

TOWN OF EXETER, RI

Lynn M. Hawkins, CMC
Town Clerk
Council Clerk
Probate Clerk

675 Ten Rod Road
Exeter, RI 02822
Ph: (401) 294-3891
Fax: (401) 295-1248
clerk@exeterri.gov

TOWN OF EXETER

NOTICE OF CONTINUED PUBLIC HEARING (from March 11, 2024)

POSSIBLE ADOPTION OF TOWN OF EXETER COMPREHENSIVE PLAN New Plan: "Exeter 2044 - One Community Moving Forward Together" AND CONSIDERATION OF PROPOSED AMENDMENTS

TUESDAY, APRIL 2, 2024, 7:00 P.M.

Notice is hereby given that the continued Public Hearing will be held during a Special Meeting of the Exeter Town Council on Tuesday, April 2, 2024, at 7:00 p.m., in the:

**Wawaloam Elementary School Cafeteria
100 Victory Highway (Rte. 102), Exeter, Rhode Island**

All interested persons are welcome to attend.

The purpose of the public hearing is to:

Consider the possible ADOPTION OF THE TOWN OF EXETER COMPREHENSIVE PLAN, New Plan: "Exeter 2044 – One Community Moving Forward Together," to comply with Rhode Island Comprehensive Planning and Land Use Act (R.I.G.L. § 45-22.2) and amendments thereto as presented previously by the Exeter Planning Board and Members of the Town Council

A draft of the comprehensive plan and summaries can be found and reviewed at <https://exeter2044.com/> or on the Town's website, home and Planning Board pages, at <https://www.exeterri.gov/planning/page/exeter-comprehensive-plan-0>

A bound, complete, printed version of the proposed comprehensive plan is available for review at the Exeter Clerk's Office and Exeter Public Library.

Posted: March 20, 2024 – April 2, 2024
Exeter Clerk's Office, Public Library, Website, and Post Office
Advertised: March 28, 2024 - The Standard Times

Copies of amendments proposed by Councilwoman Allen, Councilmen Patterson and Ellis, the Exeter Town Planner, and the Exeter Planning Board may be viewed on the Town's website attached to this notice (Home Page/Meetings Tab), or obtained in the Office of the Town Clerk during normal business hours, Monday through Friday, 9:00 a.m. to 4:00 p.m., or by emailing clerk@exeterri.gov.

The plan may be altered or amended prior to the close of the Public Hearing without further advertising, as a result of further study, or because of the views expressed at the Public Hearing. Any alteration or amendment must be presented for comment in the course of the Public Hearing.

The public is welcome to attend any meetings of the Exeter Town Council, or its committees, boards, or commissions. If communications assistance or other accommodation is necessary or required to ensure equal participation, please contact the Exeter Town Clerk's Office two business days prior to the meeting, during normal business hours, 9:00 a.m. to 4:00 p.m., at (401) 294-3891, Ext. 9, or clerk@exeterri.gov. The Wawaloam Elementary School is handicapped accessible.

**Per Order of the Exeter Town Council,
Lynn M. Hawkins, CMC, Town Clerk**

Posted: March 20, 2024 – April 2, 2024
Exeter Clerk's Office, Public Library, Website, and Post Office
Advertised: March 28, 2024 - The Standard Times

→ Diane Allen
74 Raymond Potter Lane
Exeter, RI 02822

March 15, 2024

Lynn Hawkins
Town Clerk
Exeter Town Hall

Dear Lynn:

RE: Amendments to Comprehensive Plan

A motion to delete Element 11, 11-28 v, Actions: Transition to an all-electric town fleet.

Reasons:

1. All electric trucks and heavy equipment do not start or hold a charge in cold weather so our snow plows would not be able to plow.
2. It takes twice as long to recharge vehicles in the cold weather and a longer time for trucks.
3. The batteries are very large causing trucks to weigh more.

Motion to delete Element 11, 11-18 vi, to install charging stations at the library & town hall (for discussion).

Questions: How much would the town have to pay for a charging station? How much would it cost for the charging station itself? How much would it cost to rip up the parking lot to get electricity to the stations and then repair the lot? How much money do we get from the charging station?

Motion Element 7 Affordable Housing to change no impact fees for developers to reduced impact fees for developers.

Note could not find this again in the comprehensive plan.

Sincerely,



Diane Bampton Allen

cc: Town Council + Ken

Town of Exeter, RI

Town of Exeter- 675 Ten Rod Road - Exeter, RI 02822

To: Lynn M. Hawkins, Town Clerk

→ From: Daniel W Patterson, Council President

Date: March 19, 2024

RE: **Proposed Amendments – April 2 2024, public hearing (continued)**
ADOPTION OF TOWN OF EXETER COMPREHENSIVE PLAN: NEW PLAN: "EXETER 2044 - ONE COMMUNITY MOVING FORWARD TOGETHER"

Please find attached my proposed amendments to the above. The amendments are as follows:

- **Amendments 1-3 Historical Association**
- **Amendment 4 - Onsite Wastewater Ordinance**
- **Amendment 5 - Remove Transfer of Development Rights**
- **Amendment 6- Land trust has specific duties**

~~Strikeout proposes removal~~

Add is underlined

Historical Association Amendments 1-3

– The town has historically been very supportive of the association on specific projects that achieve mutual goals for historic preservation.

Amendment 1

Page v

Designate the Exeter Historical Association to lead a historic resources program ~~with a modest annual town budget~~

Amendment 2

2-21 COMMUNITY ENGAGEMENT EXETER 2044 COMPREHENSIVE PLAN |

support historic preservation through a non-regulatory program of partnerships with community members, such as by designating the Exeter Historical Association to lead a historic resources program ~~with an annual budget from the Town, as well as~~ external grants, fee-based historic plaques and markers, and other funding sources.

Amendment 3

6-7 HISTORIC & CULTURAL RESOURCES EXETER 2044 COMPREHENSIVE PLAN |

Goal 6-1 / Strategy A

Designate the Exeter Historical Association to lead a historic resources program.

TIMELINE: FIVE-YEAR IMPLEMENTATION PLAN #1 (FYIP #1, 2024-2027); FIVE-YEAR IMPLEMENTATION PLAN #2

(FYIP #2, 2028-2033); LONG-TERM (2034-2044)

ACTIONS

i. Designate and contract with the Exeter Historical Association to create and implement a non-regulatory historic resources program.

- ~~Provide a small annual budget to support the EHA's work.~~
- Continue the long-term process of inventory and assessment for historic sites, structures, and landscapes, including an updated map and GIS database.

☐ When ☐ Who ☐ Resources

FYIP #1 and ongoing

Town Council; Exeter

Historical Association

~~Small annual town budget support for EHA program activities;~~ external grants (e.g., RI Foundation); possible program receipts (plaques and markers); collaborate with South County History Center.

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Amendment 4 - Onsite Wastewater ordinance – Added bureaucracy that will require additional staffing and add costs to homeowners

Page v

Strengthen and enforce existing regulations to protect surface and groundwater quality, ~~including adoption and implementation of the Onsite Wastewater Management Plan~~

Page vi

~~Adopt and update the Onsite Wastewater Management Plan and make residents eligible for State repair and replacement funding assistance~~

Page 1-6 VISION EXETER 2044 COMPREHENSIVE PLAN

~~For example, The Town has not established systems available under state law to help residents manage and, when needed, upgrade or repair the onsite wastewater systems on which everyone in Exeter depends to keep healthy water resources.~~

Page 2-23 COMMUNITY ENGAGEMENT EXETER 2044 COMPREHENSIVE PLAN |

Fig. 2-7 All responses

~~Adopt an Onsite Wastewater Management Plan (OWMP) to educate property owners and promote voluntary inspection and maintenance of septic systems; join the state program for loans to property owners for repair and replacements of septic systems.~~

Page 2-25 COMMUNITY ENGAGEMENT Fig 2-9

~~consider establishing an Onsite Wastewater Management Plan (OWMP), linking rules for siting/maintaining septic systems and land use regulations. With an OWMP the Town can apply for state funds to assist property owners in septic system repairs/upgrades.~~

Page 4-19 NATURAL RESOURCES

~~iii. Adopt and implement Exeter's Onsite Wastewater Management District. • This will encourage septic system maintenance and make Exeter eligible for the Community Septic System Loan Program to provide~~

interest free loans to homeowners for septic system repairs and upgrades. A preliminary study was completed in 2011 but never adopted or implemented.

