

CIRCULATION / ECONOMIC DEVELOPMENT

Comments from Division of Planning, July 21, 2014 Letter to Town

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

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.

RESPONSE: Goals, Objectives, Policies and Actions in both elements have been revised in response to this comment.

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.

Response: The Natural & Cultural Resources map showing farming, agricultural soils, etc., has been revised (**Map NCR-5**). This map is referenced on Page 31 of the Economic Development section. Text describing existing conditions has been added to the Existing Conditions discussion (see “Farming Operations” section, pp 30-32). The amount of land suitable for farming in the George Street area is described in the text. In addition, a new figure (**Figure 1**) has been added to show farm activity in the George Street area. There are no other areas in town where large-scale farming is likely to occur outside the George Street area. Smaller sites include at Johannis Farm, where the Land Trust permits continued farming under the terms of the acquisition of the property, and the Town-owned open space formerly known as “Vitullo Farm,” on Wampanoag Trail. The old Vitullo Farm site near the

Trail is being used as a community garden; it is possible formerly farmed portions of the property outside the community garden area could be leased for farming operator. Agriculture is also addressed in the Land Use element – agriculture, for example, is identified as a use on the Future Land Use Map for areas around George Street now zoned Residence 40-Conservation Development.

Goal ED-6 now includes stronger language about promoting agriculture in town. The text is below.

Goal ED-6: Support agriculture as a vital component of the local economy.

Policy ED-6.1.1: Support farming as a use within historically farmed areas of Barrington.

Policy ED-6.1.2: Work with community partners to promote local agricultural products.

Actions

A. Evaluate whether revisions to restrictions in the Zoning Ordinance are needed related to agricultural uses, to include uses such as farms, farm stands and farmer’s markets.

B. Revise Zoning Map to establish agricultural zoning districts where appropriate, in areas with historic agricultural use (including George Street) to include performance standards.

C. Evaluate Town-owned open space formerly used for farming for opportunities to lease portions to organic farming operations on a limited scale.

D. Continue to develop the community garden at the former Vitullo Farm site.

E. Review and revise local purchasing requirements to require the purchase of regionally produced foods when possible.

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

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

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.

RESPONSE: The following actions under ED Goal 4 address this comment:

C. Identify restrictions in the use table and other regulations in Zoning Ordinance that act as barriers to home-based businesses and necessary support services; revise and/or eliminate regulations that are overly restrictive, while protecting neighborhoods from adverse impacts

D. Investigate potential space in public buildings that could help support home-based businesses, such as common use meeting space.

E. Conduct study of options, such as zoning ordinance amendments, to permit uses that encourage the provision of services and amenities that will support creative and knowledge based businesses and consulting activity, including the expansion of livework opportunities.

F. Conduct market study evaluating retail and office environment in the Neighborhood Business and Business zones, including an evaluation of existing commercial space.

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.

RESPONSE: In the Issues & Opportunities section, discussion of issues affecting the local business community has been expanded (see “Promoting the Local Economy” on Page 35. Action A under Goal ED-4 calls for further evaluation of issues as follows:

- A. Form a task force consisting of residents and local business owners to:
 - Investigate and evaluate strategies for developing a sustainable, locally owned and run economy.
 - Provide a supportive community and networking opportunities for the growing number of business people who work either full-time or part-time from their homes.
 - Increase awareness of business development opportunities in addition to retail activity.
 - Evaluate impacts of and recommend policy related to food trucks and other mobile business activity.

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.

RESPONSE: The text has been corrected (see Page 29, under “Employment”)

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

RESPONSE: Table 2 (page 42) has been revised to be consistent with the RI Highway Functional Classifications:

http://www.planning.ri.gov/documents/trans/func_class/Tables/FuncClass_Barrington_081314.pdf

<http://www.planning.ri.gov/statewideplanning/transportation/reclass.php>

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.

RESPONSE: DOT has provided updated counts, from 2013; Table 3 has been revised to include these counts.

COMMUNITY SERVICES & FACILITIES

Comments from Division of Planning, Sept. 8, 2014 Letter to Town

Comment 1 – The draft Community Services and Facilities chapter does not contain a description of how Barrington addresses their municipal drought mitigation responsibilities including coordination and the communication responsibilities’ of the Town with the Water Resources Board (WRB) in the event of a long-term drought.

Suggestion: Add a discussion of how the Town currently addresses this issue and, if one is not already in place, add an implementation action to establish a municipal drought management response strategy to coordinate with the WRB during times of drought for the entire community. More information may be found in *Water 2030*, available on our website at www.planning.ri.gov/landuse/RI%20Water%202030_06.14.12_Final.pdf. (If you use the online pdf, Drought Mitigation Policies and Strategies can be found on page 164).

RESPONSE: Drought is discussed in the Natural Hazards element – see Page 129. The Plan includes an action (Goal NH-4, Action B) as part of a community outreach program to educate the public about water restrictions in times of drought, as applicable, including a concerted effort to reach those who rely exclusively on well water.

Comment 2 – Stormwater management is a topic that is required to be addressed in comprehensive plans in order to receive State approval. Stormwater management is not covered in this chapter’s discussion of infrastructure.

Suggestion: The interim standards for all infrastructure and facilities are that the plan 1) describe the existing infrastructure or facility, 2) analyze the future needs related to type and level of service for the infrastructure or facility, and 3) include goals, policies, and actions for the infrastructure or facility; this material must be added to the plan. As you consider goals, policies, and actions, we encourage you to give particular consideration to the topic of Low-Impact Development and the potential establishment of stormwater utility districts. In addition, please see Comment 6 for additional draft standards pertaining to this issue.

