STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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

May 11, 2015

Diane Williamson
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10 Court Street
Bristol, RI 02809

Subject: Review of the Draft Town of Bristol Comprehensive Plan

Dear Ms. Williamson, Diane

I am pleased to notify you that our office has completed its review of the draft Town of Bristol Comprehensive Plan. My staff has reviewed the draft Plan for State approval using the standards set forth in the Interim Guidance to which the Town of Bristol has agreed. As part of this review, we also solicited comments from other relevant State agencies. The following constitutes our evaluation of the draft material that you provided to our office. Please be advised that this is a preliminary evaluation and does not constitute official findings.

What follows is divided into three sections. The first section puts forward the standards for State approval of local comprehensive plans as outlined in the Act. The second section lays out concerns with the draft Plan that must be addressed in order to receive State approval. The third section presents other suggestions that, although not directly related to the review requirements, could improve the Plan's overall accuracy, readability, and usability if addressed.

I. Standards for State Approval

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

1) the intent and goals of the Act as stated in § 45-22.2-3(b)(1) and (c)(1)through (10) have been met;

2) the Plan is internally consistent and complete as required by § 45-22.2-6;

3) the Plan is consistent with, and embodies, the goals and policies of the State and its departments and agencies as contained in the State Guide Plan and the laws of the State;

4) planning activities have been coordinated according to the provisions of § 45-22.2-7, including coverage of the total land and inland water area within the municipal jurisdiction and coordination of land uses with contiguous municipalities;

5) the Plan has been officially adopted and submitted for review in accordance with § 45-22.2-8 and other applicable procedures;

6) the Plan complies with the rules and regulations adopted by the State Planning Council necessary to implement the standards established by the Act; and, that

7) adequate, uniform, and valid data have been used in preparing the Plan.

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

II. State Approval Concerns

A. The intent and goals of the Act as stated in § 45-22.2-3(b)(1) and (c)(1) through (10) appear to have been met.

B. The draft Plan does not appear to be internally consistent and complete as required by RIGL subsection 45-22.2-6.

The comments discussed below outline the major issues that could hinder State approval. Suggestions have also been provided as to how these issues might be addressed.

Comment 1: The first paragraph on page vi states that the Harbor Management Plan, Affordable Housing Production Plan (2005), Route 114 Scenic Roadway Stewardship Plan, Metacom Avenue Corridor Management Plan, Open Space Plan, Marine Inland Trades Route, and Natural Hazards Mitigation Plan, "are incorporated by reference." The term "incorporated by reference" means that these plans/planning studies become part of the comprehensive plan Similarly, item 1 on page vii lists these seven documents under the heading, "What are the components of the Plan?" The inclusion of these documents as part of the Comprehensive Plan would necessitate Statewide Planning's review of these documents as part of the draft. Furthermore, if these documents are included as part of the Comprehensive Plan, any revisions to them would have to be treated as an amendment to the Comprehensive Plan.

Please note, the inclusion of the Affordable Housing Production Plan (2005) creates separate approvability issues which are addressed under Comments 2 and 3.

> ***Suggestion:*** The text at the bottom of page v mentions that the seven plans/planning studies "can be referenced for more detailed information and historical analysis." We support this use of the plans/planning studies and note that this function does not require that they be incorporated by reference. The Town should consider which, if any, of the listed plans/planning studies it truly wishes to become legally part of the Comprehensive Plan and which are better suited for historical/informational reference only. Ideally, the draft Plan would be revised to integrate the relevant details from above-mentioned plans and reflect those details in the goals, policies, and implementation actions. If these documents are not to be legally incorporated into the Comprehensive Plan, the phrase "incorporated by reference" and their listing as "components of the Plan" must be deleted.
>
> If the intention of the Town is in fact to legally incorporate the above-mentioned documents by reference, then each document that is intended to be incorporated into the Comprehensive Plan must be submitted to Statewide Planning for review as part of the draft Plan. Since the Natural Hazards Mitigation Plan has been provided in the appendix, we have reviewed it and offer a comment (Comment 12) relative to it (also see Comment 2).

Comment 2: Item 1 on page vii states that the 1991 Comprehensive Plan as amended in 1994 "Blueprint for Action" and "Planning Analysis", the Comprehensive Plan–2003, and the 2005 Affordable Housing Production Plan (which was adopted as an amendment to the Comprehensive Plan) are "components" of the Comprehensive Plan. §45-22.2-12(a) requires that a municipality must maintain a single version of the comprehensive plan. The inclusion of previous comprehensive plans as "components" of this Plan is therefore inconsistent with §45-22.2-12(a).