4-19 NATURAL RESOURCES actions

FYIP #1 #2 Town Council, DPW, Town Planner, may require consultant assistance to update

Review and build on the 2011 plan; consult ordinances and implementation in other communities, such as Charlestown; Onsite Wastewater Management Plan And Community Septic System Loan Program; RI Rules Establishing Minimum Standards Relating to Location, Design, Construction and Maintenance of Onsite Wastewater Treatment Systems (250-RICR-150-10-6)

Page 10-2 FACILITIES, SERVICES & INFRASTRUCTURE (B)

10-4 Exeter employs stormwater best practices and proactive onsite wastewater system management to protect the Town's groundwater and surface water quality.

10-17 FACILITIES, SERVICES & INFRASTRUCTURE

Wastewater Management — Onsite Wastewater Management Plan

Exeter has onsite wastewater treatment systems. The State Department of Environmental Management has minimum standards for these systems.

- Under state law, municipalities have the authority to create an onsite wastewater management plan (OWMP) to meet local needs. Program elements may include an ordinance requiring system inspections; educating homeowners on good practices for system maintenance, or specifying more stringent treatment requirements in

environmentally sensitive areas. Once approved by DEM, an OWMP makes a town eligible to apply to the community septic system Loan Program (CSSLP). These funds come from the State Revolving Fund and are administered through a partnership of the Rhode Island Infrastructure Bank and Rhode

Island Housing. Money is used by participating towns to provide interest free loans to homeowners to cover the costs associated with septic system repairs and upgrades.

no information available on the town website about an OWMP or homeowner education.

- According to the State, Exeter has an approved OWMP from 2010 that calls for education and outreach to encourage homeowners to properly maintain septic systems and recommends voluntary system inspections. The Town does not participate in the Community Septic

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System Loan Program. However, it does not appear that the Town ever operationalized this OWMP. There is no ordinance about an OWMP, town staff was not aware of the document (a copy was available from RIDEM)

4 RIDEM, "Summary of Rhode Island Municipal Onsite

Wastewater Programs," September 2022.

Page 10-23 FACILITIES, SERVICES & INFRASTRUCTURE

Onsite Wastewater Management The Onsite Wastewater Master Plan can ensure proper inspection and maintenance of septic systems and joining the program for state revolving loan funds can assist residents with septic system repair and replacement. Higher density areas with older homes, such as Cedar Grove and Boone Lake, are more vulnerable to pollution from failing systems.

The Exeter Onsite Wastewater Management Plan is dated April 2010. It was prepared with grant funding for 2003 draft OWMPs for Exeter, Hopkinton, and Richmond. Exeter had pursued adoption of a wastewater management district ordinance for the Ladd Center in 2005, but a draft ordinance was not adopted. Exeter's Town Council approved completion of the 2010 plan but it is not clear whether the Town Council ever adopted the plan. RIDEM lists Exeter as having a plan but not participating in the loan program for repair or replacement of septic systems. "Onsite wastewater systems that are improperly designed, constructed, or maintained can affect groundwater through the release of contaminants such as pathogens and nitrate. "The sole source Wood-Pawcatuck aquifer that underlies most of the Town is vulnerable to contamination because of generally shallow depth to groundwater, the highly permeable nature of the aquifer, and the absence of any subsurface confining layers that might protect the groundwater."

8

Too many nutrients from onsite systems can get into surface waters, such as ponds, and cause excessive growth and eutrophication (dense growth of algae and

plants). Failing septic systems that pollute water resources are considered a form of nonpoint source pollution. Systems installed before 1968 were built without modern permitting requirements. Some of these systems may be cesspools, which are no longer allowed in Rhode Island. Exeter residents rely on individual private wells. While many are drilled bedrock wells that tap into groundwater far below the surface and which are protected from onsite systems, an unknown number of shallow wells are more vulnerable to contamination. At the time of the 2010 report, there were an estimated 2,229 onsite systems in Exeter. (The number of remaining cesspools in Exeter is unknown.) Over the previous 16 years, 1992-2009, 3.2% of the onsite systems in Exeter were the subject of repair applications to RIDEM, representing a failure rate of approximately 0.2% per year. Clusters of repairs and enforcement issues were found in the Cedar Grove and Boone Lake areas, where lot sizes are smaller than in most of Exeter. A number of Exeter surface waters, including Yawgoo Pond and Boone Lake, Breakheart Pond and Beach Pond, are considered sufficiently impaired by pollution to require additional monitoring and planning. The management approach recommended in the plan is to inventory and track septic systems and develop an active educational program for property owners. This approach involves developing and maintaining a database and encouraging residents to perform Exeter Onsite Wastewater Management Plan, 2010, page 2.

Page 10-24 FACILITIES, SERVICES & INFRASTRUCTURE

such a program. Therefore, Exeter plans to use a voluntary management program supported by education and outreach. The Town will also consider a web-based computer tracking system for maintenance activities contingent on the availability of funding." (p. 28) The plan includes an implementation plan for this approach, including application to participate in the CSSLP.

- Given the estimated failure rate over the previous 16 years, the plan estimated approximately four septic system failures per year with a cumulative total cost of \$532,000 over 10 years.
- The plan estimated a cost of \$12,000 to \$26,000 to develop Exeter's OWMP over three years.
- Charlestown has a very active mandatory inspection program, has won grant funding for special programs, and has participated in federally funded research programs. 10 voluntary inspections every three to five years.
- Towns can also create a regulatory framework through ordinance to oversee septic system

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approvals, installations and maintenance practices. In this approach, the Town would require homeowners to periodically maintain their septic systems. The Town sends a notice and when the inspection is complete, the inspector or pumping contractor sends it back to the Town. The management entity for this program would have the authority to conduct random inspections to ensure proper operation.

• Repair and replacement of failing residential septic systems is eligible for funding through a State revolving fund. The loan program operates through the Town and is available to owners of one to four family properties, with a maximum loan amount typically at \$25,000. The average loan amount is about \$15,000, and the monthly payment over 10 years would be \$131.

The Town's Office of Onsite Wastewater Management lists many informational brochures for homeowners and could be a resource for Exeter in setting up a less ambitious program.

9

• According to the 2010 plan, "Although the Town recognizes the value of a mandatory wastewater management program, current and foreseeable Town resources do not allow for

9 Community Septic System Loan Program (CSSLP): www.rihousing.com/community-septic-system-loan-program-csslp/ 10 charlestownri.gov/wastewater-management; Town of

Charlestown, RI, Onsite Wastewater Management Program 2021 Annual

Report

Page 10-23 FACILITIES, SERVICES & INFRASTRUCTURE

Onsite Wastewater Management

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Page 10-24 FACILITIES, SERVICES & INFRASTRUCTURE EXETER 2044 COMPREHENSIVE PLAN |
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~~9 Community Septic System Loan Program (CSSLP): www.rihousing.com/community-septic-system-loan-program-csslp/ 10 charlestownri.gov/wastewater-management; Town of Charlestown, RI, Onsite Wastewater Management Program 2021 Annual Report."~~

Page 10-30 FACILITIES, SERVICES & INFRASTRUCTURE

Goal 10-4

~~EXETER EMPLOYS STORMWATER BEST PRACTICES AND PROACTIVE
ONSITE WASTEWATER SYSTEM MANAGEMENT THAT PROTECT THE TOWN'S
GROUNDWATER AND SURFACE WATER QUALITY.~~

~~Goal 10-4 / Strategy A~~

~~Adopt and update the Onsite Wastewater Management Plan.~~

~~TIMELINE: FIVE-YEAR IMPLEMENTATION PLAN #1 (FYIP #1, 2024-2027); FIVE-YEAR IMPLEMENTATION
PLAN #2 (FYIP #2, 2028-2033); LONG TERM (2034-2044)~~

~~ACTIONS~~

~~i. Review and update the 2010 Onsite Wastewater Management Plan (OWMP).~~

~~• Consult with neighboring towns and Charlestown on how they have implemented onsite wastewater management.~~

~~☐ When ☐ Who ☐ Resources~~

~~FYIP #1 Town Council; DPW; possible consultant assistance~~

~~General fund~~

~~ACTIONS~~

~~ii. Adopt the OWMP, taking the low-cost approach of education for property owners and promotion of voluntary inspection and maintenance.~~

~~• Take advantage of educational materials provided by other towns and RIDEM, modifying them as needed for Exeter.~~

~~☐ When ☐ Who ☐ Resources~~

~~FYIP #1 Town Council; DPW General fund~~

Page 12-35 LAND USE EXETER 2044 COMPREHENSIVE PLAN |

Actions i.

