish land use goals that provide adequate space for needed types of land use, both public and private, in locations that minimize the adverse impact of one land use on another
- To facilitate a process that allows for the protection of, and judicious use of, the Town's soils, minerals and stone, forests, agricultural lands, waters, wildlife, and other natural resources”

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

Yes, for example:

“The Town will be an active participant in regional economic development planning efforts.” (Economic Development Chapter, Recommendation a.1, p.19)

- “The Town should explore opportunities to assist with implementation of the water quality protection and improvement strategies outlined in the White River Basin – Basin 9 2018 Tactical Basin Plan, in collaboration with other Towns and regional partner organizations as appropriate.” (Natural, Scenic, & Cultural Resources Chapter, Recommendation f.1, p.75)
- “Continue participation in the Regional Transportation Advisory Commission as well as the TRORC Road Foreman’s meeting program.” (Transportation Chapter, Recommendation f.1, p.117)
- “The Town should ensure that the TRORC Commissioner post is filled and should encourage the Commissioner to keep the Town informed of regional developments.” (Relationship to Other Plans chapter, Recommendation b.1, p.121)

**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.

Yes, this goal is specifically included in the plan (p.102).

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 lays out goals, policies, and recommendations for the concentration of intensive development in the Core Business Area, Village Area, and Hamlet Areas (pp. 104-106). Moreover, the following recommendation is provided for several of the designated future land use areas: “The Town should not permit development projects that promote or exacerbate strip development along Town Highways.”

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

Yes, the Land Use chapter notes that various types of commercial activity are encouraged primarily in the Core Business Area, Village Area, and Hamlet Areas, and any commercial activity in outlying areas should continue to be limited through zoning regulations. These land use policies are supported by policies and recommendations in the Economic Development chapter:

- “Policy e: It is the policy of the Town to continue to participate in the Village Designation program in order to enable local businesses to take advantage of the program’s benefits.” (p.19)
- “Policy f: It is the policy of the Town to encourage the development of primary retail and other appropriately-scaled commercial uses in the designated Village Center.” (p.19)
- “Policy h: It is the policy of the Town to encourage new business development in appropriate where services such as roads, fire protection, and power supply are available or planned.” (p.20)

c. Are public investments, including the construction or expansion of infrastructure, being made so as to reinforce the general character and planned growth patterns of the area?

Yes, the Plan states:

- “It is the policy of the Town that new significant public investments (including schools, public recreational areas, municipal facilities, and major commercial or residential developments) be located within or in close proximity to the village and shall utilize existing roads whenever possible.” (Energy Chapter, p. 70)
• “Channel public investments and municipal infrastructure into existing or planned settlement areas to avoid sprawl and preserve undeveloped lands” (Land Use chapter, p. 103)
• “It is the policy of the Town to integrate land use and transportation planning by encouraging concentrated growth in areas served by an adequate highway system, utilizing land use regulations and appropriate highway access management techniques to control the impacts of development on the transportation system, and prioritizing transportation improvements in areas where development already exists and where growth is desired.” (Transportation Chapter, p.118)

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

Yes, each of the smart growth principles is addressed in the plan, mainly in the Land Use, Transportation, Agriculture & Forestry, Utilities and Facilities, and Housing chapters. Sprawl is specifically addressed in the plan: “It is the policy of the Town to prohibit development that has the effect of creating sprawl, while allowing for commercial development outside of the Village District area in those areas designated as Hamlet Districts” (p.20).

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, these criteria are addressed in the Economic Development chapter (pp.19-20).

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

Yes, these criteria are addressed in the Education chapter (pp. 31-32).

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.

Yes, these criteria are addressed in the Transportation chapter (pp.116-118), and partly in the Energy chapter (p.71).

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

Yes, this is addressed by various goals, polices, and recommendations in the Transportation Chapter (p.116-118). The plan would benefit from the addition of more specific policy and recommendation language relating to pedestrian infrastructure and
amenities, especially as the latter relates to public transportation and bike route options.