> ***Suggestion:*** Remove the reference to the 1991 and 2003 Comprehensive Plans and the 2005 Affordable Housing Production Plan in Item 1 on page vii. If these plans are referenced only to provide additional resource information to the reader, please clarify this in the text. (Also see Comments 1 and 3.)

Comment 3: As noted under Comments 1 and 2, the draft Plan includes language on pages vi and vii concerning what is legally included as part of the Comprehensive Plan. One of the items listed is the 2005 Affordable Housing Production Plan. The Act requires comprehensive plans to include an affordable housing program that meets the requirements of § 42-128-8.1, the "Comprehensive Housing Production and Rehabilitation Act of 2004" and chapter 45-53, the "Rhode Island Low and Moderate Income Housing Act". Under these statues, an affordable housing plan is defined as a "*component of a housing element*" within the comprehensive plan.

Accordingly, an affordable housing plan must be integrated into the housing element and not maintained as a separate plan.

Suggestion: Please update and integrate all pertinent information from the 2005 Affordable Housing Production Plan (AHP) more directly into the Housing Element of the Comprehensive Plan and remove other references to it. If the Town wishes to reference the 2005 AHP as a resource document or for historical analysis in the Comprehensive Plan, it should clarify this in the text. Statewide Planning has helped many communities integrate affordable housing plans into the housing element of comprehensive plans and my staff would be pleased to meet with you to provide additional assistance upon your request. (Also see Comments 5 and 6)

Comment 4: Comprehensive Plan must assess the success of all previously proposed Low and Moderate Income Housing (LMIH) strategies, including:

- The general success rate of the strategy in providing low- and moderate income housing units, (low, moderate, high, etc.; however, if a numeric estimate was given as to how many units would be produced using the strategy, the actual number produced should be compared to the estimate); and
- The factors that affected the success rate of the strategy.

It does not appear that the draft Plan includes an assessment of the success of previously proposed LMIH housing strategies.

Suggestion: Since the amendments to the Low and Moderate Income Housing Act in 2004, municipalities have been required to develop and implement strategies to encourage the provision of low- and moderate-income housing. All municipalities can learn from the success and/or failure of their previously proposed strategies. Therefore, it is essential for the community to assess the success and effectiveness of previous strategies so that the strategies can be strengthened and, if necessary, new strategies can be developed. The Town must assess each previously proposed strategy, including a report of the actual number of units produced. This assessment should be used to establish realistic outcomes and projections for the strategies included in this Plan for how the Town will achieve the 10% LMI threshold. The analysis should also help the Town to determine if new strategies to achieve the 10% LMI threshold are warranted. (Also see Comment 5).

Comment 5: Comprehensive plans must describe and put numbers to strategies that demonstrate how the municipality will achieve 10% of its housing stock as LMIH. The Interim Standards also require comprehensive plans to provide a date by which the 10% threshold will be

achieved. It does not appear that the draft Plan adequately shows how or when the municipality will achieve 10% of its housing stock as LMIH.

Suggestion: Add a description of all of the strategies that the Town of Bristol will implement moving forward to meet the 10% threshold for low- and moderate-income housing. The strategies identified must seek to increase their production of LMIH units and preserve the existing low- and moderate-income units as such.

For each identified strategy, the comprehensive plan should:

- Describe the reasons why the strategy is likely to be effective given past experiences, current economic conditions, building trends, etc.;
- Provide an estimate as to how many low- and moderate-income housing units will likely be produced through the implementation of the strategy; and
- Provide associated policies and implementation actions within the Implementation Program that present the path by which the strategy will be implemented

Taking the strategies collectively, the comprehensive plan must also discuss when the 10% threshold will be met. This discussion must provide a realistic estimate of when the stock of low- and moderate-income housing will achieve 10% of the total year-round housing stock.

Comment 6: Comprehensive plans must include an existing and future needs assessment for outdoor recreational facilities. Although the draft Plan includes a brief description of the town's existing needs for outdoor recreational facilities, it does not appear that the draft Plan includes an assessment of future needs.

Suggestion: Add a statement of future needs for outdoor recreational facilities. This assessment can be qualitative in nature and should be based on the discussions that the Town has had with key stakeholders and residents and, if applicable, other strategic planning processes that the Town has undertaken. Consider the needs of all segments of your population such as seniors, youth, and people with mobility restrictions. Are the current facilities meeting these needs? If not, where are the shortfalls? If needs are not expected to change over the 20-year planning horizon, a statement should be made to that effect.