~~Consider establishing an onsite Wastewater Management Plan and link rules for siting and maintaining septic systems to land use regulations. (See Element 10.)~~

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Page 13-5 IMPLEMENTATION

New activities

~~Onsite Wastewater Management Plan implementation, including inventory, program management, and assistance with state loans for repair.~~

E. IMPLEMENTATION MATRIX

4: NATURAL RESOURCES AND CONSERVATION

~~iii. Adopt and implement Exeter's Onsite Wastewater Management District. FYIP #1-#2. Town Council;~~

~~DPW; Town Planner; may require consultant assistance to update~~

10: PUBLIC FACILITIES, SERVICES, AND INFRASTRUCTURE

Remove all section 10-4

10-4 Exeter employs stormwater best practices and proactive onsite wastewater system management that protect the Town's groundwater and surface water quality.

~~A. Adopt and update the Onsite Wastewater Management Plan.~~

~~Review and update the 2020 Onsite Wastewater Management Plan (OWMP).~~

~~FYIP #1. Town Council; DPW; possible consultant assistance~~

~~ii. Adopt the OWMP, taking the low cost approach of education for property owners and promotion of voluntary inspection and maintenance. FYIP #1~~

~~Town Council; DPW. iii. Create a database of onsite systems in Exeter.~~

~~FYIP #1-#2. DPAW; possible contractor assistance~~

~~iv. Join the CSSLP state program for loans to property owners for repair and replacement of septic systems.~~

~~FYIP #1~~

~~Town Council;~~

~~DPW~~

~~v. Every five years of operation, evaluate whether~~

Exeter should establish mandatory inspection and maintenance of septic systems.

FYIP #2 and

long term

Town Council; DPA

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~~Amendment 5 - remove transfer of development rights~~ – The ordinance, which has been in effect since 2008, has never been utilized and appears to be ineffective in achieving its goals.

Page 2-22 COMMUNITY ENGAGEMENT

Figure 2-6

Exeter takes proactive measures to advance development of a village center ~~connected to a transfer of development rights program to~~ preserve rural lands and with access to drinking water from the Ladd Center system.

Page 1-15 VISION C. Land Use Trends and

Development Patterns

There is no town center, although zoning was adopted in 2012 to enable creation of a mixed-use town center. ~~linked to a Transfer of Development Rights program.~~

Page 4-13 NATURAL RESOURCES

Exeter's large portion of land enrolled in the Rhode Island Farm, Forest, and Open Space Program includes areas with high ecological value and may be an important part of future protected land. ~~Refinement of the Town's Transfer of Development Rights (TDR) program can help balance development with preservation of open space lands for conservation.~~

Page 7-6 HOUSING & AFFORDABLE HOUSING PLAN

~~This was combined with a Transfer of~~

Development Rights (TDR) program intended to balance preservation of rural lands with higher density residential development.

Page 7-15

Establish a community housing land trust to provide affordable housing while preserving open space: While this has not been established, the village center TDR ordinance as a similar purpose but has not produced any housing or development-rights transfers.

Page 12-20 LAND USE

Transfer of Development Rights Sending Area(s) Overlay District (TDR). This is a mapped overlay district that includes land related to Exeter's purchase of the development rights to preserve farmland on the Bald Hill Nursery and for which the receiving area is land in North Kingstown. No other lands have yet been mapped as a TDR Sending Area Overlay District, though TDR from B, RE-2, RU-3, RU-4 and CR5 base districts is part of the development process required in the Planned Village Overlay, which is a floating zone described below. (Also see Zoning, Article IV, Sec. 4.8)

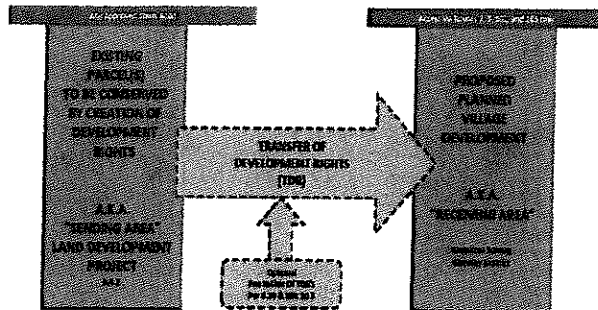
Page 12-21 LAND USE

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Remove graphic

FLOWCHART 2



In a transfer of development right, the rights to develop one parcel are purchased and transferred to another site, preserving the original parcel in its undeveloped state. (Source: Town of Exeter)

Page 12-21 LAND USE

The PVOD concept is also dependent on a Transfer of Development Rights (TDR) system, requiring TDR rights for any use that would increase residential development beyond what is allowed in base zoning. The idea was to encourage density in appropriate locations with the funds generated from the extra density via a TDR program to be used to purchase priority open space in Exeter. This would also reduce development pressure on Exeter's farms and forests. All undeveloped

~~or agricultural properties in the B, RE-2, RU-3, RU-4 and CR5 districts could serve as sending zones. Moreover,~~ a sufficient water supply for the village-level densities was expected to be negotiated with the State from the Ladd Center drinking water system.

Page 12-29 and 30 LAND USE

The plan for a mixed-use village was intended to accomplish two aims: give Exeter a walkable center like the historic town centers found in most New England towns, and drive development to this center ~~by combining it with a Transfer of Development Rights program that~~
~~EXETER 2044 COMPREHENSIVE PLAN | 12-29 LAND USE~~
~~would protect rural character in traditionally agricultural and open space lands.~~ The hoped-for village center has not attracted developer interest for a variety of reasons mentioned earlier, many of which the Town cannot directly control. However, it is worth reviewing the site design standards, development framework and process to see if there are ways to make the development more attractive to investors and less complex while preserving the town's goals. There may be opportunities for more flexibility that could attract interest when the drinking-water question is resolved and market conditions are right.

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Page 12-30 LAND USE

4. TRANSFER OF DEVELOPMENT

RIGHTS FRAMEWORK

The village ordinance does not describe how the TDR process is expected to work, nor does the Town's separate TDR ordinance. Revision is needed to the village zoning and to Section 6 of the Exeter Land Development and Subdivision regulations, which includes procedures on how to create and measure development rights in terms of detached single-family units (yield), determination of a TDR land value score, a transfer ratio for sending area lands score related to number of housing units allowed, sending area deed restrictions, and procedures for transferring rights to a receiving area. According to the Planning Board, the village development process does not explicitly appear in the Exeter Code of Ordinances but was intended to work as follows: If a developer wants more density, they pay a fee commensurate with the extra density. The funds would go to the Rural Land Preservation Trust to be leveraged with State and federal sources to buy important open space. The land trust currently has no source for matching State and federal open space preservation funds. The TDR program could supply this critical match to allow the land trust to be more active in acquiring land.

Amendment 6- Land trust has specific duties as set forth in the Town ordinance chapter 2 ARTICLE VIII. - EXETER RURAL LAND PRESERVATION TRUST

Please ensure that any modifications related to the land trust are in compliance with the ordinance.

4-15 NATURAL RESOURCES

ACTIONS

iii. Advise the Planning Board on the effects of proposed development on the quality and natural functions of water bodies and the natural integrity of adjacent land areas..

☐ When

☐ Who

☐ Resources

FYIP #1 and

Ongoing

Conservation Commission; ~~Land Trust~~

RIDEM Freshwater Wetlands Rules; RIDEM Integrated Water Quality Monitoring and Assessment Reporting; RI Rivers Council

E. IMPLEMENTATION MATRIX

4: NATURAL RESOURCES AND CONSERVATION

v. Identify and pursue funding strategies and political processes to support recommendations from the ~~Land Trust~~ and Conservation Commission.

→ CARVIN ELLIS
3/18/2024

DRAFT EXETER 2044 COMPREHENSIVE PLAN: PUBLIC COMMENT MATRIX			
For the purposes of online comment, the Draft Exeter 2044 Comprehensive Plan was divided into two parts. Part I was composed of the Front Matter (Contents - Executive Summary and Elements 1-8. Part II was composed of Elements 9-13.			
Part I: 946 total views; 154 total comments; 20 total commenters			
Part II: 398 total views; 26 total comments; 7 total commenters			
Comments purely on format issues are in a separate matrix.			
Page number	Comment	Consultant Response	Town Planner Recommendation
	Front Matter - contents Executive Summary		
	After reading the plan I find myself shocked at the use of outdated data from the 1980-1990. In my profession we refer to this as the GIGO principle. Garbage in Garbage out. This is the year 2024. Why are we using old data?	No change needed. Post-2000 data is included throughout the plan where available, in addition to some longer time series used in certain cases to demonstrate trends. See "A note on the Data" on pages 1-2 and 1-3, describing data sources and issues around data for small communities, and data in the Exeter at a Glance section, pages 1-3 to 1-4. Also see topical elements such as Elements 3, 7, 8, and others.	
iii-ExecSum	I feel these areas needing protection are of highest priority, especially water. [protect natural and historic resources]	No change needed. See Elements 4, 10, and 11.	
	Good goal to keep people informed. I would like to know what our population is currently? How much of an increase in population is expected for 2044?	No change needed. See Element 3 and Element 12.	
	What activities would be conducted in a community center? I question whether a community center [would] be worthwhile and worth the tax dollars to fund it.	No change needed. See Elements 3 and 10 for discussion of desire for a community center. Community discussion and evaluation of cost/benefit would be part of the discussion. Grants, volunteer fund-raising, and fees could be part of a funding plan.	