5. **Planning needs to identify, protect, and preserve important natural and historic features of the community’s landscape.**

   Yes, this is addressed in the Natural, Scenic, and Cultural Resources chapter (p.84).

   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, all such areas have been identified in the Natural, Scenic, and Cultural Resources chapter (pp.72-85), and/or shown on Map 5 (Natural Resources).

6. **Planning needs to maintain and improve the quality of air, water, wildlife and land resources.**

   This is accomplished in the Natural, Scenic, and Cultural Resources chapter (pp.72-85).

   a. **Are air, water, wildlife, mineral and land resources being planned for development and use under the principles set forth in Act 250?**

   Yes, these criteria are addressed primarily in the Natural, Scenic, and Cultural Resources chapter, Land Use chapter, Transportation chapter, and Agriculture and Forestry chapter.

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

   Yes, recommendation f.1 p.75 states: “The Town should explore opportunities to assist with the implementation of the water quality protection and improvement strategies outlined in the White River Basin – Basin 9 2018 Tactical Basin Plan, in collaboration with other Towns and regional partner organizations as appropriate.

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

   Yes, on p.108 recommendation o.1 states: “Development permitting in the Resource Conservation Area should prioritize the preservation and improvement of forest blocks and habitat connectivity blocks, in order to minimize fragmentation and promote the ecological health and function of Bethel’s natural resources.”
7. Planning needs to make efficient use of energy, provide for the development of renewable energy resources, and reduce emissions of greenhouse gases.

Yes, this is addressed by the goals, policies, and recommendations within the Energy chapter. (pp.69-71)

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?

All of these criteria are addressed by the goals, policies, and recommendations within the Energy chapter (pp.69-71).

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

Yes, the Plan incorporates specific energy targets in order to meet state goals, and has developed policies and recommendations that will help the Town move toward its targets.

8. Planning needs to maintain and enhance recreational opportunities for residents and visitors.

Yes, this is addressed in the Recreation chapter (p.101).

a. Is growth being planned so as not to significantly diminish the value and availability of outdoor recreational activities?

Yes, in the Recreation chapter, policy b (p.101) states: “It is the policy of the Town to encourage patterns of land use that maintain and enhance the opportunity for outdoor recreation.” The policy is supported by a number of specific recommendations.

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

Yes, in the Recreation chapter, Recommendation b.2 states: “Through the development review process, the Town should identify, provide, and protect public access to non-commercial outdoor recreational opportunities, such as water bodies and hiking trails, wherever appropriate.” (p.101)

9. Planning needs to encourage and strengthen agricultural and forest industries.
Yes, this is accomplished in the Agriculture and Forestry chapter, pp. 97-98.

a. Have strategies to protect long-term viability of agriculture and forestlands been encouraged, including maintaining low overall density?

Yes, specific strategies have been identified (pp. 97-98), including the use of various development regulations to prevent fragmentation of working lands, and ensuring that good management practices are being employed.

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

Yes, this is addressed by Goal 3 and the supporting policies and recommendations on p. 98.

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

Yes, it is encouraged by policy h on p.98, which is backed up by recommendations for the Town to continue supporting the farmer’s market and the school’s farm-to-table health initiatives.

d. Are sound forest and agricultural management practices encouraged?

Yes, these are encouraged by policy b and accompanying recommendations on p. 97.

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

Yes, this is emphasized in the Land Use, Transportation, and Energy chapters, as noted above.

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, this is addressed by the goal, policies, and recommendations on p.81 (within the Natural, Scenic, and Cultural Resources chapter).

11. Planning needs to ensure the availability of safe and affordable housing.

Yes, this is addressed by the goals, policies, and recommendations within the Housing chapter (pp. 24-26).

a. 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, these criteria are primarily addressed within the Housing chapter, which has goals, policies, and recommendations calling for the concentration of housing stock in already-developed areas with access to existing public facilities and utilities, or at rate consistent with the community’s ability to provide services (pp. 24-26).

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

Yes, policy c on p. 25 states, “It is the policy of the Town to promote mixed-income housing by encouraging the development of accessory dwelling units, multifamily housing, and manufactured housing (including mobile homes) in locations similar to where single-family housing is allowed.” This policy is supported by the goals, policies, and recommendations in the Land Use chapter.