Comment 7: Comprehensive plans must assess housing needs over a minimum 20-year time frame. This assessment must include a discussion of needs for additional affordable housing (generally) and whether there is a need for more suitable housing options, looking at:

- Whether there are a range of housing unit sizes and types available (i.e. rental, places to age in place, homes for families, singles, etc.); and
- The needs related to housing for the community's homeless.

It does not appear that an assessment of housing needs over a minimum 20-year time frame has been included in the draft Plan.

Suggestion: Please add the required assessments. With regard to the range of housing unit sizes and types, the Plan should consider the current housing inventory as well as population projections. Population projections are available on the Statewide Planning website at www.planning.ri.gov/documents/tp/tp162.pdf.

With regard to homelessness, the Plan should also acknowledge existing services for the homeless such as the short-term shelter services provided by the Rhode Island Veterans Home on Metacom Avenue or the East Bay Coalition for the Homeless' 18 apartments located in East Providence, Bristol, and Warren. With regard to assessing needs, rather than simply citing a lack of data, the draft Plan should add an action to collect such data. An example of such an action might read: "Work with local homeless agencies (RI Veterans Home, Riverwood MHS, and/or East Bay CAP) to track homeless individuals or families who may have resided within the Town."

Comment 8: Comprehensive plans must include an inventory of prime agricultural lands, including identification of the locations and types of active agricultural operations and agricultural lands that have been protected from development, even if currently idle. Although the significance of farms both aesthetically and economically has been discussed at length in the draft Plan, it does not appear that an inventory of agricultural lands, nor identification of active agricultural operations and protected agricultural lands, have been included.

Suggestion: Provide an inventory of agricultural lands and active agricultural operations. This inventory is clearly connected to, but goes beyond, the identification of agricultural soils. For example, there are some types of agricultural lands and operations that do not depend on standard farmland soils that must also be inventoried, if applicable. These include lands on which livestock operations exist, lands for specialty crops such as apples, peaches, grapes, blueberries, or cranberries and lands where greenhouses or other agricultural buildings are located. An inventory of significant agricultural operations may be presented in narrative, list, table, or map form. Whatever form you choose, the inventory must identify:

- The locations and types of active agricultural operations; and
- Farm lands that have been protected from development, even if currently idle.

Comment 9: Comprehensive plans must include a map of proposed future water and sewer service areas. While Map 8 Services and Facilities displays *existing* water and sewer lines, it does not appear to display *future* water and sewer service areas. We note that the draft Plan

mentions that the Town intends to expand sewers (Policy 3A on page 14) which highlights the importance of identifying the future sewer service areas.

Suggestion: Include a map of proposed or potential future water and sewer service areas. (Also see Comment 41).

Comment 10: Comprehensive plans must include the Water Supply Systems Management Plan (WSSMP) Executive Summary from all water suppliers serving the municipality (in this case the Bristol County Water Authority) or ensure that the content of the WSSMP is reflected in the analysis of water needs and the formulation of goals, policies, and implementation actions. The draft plan contains a section titled "Bristol County Water Authority" on page 164 in which it states, "A copy of the Introduction to the June 2014 BCWA Master Plan is appended to this Plan". We assume this statement refers to the Executive Summary of the BCWA Water Supply System Management Plan; however, it does not appear that this Executive Summary was included in the draft.

Suggestion: Include the Executive Summary of BCWA Water Supply System Management Plan as stated in the text. Alternatively, the Town could expand its discussion of water, provide additional information, and explain how the content of the WSSMP is reflected in the analysis of water needs and the formulation of the Plan's goals, policies, and implementation actions. (Also see Comment 42)

Comment 11: Comprehensive plans must analyze the needs for existing and future levels of services and facilities over the minimum 20-year planning timeframe for, libraries, police, fire, emergency services, indoor recreational facilities, community centers, water supply, and the management of wastewater, stormwater, and solid waste. The Interim Standards also require an analysis of the existing and future needs for schools over a 10-year period. It appears that the draft Plan does not adequately assess existing and future needs for the above-mentioned categories of services and facilities.

Suggestion: A statement of existing and future needs for the above-referenced categories of services and facilities should be added. These needs assessments can be qualitative in nature and should be based on the discussions that the Town has had with key stakeholders and residents and, if applicable, other strategic planning processes that the Town has undertaken. Population projections should also be taken into consideration. If needs are not expected to change over the 20-year planning horizon (10 years for schools), a statement should be made to that effect.