	[Add] "better access to data and information" [to item 1-Keep everybody informed]	Include in final draft.	
	As you develop along route 3 please remember that those of us abutting the route 3 commercial lands are having an enormous problem with people entering our land hunting illegally and adding trash and actually building on other people's property. It would be nice to have some legal language that requires commercial property to protect the abutment to residential open space etc. These expenses are crippling!	Add language to the final draft in Elements 8 and 12 about the proposed Route 3 Master Plan to include consultation with abutting property owners and potential resolution of these issues.	
	I like trails for sure but not ATVs on them. I am leery of terms like "multi-use trails." Do you mean bicycles, walkers, and horse riders, ATVs?	multi-use trails will require public consultation and decisions about what kinds of users would be contemplated	
	Add "balanced, compatible" to items about Routes 3 and 2 master plans	Include in final draft.	
	What does "add" meant?	off Route 2 which has the only public water supply system in Exeter. [Typo- initial capital letters needed for final draft.]	
	Don't schools already offer after school activities that include athletic fields? A creation of trails and parks would be beneficial.	No change needed. Non-school sports organizations have limited access to school resources. Creation of an open space and recreation plan would require discussion of needs and decisions on priorities, how to share resources, and improvements.	
iv-Exec Sum	This is technically a new comprehensive plan, not an update of the previous plan.	Change in final plan.	
v-ExecSum	Excellent points on these first two bullets! We need to embrace technology to spread the word and allow virtual meetings and record and share information.	No change needed.	
	Add "grants and" [to item on leveraging partnerships for conservation, etc.]	Add to final plan.	
	Add "and consider incentives (stipend)" to item on recruiting for a Conservation Commission	Add to final plan.	
	Add "performance standards and" [to item on Town govt and Best Management Practices]	Add to final plan.	

	Add "developing performance standards and regulations as well as " to item on regulations to protect surface and groundwater quality	Add to final plan.	
	Add "provide matching funds to apply for grants that seek restoration and preservation of historical and cultural resources" [to item on coordinating with partners]	Add to final plan	
	Add "set aside matching funds (annual/capital) for state grant open space applications (protection)" to item on an open space and recreation plan	Add to final plan.	
	Add "and grants" to item on pursuing funding	Add to final plan.	
	Add "and incentivize" to item on marketing Exeter Village Center	Add to final plan.	
	Please add wetlands to your list. Water and forests are important, but in this age of climate change it's critical to save our wetlands. [list in Be ready for environmental change]		
	Add "in specific areas of the town, such as Ladd Center and the lands north or Route 102 and Route 3" [item on affordable housing and senior housing]	Add to final plan.	
vi-Exec Sum	(The Town has a pavement assessment study.) The town conducted a pavement assessment study which may be used to secure additional grant funding for maintain, repairing, and reconstruction of town roadways. [Add to Town Systems item]	Include in final draft in ExeSum and also in Element 9.	
	Add "balanced, appropriate" to item on facilitating non-residential development through a Route 3 master plan	Add to final plan.	
	Add "for state roadway's work with the Rhode Island State Police" [Town Systems item] and add "work with RIDOT to establish a road diet on Route 3" [item on coordinating with RIDOT]	Add to final plan.	
	Really excited about the possibilities that will come from having a dedicated EDC in town. It's so important!	No change needed.	
	Yes, good idea [dedicated EDC]. We of a past EDC had similar ideas. But no appetite at the time.	No change needed.	
	Add "build of establish (renovate an existing building) [item on a new town hall]	Add to final plan.	
	Add "user-friendly" [item on collecting and reporting town data and activities]	Add to final plan.	

	Would love to see us commit to making these opportunities and procedures as user-friendly and easy to accomplish as possible. Something "Commitment to making new and existing energy opportunities for residents and commercial entities easy to use and executed within a brisk timeframe." [ite on Sustainability, Climate Resilience, and Energy]		Possibly modify language for final plan. See Element 11.
	Planning Board should conduct a public process (not necessarily a public hearing)		Revise for final plan - also in Element 13.
	Wanting to increase the non residential tax base will not occur while our town has a big Do NOT allow business Entrepreneurs with progressive ideas - example with the Shartner farm situation being highly so visible along busy route 2.		No change needed. See Element 8.
	Add "Route 102 and Interstate 95" [item on revising the zoning ordinance in conjunction with master plans]		Add to final plan.
	Add "or similar body" [item on Comp Plan Implementation Advisory Committee]		
1-VISION			
1-5	Add "zoning" [list of issues covered in 2023 legislative changes]		Add to final plan
	Add "land development regulations" [sentence on requirements for municipal updates]		Add to final plan
	The lack of engagement could also be a result of the perceived lack of transparency, communication and accountability.		No change needed.
	Show prospective businesses our crime statistics if they have a problem with our lack of policy department. [section on capacity of small government]		No change needed. For some businesses, it's an insurance risk issue.
1-6	I'm sorry, adding solar panels everywhere is not going to change the weather in Exeter. Increasing the renewable mix will not likely make electricity more reliable or more affordable. [paragraph on climate]		No change needed. See Element 11.
	Add "with a balanced approach of resources management and sustainability [paragraph on climate change]		Add to final plan
2-COMMUNITY ENGAGEMENT			
2-2	20 [committee members]		Revise in final plan.
	[website] is an inclusive interactive site		Ad to final plan

2-3	<p>Do people really want a town center or gathering place? If you receive survey results that suggest this is desired, but you are basing this on, say, 200 responses, what are you suggesting the action would be? 200 out of 6,000 is nowhere near a majority. I know this is a strawman but I get the feeling we are basing actions on very small response sizes. I like the ruralness of the town and the school system. If I wanted a downtown, I would live in a town that already offers that, which I would suggest others consider instead of trying to turn Exeter into North Kingstown, for example.</p>	<p>No change needed. The desire for a community gathering place and community activities was a strong theme in the engagement process. However, proposals in the comp plan would need to go through additional community engagement and discussion to be implemented..</p>	
2-3	<p>Add a bullet on the public open house</p>	<p>Add to final plan.</p>	
2-5	<p>I agree with all of these expressions. [What people like most about Exeter]</p>	<p>No change needed.</p>	
2-5	<p>Neighboring towns have very friendly & active senior centers that are available to Exeter residents, therefore I suggest seniors seek out these centers.</p>	<p>No change needed.</p>	
2-7	<p>I agree [about neighboring senior centers]--we don't have to have everything within the town. We are ok with driving to neighboring towns, which is the tradeoff for living on our low-tax rural town.</p>	<p>No change needed.</p>	
2-7	<p>I have seen more clear cutting for solar on residential properties in town. Does this actually benefit the town? Are they taxed differently than normal property taxes? Or does this only benefit the land owner so they can pay their normal residential taxes? Is there a way for anything above a certain size to be considered "commercial" or something and therefore taxed differently?</p>	<p>No change needed. Taxation of solar farms (utility scale) is controlled by state law.</p>	
2-8	<p>We should ensure homeowners' septic tanks are functioning well and assist financially if needed to bring up to code.</p>	<p>No change needed. See Element 10.</p>	
2-8	<p>Yes I am concerned about this too. [Loss of farms and open space.] The farmers might be financially pressured to sell to a developer if they cannot keep the farm going. Perhaps a village center could provide a farmer's market in the form of a grocery store, with ice cream for children and tourists.</p>	<p>No change needed. See Elements 8 and 12.</p>	
2-9	<p>My husband and I moved to Exeter in 2019. Despite the pandemic, we have found the town to be very friendly and welcoming! The library, our neighborhood, town meetings, Tilted Barn, Cuttyhunk Preserve have been wonderful places to meet people from town.</p>	<p>No change needed.</p>	

