



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Administration
DIVISION OF PLANNING
One Capitol Hill
Providence, RI 02908-5870

July 21, 2014

Mr. Philip L. Hervey
Town Planner
283 County Road
Barrington, RI 02806

Subject: Draft Comprehensive Plan Review - Economic Development and
Circulation Chapters

Dear Mr. Hervey:

I am pleased to notify you that our office has completed its review of the above referenced chapters. The following constitutes our evaluation of the draft material that you provided to our office. Please be advised that this is a preliminary evaluation and does not constitute official findings.

Let me begin by noting that overall, the draft chapters are among the finest we've reviewed. They are well-organized, clear, and attractively presented. However, the most important part of this review is to alert you to any aspect of the draft that could prevent its receiving State approval. This includes any potential conflicts with elements of the State Guide Plan or the goals and policies of State Agencies, any internal inconsistencies within the Plan, and any missing material that is required to be included in a comprehensive plan by the Comprehensive Planning and Land Use Regulation Act (the Act). Our understanding is that the Town intends for this plan to meet the requirements of the Act as amended in 2011 and thereby qualify for a ten-year State approval; the standards of our review are based on this understanding. In addition, we've tried to provide technical advice in both content and structure that would improve the Plan's accuracy, readability, and overall usability.

What follows is divided into three sections. Section I enumerates the standards for State approval of local comprehensive plans as outlined in the Act. Section II sets forth concerns with the draft Plan that must be satisfactorily addressed in order to receive State approval. Section III presents other suggestions that, although not directly related to the review requirements, could improve the Plan's overall accuracy, readability, and usability if addressed.

I. Standards for State Approval

The State review is intended to ensure that comprehensive plans comply with the requirements of the Comprehensive Planning and Land Use Regulation Act (the Act). These include:

- 1) the intent and goals of the Act as stated in § 45-22.2-3(b)(1) and (c)(1) through (10) have been met;
- 2) the plan is internally consistent and complete as required by § 45-22.2-6;
- 3) the plan or amendment is consistent with, and embodies, the goals and policies of the State and its departments and agencies as contained in the State Guide Plan and the laws of the State;
- 4) municipal planning activities have been coordinated according to the provisions of section 45-22.2-7;
- 5) the plan or amendment has been officially adopted and submitted for review in accordance with §45-22.2-8 and other applicable procedures;
- 6) the plan or amendment complies with the rules and regulations adopted by the State Planning Council necessary to implement the standards established by the Act; and, that
- 7) adequate, uniform, and valid data have been used in preparing the plan or amendment.

Although all of the above will be considered in the final review of the Plan once it has been adopted by your Town Council, at this stage of the process, items 4) and 5) do not apply and are not evaluated in this review.

II. State Approval Concerns

A. The intent and goals of the Act

Comment 1 - It appears that the draft chapters meet the intent and goals of the Act.

B. Internal consistency and completeness

Since this review is limited to two chapters, a full evaluation of internal consistency and completeness cannot be accomplished at this time. However, based on the material provided, we offer the following comments.

Comment 2 - The proper categorization of Goals, Objectives, Policies, and Actions is important to the clarity of a comprehensive plan. The proper categorization of Actions is especially important under the new requirements of the Act, one of which is that communities must conduct an assessment of the plan's implementation program within five years of its adoption. While the majority of these chapter's statements are well-thought out, clear, and properly classified, a few may not be. For example Economic Development Goal 3, Action A is:

"Allow limited non-residential development as part of a "Mixed Use Village" recommended for the Zion Bible Institute property..."

What is the actual “action” to be taken? Does a zone change need to be enacted or is this just a policy statement of support for the concept (in which case it would not be an Action).

Suggestion: Rather than our staff commenting on each goal, objective, policy, and action, we request that you review them in light of the guidance attached (excerpted from our draft Comprehensive Planning Guidance and Standards Manual). As appropriate, re-categorize them or revise them to follow our definitions.

Comment 3 – One of the requirements of comprehensive plans is the identification of existing types and patterns of economic activities including, but not limited to, business, commercial, industrial, agricultural, and tourism. We were very pleased to see that all these topics were addressed in the Economic Development chapter, including a section that specifically addresses agriculture. With respect to agriculture, we would like to take this opportunity to remind you that in addition to the role of agriculture as part of your local economy, the Act has several requirements that must be addressed. Specifically:

- An identification of agricultural soils on a map.
- An inventory of prime agricultural lands. This inventory is clearly connected to, but potentially goes beyond, soil types. For example, there are some types of agricultural lands that do not depend on standard farmland soils that must also be inventoried, if applicable. These include lands on which livestock operations exist and lands for specialty crops such as apples, peaches, grapes, blueberries, or cranberries.
- The locations and types of active agricultural operations.
- Farm lands that have been protected from development, even if currently idle.
- Identification of the areas of the municipality where agricultural operations would be beneficial as a future land use. There are three acceptable options for fulfilling this requirement:
 - To designate agriculture as a category on the Future Land Use map;
 - To include an agricultural overlay on the Future Land Use map; or,
 - To include agriculture as a permitted use in one or more land use categories and to describe the reasons why agricultural use cannot be mapped as a future land use or with an overlay.

