

**RE: TOWN OF CHELSEA, VERMONT
TOWN PLAN REVIEW
CASE # 16-4**

BACKGROUND

Pursuant to 24 V.S.A., Section 4350, the Town of Chelsea, Vermont Selectboard requested this Commission to review and approve the Chelsea Town Plan adopted on November 16, 2015 by the Town. The Plan encompasses land use for the Town of Chelsea, 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. The Regional Commission scheduled and held a Public Hearing on this review on January 20, 2016 in Norwich, Vermont. This matter is now ready for decision.

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 2015 Chelsea Town Plan is a comprehensive planning document to guide municipal decision making that has been divided into fifteen distinct chapters, as required under 24 VSA § 4382.

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

Yes. As noted in the Plan, “the Planning Commission has invited public input into the planning process and has found continued support for the protecting [sic] of the community’s rural and historic character” (p. 2). Being as the Plan serves as a “vision for the community,” the community must “imagine what the future should be,” and then bring those ideas to fruition (p. 3).

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

Yes. One of the Plan’s goals is to “allow for reasonable development without sacrificing important cultural and natural resources,” (p. 62) which requires the Town to “ensure careful review of all development projects to minimize the impact on Chelsea’s natural and cultural resources” and “protect unique resources by careful planning” (p. 62).

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

Yes. The Town’s policy is to “cooperate with neighboring towns, regional planning commissions and economic development groups to plan for and maintain a balance between the type and number of jobs created and natural population growth in the area” (p. 17). The Plan also states that the Town should “work with neighboring towns and the region to encourage good land use and environmental policy that benefits the citizens of Chelsea,” which may be achieved through continued communication, participation in TRORC, and planning information/development data exchanges with neighboring communities (p. 98).

Specific Goals

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

- 1. Planning for development needs to be conducted so as to maintain the historic settlement pattern of compact village and urban centers separated by rural countryside.**
 - a. Is intensive residential development being encouraged primarily in areas that are identified as community centers, and is strip development along highways being discouraged?**

Yes. The Plan encourages residential growth in the Village and Rural Residential Areas “while balancing the flood safety and the character of the village” (p. 70). With respect to strip development, the Town’s policy is “to prohibit development that has the effect of

creating sprawl” and that “primary retail development should be located in designated Village Center areas” (p. 16).

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

As per the Plan’s “Future Land Use” section in the “Land Use” element, the Town encourages “the growth of Chelsea’s village in the parts of the Village Area that are outside of the Flood Hazard Area,” while providing “a location for higher density residential and commercial development at a scale that does not negatively impact Chelsea’s ability to provide services or protect homes and businesses from severe flooding events” (p. 70). While new business growth in the Village Area will not be discouraged outright, the Plan is at pains to ensure developers and businesses are aware that they may be subject to additional requirements that mitigate against the risk of flooding if they are either located within or adjacent the Chelsea Flood Hazard Area (p. 14).

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 routinely states that growth should not exceed the provision of services in the Town, and seeks to “provide residents with safe, effective, responsible and affordable municipal infrastructure, facilities and services consistent with other town goals and wherever possible, to encourage and work with other public and private utility providers to do the same” (p. 39). In support of this, the Plan recommends that the Selectboard “create a Capital Budget and Program to guide future investments in infrastructure” (p. 48).

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. At the outset of the Plan, the Town sets a goal to “encourage a strong and diverse local economy that provides satisfying and rewarding employment opportunities for residents while maintaining the community’s rural character” (p. 73). The Town sets a policy to “attract diverse and sustainable businesses to Chelsea which provide jobs and contribute to the small town quality of life (p. 16).

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

Yes, in part. The Plan adequately addresses the need to “provide a safe and secure learning environment...to all students” and to “encourage the creation of affordable

childcare facilities,” but the Plan does not address the area of vocational or other adult/continuing education opportunities for the people of Chelsea apart from a brief discussion within the “Education” element’s “Adult Education” section (p. 29).

4. Planning needs to provide for safe, convenient, economic and energy efficient transportation systems that respect the integrity of the natural environment, including public transit options and paths for pedestrians and bicyclers.

a. Has the need for public transit been addressed?

Yes. The “Transportation” element states that the Town aims to “provide and maintain a safe, energy efficient, and cost-effective transportation system integrating all modes of travel (auto, pedestrian, bicycle, and mass transit) and meeting the needs of the public in a manner consistent with the other goals, policies and recommendations of this Town Plan” (p. 80).