2-10	I viewed this meeting [Wealthworks meeting] and it was full of excellent suggestions for developing our community. Most of them don't cost anything--just people getting involved--and would go a long way to making Exeter a better place. Are the slides available fore people to review?	No change needed. Slides will be in the Appendix.	
	an egg cooperative?	No change needed.	
2-15	Let's give the farmers some support in these simple ways.	12.	
2-16	Could farms host weddings, car shows, hayrides by apply for the same permit as Santa's Magical Drive-Thru?	No change needed. See Elements 8 and 12.	
2-17	The sliding scale property tax relief was a great when first enacted to enable aging seniors to stay on the farm but over the years inflation has greatly diminished its effect. A recalculation of the income tables would be of great benefit to the aging population.	No change needed.	
2-30	As we consider a new town hall, how will modern needs for town management be incorporated into its design?	No change needed. The design process will pay attention to functional needs for management, technology, an so on.	
3 - UNDERSTANDING EXETER TODAY			
3-3	Add "housing crisis" [to item on persistent planning issues]	Add to final plan.	
3-12	This data [high proportion of households with persons 60+] emphasizes the need for a comprehensive plan. We should double back to the beginning and add this in the verbiage.	Add to final plan.	
3-14	This is EXACTLY why we moved to Exeter. I hear the same from many other 30-40 year olds that move here. We moved from busy towns to have quiet and lower populations. I am nervous that future development in Exeter will greatly impact exactly what people love about this beautiful town. [paragraph low-growth in rural towns]	No need for change	
3-15	Do these figures account for the statistics of the aging population of Exeter? I don't mean this is the wrong way... but as people get older and pass away or move to care facilities, those houses would get sold NOT necessarily building all new housing. It seems we will potentially have a lot of lots of land and older homes going up for sale in the next 20 years. Again, please no one take offense to this comment/question, just being honest and asking.	No need for change. See buildout exercise in Element 12.	
3-16	Correct last two Fig. 1-2 table headings	Correct in final plan.	

3-17	Add "and transformation of farmlands to solar fields Where can I learn more about this PILOT arrangement? Agree 100% to this entire paragraph! [Future destiny of large parcels of land] By January 1, 2024.	Add to final plan. No need for change. Zoning Ordinance. No need for change. Add to final plan.
3-18		
3-19	Add "reactive vs proactive strategies to future land uses , changing conditions and challenges" [to land use model section of Weaknesses]	Add to final plan.
1-20	Add "strategic long term" [to land use model section of Weaknesses] Great identity opportunities! Add "and Ladd Center master plan (portion dedicated to (low income or senior housing) LOVE these bottom two bullets - e.g. golf course....how about a tree tops course or some other kind of outdoor businesses?	Add to final plan. No change needed. Add to final plan. No change needed.
4-NATURAL RESOURCES AND CONSERVATION		
4-2	Add "within local regulations and..." [to bullet - Promote best practices...]	Add to final plan
4-3	Add "annual resources dedicated to matching open space grants for preservation" and "support additional performance standards in the zoning ordinance and land development regulations to protect potable groundwater resources [to policies under goals 4.2. and 4.3] Over the past 50 years, I have witnessed a profound change in the amount of water available through our wells. I am concerned that we are not doing enough to monitor the availability of groundwater in Exeter. We serve as the headwaters to the Queen River aquifer and if I am already seeing major changes in the amount of water my wells pump I am concerned what it will look like in another 50 years. As the growth continues south of us more groundwater will be pulled from our area and I'm wondering if anybody is paying attention. We might go and look at the recent New York Times article about the loss of groundwater in all of New England, I am seeing it and we need to raise the flag now.	Add to final plan Relevant information, goals, strategies and actions can be found in Elements 4, 5, 9, 10, 11, 12--more language could be added on water issues.
4-7	Does recreation include swimming? There seems to be no swimming signs on a lot of the ponds.	No change needed.
4-11	Definition of old growth forest has changed slightly and needs to be revised.	Revise for final plan.

4-17	Goal 4-1, Strategy C, action iii.- Rephrase to say use the maps generated in the comprehensive plan to determine areas that are suitable for development and those that should be a high priority for conservation. Not likely that Exeter will have resources to refine the maps already generated.	Revise for final plan. In the future, state map resources on which this plan depends may be updated.	
4-19	Is there a sense as to why this [Onsite Wastewater Management District] was not adopted or implemented?	No change needed.	
5 - OPEN SPACE AND RECREATION			
5-2	This [connected trail system] would be nice but can't be designed in a vacuum and I'd be worried about negative effects of these changes, including: build it and they will come - town spending and impacts t, say, local traffic flows, but no one uses the resources. That said I would definitely be interested in other rural towns that successfully added these types of recreational things without negative consequences.	No change needed. Design of individual trails and a connected trail system would require evaluation of costs and benefits, community engagement, etc., and could benefit from grant funding.	
5-5	Do these types of things like sportsman clubs or other outdoor activities generate taxes or revenue for the town? Since we have so much recreation in our town that other towns in the state do NOT have, could we leverage this in a way to reap tax benefits and people outside? E.g. hosting mountain bike races, building other outdoor recreation (similar to golf) that we could generate revenue and business tax.	No change needed. See discussion of outdoor economy in Element 8.	
6 - HISTORIC AND CULTURAL RESOURCES			
6-5	So we had these places and they have fallen to disuse. What does that tell us? I would suggest that it means people aren't looking for places like this.	No change needed.	
6-7	I'd like to understand what role this facility [the Grange] really played in the community and through what periods of time. That might be a piece of data worth looking at before we just try to "restore it to its former glory." The conditions for it to thrive (as it was originally devised) may no longer be present, so resurrecting it would be wasteful.	No change needed. It is an example of an existing building that could renovated for a new role.	
7 - HOUSING AND AFFORDABLE HOUSING PLAN			

7-2	<p>Interesting to note {group home beds count as affordable housing} I believe this is the development near Oak Harbor Village? Was this development successful? All units occupied?</p> <p>OK but maintaining the minimum 10% seems fine with me, and probably most residents. So we'd only need to plan for growth to keep up with conventional growth.</p>	<p>No change needed.</p> <p>No change needed. Yes - Pine View Apartments, all occupied.</p>
7-3	<p>Is this even a reasonable goal, to be everything to everyone? Is there another town that has achieved this with good results? [Vision statement on housing for families and for seniors]</p>	<p>No change needed.</p>
7-5	<p>If this were really true, property values would not have increased - people do in fact, want to live here, but because of Exeter is, not what it could be in some future vision. [on reduced pace of housing development since the Great Recession]</p> <p>Despite vulnerability to natural hazards, well-maintained mobile homes with limited public infrastructure seem to be a viable approach to affordable housing. If the State does not recognize, recommend advocating with State to include existing mobile home stock in affordable housing stock.</p>	<p>No change needed.</p> <p>not considered affordable housing for the purposes of state requirements because mobile home parks are not subject to permanent income, rent, and other restrictions.</p>
7-15	<p>I guess I could do my own research but how would this actually be implemented? Would living in these locations require residents to "work the land?" Or are we assuming any resident would always take advantage of the opportunity to use the farmland to generate some extra income (even if the economics of farming are way less attractive than the romanticized version)?</p>	<p>Add a little more explanation in the final plan. These are residential developments that have an adjacent professionally-managed farm, farmers' market, etc. (not where residents have to work the farm).</p>
7-19	<p>Is it possible for Exeter to provide for ALL levels of income and ALL stages of life? Is it okay for us to say "we can't be everything but we want to be (this)"?</p>	<p>No change needed. State expectations for a small, rural town would be to endeavor to provide housing choice/opportunities for the town's housing-vulnerable populations, such as low-income and seniors. Town government can monitor the housing market and needs.</p>
7-22		

7-25	Is there a clear sense as to why this idea [Exeter Village Center] did not result in development when it was included in the 2004 plan? What market forces are present today that might change its appeal?	No change needed. Lack of an agreement on access to the Ladd Center public water system, the housing crash and Great Recession, competition from other locations, lack of outreach to potential developers.	
8 - ECONOMIC DEVELOPMENT			
8-4	When a land owner puts up solar for which they are getting paid for the use of their land, is this in any way consider a commercial business? Is the town able to collect taxes differently than just for residential purposes? I am nervous that the much larger acres or land with aging owners will eventually just be sold and clear cut fo solar thus losing ou Rural environment. I agree it areas are already cleared but want to know if town can tax differently? [On the issue of reducing non-residential tax burden but losing rural character in the process] 1000% agree. Great comment. Please don't make us slowly turn into Warwick.	No change needed. See Elements 11 and 12. The State regulates taxation of utility-scale solar and recently limited location of the same in relation to "core forest" areas.	
	Yes, and, adding a commercial tax base to fund town resources, which ultimately is to attract new people to the town, increase development and perhaps lower the average cost of home ownership comes at a cost. Where is the space for ALL of that going to come from? Our forests?	No change needed.	
8-6	[On the Outdoor Economy] This is excellent -- "sell" our outdoor experiences. Camping, tree tops courses, golf, bring in more outdoor competitions...ways to generate income.	No change needed.	
8-12	I would like to know what the planned district is for this area between Yawgoo and Wolf Rocks as there are residential properties that abut/are near this? Thank you	No change needed. The master plan will require an inclusive process with all existing property owners in and near the master plan area.	