RESPONSE: Added Map CSF-4 showing stormwater facilities and Map CSF-5 showing impervious surface coverage. Added a description of the Stormwater Management facilities and practices in the Existing Conditions section (Page 61) and a discussion of Stormwater in the Issues section (Page 64). Added/revised actions (C, D and E) under Community Services & Facilities Goal CSF-1 (Page 67)

Comment 3 – The final Plan will need to consider the topic of climate change, sea-level rise, and natural hazards. This may be accomplished in an individual chapter or it may be interwoven through several chapters. While the impact of a changing climate and sea-level rise on Barrington’s array of facilities and services is not required to be presented in the Facilities and Services chapter under the interim standard, the potential impacts must be assessed somewhere in the final document. However, with respect to infrastructure and facilities, the comprehensive plan must 1) identify what currently exists within areas exposed to climate change, sea-level rise, and natural hazards; 2) identify any priority issues that the municipality would face in the event of a natural hazard occurrence; and 3) include goals, policies, and implementation actions for minimizing the risks posed to infrastructure by climate change, sea-level rise, and natural hazards.

In the course of this review, the Department of Health, Office of Drinking Water Quality provided us with information specifically pertaining to one aspect of facilities and services, the provision of drinking water. We believe this information may prove valuable in the preparation of your comprehensive plan.

The Department of Health, Office of Drinking Water Quality undertook a project titled *SafeWater RI: Ensuring Safe Water for Rhode Island’s Future (SafeWater RI)*. The objective of the project was to assess changing environmental conditions (including temperature, precipitation patterns, sea-level rise, and storm surge) and their potential impacts on drinking water utilities in Rhode Island, and develop strategies to address these changing conditions. The project addresses the implications of climate change to drinking water utilities by providing locally relevant and actionable data for water utility managers to evaluate and plan for future scenarios. For example, while Barrington relies on the Bristol County Water Authority for the delivery of public water, any associated infrastructure located in Barrington such as pump stations or emergency back-up wells should be identified and discussed in the Plan.

Suggestion: As you continue to develop the Plan, please be sure that climate change, sea-level rise, and natural hazards are appropriately addressed and cover all aspects of comprehensive plans. We recommend you consult our most recent guidance on Natural Hazards and the SafeWater RI Project Reports. Our office is also preparing a Vulnerability of Transportation Assets to Sea Level Rise report that will include maps displaying areas of potential inundation under various sea-level rise scenarios. We anticipate this report to be available within the next month. For your convenience, we will email pdf’s of both our draft Natural Hazards guidance chapter and the three SafeWater reports. You may also wish to consult with Carlene Newman of the Office of Drinking Water Quality. She can be contacted at 222-3436 or carlene.newman@health.ri.gov.

RESPONSE: These issues are addressed at length in the Natural Hazards element (the initial draft has been reviewed by the State).

Comment 4 – Not all of the required facilities and infrastructure are included on the three maps contained in this chapter. All of the following may need to be mapped and labeled:

- All publicly-owned and/or operated buildings, including but not limited to town hall, administration buildings, schools, community and/or senior centers, libraries, fire stations, police stations, etc.
- Drop-off facilities for recyclables
- Municipal compost or refuse disposal sites
- Wastewater pump stations
- Wastewater treatment plants
- Stormwater retention ponds
- Water supply infrastructure

Suggestion: Add, either to the existing maps or as new maps, all of the above items as they pertain to Barrington.

RESPONSE: Added Map CSF-4 – Stormwater Facilities (showing stormwater lines and catch basins) and Map CSF-5 – Impervious Surface. We have not mapped stormwater retention ponds – to be addressed as part of expansion of GIS capabilities recommended under Action E under Goal CSF-1. The Recycling Center has been added to Map CSF-1, which depicts all of the other facilities listed in bullet 1.

Comment 5 – Pages 65-66 of the chapter contain a section titled Refuse Collection and Recycling which begins to address the solid waste management content required in a comprehensive plan; however, additional information may be needed for State-approval upon the adoption of the Guidance and Standards Manual.

The draft Community Services and Facilities chapter mentions curbside recycling and refuse collection services. Commendably it also identifies local programs to incentivize household recycling (PAYT and No Bin No Barrel) and raises the issue of food waste composting. Nevertheless, this section should fully cover descriptions and quantification of solid waste managed by the municipality, including:

1. The method(s) by which municipal solid waste is collected (e.g. picked-up curbside, dropped-off by residents at a transfer station, dropped-off by residents at a recycling center, some combination of methods, etc.) Please note that the Rhode Island Resource Recovery Corporation reports that the Town manages both a residential drop-off collection and yard waste composting facility, neither of which is mentioned in the draft.
2. The types of municipal solid waste that are collected by each collection method identified. Types of municipal solid waste include mixed household waste, yard waste, recyclable materials, household hazardous wastes, electronics, bulky items (e.g. furniture, appliances, mattresses), commercial wastes, etc.
3. The types of municipal solid waste (mixed refuse, recyclables, etc.) that are currently being brought to the Rhode Island Resource Recovery Corporation.
4. The types of municipal solid waste that are being sent somewhere other than the Rhode Island Resource Recovery Corporation.
5. The current ways in which the solid waste management system is being funded.

In addition to this material, there appears to be some contradictory information presented. The figures for tons of material recycled and landfilled as presented in the narrative do not match the figures presented in Table 3: Public Works Department Activities.

Suggestion: Expand the Refuse Collection and Recycling section to include all of the required material and clarify the apparent contradictory information relating to Table 3. If the Town needs assistance in obtaining information on any of the items above, we recommend that you contact Rhode Island Resource Recovery Corporation. Mike McGonagle, Director of Information Systems and Business Analysis may be reached at 942-1430 or mikem@rirrc.org or Sarah Kite-Reeves, Director of Recycling Services may be reached at 942-1430 or sarahk@rirrc.org.

RESPONSE: This information has been updated and reorganized to improve clarity – see Pages 57 and 59 and Table 3 on Page 59.