Suggestion: As you are preparing other chapters of the Plan (e.g. Natural Resources, Open Space, Land Use, etc.) please be sure the above cited information is included.

C. Consistency with, and embodiment of, the goals and policies of the State

Comment 4 – It appears that that the draft chapters are consistent with, and embody the goals and policies of the State.

D. Compliance with the rules and regulations adopted by the State Planning Council

Comment 5 – It appears that that the draft chapters comply to the rules and regulations of the State Planning Council.

E. Adequate, uniform, and valid data

Comment 6 – It appears that that the draft chapters use adequate, uniform and valid data.

III. Comments and Suggestions to Enhance Accuracy, Readability, and Usability

Comment 7 – The Economic Development chapter clearly identifies significant and expanding business and industry sectors such as healthcare, retail trade, financial activities/finance and insurance, accommodation, food services, etc.) While the draft contains some strategies for supporting some of these sectors (for example the strategies presented under “Defining the Village Center” and “Tourism”), other sectors are not covered. Similarly, some of the sub-sections provide information about existing conditions and potential opportunities but are not followed-up with specific policies or actions.

Suggestion: Consider adding a discussion of strategies for supporting all sectors of Barrington’s local economy and add additional policies and actions as appropriate. For example, we commend the Town’s commitment to home-based businesses but adding an action or actions to assess the adequacy of existing zoning or the infrastructure needs of home-based businesses (e.g. high-speed data, common use meeting space to meet clients, etc.) and investing in them to support continued growth of this sector of the local economy would considerably strengthen the Plan.

Comment 8 – While not a requirement for State approval at this time, we recommend that the Town consider including a discussion of any issues affecting the business and industry sectors within the municipality. Such issues could arise from local or regional economic or regulatory conditions. In addition, it would helpful to include any local, regional, or State-led economic development plans, programs, or other incentives currently in effect or offered by the municipality.

Suggestion: Consider add a discussion of the above.

Comment 9 – There is a citation error on page 35 of the Economic Development chapter.

“The R.I. Department of Economic Development provides figures of the total labor force made up by residents, and of employment levels within the community itself, for all cities and towns in the State.” (ital. ours)

As noted in the accompanying Table 4, the correct source is the R.I. Department of Labor and Training.

Comment 10 – In the Circulation chapter (page 52), Table 2: Classification of Barrington Roads presents an older version the Functional Classification system.

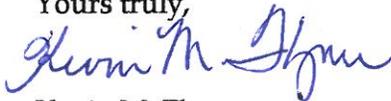
Consider updating this table using the most recent Rhode Island/USDOT Functional Class Titles.

RURAL	URBAN
Principal Arterial	
Interstate	Interstate
	Other Freeway & Expressway
Other Principal Arterial	Other Principal Arterial
Minor Arterial	
Minor Arterial	Minor Arterial
Collector	
Major Collector	Major Collector
<i>Note: Roadways Ineligible for Federal-Aid</i>	
Minor Collector & Local	Local

Comment 11 – Table 3: Traffic Counts – Annual Average Daily Traffic (AADT) on page 54 only presents data through 2008. We believe more recent data is available. We recommend that you contact Dan DiBiaso at RIDOT (daniel.dibiasio@dot.ri.gov or 222-3024 x4098) for the most recent traffic counts.

As previously mentioned, this is a preliminary review. At the appropriate time, we encourage the Town to provide us the “final draft”, incorporating revisions made to the current draft. As always, please feel free to contact Kevin Nelson, Supervising Planner with any questions, concerns, or requests that you may have at 222-2093 or at kevin.nelson@doa.ri.gov.

Yours truly,



Kevin M. Flynn
Associate Director

cc: Jared L. Rhodes II
Kevin J. Nelson

formatting before being added to the plan. Not all maps are easy to understand, for example those that show too much data, and all of the maps that end up in a plan should be user-friendly.

GENERAL MAP FORMATTING STANDARDS AND GUIDELINES

For State approval, all maps must include:

- A title that is reflective of the data shown on the map;
- A legend that provides information about the data presented within the map; and
- Information about the source(s) of the data being shown.