<p>As a large landowner who abuts route three commercial development I have an especially difficult time with trespassing, unwelcome trash, dumping and land encroachment. It is exceptionally expensive to monitor the boundary lines from open space to commercial land along the route three corridor. I would hope that we can find a solution that would prevent trespassing and land encroachment along that boundary line and for all boundary lines where commercial abuts agricultural land [land] that there are clear rights for both properties. I have documented by photograph areas where ATVs are entering from a commercial retail establishment along route three onto my property. It should not be my responsibility to fence off the area. I feel it ought be the responsibility of the commercial retail people, especially when I approach them and they way, oh, we don't let this happen, but clearly the only way they're getting onto my land is through their land.</p>			
<p>8-13</p>	<p>[On attracting businesses to serve nature recreation visitors} YES - this is a GREAT idea. Limited small business to serve those visitors--possible café, outfitters stores (like in Richmond), bike shop, fishing/hunting supplies, etc.</p>	<p>Add language to final plan discussion of Route 3 and 2 master plans on resolving issues of commercial/agriculture/open space interface as part of the master plan inclusive process.</p>	
	<p>Campground within Arcadia area???</p>	<p>No change needed.</p>	
	<p>Local businesses could even start supporting each other perhaps with flyers or information at these types of events pointing customers to nearby food, shopping, etc. (In town pamphlets like you see when you visit another state)</p>	<p>No change needed. There is one primitive Backpack Camping Area in Arcadia.</p>	
	<p>Agree--missed opportunities here! [Lack of businesses to serve visitors.]</p>	<p>No change needed.</p>	

	<p>The payment in-lieu of taxes (PILOT) illegally and imprudently exempted RI Grows LLC from their obligation to pay an appropriately assessed property tax on a one million square foot new agricultural/commercial structure. Stabilizing taxes for manufacturing, commercial or residential properties must comply with RI Statute 44-3-9. RI Grows LLC is clearly subject to property taxation according to RI Statute 44-3-9. The payment in lieu of taxes (PILOT) without Public Notification is an illegal five-away to RI Grows LLC that is unfair to the taxpayers of Exeter. According to the Controlled Environment Agriculture (CEA) zone amendment a Tier III CEA Greenhouse would pay a one-time (or annual) fee in lieu fo a property tax of \$250,000 as opposed to an appropriately assessed \$1,254,600 annual property tax. A tier III CEA Greenhouse is a commercial structure as described in the proposed CEA amendment and a Superior Court Decision. As such it should be taxed and would pay an estimated annual property tax calculated as follows: 25 acres x 43,560 sf = 1,089,000 sf; \$90,000,000 Construction cost & Assessed Valuation; \$90,000,000/1000 sf = \$90,000 x \$14.27 = \$1,284,3000 Annual Property Tax. Exeter's ability to increase its tax base and not add to the burden of residential property owners is severely limited. CEA projects like RI Grows LLC is the only potential tax resource that can address this problem and giving them a tax exemption is economic suicide for Exeter.</p>		
8-17	<p>What exactly are the real benefits for town residents as far as this push to develop an economic development strategy? I don't mean hand-waving and assumptions. And if we can even agree on what the result would be, does everyone (or even majority) agree that the result is GOOD??</p>		No change needed.
8-24			No change needed.
8-26	<p>Southern RI Conservation District?</p>		No change needed.
8-35	<p>Foster good communication and working relationship between the Town and agricultural landowners. Would love to see the Schartner land productive--this is a two-way street with responsibility on part of Town and landowner.</p>		No change needed.
9- TRANSPORTATION			
9-7	<p>Route 102 is a jewel. What opportunities are there to make the most of its designation?</p>		No change needed.

9-11	STIP 1576 has already been completed. Should this project be removed from the list?	Mark as completed in final plan.	
9-12	Can we please put up some speed cameras! I've had animals killed on route 102 due to speeding, people do not realize that this is a rural area with livestock potentially on the road and more signage would be helpful to alert drivers that livestock could be on the road and the 45 mile an hour speed limit needs to be observed not 50+. Speed cameras could be a potential source of income and greatly reduce the amount of speeding on our roads.	Add discussion of speed cameras with RIDOT.	
9-16	Project has already been completed.	Mark as completed in final plan.	
9-19	Are over weight vehicles the concern? I'm not sure what a load limitation study would accomplish if you're trying to inventory the existing conditions on Route 102.	There are complaints of too many trucks on Route 102. The appendix contains a 2022 vehicle classifications by percentage count at Route 165.	
10 - PUBLIC FACILITIES, SERVICES & INFRASTRUCTURE			
10-2	Where would the money for this come from? [new town hall]	No change needed. See Element 13.	
	How can the vision of a new town hall incorporate a vision for a modernized town government with more robust information resources? How can the two be envisioned together?	No change needed. Architects much be asked in the design concept and detailed design to incorporate modern functionality, as well as energy efficiency.	
	Is it possible to stream town council and other town meetings? I think this would go a long way to improving communication.	No change needed. Other towns do it and Exeter could also.	
10-10	[On having a police department] Lots of strong opinions on both sides of this. Can a robust cost-benefit analysis be done to clarify the issue? How would the addition of a town manager come about? Is this a budget item? In what ways might a town manager bring about efficiencies that help keep our town government small?	No change needed. Several cost-benefit analyses have been done and so far the decision is not to have town police.	
10-20	Could there be someone in town willing to make/improve our website? [On having public disclosure content and interactive opportunities on the town website] Yes please!	No change needed.	
11 - SUSTAINABILITY: CLIMATE CHANGE RESILIENCY, ENERGY & HAZARD MITIGATION			

11-4	Vision statement text is incorrect.	Correct vision statement for final plan.	
12 - LAND USE			
12-4	The approved Controlled Environment Agriculture (CEA) zoning amendment is invalid in its entirety because of multiple violations of the Exeter zoning ordinance and RI state laws. It should not be included in the Comprehensive Plan 2044 because it falsely legitimizes an illegally adopted zoning ordinance. Notification for both the February 27 and March 9, 2023 Public Hearings were misleading because they were advertised only for a Lot Coverage Amendment that suddenly morphed into an extensive Controlled Environment Agriculture (CEA) ordinance that included a tax exemption (payment in lieu of taxes) in violation of RI State Statute section 45-24-53. The Notifications were clearly misleading, and are rendered defective and invalid in accordance with the following self-executing paragraph in the Exeter Zoning Ordinance: "F. No defect in the form of any notice under this section shall render any ordinance or amendment invalid, unless the defect is found to be intentional or misleading."	No change needed.	
12-13	[Same as the comment on page 12-4 above.]	No change needed.	
12-14	[Reference to core forest map] Is this map shown below?	Refer to core forest map elsewhere in plan or show again in final plan.	
12-14	How does this PILOT fee compare to the tax that would otherwise be levied on a CEA site?	No change needed.	
12-26	What additional resources might the planning board and staff need to meet the deadline?	No change needed.	
12-29	Consider having resources available at Town Hall, on the Town website, and/or offering annual workshop or seminar that landowners could attend.	No change needed. See Elements 10 and 13.	
12-30	TDR does not sit right with me--it allows a zoning relief in exchange for money? I understand the concept, and if it has substantiated benefits OK, but if this framework is not required by the State, I recommend the Town bet the concept more thoroughly before implementing.	No change needed. Proposed refinement of TDR would include further discussion.	
12-31	[revisit previous work on accessory uses for agriculture] Yes!	No change needed.	

12-36	<p>Strategy A is much more desirable to avoid habitat fragmentation. Strategy B will provide isolated pockets within a development that won't support much wildlife beyond what is found in a typical suburban neighborhood. Let's maintain open spaces connected corridors wildlife to safely exist and travel in our town.</p>	<p>No change needed. Both strategies can be pursued.</p>
<p>13 - STEWARDSHIP AND IMPLEMENTATION</p>		
13-5	<p>Should the Town consider using 1099 consultants instead of hiring town employees for some of these tasks?</p>	<p>No change needed. Use consultants, staff, or volunteers as appropriate to the task.</p>
13-10	<p>{On annual report}. This is a great idea. Distributing a comp plan summary is a great idea. Could it be written in a way more accessible to those of us who don't always understand "planner speak?"</p>	<p>No change needed.</p>
13-11		<p>No change needed.</p>

**Proposed Town Planner Planning Amendment
Public Hearing April 2, 2024, JOINT MEETING OF THE TOWN COUNCIL AND PLANNING BOARD**

**To the Exeter 2044 Comprehensive Plan "One Community Moving Forward."
Dated February 7- March 4, 2024**

To: Lynn M. Hawkins, Town Clerk and Honorable Members of the Exeter Town Council and Planning Board

From: William J DePasquale Jr., AICP Town Planner

Date: March 19, 2024

→ RE: **Town Planner Proposed Amendments - ADOPTION OF TOWN OF EXETER COMPREHENSIVE PLAN: NEW PLAN: "EXETER 2044 - ONE COMMUNITY MOVING FORWARD TOGETHER"**

Continued public hearing April 2, 2024, JOINT MEETING OF THE TOWN COUNCIL AND PLANNING BOARD.