Comment 6 – As noted in Comment 2, stormwater management is a topic that is required to be addressed in comprehensive plans in order to receive State approval but is not covered in this chapter’s discussion of infrastructure. The draft standards include several specific items pertaining to stormwater management that must be included in the comprehensive plan. They are:

- a description of the Town’s maintenance program for stormwater infrastructure;
- an assessment of the adequacy of funding for the maintenance program;
- identification of any areas regularly subjected to stormwater related flooding during storm events;
- a description of any plans for improvements in the management / funding of stormwater infrastructure; and
- identification of any current municipal regulations or standards regarding stormwater management.

Suggestion: Add the above items as they pertain to Barrington.

RESPONSE: These items are addressed (as mentioned under Comment #2) in the Existing Conditions section, and Issues & Opportunities section (see “Stormwater Management” subheads).

HOUSING & NEIGHBORHOODS

Response to State Comments – Nov. 5, 2014 Letter from Division of Planning

Comment 1 – The Interim Standards require comprehensive plans to discuss housing patterns and conditions, specifically including:

- data on breakdown of unit types: single- v. multi-family, rental v. ownership, seasonal v. year-round and
- the effects of foreclosure, abandonment and/or blight.

While the draft chapter does contain information about past construction of single and multi-family housing since 1990, this does not adequately satisfy the requirement for data on the breakdown of unit types. It does not appear that the draft plan addresses the effects of foreclosure, abandonment, and/or blight either.

Suggestion: Please add information that addresses the above issues. Please see Attachment 1, Item A for suggested data points prepared by Statewide Planning. If information was omitted because some of these issues do not exist, then a statement to that effect should be made. If they do exist, then a discussion of these topics must be added to the draft chapter.

RESPONSE: Added and revised tables to include data on housing unit types (Table 13), foreclosures (Table 14), and occupancy (Table 15) – see Page 15. Added text to describe the data, and added a discussion on “Foreclosure / Blight / Abandonment”. See pages 14 and 15 under “Housing Inventory”

Comment 2 – The Interim Standards require comprehensive plans to provide a date by which the 10% threshold for low and moderate income housing will be achieved. It does not appear that such a date has been included in the draft chapter.

Suggestion: Taking the strategies collectively, provide a realistic estimate, of when the stock of low- and moderate-income housing will equal 10% of the total year-round housing stock.

RESPONSE: Revised Objective HN-3.2 (Page 24) to include the year 2035 as the target date for achieving the 10% goal:

Objective 4.2: Produce affordable housing units at a rate that keeps Barrington on the path toward achieving the 10 percent affordable housing goal **by 2035**.

The 20-year timeframe is consistent with *Table C-1: LMI Units by Strategy and Year* - see Appendix I, Page I-16.

Comment 3 –The Interim Standards require comprehensive plans to discuss whether there is a need for more suitable housing options, such as whether there are a range of housing unit sizes and types available (e.g. rental, places to age in place, homes for families, singles, etc.); and whether there is a need for better housing conditions. It does not appear that the need for suitable housing options or the need for better housing conditions has been adequately discussed in the draft chapter.

Suggestion: A discussion of the need for more suitable housing options should be added to the draft chapter. To properly address this topic, communities should consider the following guiding questions:

- How is the condition of the housing stock likely to change and what are the likely effects of future natural hazards?
- Do the characteristics of the existing housing stock match the needs of the population?
- What actions can the municipality take to provide a greater variety of housing options to suit population needs?

RESPONSE: Effects of natural hazards are discussed in-depth in the Natural Hazards element.

A discussion of the supply of alternatives to single-family detached housing has been added to Page 19 (see “Multifamily/Infill Housing”). The “Village Center” is identified as most suitable for new apartment development given proximity to goods and services and RIPTA bus service. Past actions to allow different housing types – apartments as of right in the Business and Neighborhood Business zones, cottage-style developments, and accessory apartments, for example – are discussed throughout the housing chapter. The proposed 40-unit Palmer Pointe development - with duplex, townhouse and other types of units – is also cited.

The critical future housing issue identified in the plan is the need for senior housing units given the aging demographic. The plan calls for creation of a “Senior Residential Village” zone at the former Zion Bible Institute campus that could result in development of approximately 200 to 220 senior housing units – independent living apartments and cottage-style units – as well as an assisted living facility and a memory care facility. See Goal HN-1 and Appendix II.

Comment 4 – In the housing element’s main text, pg. 15, the draft chapter notes that with 160 LMI units, “Barrington will need to produce 467 more affordable units to meet the 10 percent standard.” A more accurate assessment of what Barrington “will need to produce” accounts for projected population growth. As noted in Appendix IV, 589 additional LMI units will need to be added over the next 20 years before the Town hits the projected 10% mark.

Suggestion: Revise the narrative on pg. 15 to reflect the full number of LMI units that will be needed over the next 20 years.

RESPONSE: This reference is on Page 15 in the revised draft. The text has been revised to clarify where Barrington stands today (467 units short of 10 percent), and how many more will need to be built factoring in the higher number of total housing units with new growth. It now reads:

“In order to meet the 10 percent standard (which is based on 2010 U.S. Census figures), 627 units (10 percent of 6,386 less 118 seasonal units) of Barrington’s dwelling units must be “affordable” based on the state’s definition. The current affordable housing inventory of 160 units falls 467 short of the requirement. Factoring in additional growth, Barrington would need to produce approximately 544 more affordable units to meet the 10 percent standard over the next 20 years (see Appendix I, Table C-1).

In addition, Table C-1 in Appendix I (Page I-16) has been revised to more clearly indicate that the strategies would produce 544 new LMI housing units in ADDITION to the existing count of 160 units in order to reach 10 percent -- resulting in a total of 706 LMI units. (This would be 10 percent of the projected year-round housing unit total of 7,055 in Year 20.)