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

Yes, in part. It is Town policy to “cooperate with other communities in the region through the TRORC and its Transportation Advisory Committee to ensure that the region’s transportation system is developed in a well-coordinated manner that recognizes and balances the needs and desires of each community,” which entails promoting access and linkages to highways, air travel, rail travel, and other means of transportation (p. 80). However, there is no mention within the “Transportation” element or elsewhere of the air and rail services available to Town residents, either within Chelsea or any other nearby municipalities.

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

a. Have special areas been identified, including significant natural and fragile areas; outstanding water resources, including lakes, rivers, aquifers, shorelands and wetlands; significant scenic roads, waterways, and views; and important historic structures, sites, or districts, archaeological sites and archaeologically sensitive areas?

Yes. The “Natural, Scenic and Cultural Resources” element provides thorough discussions on each of the following resources within its many subsections: water resources, the working landscape, wetlands, flood plains, flora, fauna, natural communities, invasive species, mineral resources, and significant natural and historic areas (pp. 49-61).

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

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

Yes. The Town seeks to “identify and protect those natural and historic resources that are unique to Chelsea and make it special,” (p. 61) which, as previously stated, requires “careful review of all development projects to minimize the impact on Chelsea’s natural and cultural resources” (p. 62).

7. Does the Plan encourage the efficient use of energy and the development of renewable energy resources?

Yes. The Plan contains goals that: “encourage a continued pattern of settlement and land use that is energy efficient;” “promote the construction of energy efficient residential and commercial buildings;” “increase awareness and use of energy conservation practices;” “increase public transportation opportunities” (pp. 94). Further, “Chelsea supports the development and use of renewable energy resources...at a scale that is sustainable, that enhances the energy system capacity and security, that promotes cleaner, more affordable energy technologies, that increases the energy options available locally, and that avoids undue adverse impacts of energy development on the local community and environment” (p. 95).

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

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

Yes. The Town has set a goal to “ensure that the patterns of land use in Chelsea continue to allow for recreational opportunities for all” (p. 42).

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

Yes. The Plan addresses non-commercial outdoor recreational opportunities, and sets recommendations to encourage state highway improvements that will include “a wider shoulder to better accommodate pedestrians and cyclists” and a need to ensure walking trails, bicycle trails, and cross-country ski trails are “part of a long-range plan for the community” (pp. 42-43).

9. Planning needs to encourage and strengthen agricultural and forest industries.

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

Yes. The Plan seeks to “encourage the conservation, wise use and management of the town’s agricultural and forestry resources, to maintain its environmental integrity, and to protect its unique and fragile natural features” (p. 67). It is the Town’s policy to “avoid the fragmentation of valuable agricultural and forest lands by maintaining flexible zoning that encourages development at a scale that protects the working landscape,” such as encouraging clustered or peripheral development in areas with high-value agricultural and forest land to prevent fragmentation and sprawl (p. 51).

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

Yes. The Town “support[s] the development of local enterprises that create markets for locally produced goods and services,” which extends to value-added agricultural and silvicultural products (p. 16). However, the Town also wants to ensure that the “economic growth of agricultural and forest operations [is] at a scale that is appropriate for Chelsea” (p. 68).

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

Yes, in part. As previously stated, the Town “support[s] the development of value-added farm and forestry products.” Additionally, the Town also recommends promoting “a better understanding of the farming and forestry practices, and natural resources management in general” through the sponsoring of “continuing education opportunities to the public” (p. 68). The Plan would benefit from a specific policy or recommendation that promotes the purchase and use of such products by townspeople as a means of improving health and the economic vitality of the community.

d. Are sound forest and agricultural management practices encouraged?

Yes. According to this Plan, “[f]armers, loggers, and foresters should use Accepted Management Practices (AMP) and are encouraged to implement Best Management Practices (BMP) in their operations and to minimize point and non-point source pollution” (p. 68).

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

Yes. The Town seeks to ensure that the “construction of utilities, roads or other physical modifications should skirt tracts of productive agricultural land rather than divide them” (p. 68).

10. Planning needs to 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.

a. Have strategies to facilitate the appropriate extraction of earth resources and the proper restoration and preservation of the aesthetic qualities been addressed?

Yes. With respect to mineral resources, the Plan states that extraction and processing facilities “shall be planned, constructed, and managed...[t]o reclaim and re-vegetate sites following extraction” (p. 60). The Plan also states that, with respect to silviculture, the Town will “[p]reserve recreational and scenic access by ensuring that at the completion of logging projects all roads are restored to their previous condition” (p. 67).