As the town planner, I have proposed some amendments to the planning board-approved draft Comprehensive Plan titled "Exeter 2044—One Community Moving Forward Together". These amendments will be considered at April 2, 2024, JOINT MEETING OF THE TOWN COUNCIL AND PLANNING BOARD public hearing continued from March 11, 2024. The intention of the proposed changes is to simplify the process of incorporating feedback and recommendations from the public and statewide planning. The changes will also allow for non-substantive revisions to the plan, errors/omissions, required mapping, and format changes. These changes are desired to be implemented during the Town council adopted hearing, which concerns the approval of the Comprehensive Plan titled "Exeter 2044—One Community Moving Forward Together" for the Town of Exeter.

Planner Amendment

Amend the plan to address:

1. Mapping adjustments as noted in the Statewide Planning Letter to the Town Planner, dated March 7, 2024, from the Department of Administration Division of Statewide Planning 235 Promenade Street Suite 230 Providence, RI 02908, concerns regarding mapping in general and in particular the Map file of 11 x 17 maps according to Statewide Planning standards.
2. Other adjustments to text and layout as noted in the Statewide Planning Letter to the Town Planner, dated March 7, 2024, from the Department of Administration Division of Statewide Planning 235 Promenade Street Suite 230 Providence, RI 02908, Statewide Planning Letter suggestions A-F.
3. Improvements to formatting and visuals as needed
4. Additional photographs as suggested in the Statewide Planning Letter to the Town Planner, dated March 7, 2024, from the Department of Administration Division of Statewide Planning 235 Promenade Street Suite 230 Providence, RI 02908.
5. Corrections of typos or other errors as well as additional relevant updated or missing data statistics or similar.
6. Add the Final Cover and Table of Contents
7. Appendix (additional background materials, e.g., lists of historic resources)
8. Add photographs and conduct format changes in response to statewide planning suggested edits.
9. Add pertinent information from the Town Planner review of the public online comment matrix, the consultant's response, and the Planner's recommendation to the Planning Board and Town Council.

**Continued public hearing to April 2, 2024, JOINT MEETING OF THE TOWN COUNCIL
AND PLANNING BOARD**

AGENDA

**EXETER TOWN COUNCIL
SPECIAL MEETING**

MEETING DATE

MONDAY, MARCH 11, 2024, 7:00 P.M.

MEETING LOCATION

**Wawaloam Elementary School Cafeteria
100 Victory Highway (Rte. 102)
Exeter, Rhode Island**

**All Agenda Items are subject to review, consideration,
discussion, and/or possible action by the Town Council**

**Per the Town Council's By-laws, Section 119 (Decorum), order must be preserved during Town Council Meetings. No person shall by statement,
action, conversation, or otherwise, interrupt a Council Member or delay the proceedings of the Town Council Meeting.**

- No. 1: CALL TO ORDER AND ROLL CALL**
- No. 2: JOINT MEETING OF THE TOWN COUNCIL AND PLANNING BOARD:
PUBLIC HEARING: PLANNING BOARD RECOMMENDATION AND
TOWN COUNCIL ADOPTION OF TOWN OF EXETER COMPREHENSIVE
PLAN: NEW PLAN: "EXETER 2044 - ONE COMMUNITY MOVING
FORWARD TOGETHER" (See Notice of Public Hearing previously posted)**
- No. 3: ADJOURNMENT**

**POSTED MARCH 6, 2024, AT TOWN OF EXETER CLERK'S OFFICE, PUBLIC LIBRARY, AND POST OFFICE, AND ON
SECRETARY OF STATE'S AND TOWN
OF EXETER'S WEBSITES**

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STATE OF RHODE ISLAND

Department of Administration
DIVISION OF STATEWIDE PLANNING
235 Promenade Street, Suite 230
Providence, RI 02908



Office: (401) 222-7901
Fax: (401) 222-2083

March 7, 2024

Mr. William DePasquale, Director of Planning
Town of Exeter
675 Ten Rod Road
Exeter, RI 02822

Subject: Draft Comprehensive Plan Chapters Review

Dear Mr. DePasquale:

Our office appreciates the opportunity to work with our municipal partners in the drafting of community comprehensive plans. We have completed our review of the Town of Exeter's *Comprehensive Community Plan Update* ("the Plan") draft chapters for Land Use, Economic Development, Housing, Transportation and Circulation, Natural Resources and Conservation, Historic and Cultural Resources, and Recreation and Open Space. The following is our evaluation of the draft material provided.

Please be advised that this is a preliminary evaluation and should not be considered official findings.

What follows is divided into two sections: Section I sets forth concerns with the draft material that relate to approvability issues, while Section II presents other suggestions that, although not directly related to approvability standards, could improve the plan's overall accuracy, readability, and usability, once addressed.

I. STATE APPROVAL CONCERNS

The following approval concerns were identified during the review. The concerns are organized by submitted element.

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and outdoor recreation facilities provided on Page 21 of the Natural Resources and Conservation chapter, there is no map title or map figure associated with the map. On Page 31 in the Historic and Cultural Resources chapter, there is also a map that is lacking a title or figure reference point and, in particular on this map, there is a feature in the legend for “heritage landscapes” which is shown with symbology that is very similar to the symbology for parcel boundaries included within the map, thus making it difficult to discern where the heritage landscapes are actually located in Exeter. These are just two examples, but there are several more maps provided within the draft chapters that are missing titles, or where the map symbology is difficult to interpret.

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Suggestion – When the Town of Exeter completes a final draft of the Community Comprehensive Plan update, we suggest that the maps should be included as separate pages and at a scale that is discernable to all readers of the Plan. Please provide stand-alone Comprehensive Plan maps that meet the requirements of Planning Standards 12.1 - 12.5 and the generally accepted standards used in land use maps.

Land Use

Comment 2: Similar to the mapping comment above, the Future Land Use Map (“FLUM”) provided on Page 29 of the draft chapter should be clearly titled as the Exeter FLUM and include a scale where the map features are easily interpreted and the map legend and symbology give clear guidance as to the Town’s desired approach to land use planning over the required twenty-year planning horizon.

The map that is included has several problems. The current zoning districts should not be included on the FLUM, as it is the FLUM that guides implementation of future zoning changes and zoning amendments to achieve the land use goals of the Town over the twenty-year planning horizon of the Plan, as well as the eighteen-month deadline to bring the Town’s zoning into compliance with the FLUM. Additionally, within the map there appears to be a problem with white lines running across the map, which perhaps could be a problem with how the overlay GIS layers were included. These lines make it difficult to determine boundaries for a given map feature, which is already complicated due to the map scale.

Suggestion – The Future Land Use Map should be included as a separate page and at a scale that is discernable to all readers of the Plan. The zoning layers should be removed from the FLUM and the errors with lines running across them must be resolved before the FLUM can be considered approvable. Currently, the draft FLUM included would not meet the thresholds of Planning Standards 12.1 – 12.5.

Comment 3: Although the Plan does a good job describing the base zoning districts and overlay zoning districts within the draft Land Use chapter (as required by Planning Standard 10.2), the Plan does not include the descriptions of the future land use categories depicted on the Future

Land Use Map shown on Page 29, as required by Planning Standard 10.6

Suggestion – Please include detailed descriptions of the land use categories shown on the Future Land Use Map shown on Page 29 of the draft chapter. In order to meet the requirements of Planning Standard 10.6 the Town must, at a minimum, include:

“...descriptions of each of the future land uses and densities shown on the FLUM that discuss, at a minimum: a) The general uses that are desired within the future land use category (residential, commercial, industrial, agricultural, civic, institutional, open space, recreation, etc.); and b) The average residential density or the range of residential densities that are desired within the future land use category.”