To make maps as user-friendly as possible, all maps should also:

- Be set on a base map showing at a minimum, and where appropriate, municipal boundaries, rights-of-way, and water bodies;
- Include a north arrow;
- Include a scale bar; and
- Provide labels to identify significant pieces of data.

When finalizing maps for inclusion in the comprehensive plan, it is always best to print them at the intended size and consider the graphic qualities of the map, such as the width of line weights, the size of labels, and the appropriateness of colors chosen.

SUMMARY

Some key points to remember about maps are:

- The Act requires that specific datasets be mapped within a comprehensive plan, as described within the topical chapters, Chapters **X.X through X.X**.
- Maps have two purposes: illustrating information and assessing information.
- It may be that not all maps that are used during the planning process are appropriate for inclusion within the plan.
- For State approval, all maps must include a title, legend and information about the sources of the data.

GOALS, POLICIES AND IMPLEMENTATION ACTIONS

The Act requires that goals, policies and implementation techniques (or actions) be included to address each of the required topics. Goals, policies and implementation actions have different purposes and should be crafted so that they can be used by the municipality effectively. While policies and actions may both lead to achievement of the same goal, it is important to remember that they are not necessarily linked hierarchically.

Each chapter in Section **X** contains sample goals, policies and implementation



The Comprehensive Planning and Land Use Regulation Act **does not** require that comprehensive plans include objectives and therefore objectives are not required for State approval.

QUICK GUIDE TO GOALS, POLICIES AND IMPLEMENTATION ACTIONS

GOAL: A desired outcome of the planning process. Simple, broad, high-reaching.

Appropriate public transportation options will be available for the community's use.

POLICIES: Statements that guide the actions of municipal decision makers so that all actions and decisions help to achieve the goals.

Encourage businesses to offer incentives for commuting via an alternative transportation mode.

Promote the use of alternative transportation by public employees.

Support development that includes elements designed to increase the use of alternative transportation.

Coordinate land use decisions to allocate higher densities of residential and commercial uses in areas well served by public transportation.

ACTIONS: Specific, measurable acts whose implementation will bring the municipality closer to achievement of its goals.

Assess the conditions of the city's rights of way for use by bicycles and maintain an up-to-date list of necessary improvements.

Create a designated city-wide network of on-street bicycle routes that connects the city's key destinations and highest density neighborhoods.

Adopt site and architectural design guidelines for commercial development that increase pedestrian and bicycle interest and safety.

The **goals** define the place where all of the community's hopes and dreams have been realized. The community's goals should be realistic yet ambitious, unhindered yet obtainable.

The **policies** of a comprehensive plan give direction to decision-makers and key community leaders, providing guidance on handling difficult issues, prioritizing the allocation of scarce resources and working together to achieve goals. Policies set out the parameters for action; they are the procedures that must be followed for the goals to be achieved and they set the tone for community action.

Specific and attainable, the **implementation actions** are the steps that can be taken, along and in line with the path that has been set out, to reach the goals. These actions, if completed, will keep the community moving down the road for the next twenty years (or more).

A NOTE ON OBJECTIVES

While not required for State approval, many communities find it helpful to include objectives within their comprehensive plans to make it easy to measure their success. Objectives are related to the goals, but are measurable and attainable within an identified timeframe. Objectives set a time period by which a specific, measurable outcome will be achieved.

Example: By 2025, 5% of the population will use a means other than a single-occupant vehicle for commuting.

actions that would help a comprehensive plan embody and be consistent with the goals of the State.

SETTING THE VISION WITH GOALS

goal (n): a desired outcome of the planning process

There are many overlapping and interrelated aspects of the community, all of which should be considered when determining the community's vision, (which is why the Comprehensive Planning and Land Use Act requires that communities address a wide variety of topics within their comprehensive plans, as described in chapters **X.X through X.X** starting on page **X**). The comprehensive plans goals should answer important questions about the future of the municipality, such as:

- > How will lands be used in the future?
- > How will uses be distributed?
- > What kinds of places will exist within the community?
- > What will the transportation network consist of?
- > What types of goods, services and jobs will be available for residents?
- > What services will be provided to residents by the community?
- > How much and what types of energy will the community be using?
- > Will there be enough water to serve all of the community's residents and businesses?
- > Will the community have properly planned for natural hazards and climate-related stresses?
- > How much open space will be available for residents use?
- > What types of recreational opportunities will be available, where will they be located and who will they serve?
- > Will there be any historically and culturally significant structures or places remaining?
- > Will there be any opportunities for cultural enrichment?
- > What types of housing will be available?
- > Will all of the community's residents be able to afford housing that fits their needs?
- > Will the elderly be able to age in place?
- > Will there be jobs for young people returning from college?
- > Will residents be healthy? Will they be happy? Will they enjoy life in the community?