In order to determine what your needs might be, consider the following guidance:

- Quality of service: assess the anticipated future quality of service, such as:

Discussion of whether residents are able to adequately access the service;

- Discussion of the effectiveness of the service at achieving desired outcomes;
- Identification of any existing major issues related to administration of the service; and
- Indication of how the quality of service is likely to change over the 20- year planning horizon (improve, stay the same, worsen) and the reasons why such a change is expected.

- Condition and capacity of facilities and infrastructure: assess anticipated future issues related to the condition and capacity of facilities and infrastructure, such as:
  - Discussion of any existing issues related to the condition and/or capacity of facilities and infrastructure; and
  - Indication of how the condition and/or capacity of facilities and infrastructure is likely to change over the 20-year planning horizon (improve, stay the same, worsen) and the reasons why such a change is expected.

If any needs are identified, appropriate actions to address them should be added to the Implementation Program.

Comment 12: Comprehensive plans must address the potential impact of natural hazards and climate change on the community. It appears that the Town has endeavored to address this requirement by incorporating Bristol's Natural Hazard Mitigation Plan (NHMP) by reference and including it as an appendix. However, in taking this approach, the draft Plan does not fully integrate natural hazard assessments, concerns, or priorities directly into the body of the comprehensive plan itself.

Suggestion: Ideally, we recommend that the Town integrate additional detail from the NHMP more fully into the Comprehensive Plan by discussing the relationship of natural hazards and climate change to land use, housing, transportation, services and facilities, and economic development. If the Town chooses this option, the draft Plan should be revised to include a discussion of the pertinent issues addressed in the NHMP that are relative to the comprehensive planning topics. Alternatively, the Town may retain the current structure of including the NHMP as a separate document incorporated by reference and attached as an appendix provided that relevant goals and policies from the NHMP are carried forward into the Vision, Goals, and Policies chapter of the Plan and the Mitigation Actions from the NHMP are incorporated into the Implementation Program of the comprehensive plan. Keep in mind that selecting this option would mean that the NHMP is a part of the Comprehensive

Plan and any revisions to the NHMP would have to be treated as an amendment to the Comprehensive Plan.

Comment 13: Comprehensive plans must identify areas of the community that could be vulnerable to the effects of sea-level rise by including a discussion of sea level rise threats. It does not appear that the draft Plan includes such a discussion.

Suggestion: Please add a discussion of the threats that sea level rise could pose to the community.

For more information, please see the attached "Overview of a Changing Climate in Rhode Island."

Comment 14: The Land Use section of comprehensive plans must describe Future Land Use designations, including a description of the preferred uses for each category. It does not appear that such a description has been included in the draft Plan.

Suggestion: Add a description of each land use category such as residential, commercial, open space, etc., that is illustrated in the Future Land Use Map. If descriptions of these categories currently exist, they can simply be included in the Land Use section of the plan. If these descriptions do not exist, the Town must define these categories and include them in the Land Use section.

Comment 15: The Land Use section of comprehensive plans must include an analysis of the inconsistency of zoning districts, if any, with the planned future land use. Although a map of inconsistent areas has been included, it does not appear that such an analysis has been included in the draft plan.

Suggestion: Although Map 5D, "Discrepancies between the Future Land Use Map and Existing Zoning" provides a visual synopsis of the inconsistencies between current zoning and the Future Land Use Map, those differences are not explained or identified. When identifying inconsistencies between the FLUM and existing zoning, comprehensive plans must:

- Identify the existing zoning in the areas that have been determined to be inconsistent;
- Identify the future land use designations of areas that have been determined to be inconsistent; and
- Discuss why the future land use designation and the existing zoning are inconsistent.

It is not necessary for all of the above information to appear on the map itself; it may be more appropriate to number areas that have been deemed inconsistent and to provide a summary

table of the future land use categories and the existing zoning districts. However, the analysis of the inconsistencies must clearly indicate the current zoning and the planned future land use.

Comment 16: Comprehensive plans must include an Implementation Program as a single section of the plan that includes a statement which defines and schedules public actions to be undertaken in order to achieve the goals of each component of the plan. It does not appear that a stand-alone Implementation Program has been included in the draft Plan.

Suggestion: Each chapter of the draft Plan contains a section titled "Implementation Actions." Each of these sections could be replicated and collated to form a stand-alone Implementation Program that states, schedules, and defines the public actions to be undertaken in order to achieve the goals of each component of the plan. During our review, we noticed at least one action to which a responsible party was not assigned -- Transportation Action C-19 (page 155). Please review all actions to ensure that when transferred to the Implementation Program, all actions have assigned timeframes and responsible parties.