Comment 5 – Some data presented in the draft chapter such as income distribution, characteristics, and HUD income classifications, does not reflect the most recently available data or presents data from inconsistent sources.

Suggestion: Revise the data to reflect the most recently available data and use consistent sources. Statewide Planning has recommended revisions in Attachment 1, section B.

RESPONSE: Table 5 has been revised to include 2008-12 ACS data, and the related text on pages 8 and 9 have been revised for consistency with the data.

The change in median house prices has been corrected (see Page 14), and a new figure – Figure 1 on Page 13 – has been added to show median sales prices since 1979.

Comment 6 – The Draft standards require comprehensive plans to provide an overview of the existing housing context. It appears that some of the data points for this requirement have not been included in the overview of existing housing conditions. Specifically, the draft chapter does not identify the number and percentage of occupied and vacant housing units. Additionally, the plan does not identify the median age of housing units. Finally, it does not appear that the draft chapter addresses the general trend in rental prices over the past 10 or more years.

Suggestion: Please add the required data or if it is not applicable to the Town, please add a statement to that effect. Please see Attachment 1, sections C and D for Statewide Planning’s recommendation for how to include this data.

RESPONSE: Tables 11 and 12 (Page 14) were added to include the data. Table 10 (Page 14) has been revised to compare rental costs in 1990, 2004, and 2013 (years selected based on data availability)

Comment 7 – The Draft standards require comprehensive plans to identify existing housing patterns and conditions, including any condition-related issues that may be occurring within the town, such as high rates of foreclosure or abandonment, general neglect or deterioration of the housing stock, overcrowding of housing units, etc. It does not appear that the draft chapter has described any condition-related issues such as these. The draft guidance also requires comprehensive plans to discuss any ordinances or other land use regulations that may exist whose specific purpose is to limit or restrict residential growth within the Town. It does not appear that such a discussion has been included in this chapter.

Suggestion: This may have been omitted because such issues do not exist; if this is the case, then a statement to that effect should be made. If they do exist, then a discussion of these topics must be added to the draft chapter.

RESPONSE: These are not issues in Barrington. Information on foreclosures and code complaints has been added – see “Foreclosure / Blight / Abandonment” and Table 14 on Page 15

Comment 8 – The Draft standards require comprehensive plans to assess existing and future housing needs, including the need for affordable housing. This assessment must include a discussion of the suitability of housing options such as whether the number of rental units within the community seems adequate or whether there are a range of housing unit sizes and/or types to accommodate a range of population needs. Comprehensive plans must also assess housing conditions, such as how the condition of the housing stock is likely to change due to age, deterioration, and/or attrition or what portion of the housing stock is vulnerable to natural hazards and climate change impacts. The draft chapter has not sufficiently assessed these issues.

Suggestion: Describe whether the available housing types and the location of housing match the needs of the existing population, determined by comparing the characteristics of current residents, the existing housing patterns and the characteristics of the existing housing stock. When assessing the suitability of housing options, comprehensive plans should consider the guiding questions included in the attached draft guidance chapter on housing.

RESPONSE: Available housing types are listed by type in Table 13 on Page 15. Most of the units are single-family detached (90.9%), but this percentage has declined since 1990, when 93.7 percent of all housing was single-family detached. The number of multifamily units has increased from 120 in 1990 to 332 in 2008-12 (according to American Community Survey estimates). The challenge today is finding areas suitable for higher density and a mix of housing types.

As discussed in the Housing and Land Use chapters, these areas are: the former Zion Bible Institute campus (designated on the FLUM as suitable for a Senior Residential Village), the Sowams Nursery site on the east side of Sowams Road (designated on the FLUM as suitable for “Village” development, and the location of the 40-unit Palmer Pointe development discussed earlier), and the mixed use/mixed housing areas identified on the FLUM – the Neighborhood Business zone and Business zone – where multifamily is permitted as of right as part of mixed-use projects.

As mentioned earlier, a discussion of the supply of alternatives to single-family detached housing has been added to Page 19 (see “Multifamily/Infill Housing”). The “Village Center” is identified as most suitable for new apartment developments given proximity to goods and services and RIPTA bus service. Past actions to allow different housing types – apartments as of right in the Business and Neighborhood Business zones, cottage-style developments, and accessory apartments, for example – are discussed throughout the housing chapter. The proposed 40-unit Palmer Pointe development - with duplex, townhouse and other types of units – is also cited.

The critical future housing issue identified in the plan is the need for senior housing units given the aging demographic. The plan calls for creation of a “Senior Residential Village” zone at the former Zion Bible Institute campus that could result in development of approximately 200 senior housing units – independent living apartments and cottage-style units – as well as an assisted living facility and a memory care facility. See Goal 1 and Appendix II.

Comment 9 – The Draft standards require comprehensive plans to include policies and/or implementation actions that specifically address preserving the stability and character of existing residential neighborhoods and preventing the displacement of low-income residents. Policies and/or implementation actions regarding promoting the use and rehabilitation of the existing housing stock and maintaining a housing stock that is safe, healthy, and sanitary

must be included as well. It does not appear that policies and/or implementation actions addressing the above topics have been included in the draft chapter.

***Suggestion:* Preserving the stability and character of existing residential neighborhoods is an important part of planning for housing and must be addressed within the comprehensive plan with policies and implementation actions. Please see the attached draft guidance on housing for more information on how to address this comment.**

RESPONSE: The Plan places greater emphasis on capturing existing affordable housing (see Goal HN-3, Objective HN-3.1) – a critical affordable housing strategy given the limited supply of developable land in town. The issue is discussed on Pages 18 and 19

(“Neighborhood Character”) and Page 20 (“Existing ‘Affordable’ Houses”). See also Pages 15 and 16: “Affordability of Existing Homes”.

The strategy preserves neighborhoods and avoids displacing lower income residents (and is likely much more cost-efficient than new construction). It is consistent with one of the Plan’s major themes – protecting neighborhood character (the themes are discussed in the Introduction section).