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, this is addressed in policy c on p. 25.

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, these are addressed through the Utilities and Facilities chapter, Emergency Services chapter, Education chapter, and Health chapter.

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

No, the rate of growth relative to the Town’s capacity for service provision is addressed in multiple chapters of the plan.

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 workforce development?

Yes, this is addressed by Goal 1 and associated policies and recommendations on p. 31.
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, this is addressed on p. 91:
   "Policy a: It is the policy of the Town that the preferred uses for SFHA and River Corridor areas should be for open space, greenbelts, pastureland, recreational, and agricultural uses.
   Recommendation a.1: The Planning Commission should consider revising Bethel’s Unified Bylaw to avoid new development within the SFHA and River Corridors, with the exception of open space, recreational, and agricultural uses."

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

   Yes, this is addressed on p. 92:
   "Policy c: It is the policy of the Town that floodplains, wetlands, riparian areas, and upland forested areas should be protected and restored in order to attenuate and moderate flooding and fluvial erosion.
   Recommendation c.1: Encourage property owners to maintain vegetated buffer strips in riparian zones bordering streams and rivers. Rock rip-rap and retaining walls should only be used to the minimum extent necessary and when bioengineering techniques may not be adequate to prevent significant loss of land or property."

c. Are flood emergency preparedness and response planning encouraged?

   Yes, this is addressed by Goal 4 on p.92. The plan would benefit from the development of policy and recommendation language more directly focused on flood preparedness and emergency response planning.

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

The Two Rivers-Ottauquechee Regional Plan was adopted on July 15, 2020 and became effective on August 19, 2020. It will remain in effect until August 19, 2028.

The Bethel Town Plan is found to be compatible with the Two Rivers-Ottauquechee Regional Plan. As used in this review, the term "compatible with" has been defined (in Section 4302) as meaning: that the Plan in question, as implemented, will not significantly reduce the desired effect of the implementation of the other plan (emphasis added). If a Plan, as implemented, will significantly reduce the desired effect of the other Plan (in this case, the Regional Plan), the Plan may be considered compatible if it includes the following:

(a) a statement that identifies the ways that it will significantly reduce the desired effect of the other Plan;
(b) an explanation of why any incompatible portion of the Plan in question is essential to the
desired effect of the Plan as a whole;
(c) an explanation of why, with respect to any incompatible portion of the Plan in question,
there is no reasonable alternative way to achieve the desired effect of the Plan; and
(d) an explanation of how any incompatible portion of the Plan in question has been
structured to mitigate its detrimental effects on the implementation of the other Plan.

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

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

Barnard, Bradford, Braintree, Bridgewater, Brookfield, Chelsea, Corinth, Fairlee, Granville,
Hartford, Hartland, Newbury, Norwich, Pittsfield, Plymouth, Pomfret, Randolph, Rochester,
Royalton, Stockbridge, Strafford, Thetford, 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 Bethel 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, an overarching set of purposes and objectives is outlined in the Introduction chapter,
and each subsequent chapter has topic-specific goals, policies, and recommendations.
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.

Yes, these criteria are met by the current and future land plan laid out in the Land Use Chapter and Maps 1 and 2. Map 5 (Natural Resources) shows the location of highest priority forest blocks and habitat connectors, the preservation of which is addressed in the Land Use chapter and elsewhere in the plan.

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.

Yes, the Plan includes a comprehensive Transportation chapter that outlines current and proposed facilities, and discusses near-term facility projects. Transportation facilities are shown on Map 4.

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.

Yes, the Plan includes a comprehensive Utilities and Facilities chapter and accompanying map (Map 3). Some public facility information, including future project needs / costs / financing, are integrated into the Emergency Services chapter, Recreation chapter, and Transportation chapter. Energy facilities are mapped in Appendix B.

5. A statement of policies on the preservation of rare and irreplaceable natural areas, scenic and historic features and resources.
Yes, this is addressed by the goals, policies, and recommendations on pp. 84-85.