Comment 17: Comprehensive plans must detail the timing and schedule of municipal actions required to amend the zoning ordinance and map to conform to the comprehensive plan in the Implementation Program. It does not appear that the Implementation Program includes this information.

Suggestion: Include in the Implementation Program a schedule of municipal actions required to amend the zoning ordinance and map in order to conform to the comprehensive plan.

Comment 18: Comprehensive plans must include a map of existing conservation and open space areas that are permanently protected. The legend on Map 10 – Open Space, Conservation, Recreation, and Other Undeveloped Properties does not appear to specify whether the areas shown are permanently protected or not. Also related to Map 10, it appears that Map 10 and Map 5B – Future Land Use may be inconsistent. Specifically, there are areas identified on Map 10 as Publicly Owned Protected and Privately Owned Protected that are shown for future development on the Future Land Use Map (FLUM).

Suggestion: Revise Map 10 in order to clearly show what areas are permanently protected (both public and private). If inconsistencies subsequently remain between Map 10 and Map 5B, please revise the Future Land Use Map to show areas with permanent protection as open space or conservation.

Comment 19: There appears to be an inconsistency between Map 6-Homes and Neighborhoods and map 5B-Future Land Use. Specifically, Map 6 displays a category, "Open Space

Conservation with Affordable Housing and Agriculture." The same areas on the FLUM are designated as either Medium or High Density Residential.

Suggestion: Review Map 6 in relation to the FLUM to ensure there is consistency between future residential densities. Defining the category "Open Space Conservation with Affordable Housing and Agriculture" in the text and explaining whether it is an existing or future intended use would help clarify Map 6 as well. Alternatively, this category could be removed from Map 6.

C. The Plan does not appear to be consistent with the goals and policies of the State and its departments and agencies as contained in the State Guide Plan and the laws of the State.

Comment 20: Action C-21 (page 156) is to, "Maintain the tree island at the intersection of Routes 114 and 136 near Roger Williams University during any road improvement programs for that area" and cites RIDOT as the responsible party. State Guide plan Element 611: *Transportation 2035*, Policy S.2.c. is, "Improve the operating characteristics of the transportation system through safety improvements to the right of way including pavement, signage, signalization, lighting, sight distances, sidewalks, traffic calming, access management, etc." While we understand the desire of the Town to maintain this scenic intersection, there could be future safety issues that could potentially conflict with this desire.

Suggestion: The above statement is more properly classified as a policy than an action (see Comment 22). In any case, it must be modified (or deleted). For example, modifications that would remove the conflict with *Transportation 2035* would be to say that the Town "encourages" that the tree island be maintained or that it should be maintained "consistent with highway safety".

Comment 21: The Plan's only land use goal is to, "Manage land use to support the goals and policies of all elements of the Comprehensive Plan…" This single goal does not appear to be sufficient to embody the goals and policies of the State relating to land use. In any case, it is not advisable to formulate a goal that cannot stand alone i.e. referencing other goals and policies.

Suggestion: Craft a land use goal or goals that clearly embody the State's goals for land use. We recommend that you review the Land Use goals found in *Land Use 2025*.

- Continue to integrate land use and transportation planning using a travel corridor framework and promote responsible development practices in the public and private sectors. ~ Transportation 2035, Goal LU, (page 5-31)
- Create great places by coordinating economic, housing and transportation investments. ~ Rhode Island Economic Development Plan, Goal 4, (page 108)

- Locate housing units in reasonable proximity to employment opportunities, commercial enterprises, leisure time activities and public transportation. ~ State Housing Plan, Goal 1-1-4A, (page 1.1)
- Manage and plan for water systems that support sustainable, compact land use and concentrate development within the urban service boundary and or growth centers. ~ Water 2030, Goal IMP-3, (page 3-81)

D. It appears that planning activities have been coordinated according to the provisions of § 45-22.2-7.

E. It appears that the Plan complies with the rules and regulations adopted by the State Planning Council necessary to implement the standards established by the Act.

F. It appears that adequate, uniform, and valid data were used. While not reaching a level of approvability, we did notice apparent errors and inconsistencies in the data. These errors / inconsistencies are reported in section III.

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

Comment 22: 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 some of the draft Plan's statements are well-thought out, clear, and properly classified, many are not. For example, Economic Development Policy G under Goal 5 states "Install environmental and conservation related signage and kiosks where appropriate to educate the public to ongoing environmentally beneficial projects." This is a discrete action that would be more appropriately classified as an action. Similarly, Land Use Goal 1 "Manage land in a manner that supports the comprehensive planning goals of the Town of Bristol." sounds more like a policy than a description of a desired condition for the Town.