Comment 10 – The Draft standards require comprehensive plans to include policies and/or implementation actions that specifically address locating new housing in appropriate areas of the community at densities that are appropriate to the characteristics of the land, the availability of infrastructure and community services and the densities of surrounding neighborhoods. The Draft standards also require comprehensive plans to identify areas that may be suitable for future housing development or rehabilitation. These requirements are not thoroughly addressed in this chapter, and should be dealt with in greater depth in the Land Use Chapter. If the Town has not yet drafted the Land Use Chapter, then you should be advised of these requirements before proceeding. The specific requirements that must be addressed in the Land Use Chapter are as follows:

- The FLUM must identify the areas of the municipality in which residential uses are desired as a future land use.
- The land use chapter must describe the characteristics of the various residential future land use categories identified on the FLUM, including the desired density.
- Particular parcels, buildings or areas that will be suitable for redevelopment, if any, must be discussed, either in the housing section or the land use chapter.

Suggestion: Including residential districts at varying densities on the Future Land Use Map is the first step and must be complemented with additional policies and actions. In order to determine which policies and actions would be most appropriate to guide new residential growth to desired areas, and consider areas in which future housing development or rehabilitation may be appropriate, please use the attached draft guidance on housing.

RESPONSE: The (draft) Future Land Use Map (Map LU-6 in the Land Use element) identifies areas where residential, at varying densities, is the desired future land use. In addition, the Plan identifies two key sites on the new Future Land Use Map as suitable for higher density “Village” zoning with a mix of housing types – sites originally designated for Village development in the 2009 Comprehensive Plan based on a town-wide land use study completed in 2008. Developer guidance is provided in Appendix II for creation of new zoning upon application by developers.

Comment 11 – The draft chapter commendably includes a goal to promote sustainable development features in new housing. The proposed actions to support this goal listed on page 24, however, raise concerns about creating different standards for affordable housing built under the Comprehensive permit process or with a municipal subsidy (action items 4 and 5 under Goal 3). Affordable housing should not be held to a different standard than other housing developments.

Suggestion: Revise these actions so that they can be broadly applied to housing development activity town-wide.

RESPONSE: Goal 3 and the related policy and actions have been deleted. These items are addressed elsewhere in the plan – in the Natural Hazards element and in the Energy element.

Comment 12 – The draft chapter’s assessment of housing affordability indicates that there is a scarcity of multi-family rental property and the income needed to purchase a single family home is unattainable for the majority of Barrington households.

Suggestion: If multi-family housing is not allowed by right, the town may wish to add an action to consider amending the zoning ordinance to allow multi-family housing by right, for rental properties other than those that are age restricted, in residential and mixed use zones.

RESPONSE: The Town has already taken steps to allow more non age-restricted multifamily housing. For example, multifamily housing is allowed by right within mixed-use developments in the Business and Neighborhood Business zones – areas that are suitable for higher density housing, given access to services and, in the Village Center, proximity to RIPTA’s main bus routes. The Town in 2012 increased the allowable residential density in the NB and B zones by allowing increases in the height limit as well as reducing the required off-street parking – making it feasible for developments to include more apartments than previously allowed.

The Zoning Ordinance also was amended in 2012 to allow for detached and attached accessory apartments, and the conversion of existing houses into two-family structures as a special use within residential zones, provided one of the units is affordable.

The draft Plan (see Actions C and D under Goal 3, Objective 3.2) calls for building on strategies already put in place to promote a mix of housing types. The Actions call for developing materials and holding workshops to demonstrate “best practices” for designing/building accessory apartments, developing cottage-style housing, and creating two-family dwellings (new or through conversion of existing homes).

The Town, as discussed in detail in the Plan, has few options for higher density/multifamily housing given the limited supply of developable land within town. It should be noted that both of the “Village”-designated sites (as discussed above under Comment 10) have resulted in proposals for development of family housing (40 multifamily units at the Sowams Nursery

site), and senior housing (approximately 200 independent senior multifamily and cottage units). These developments will add almost 250 units that will diversify the Town's housing stock. More apartments will be added in the future with continued development anticipated in the Village Center.

OPEN SPACE & RECREATION

(This element has been renamed “Outdoor Recreation”)

Comments from Division of Planning, Sept. 8, 2014 Letter to Town

Comment 7 – The Parks and Open Space Map (Map OSR -2) is an excellent depiction of the Town’s outdoor recreational facilities. However, the new standards proposed for State approval include displaying all designated public access points to natural and conservation areas intended for public recreation, including off-street parking areas, trailheads, access easements, and community boat ramps, as well as any other specified area where the public can enter or have access to a natural open space area. This information is not included on the existing map.

Suggestion: Given the information already contained on the Parks and Open Space Map, it may be difficult to add these additional features. We suggest that an additional map showing designated public access points to natural open space and conservation areas be added to the chapter.

RESPONSE: Shoreline access points have been deleted from Map NCR-3 (*Coastal Areas*); a new map, OR-2: *Public Access: Natural Areas, Shoreline* has been created depicting public access points, trailheads, parking areas and boat ramps in natural/conservation areas.

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

Comment 8 – 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.

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

RESPONSE: Goals, Objectives, Policies and Actions in both elements have been revised in response to this comment.

Comment 9 – Consider exploring the role the arts can play in building a greater sense of community in Barrington and in enhancing recreational and educational opportunities. There are a number of ways that cities and towns are using the arts to enliven communities, including artist-designed street "furniture" and various forms of public art. Arts programs conducted by Recreation departments or afterschool programming in libraries and community centers are important community services. Even using Town facilities like Town Hall to showcase the work of Barrington artists can play a role in contributing to a rich cultural life.