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

a. Is housing encouraged to meet the needs of a diversity of social and income groups, particularly for those citizens of low and moderate income?

Yes. The Town’s goals are to “help Chelsea remain a well-balanced community that offers housing for all income levels,” and allow for “growth of housing for all income levels at a rate consistent with the community’s ability to provide services in a fiscally sound manner...” (p. 23).

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

Yes, in part. With respect to multi-family (and senior) housing, the Plan states that such housing “should be encouraged to locate in areas free from flood hazards, where adequate public sewer and water services are available and access to schools and other services reasonably are afforded,” and subsequently encourages them to be sited in the Village Area (p. 23, 70). However, there is no specific mention of manufactured or mobile housing beyond stating that such housing does exist. Future iterations of the Plan must discuss their siting outright.

c. 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. The Town establishes two important community goals related to planning for housing: providing “[s]afe, adequate, and affordable shelter for present and future populations” and “[s]uitable density and distribution of housing throughout the town.” One of the housing goals that Chelsea has established to guide housing development is to “conserve and protect the quality of existing residential neighborhoods and to renew or rehabilitate obsolete and deteriorating dwelling units and neighborhoods” (p. 18). With

respect to housing location, the Town encourages growth in or near the Village Area, but not within the Flood Hazard Area.

- d. 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, in part. The Plan states that the “conversion of larger homes to two and multiple family units to meet the needs of the community appropriate where the historic character of a building or neighborhood is not unnecessarily destroyed or diminished,” and that Chelsea “should explore incentives to encourage homeowners to convert portions of their property into affordable apartments” (pp. 23-24). The Plan does not expressly state that any such housing should be for the benefit of disabled and elderly persons, nor does it state that such conversions or additions ought to be located in the Village Center or adjacent areas close to cost-effective care and services.

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

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

Yes. The “Utilities & Facilities” and “Health and Emergency Services” elements discuss matters related to Chelsea’s community buildings, public water, wastewater treatment, solid waste management, cemeteries, communication facilities, healthcare facilities, fire protection services, police protection services, and other emergency medical services (p. 31-39, 44-47).

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

No. The Plan seeks to ensure that growth is effectively managed to avoid growing beyond the Town’s capacity to provide the necessary facilities and services to residents, and “encourage[s] new business development in appropriate locations where services such as roads, fire protection and power supply are available or planned” (p. 16).

- 13. Planning needs to ensure the availability of safe and affordable child care and integrate child care issues into the planning process, including childcare financing, infrastructure, business assistance for child care providers, and child care work force development.**

Yes. The Plan encourages “the creation of affordable childcare facilities that meet the established needs of residents in Chelsea,” while also supporting the “creation of licensed childcare facilities that are run from the home as home occupations” (p. 29-30).

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

The Two Rivers-Ottawaquechee Regional Plan was adopted on September 8, 2015 and it will remain in effect until October 13, 2023.

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

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

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

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

Barnard, Bethel, Braintree, Bridgewater, Brookfield, Chelsea, Fairlee, Granville, Hancock, Hartford, Hartland, Newbury, Norwich, Pittsfield, Plymouth, Randolph, Rochester, Royalton, Sharon, Stockbridge, Strafford, Topsham, Tunbridge, Vershire, West Fairlee, Woodstock.

These approval decisions and Plans have been reviewed in the context of the above question. Based on this, we find the Chelsea 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.

The "Goals of the Plan" element includes 11 general goals that serve as overarching objectives for the Plan in meeting state statutory requirements and fulfilling the Town's present and future needs (pp. 1-2). Each subsequent element of the Plan contains a listing of goals, policies, and recommendations that will guide future growth and development within Chelsea while also protecting the environment.

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; and setting 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.

The "Land Use Plan" element serves as a land use plan (pp. 69-75). Future Land Use and Current Land Use maps can be found in the appendix.

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.

The "Transportation" element serves as a transportation plan (pp. 76-80), and a Transportation map can be found in the appendix.

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.

The “Utilities and Facilities” element serves as a utility and facility plan (pp. 31-39), and a utilities and facilities map can be found in the appendix.

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

The “Natural, Scenic and Cultural Resources” element serves as a statement on the preservation of rare and irreplaceable natural areas, scenic and historic features and resources in Chelsea (pp. 49-61), and a natural resources map can be found in the appendix.