Finally, many of the Actions are accompanied by extensive narratives. It may be preferable to maintain all narrative and explanations within the body of the text and not in the action matrix.

> ***Suggestion:*** Please review the plan's goals, policies, and actions in light of the attached guidance excerpted from the draft Comprehensive Planning Guidance and Standards Manual) and revise as appropriate. Where possible, consider combining and consolidating goals, policies, or actions that are similar. Please also consider cross-referencing actions that appear in multiple locations for ease of reference andmoving all narrative and explanatory text into the main body of each element.

Comment 23: The readability of the draft Plan is somewhat difficult. For example, each chapter is laid out a bit differently and written in a different "voice." Furthermore, many times there is a lack of consistency in formatting and structure *within* a chapter, which makes it difficult to navigate the document and to find key takeaways.

> ***Suggestion:*** Consider revising the draft Plan so that each chapter is formatted consistently and presented in a single writing style. A thorough proofreading of each chapter for errors and typos is advisable. Also consider presenting the background content by topic and summarizing the key issues in the narrative using bullet points.

Comment 24: While the draft Plan provided a wide array of maps, not all of the maps are identified or explained in the text. It is not always clear as to why the Town is displaying information on certain maps and how they relate to the analyses of various issues or the development of the Town's goals, policies, and actions. For example, maps 2, 3, and 4 display "Planning Areas" of the Town but there is no explanation of the significance of establishing planning areas.

> ***Suggestion:*** For all maps, include some explanatory text in the body of the Plan that provides a context and purpose for each map. The reader can then be referred to the map for additional information.

Comment 25: The legends appearing on all maps are exceedingly small and difficult to read.

> ***Suggestion:*** Ideally, we would recommend larger maps e.g. 11x17 tri-fold which could easily accommodate larger print not only for the legend but for text displayed on the maps as well. Even if a larger map size is not chosen, we strongly recommend that the legends on all maps be enlarged.

Comment 26: Map 5A – Existing Land Use displays 26 categories of land uses and land covers. While this is acceptable, it makes the map somewhat difficult to read. This is due to the fact that some of the uses only cover very small areas and because it necessitates similar color symbologies to accommodate so many categories. For example, it is very difficult to distinguish between the shades of red for Commercial, Commercial/Industrial Mixed, and Waste Disposal. In addition, the map does not specify the year for which the existing land uses were assessed.

> ***Suggestion:*** Consider combining some of the similar land uses into broader categories or eliminating some. For example, the map contains five categories relating to agriculture. For the purposes of this map, it may not be necessary to display a category such as power lines. Consider revising some of the colors to make them easier to distinguish. Finally, please add "2011" to the title of the map i.e. Existing Land Use 2011. If you have any questions or need

any assistance please contact Christina Delage Baza at Christina.Delagebaza@doa.ri.gov. or 222-6481.

Comment 27: Action LU-1 references a "build-out population of between 24,000 and 26,000 people" and "a period of 30 to 80 years for build-out to occur" but the draft Plan does not contain any explanation or methodology for this projection.

Suggestion: If possible, please add an explanation or methodology for the build-out analysis. This could be included as a section in the Land Use Element or as an appendix. Population projections are also available from Statewide Planning at www.planning.ri.gov/geodeminfo/data/popprojections.php.

Comment 28: The intent of Action LU-18 which is to "Work with the State of Rhode Island to redefine and/or amend the current affordable housing guidelines" is unclear. There did not appear to be an explanation in the text as to what the issue is that the Town would like to address or to what affordable housing guidelines the draft Plan refers.

Suggestion: Please add some explanatory text to provide context for and support to this Action. Consider moving the Action to the Housing Element if appropriate.

Comment 29: Chapter 2--Snapshot of Bristol primarily uses American Community Survey 2008-2012 5-Year Estimates while Chapter 4--Housing primarily references 2010 Census data for the same data points. While both are valid sources of data, the use of different sources for similar data could create some confusion for readers.

Suggestion: Consider using only one of the above-referenced data sources consistently among chapters where possible.

Comment 30: There appears to be an inconsistency between Figure 2.6 Age of Housing Stock in Bristol, RI, (page 22) which appears to indicate that15 housing units were built in "2010 and later" and the text on page 59 which states, "Between 2009 and 2013, there were 77 new single family residential units and two multi-family units (a three-family and a two-family) built".