Suggestion: Contact Randy Rosenbaum, Executive Director, RI State Council on the Arts at 222-3883 or Randall.Rosenbaum@arts.ri.gov for further ideas and technical assistance in incorporating the topic of art in the comprehensive plan.

RESPONSE: No new actions have been included in the Plan, as the Town has addressed this issue already. For example, the Town has actively been incorporating art in public spaces (at the Library and Senior Center), and is working to add public art to parks – including at a waterfront park on County Road. In addition, the Town has for years operated a theater program – Barrington Community Theater – and the nonprofit Community School (based at Town Hall) has many educational offerings related to art.

Comment 10 – On page 73 of the Community Services and Facilities chapter, Policy 1.1.2, Action H mentions a “proposed Groundwater Overlay District”. However, there does not appear to be any text in this chapter discussing such a district.

Suggestion: Either in this chapter or elsewhere, the Plan should describe the Town’s intent for a Groundwater Overlay District. If the discussion is included in a different chapter, a cross-reference would be helpful.

RESPONSE: References to proposed overlay district have been deleted from all action items. The Natural & Cultural Resources (Objective NCR-1.2/Action F, page 86) element recommends eliminating the advisory review step for projects within the overlay district, as the Water Authority has no plans to utilize the Nayatt groundwater resource due to saltwater intrusion and other factors.

Comment 11 – On page 74 of the Community Services and Facilities chapter it appears that under Policy 3.1.3 Actions A. and D. are the same thing.

Suggestion: Revise as appropriate.

RESPONSE: Duplication has been eliminated.

Comment 12 – The Open Space and Recreation chapter very commendably includes an excellent list of criteria for open space acquisitions; namely, Policy 3.1.2: “Evaluate potential open space protections based on the following criteria:...” As we are sure you are aware, the State has begun confronting the issue of Sea Level Rise (SLR). Given Barrington’s location and low lying topography, SLR has the potential of significant impacts on the community. One aspect of SLR is the likelihood of coastal wetland migration. This is a topic for which Barrington may wish to start planning for now.

Suggestion: The Coastal Resources Management Council (CRMC) and partners will be completing a state-wide project on coastal wetland migration this fall. The maps and data will be helpful to all 21 coastal communities in planning for coastal wetland migration. With the availability of these maps, we recommend the Town consider adding the protection of upland areas adjacent to coastal wetlands that are projected to migrate landward as a criterion for evaluating and prioritizing open space acquisition or conservation. Please contact James Boyd at CRMC at 783-3370 or jboyd@crmc.ri.gov for further information or assistance on this issue.

RESPONSE: The protection of open space has been moved to Natural & Cultural Resources to improve clarity (there was duplication between the two elements).

Policy 3.1.2 now shows up in Natural & Cultural Resources under Goal NCR-1, Policy NCR-1.1.1. The list of criteria has been revised to include the following (see second bullet at the top of the left column on Page 85):

- ...
- Protection of upland areas adjacent to coastal wetlands that are projected to migrate landward due to impacts from sea level rise
- ...

General Comment:

This element has been renamed “Outdoor Recreation” to reflect its focus on recreational issues.

In the previous draft, open space protection was in both this element and the Natural & Cultural Resources element. Given land constraints in town, the Outdoor Recreation element emphasizes utilizing existing land resources to meet recreational needs over acquisition of new sites.

To avoid duplication, open space issues are now in the NCR element only – a more appropriate chapter given the major issues related to open space – providing area for coastal marsh migration, protection of habitat, limiting development impacts in or near sensitive areas (floodplain, wetlands, etc)

NATURAL HAZARDS NATURAL & CULTURAL RESOURCES ENERGY

Comments from Division of Planning, Nov. 17, 2014 Letter to Town

Comment 1 – The draft Standards require comprehensive plans to include one or more maps that illustrate the areas that are projected to be inundated due to 1', 3' and 5' of sea-level rise. It does not appear that such a map(s) has been included.

Suggestion: Include this map(s) in the plan. This information is available through RIGIS within the 'Planning and Cadastral' section or at the following website:
www.edc.uri.edu/rigis/data/data.aspx?ISO=planningCadastre.

RESPONSE: A new map, *NH-3: SLR Inundation Zones*, has been added.

Comment 2 – The draft Standards require comprehensive plans to include a map identifying conservation areas. It does not appear that this map has been included.

Suggestion: Add the required map(s) or add the information to an existing map. The map(s) must include and identify:

- Publicly-owned conservation areas that are permanently protected; and
- Privately-owned conservation areas that are permanently protected;

This information is available through RIGIS within the 'Environment and Conservation' section or at the following website: www.edc.uri.edu/rigis/data/data.aspx?ISO=environment

To view the full set of conservation lands, you will need to refer to both the 'Conservation Lands: State of Rhode Island' and 'Conservation Lands: Municipal and NGO' datasets.

RESPONSE: This map was in the Open Space & Recreation ("Outdoor Recreation") element. It's been moved to the Natural & Cultural Resources element (Map NCR-4), a more appropriate chapter given the information.

Comment 3 – The draft Standards require a comprehensive plan to assess existing and future issues facing the community's significant natural resources. We commend the Town for including a section on Issues and Opportunities but it does not appear that an assessment of how the identified issues are likely to change over the course of the Plan's 20-year planning horizon has been included.

Suggestion: For each identified issue, add the required 20-year planning horizon assessment.

RESPONSE: This plan is based on a 20-year planning horizon (as mentioned in the introduction). With the Town nearing build-out, limiting the potential increase in population, the plan emphasizes utilization of existing resources to the extent feasible – such as existing recreational sites, redevelopment of the Zion Bible Institute site, and capturing existing affordable housing. There are specific 20-year planning assessments, such as with the estimated affordable housing production and with the future threats of sea level rise

(extending beyond 20 years). Adding a 20-year assessment to each issue in the plan is unworkable and overly cumbersome and would result in no changes to the issues and opportunities already identified throughout the plan.