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

The “Education” element contains an educational facilities plan (pp. 25-29), and educational facilities information is included within the facilities map that is located in the appendix.

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

The “Town Plan Implementation” element contains information on the regulatory and non-regulatory implementation methods that may be employed to further the Plan’s objectives, along with the parties responsible for implementation (pp. 99-103).

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

The “Relationship to Other Plans” element contains information on how the current Plan relates to plans of adjacent municipalities within the TRORC region as well as with the Regional Plan (pp. 97-98).

- 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.**

The “Energy” element includes a thorough analysis of energy issues within Chelsea, namely looking at energy demands, a discussion on renewable energy resources, regulatory considerations, residential energy efficiency measures, the role of the Town in energy efficiency, and the nexus between energy and transportation policy (p. 82-96).

- 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.**

The “Housing” element addresses the community’s needs for low- to moderate-income housing (p. 18-24).

- 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.**

The “Economic Development” element describes Chelsea’s current state of the Town’s economy and the desired direction of economic development, along with policies and recommendations for economic growth (p. 10-17).

- 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.**

The Plan’s “Natural, Scenic and Cultural Resources” contains a “Flood plains” section and the “Land Use Plan” element contains a “Flood Hazard Area” section (p. 53-57 and p. 71, respectively). Collectively, these can be seen to serve as a flood resilience plan.

CONCLUSION

Based upon the above findings, it is the conclusion of the Regional Commission that the Chelsea Town Plan be approved. This approval shall remain in effect until the date that the Plan expires, or until it is amended and reviewed pursuant to these provisions, whichever occurs first.

DISCUSSION

The Regional Commission appreciates the opportunity to formally evaluate the Chelsea 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 Chelsea 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 2015 Chelsea Town Plan is a marked improvement to the 2008 Town Plan. Entirely new elements have been drafted and the overall Plan has increased by nearly fifty percent in size. In adding such text to the Plan, the Town has effectively remedied the deficiencies of the previous iteration of the Plan. One significant area of consideration in the 2015 Plan relates to the overall direction of growth for the Town in the wake of Irene, with respect to the need to drive new development away from the areas within and in close proximity to the historic downtown (“Village Area”) that are most susceptible to flooding. While Towns should, in as much as possible, direct growth toward the downtown area, this new approach reflects an appreciation that Chelsea must now “consider reducing the types of uses allowed within the mapped floodplain in order to protect lives and property” (p. 57). This sentiment carries throughout the Plan, and is reflected in other elements.

Certain areas within the Plan would benefit from greater discussion or inclusion, and must be addressed in future iterations of the Plan, as noted below:

- The “Utilities and Facilities” element must include a prioritization of future needs for Chelsea’s facilities that includes any anticipated costs and potential funding sources to complete modifications, upgrades or repairs. This information could be incorporated from a Capital Plan and Budget, as and when such a document is created for the Town, and must consider flood hazard area limitations and flood proofing requirements outlined in the Unified Bylaw.
- The “Transportation” element does not discuss any rail or air travel to any extent. Including a discussion on how existing transportation methods link residents to airports and stations would rectify this issue.

- There is no discussion around adult and continuing education opportunities within the Town or nearby municipalities (or, as may be the case for many with adequate internet access, online). Having a broader discussion on higher education opportunities and the aforementioned continuing education and adult daycare facilities for retirees/elderly residents will be a significant improvement.
- The Plan does address accessory dwelling units, albeit to a very limited extent. Any future iterations must have a more extensive discussion around the subject of ADUs as a means of providing affordable housing opportunities for low- to moderate-income residents as well as the elderly and disabled. Such housing should be allowed wherever residential housing is permitted, particularly within the Village Area or anywhere in close proximity to town services and care facilities. Additionally, the Plan must include a discussion on mobile and manufactured homes in the Town, presenting them as a further affordable housing opportunity for residents.
- The “Agriculture and Forestry” element should include specific goal, policy, or recommendation statements that relate to the promotion of value-added farm and silvicultural products.
- In order to better meet statutory requirements related to Flood Resiliency, the Town should include a thorough standalone element on the subject that incorporates more town-specific data and information from the recently approved FEMA Hazard Mitigation Plan. Presently, the information the Plan does include is scattered and high-level in nature. Relating the historic incidences of flood events in the Town and better pinpointing the areas most susceptible to flooding will improve the strength of the overall Plan.

Dated this 20 th day of January, 2016 at Norwich, Vermont.

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