Suggestion: Please update Figure 2.6 to reflect the addition of 79 new residential units or add an explanation of the difference.

Comment 31: Under the section Housing – Introduction and Background, in the first paragraph on page 60, the draft Plan states that, the Town's flood insurance discount "is capped at 10%" is no longer valid. According to the Rhode Island Emergency Management Agency, the Town is eligible to receive a discount greater than 10%, such as a Class 7, as long as it meets the requirements.

Suggestion: Remove or update the references to the Town's discount being capped at 10% to reflect the current situation. In addition to page 60, the 10% cap is also cited in Action H-19 on page 70 and in Chapter 6 on page 103. You may also wish to mention that the Community Rating System, referenced in connection with this topic, is part of the National Flood Insurance Program.

Comment 32: The Economic Development Element contains its own appendix titled, "Tables, Graphs, and Charts" (page 99). Despite the title, this appendix consisted of only one table. Given the title, we wonder if additional material is missing.

Suggestion: If additional material was intended for this section, please include it. If it consists of only one table, it could easily be integrated into the main body of the text. If it is to remain as an appendix, it would be less confusing for the reader if it was included with the other appendices at the end of the Plan.

Comment 33: The draft Plan includes an Economic Development map (Map 7 on page 100). Among other things, this map displays "Rehab/Economic Opportunity Sites"; however, the text does not appear to contain information concerning them.

Suggestion: Please provide additional information on the identified Rehab/Economic Opportunity Sites. Consider discussing how these sites were chosen and what does the Town hope their redevelopment will do or provide.

Comment 34: Action NHCR-2 to "Create a standing committee of appropriate technical and professional experience to compile and maintain a hazard mitigation list..." does not mention coordination with the State Hazard Mitigation Officer.

Suggestion: Please add coordination with the State Hazard Mitigation Officer to the Action.

Comment 35: Action NHCR-8 (page 108) is to: "Continue the work of the Tree Commission and implementation of the "Bristol Tree Management Plan for 2001-2006." The goals of this Plan include working toward meeting the state's goal for Bristol to increase and maintain the forest cover by 25% by the year 2020". The intent of this Action is very commendable but raises several questions:

- It appears that the source of the "the state's goal for Bristol" may be the State's *Urban and Community Forestry Plan*; is this correct? If so, it would be helpful to cite this in the text.
- Are the goals of the Tree Management Plan reflected in the draft Comprehensive Plan?
- What is the base that the 25% increase is to be measured against?

- Are there specific actions (e.g. annual tree planting program) that the Tree Commission is implementing?
- Is a management plan for the period 2001-2006 still appropriate? Would an action to update the Tree Management Plan be appropriate?

Suggestion: Please add a section in the text discussing urban and community tree resources, the work of the Tree Commission, and the Tree Management Plan. We recommend adding specific actions for maintaining and increasing tree cover in addition to the general action described in NHCR-8.

Comment 36: Action NHCR-11(c) calls for consideration of "establishing some form of transfer of development rights (TDR) legislation in the Zoning Ordinance"; however, we could find no explanation or discussion of TDR in the body of the draft Plan.

Suggestion: Please add an explanation of why the Town is considering TDR and a discussion of how it might work within the context of Bristol.

Comment 37: It appears that Map 11 "Historic Districts, Buildings, and Properties" (page 119) identifies some, but not all of the districts and properties shown by name.

Suggestion: Add the names of all historic districts and properties to the map or consider adding an accompanying table that identifies the districts and properties shown on the map by name.

Comment 38: The draft Plan's identification of Bristol's natural resources is done primarily by maps with very little accompanying text. One natural resource that the Town expressly supports is water quality improvements (NHCR Goal 6, page 106) and we believe there is an opportunity to provide additional text that would help support that goal.

Suggestion: Consider adding a discussion of watershed planning efforts to the Plan. Two watershed plans are particularly relevant to Bristol. They are the Bristol-Kickemuit River Watershed Plan (www.dem.ri.gov/programs/benviron/water/quality/pdf/bkwatplan.pdf) and the Barrington-Palmer-Warren Rivers Watershed Plan (www.dem.ri.gov/programs/benviron/water/quality/pdf/bpwatplan.pdf). Both watershed plans were developed in 2012 with input from stakeholders including Bristol town officials. In addition to water quality, an examination and discussion of any prominent issues facing the Bristol's natural resources would enhance the Plan.