Comment 4 – The draft Standards require a comprehensive plan to include a map illustrating the effects of sea-level rise on saltwater marshes. The map must identify areas of potential losses and marsh migration areas. This information could be used to connect the effects of sea-level rise with the Town’s policies and actions relating to the preservation of natural resources, especially migrating coastal wetlands.

Suggestion: Add the required map. The Coastal Resources Management Council has offered their assistance as the Town pursues this requirement. The Sea Level Affecting Marshes Model (SLAMM) project should be able to provide this information in the near future.

While not a requirement for approval, consider adding an Action to modify the criteria for evaluating and prioritizing open space acquisition and conservation easements to consider SLAMM data. Consider modifying Goal 1, Action B to read, “Seek grants and other funding sources to protect open space, including habitat areas, upland areas adjacent to coastal wetlands, and farmland, through acquisition and conservation easements.

Depending on how the Town chooses to incorporate this information into the Plan, we suggest including appropriate cross-references between the Natural Resources and Natural Hazards chapters.

RESPONSE: A new map has been added to Natural & Cultural Resources, *Map NCR-7 – Coastal Marshes: Potential Loss, Migration Areas*. This map identifies coastal marshes that are already inundated at mean high tide, and would be subject to inundation at future mean high tides with 1, 3, and 5 feet of sea level rise. Additionally, the map shows coastal wetlands that are outside areas subject to inundation at 5 feet of sea level rise, existing freshwater wetlands, and conservation properties that are permanently protected – making it more feasible to provide area for future coastal wetland migration. The plan also references the SLAMM maps. The Town believes this is the most feasible way to map impacts of sea level rise on coastal wetlands. The SLAMM maps for Barrington alone cover 36 pages (see http://www.crmc.ri.gov/maps/maps_slamm/slammm_barrington.pdf). Showing migration areas at different potential levels of sea level rise is not possible on a town-wide map. Map NCR-7 is effective in showing areas adjacent to threatened marshes, and where additional protection would be critical to provide room for wetland migration.

Comment 5 – The draft Standards require a comprehensive plan to discuss and assess existing techniques for minimizing the negative impacts of development on the community’s significant natural resources. While some information is provided e.g. land acquisition, other important techniques such as LID do not appear to have been included. In addition, the discussion and assessment of all techniques employed to minimize the negative impacts of development should include a description of the purpose and scope of the technique and an assessment of how well it is working.

Suggestion: We realize that the Town may intend to provide some of the required information in the Land Use chapter. Wherever it is located within the Plan, it is important that the information be provided. Please review the attached draft Natural Resources chapter from the *Comprehensive Planning Guidance and Standards Manual* for additional detail (page 86 specifically addresses this requirement).

RESPONSE: The Plan has been revised in response, as follows:

- Existing Conditions: Two sections were added – “Regulation of Development Impacts” (Pages 75 to 76) and “Open Space Protections and Incentives” (Pages 76 to 77)
- Issues and Opportunities: These issues are covered in “Future Land Acquisitions” (Pages 77 to 78), “Effectiveness of Regulations” (Page 79) and “Protection of George Street’s Agricultural Heritage and Rural Character” (Page 84)
- Goals, Objectives, Policies & Actions: These issues are covered under Goal NCR-1 Objective 1.1 (various actions re- open space protection), Goal NCR-1 Objective 1.2 (various actions re- improving regulations), and Goal NCR-6 (actions for protecting George Street from adverse impacts)

Comment 6 – With respect to natural resources, the draft Standards require the Future Land Use Map to include existing and proposed conservation areas. With respect to cultural and historic resources, the draft Standards require the Future Land Use Map to include existing and proposed historic districts. We understand that the Town has not completed the Land Use chapter of the draft Plan but we wish to take this opportunity to alert the Town of these requirements.

Suggestion: Please ensure that when preparing the Plan’s Future Land Use Map, that both existing and proposed conservation areas and the boundaries of any existing or proposed historic districts are included.

RESPONSE: The Future Land Use Map (Map LU-6 in the Land Use element) shows existing and proposed conservation areas. It shows no proposed local historic districts (none are proposed at this time). Map NCR-6 shows National Register Districts and areas identified for consideration as National Register Districts.

Comment 7 – Map NCR-4 does an excellent job illustrating the location of Barrington’s historic and cultural properties; however, the draft Standards also require comprehensive plans to identify which of these properties are municipally-owned and/or managed.

Suggestion: Identify which properties shown as listed on the National Register of Historic Places or as located in locally designated historic districts on Map NCR-4 are municipally-owned and/or managed (if any). If no properties are municipally owned or managed, then a statement to that effect should be made.

RESPONSE: The map Legend has been revised to indicate that the Civic Center (with the Town Hall and Library) are municipally owned and managed. This is the only such property in town.

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

Energy Chapter

Comment 8 – The draft Plan is to be commended for its extensive array of policies and implementation actions for energy efficiency and conservation. In addition to efficiency and conservation, the State is committed to the expansion of renewable energy supplies including solar, wind, geothermal, and hydro. Accordingly we urge municipalities to consider the development of renewable energy production facilities.

Suggestion: Add a discussion of what renewable energy sources might be appropriate in Barrington. Consider adding one or more policies and actions concerning how the Town could enable or promote the development of renewable energy production facilities by the private sector.

RESPONSE: Renewable energy options are discussed on Pages 107 to 108, with new text on solar installation incentives for private property owners. Goal E-1 includes several actions (listed below) recommending pursuit of renewable energy projects. Action “B” was added – recommending a feasibility study of Town and school sites to identify and prioritize projects.