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

Yes, the Plan's Education chapter discusses the current and future state of educational services and facilities in the Town, and facilities are shown on Map 3. Attempts to request input from the school were unsuccessful; that outreach should begin as early as possible in the planning process for the next plan update.

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

Yes, the Town Plan Implementation chapter discusses the various policy tools used for implementing Town Plans. Appendix A of the plan assigns responsible parties and an implementation timeframe to each recommendation in the Plan.

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

Yes, the Plan includes a Relationship to Other Plans chapter, which examines potential conflicts between Bethel's land uses and those of neighboring Towns. The chapter also reviews compatibility with the 2017 Regional Plan. During the Plan update process, the Town was in conversation with TRORC about expected changes to the Regional Plan, and the resulting 2020 Town future land use map and the 2020 Regional Plan Future Land Use maps are consistent with one another. In the next update of the Town plan, the Relationship to Other Plans chapter should be updated to discuss the latest version of the Regional Plan document.

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.

Yes, these criteria are met by the Energy Chapter and are supported by data in Appendix B.

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.
Yes, these criteria are addressed by Goal 1 and its accompanying policies and recommendations (p.24-25).

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.

Yes, the Plan includes a comprehensive Economic Development chapter that addresses these criteria. Additional information about the location, type, and scale of desired economic development is included in the Future Land Use Section of the Land Use chapter. The Economic Development chapter would benefit from the additional specific recommendations to foster the development and support of new businesses in Town.

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.

Yes, the Plan includes a Flood Resilience chapter that discusses flood hazard and river corridor areas within the Town. The chapter lays out a number of goals, policies, and recommendations that aim to protect the aforementioned areas as well as wetlands, riparian areas, and upland forests (p. 91-92). Flood Hazard Areas are shown on Map 2 (Future Land Use).

CONCLUSION

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

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

“‘Conformance with the Plan’ means a proposed implementation tool, including a bylaw or bylaw amendment that is in accord with the municipal plan in effect at the time of adoption, when the bylaw or bylaw amendment includes all the following:
(a) Makes progress toward attaining, or at least does not interfere with, the goals and policies contained in the municipal plan.
(b) Provides for proposed future land uses, densities, and intensities of development contained in the municipal plan.
(c) Carries out, as applicable, any specific proposals for community facilities, or other proposed actions contained in the municipal plan.”

The 2020 Bethel Town Plan is an improvement from the 2014 Town Plan. Major additions included a Flood Resilience Element, discussion of community facilities needs and associated costs/financing, a map identifying priority forest and habitat blocks, and language promoting the preservation of forest blocks and habitat connectors. The updated Plan includes the following elements requested by TRORC in the 2014 Plan review:
• More detail on upcoming capital improvement projects in the Utilities and Facilities chapter
• More detail on rail and air linkages in the Transportation chapter
• Deeper discussion of higher education opportunities in the Education chapter
• Language in the Housing chapter specifically addressing ADUs, mobile homes, and manufactured homes
• A stand-alone Flood Resilience chapter

Furthermore, the 2020 Plan adds a 6th future land use area, the Core Business Area. The addition of the Core Business Area brings the Town Plan into alignment with the Town’s Unified Bylaw and zoning, ensuring a consistent approach to development. The Core Business Area recognizes the existing high-density development and commercial uses.

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

1. The plan would benefit from the addition of more specific policy and recommendation language relating to pedestrian infrastructure and amenities, especially as the latter relates to public transportation and bike route options.
2. The plan would benefit from the development of policy and recommendation language more directly focused on flood preparedness and emergency response planning.
3. Attempts to request input from the school were unsuccessful; outreach to school administrators and/or teachers and students should begin as early as possible in the planning process for the next plan update.

4. In the next update of the Town plan, the Relationship to Other Plans chapter should be updated to discuss the latest version of the Regional Plan document.

5. The Economic Development chapter would benefit from the additional specific recommendations to foster the development and support of new businesses in Town.

Dated this 9th day of December, 2020 at Woodstock, Vermont.

By: [Signature]
Peter G. Gregory, AICP, Executive Director