The answers to these questions (and more, as explained in this guidebook) should all be found within a community's comprehensive plan – these are the community's goals. The goals define the place where all of the community's hopes and dreams have been realized. Goal setting is an important step in the comprehensive planning process. The community's goals should be realistic yet ambitious, unhindered yet obtainable. When a community envisions what

it could be like in the future, there should be little nay-saying and almost no, “we’ll never get there”.

One easy way to think about the pieces of a comprehensive plan is to compare them to the Wizard of Oz. Like Dorothy, who is thrown, house and all, into the Land of Oz, we first need to know what we want (to get back home) before we can set a plan for achieving it (follow the yellow-brick road, get to the Emerald City and ask the wizard).

However, it isn’t enough to just set a goal – a comprehensive plan must set forth the vision (or goals) and the specific course of action that the community can follow to reach the goals. The course of action is composed of two specific elements that provide direction on obtaining the community’s goals, policies and implementation actions.

GUIDING DECISIONS WITH POLICIES

pol·i·cy (n): statements that guide the actions of municipal decision-makers so that all actions and decisions help to achieve the goals

The policies of a comprehensive plan give direction to decision-makers and key community leaders, providing guidance on handling difficult issues, prioritizing the allocation of scarce resources and working together to achieve goals. Policies set out the parameters for action; they are the procedures that must be followed for the goals to be achieved and they set the tone for community action.

Knowing that the yellow-brick road was the only way to the Emerald City and achieving her goal of getting home, Dorothy’s parameters for action were to continue on the defined path. If Dorothy were to set about the task of developing policies for her fearless foursome to follow, perhaps they would have ended up with policies similar to these:

- Continue to follow the yellow-brick road, regardless of the circumstances, until arrival at the Emerald City,
- Stay away from the poppies, and
- Partner with whoever is willing to help in reaching the destination.

Policies are typically phrased with guiding verbs, rather than action verbs. See the list on page X for examples of verbs that are best suited for a comprehensive plan’s policies.

MAKING PROGRESS WITH IMPLEMENTATION ACTIONS

im·ple·men·ta·tion ac·tion (n): specific, measurable acts whose implementation will bring the municipality closer to achievement of its goals.

Specific and attainable, the implementation actions are the steps that can be taken, along and in line with the path that has been set out, to reach the goals. These actions, if completed, will keep the community moving down the road for the next twenty years (or more). To make them meaningful,

implementation actions must be associated with a responsible party (does Dorothy carry Toto or is it the Cowardly Lion?) and a timeframe (do we hurry through the angry apple trees or walk leisurely?).

Implementation actions should be specific and action-oriented. Implementation actions should use action verbs, such as those found in the list on page X.

SUMMARY

Some key points to remember about goals, objectives, policies and implementation actions are:

- Goals set the desired outcome and reflect the community's vision for its future. They should be broad and high-reaching.
- Objectives are measurable and can be accomplished. They show that progress is being made toward the goal. Objectives should include timeframes.
- Policies give direction to decision-makers. They set out the parameters for action.
- Implementation actions are specific and action-oriented. They must have a timeframe and be associated with a responsible party.
- Policies and Implementation Actions can help achieve the same goal but are not hierarchical.
- Policies and Implementation Action statements should begin with verbs.
- Objectives are not required for State approval.

USING THE RIGHT VERB

Policies and implementation actions have very different purposes. When crafted correctly, each can be effective tools in helping a community reach their goals. The first step in using these tools correctly is knowing the difference; the second is using language that helps the reader understand the purpose of each. Each policy and implementation action should begin with a verb. Some typical verbs for each are below.

POLICIES

Accommodate	Inform
Address	Insist
Advance	Maintain
Affirm	Make sure
Aid	Manage
Anticipate	Nurture
Assert	Persuade
Assist	Preserve
Assure	Prioritize
Balance	Promote
Base on	Protect
Conserve	Recognize
Consider	Recommend
Continue to	Require
Coordinate	Resist
Declare	Retain
Discourage	Seek
Encourage	Support
Ensure	Urge
Explore	Work to
Foster	
Further	
Help	
Improve	

IMPLEMENTATION ACTIONS

Acquire	Identify
Adapt	Implement
Adjust	Initiate
Adopt	Institute
Amend	Inventory
Appraise	Investigate
Assess	Modify
Begin	Partner with
Calculate	Prepare
Create	Provide
Collaborate	Pursue
Consult with	Regulate
Contact	Review
Dedicate	Revise
Designate	Schedule
Determine	Study
Develop	Undertake
Devise	Update
Disseminate	Use
Enact	Work with
Establish	
Evaluate	
Fund	
Hire	