- A. Complete energy efficiency upgrades and renewable energy installations at municipal and school buildings, starting with the most cost-effective projects to maximize savings to help fund future projects.
- B. Engage a consultant to develop a town-wide renewable energy plan, to include an evaluation of municipal and school sites for potential solar and other renewable energy installations, to include projected energy production, cost estimates, energy savings and estimated payback.
- C. Strongly consider an investment in geothermal technology at new facilities, such as a new Middle School, if such an investment can provide long-term energy efficiency and cost savings.

Natural Hazards Chapter

Comment 9 – Natural hazards and climate change are a lens through which all of the other topical areas discussed within a comprehensive plan should be viewed. The impacts of natural hazards and climate change are far-reaching, touching every component of a community, including all of the components discussed within a comprehensive plan. To fully integrate natural hazard and climate change considerations throughout the comprehensive plans, municipalities should ensure that the plan’s assessments, goals, policies and implementation actions reflect the impacts that have been identified. Nothing within the plan should contradict the findings related to natural hazards and climate change and communities should be aware of potential impacts when setting goals, policies and implementation actions.

Suggestion: Ensure that all chapters of the comprehensive plan, especially Land Use, consider natural hazards.

RESPONSE: Natural hazards and climate change/sea level rise are among the most significant issues facing Barrington going forward. The Plan provides a comprehensive analysis of these issues in the Natural Hazards element, and recommends actions to ensure the Town plans for and manages these impacts. (In particular, see Goals NH-1, NH-2 and NH-3 and related actions.) The potential impacts are so far-reaching over such a long period of time, it is impossible at this point in time to provide specific actions to solve these difficult challenges facing the Town. Effectively tackling these issues will require a systematic assessment and provision of adequate resources over time. This is the approach recommended in the Plan.

Other elements touch on these issues as well – for example, open space acquisition criteria in the Natural and Cultural Resources element (Policy NCR-1.1.1) emphasizes protection of upland for migration of coastal marshes impacted by Sea Level Rise and securing property that provides flood protection. Many other actions will help mitigate potential future impacts of natural hazards. For example, the Housing element recommends capturing existing affordable housing and creating a zone for the former Zion Bible Institute to allow development of a higher density “Senior Residential Village” – helping the Town to meet

housing needs without increasing development pressure in areas, including parcels in or adjacent to floodplain that may be subject to impacts of sea level rise.

Comment 10 – Goal 1, Action C on page 50 reads “Consider amending the Zoning Ordinance and subdivision regulations to require design standards that exceed FEMA’s requirements.” Depending on the specifics, this may not be legally possible. It is our understanding that FEMA requirements for building design and elevation standards are incorporated in the current State Building Code which is enforced by the local building official. Municipalities do not have the authority to establish a local building code.

Suggestion: Revise the Action to clarify that the Town will not establish standards contrary to the State Building Code. Consider replacing the word “require” with “incentivize”.

RESPONSE: This action has been deleted.

Comment 11 – It appears that Table 5 “Estimated Number of Structures In flood zones” on page 37 directly relates to Map NH-2 Development in Flood Zones on page 35. Having this map and table disconnected by a page of intervening text is a bit confusing.

Suggestion: Move Table 5 to immediately precede or immediately follow Map NH-2 if in fact the table quantifies the number of structures shown in the flood zones depicted on the map.

RESPONSE: Table 3 now appears on Page 116, where the Plan discusses structures in the flood zone.

Note that the Plan has moved all relevant maps to the end of each element. The insertion of maps within the body of each element had interrupted the flow of the text. Now users can easily find maps for each element.

Comment 12 – Page 35 contains a reference to the *RI Drought Management Plan*; this plan has been incorporated into, and superseded by, *RI Water 2030*.

Suggestion: Please change the reference to *RI Water 2030*.

In addition to the preceding comments, the Rhode Island Emergency Management Agency also provided several suggestions for your consideration; they are attached to this letter in their entirety.

RESPONSE: This has been corrected (this text now appears on Page 117 under “Low Risk Hazards.” The Plan has also been revised as appropriate in response to RIEMA’s comments.

Natural & Cultural Resources Chapter

Comment 13 – While the chapter includes a discussion of farms and agriculture, it is relatively brief. Additionally, there is no mention of the Farm, Forest, and Open Space Program (FFOS) which provides property tax reduction in return for land preservation.

Suggestion: Consider adding an expanded discussion of farming and agriculture.

With respect to FFOS, it appears that the Town does not currently participate in the program but Action 6D, “Evaluate potential options to protect agricultural lands, such as Agricultural/Forest

Districts, an agreement where landowner voluntarily agrees to not develop a farm or forest land for a set period of time” signifies an intent for the Town to consider the FFOS Program; is this correct?

In addition to the preceding comments, the Rhode Island State Council on the Arts also provided several comments for your consideration; they are attached to this letter in their entirety.

RESPONSE: Agricultural lands are discussed on Pages 73 and 74. Information on FFOS has been added – see Page 77 (the Town participates in the program). Protection of the agricultural lands in the George Street area is discussed on Page 84. Protection of agricultural land is one of the open space acquisition criteria (Policy NCR-1.1.1 – see Page 85); Goal NCR-6 and the related actions provide additional recommendations for preserving agriculture lands and farming.

Agriculture and farming is discussed in detail in Economic Development (Pages 30 to 32; Page 37; Page 40) and Land Use (Pages 142-143; Page 146)

General

Comment 14 – The proper categorization of Goals, 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 Natural Resources Goal 5 is “Adopt protections for scenic resources.” As phrased, this is an implementation action (i.e. “adopt”). Another example is Energy Goal 3 which is, “Provide resources and set policies to achieve the Town’s energy goals.” Providing resources and setting policies are a means to an end (the goal) but are not the endpoint themselves.

Suggestion: Please review the Goals, Objectives, Policies, and Actions in light of the guidance previously provided. As appropriate, re-categorize them or revise them to follow our definitions.

RESPONSE: Goals, Objectives, Policies and Actions in both elements have been revised in response to this comment.