Comment 39: The third paragraph on page 124 references Map 10 Open Space & Recreation and mentions a "proposed Greenbelt and Path System". While Map 10 does contain a "Trails

and Paths" symbol, it is not clear as to what is existing, what is proposed, and how it relates to the "proposed Greenbelt".

Suggestion: Please add additional information as to what constitutes the proposed Greenbelt and Path System. Clarify in the text, on Map 10, or both as to what already exists and what is proposed.

Comment 40: Policy 2G (page 168) reads:

> Establish a municipal drought management response strategy between the Town and the BCWA, in conjunction with state agencies and in compliance with the State Guide Plan Element 724 Rhode Island Drought Management Plan.

This statement is more appropriately classified as an action than a policy (see Comment 22). In any case, the citation to State Guide Plan Element 724 Rhode Island Drought Management Plan is incorrect due to the fact that this Guide Plan Element has been repealed. The issue of drought is now included in State Guide Plan Element 721, Rhode Island Water 2030.

Suggestion: Please either delete the reference to the State Guide Plan Element or correct it to cite Rhode Island Water 2030.

Comment 41: Although Bristol is primarily served by sewers, there are some areas served by On-Site Wastewater Treatment Systems (OWTS). Unfortunately, the draft Plan does not discuss OWTS.

Suggestion: Bristol has an approved on-site wastewater management plan that we recommend be mentioned in the Services and Facilities Element of the Comprehensive Plan. The Town should also consider whether it would be appropriate to add one or more action items to implement the management plan.

Comment 42: Although Bristol is primarily served by public water, there appear to be some areas served by groundwater wells. However, there is no description of the groundwater resources within the town except in passing as part of a discussion about the threat of salt water intrusion and aquifer draw-down on Poppasquash Point.

Suggestion: Please add a description of the Town's groundwater resources.

Comment 43: NHCR Policy 1D includes the statement to "to include the Bristol County Water Authority within the oversight of the State Public Utilities Commission (PUC) or other similar state organization such as the RI Water Resources Board". There is no discussion either in the Natural, Historical, and Cultural Resources Element or in the Services and Facilities Element explaining the intent or rationale for this Policy. Furthermore, since the Bristol County Water

Authority is a major water supplier, it is covered by the Rules and Regulations of the Water Resources Board.

Suggestion: Please add explanatory text to support this Policy or delete it.

Comment 44: The draft Plan contains a section on Energy Efficiency on page 167 and a Goal (Goal 9) to assess energy usage in municipal buildings and increase energy efficiency. The Office of Energy Resources (OER) commends the Town's commitment and offers the following suggestions which could strengthen this section of the Plan.

Suggestion: Consider adding:

- a discussion of the State's "lead by example" program called the Rhode Island Public Energy Partnership (RIPEP) for energy efficiency programs for municipalities. If the Town is not already participating in the program, an action item to do so should be considered.
- a goal, policies, and actions to support renewable energy – both for specific municipal-led projects and for the ability of residents to more easily access renewable energy. In this respect, OER suggests the Town examine its zoning and permitting with respect to small-scale/rooftop solar systems and offers its assistance in providing model zoning ordinances.
- a discussion of what the Town means in Action SF-19 to "explore alternative energy source[s] for municipal power.
- an action to seek grant funding or other State assistance to increase the use of renewable energy in municipal buildings. This could be an individual action or incorporated into Action SF-34 (page 176) which makes this commitment for energy efficiency.

In addition to the above, the OER has drafted the following for possible inclusion into the update of the State's Energy Plan. All are policies or actions that are targeted for municipal consideration:

- Establish an energy use baseline and develop a plan to reduce energy use by 20 percent within 5 years.
- Pass a resolution designating it a Property Assessed Clean Energy (PACE) Municipality.
- Set requirements to minimize lifecycle energy costs for new construction; one way to meet these requirements is to adopt an approved high performance building "stretch code".

- Provide as-of-right siting in designated locations for renewable/alternative energy generation, research and development, or manufacturing facilities.
- Adopt an expedited application and permit process for as-of-right renewable energy facilities.
- Purchase only fuel-efficient vehicles.
- Adopt property tax and zoning policies that preserve open space and promote "smart growth".

In conclusion, we look forward to assisting you in completing the revision process. Please feel free to contact Kevin Nelson of my staff with any questions, concerns, or requests that you may have. He can be reached at 222-2093 or kevin.nelson@doa.ri.gov.

Yours truly,

Kevin M. Flynn
Associate Director

cc: Jared Rhodes
Kevin Nelson
Caitlin Greeley