Natural Resources

Comment 4: Planning Standard 2.1(e) and (f) for Natural Resources requires that municipalities “identify the following natural resources and natural resource areas on one or more maps....: (e) Forested areas (f) Any existing large, intact, or connected blocks of habitat area...” Within the draft chapter for Natural Resources and Conservation on Page 11, it appears the Town tried to meet these two standards within one map that shows unfragmented forest blocks, natural heritage areas, and highly vulnerable habitat. Unfortunately, this map is problematic. First, there are numbers on the map that appear to correspond to the natural heritage areas; however, there is no explanation in the map legend as to what these numbers mean. The second issue is that the map has a layer shaded in grey that is supposed to show the amount of protected lands that cover ecological resources in Town; however, this layer should have been transparent, as it blocks out the identification of any underlying data in the map for the reader. The last issue is that this map is not actually presented as part of the series of embedded maps within the chapter itself; instead the Town has labeled this as map “Figure 2” with a lengthy detailed comment box. There is no clear map title and, as described above, there are several features within the map that are not adequately explained or labeled within the map legend.

Suggestion – Please address the comments above so that this draft map can meet the requirements of Natural Resources Planning Standards 2.1(e) and (f), as well as mapping Planning Standards 12.1 – 12.5.

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Comment 5: Within Planning Standard 4.1, the requirement to “identify historical and cultural resource areas and sites such as, but not limited to, historical building, landmarks, and scenic views” section (b) also requires that a municipality “include clear identification of the name of each mapped resource area or site.” The map included on Page 31 of the draft chapter for Historic and Cultural Resources includes a map that does not have a title of figure reference point with it. Additionally, within the legend provided for this map there is a heart symbol denoted by the label “Special Places;” however there is no explanation as to what places qualify as “special” within the provided text. Lastly, the “heritage landscapes” look like parcel

boundaries which are already shown on the map and makes it difficult to differentiate between the two. Planning Standards 4.1(b) has not been met.

Suggestion – Please revise this map to include a clear map title, and explanations for all resource items included with symbology in the legend of the map. To meet the requirements of Planning Standard 4.1(b) as well as Planning Standards 12.1 - 12.5, the map must be easy to read and at a scale appropriate to discern symbology, map features, and all items included within the map that should have a concise explanation within the supporting text.

Comment 6: Planning Standard 4.5 for Historic and Cultural Resources requires that municipalities “include goals that embody the State’s goals for historic and cultural resources and policies to support each goal.” The Historic and Cultural Resources element of the Plan does not have a goal which embodies the goal of the state historic preservation plan, *Protecting Our Legacy of Buildings, Places, and Culture: An Historic Preservation Plan for Rhode Island* (State Guide Plan Element #210) to “ensure equity and representation in historic preservation and cultural heritage.” This goal is central to the State Guide Plan element and the Plan should address this topic area in the goals and policies of the element.

Suggestion – Please add additional goals and policies that would help to fully embody and address the state’s goals for consistency. These additional goals and policies should address how the Town will ensure equity and representation in preserving and accessing historical resources within the community and how information will be provided to residents to help the public become more knowledgeable about Exeter’s historic buildings and cultural heritage.

Economic Development

Comment 7: There are no goals provided within the draft chapter for Economic Development that are consistent with Goals 1 and 2 of the State Guide Plan element for economic development *RI Rising: A Plan for People, Places, and Prosperity* (Element #121) to “provide educational training opportunities to activate a 21st-century workforce” and “foster an inclusive economy that targets opportunity to typically underserved populations.” These goals are central to the State Guide Plan element and the Plan should address these topic areas in the goals and policies of the draft chapter.

Suggestion – Please add additional goals and policies that would help to fully embody and address the state’s goals for consistency. These additional goals and policies should address how the Town will foster an inclusive economy and provide educational; training opportunities.

Comment 8: The Standards require a discussion of how the plan will advance the State’s comprehensive economic development strategy (CEDS), *Ocean State Accelerates* (2023) (Requirement 6.3).

Suggestion- Explain how the plan will advance the State’s interim comprehensive economic development strategy (CEDS), *Ocean State Accelerates*.

Comment 9: Planning Standard 6.2 (b) requires that a municipality “Discuss any issues that may exist related to the services and infrastructure provided for local businesses” and Planning Standard 6.2 (c) requires that a municipality “Discuss any local economic or regulatory issues affecting the business and industry sectors within the municipality.” The draft chapter provides very little description of the availability of infrastructure (including broadband) for businesses and, while there is good analysis of potential zoning changes for Route 2 and Route 3 corridors, there is no description of the current strengths or weaknesses of the existing zoning regime for businesses or local economic development programs to assist businesses.

Suggestion – In order to fulfill the requirements of Planning Standard 6.2 parts (a) – (d) the Plan must provide more information and discussions of the current regulations for commercial and industrial businesses in Town, as well the availability of infrastructure and any economic development programs or incentives offered by the Town to support businesses.

Transportation

Comment 10: Planning Standard 8.3 requires that a municipality, “Include goals that embody the state’s goals for transportation and policies to support each goal.” Based on the way the goals and policies are currently structured in the Transportation and Circulation chapter, there does not appear to be a commitment behind the language in achieving consistency with the goals of *Moving Forward Rhode Island 2040: The State Long Range Transportation Plan*. For instance, the provided Goals 2 and Goal 5 do not actually read like goal statements but rather as subjective statements of condition or facts regarding occasional review of infrastructure.

Exeter Goal 2 - “Speeding is not a significant problem on Exeter roads.”

Exeter Goal 5 - “The Town reviews transportation needs every five years.”

These are not goal statements: a goal statement is a desired outcome. Goals should be simple, broad, high reaching, yet specific enough to be meaningful for guiding policy. The Town should review the Rhode Island Division of Statewide Planning’s *Comprehensive Planning Guidance Handbook: Revised and Abridged* for further guidance on how to draft appropriate and specific goals, policies, and actions.

The Town has not provided any goals that embody Goal 1 of the State Long Range Transportation Plan (LRTP) to “Support Economic Growth through transportation connectivity and choices to attract employers and employees.”

Suggestion – In order to fulfill the requirements of Planning Standard 8.3, the town must provide new goals that fully embody the goals of *Moving Forward Rhode Island 2040: The State Long Range Transportation Plan* and are written in a clear and concise manner to guide policy and future actions relating to transportation needs within the Town of Exeter.

II. COMMENTS AND SUGGESTIONS TO ENHANCE ACCURACY, READABILITY, AND USABILITY

Comments and suggestions common to multiple elements are presented first, followed by an element-by-element assessment.

General Comments:

Comment A: Within the Housing draft chapter, the tables included in the Plan do not have table number references. The chapter should include table numbers in ascending order for the data tables provided for easy reference when reading the Plan.

Suggestion – Please include table numbers for the data tables provided in the Plan for reference.

Comment B: One of the recommended Planning Standards for Housing (Standard 5.3) recommends that municipalities include data points relating to housing affordability as provided by the Department of Housing and Urban Development’s (HUD) Comprehensive Housing Affordability Strategy (CHAS) datasets, which are readily available online. Exeter has included some of this data within the chapter for Housing relating to cost burden for households within the community but has not included all the data that is usually provided via the CHAS database. Most communities include a table derived from the latest CHAS datasets, which currently are the 2016 – 2020 ACS 5-year estimates.

Suggestion – We recommend that the Town of Exeter include the full CHAS data on the number of households within the community that are housing cost-burdened, as well as LMI households that are cost burdened.

The data is readily available at: <https://www.huduser.gov/portal/datasets/cp.html>

Comment C: Exeter has noted within the Housing chapter that the Town has met the state goal for affordable housing units as of 2023, now that 184 group home beds for persons with special needs can be counted as part of a municipalities affordable housing inventory. In Exeter, sixty-nine percent of the affordable housing units are group home beds (Pages 10 -11 of the draft chapter), resulting in only one-third of the affordable housing units in the community that are available for year-round housing in single family or multi-family dwelling units. With that being the case, the Town should be cautious with some of the language included in the chapter relating to future affordable housing strategies that indicate pulling back or eliminating affordable housing strategies such as inclusionary zoning or accessory dwelling units (due to changes in the state laws in 2023 related to these strategies). The percentage of “available” year-round affordable housing units in Exeter is quite small when the group home beds that only serve special needs individuals are deducted from the total. The Plan should suggest clear new strategies for developing affordable housing units in Exeter.

Suggestion – We suggest that the Town promote a new inclusionary zoning ordinance (not the prospective elimination of inclusionary zoning) as well as strategies for the promotion of new affordable housing units such as the pursuit of available affordable housing development and

affordable housing rehabilitation grants and loans provided through the RI Department of Housing as well as RI Housing.

Comment D: The first action included in the Housing chapter begins with a statement, “This is a big job and not realistic...”. This text should be removed and placed within the text that precedes the actions within the documentation that explains the statement. Explanatory wording is neither necessary nor appropriate for actions.

Suggestion – Please remove the language described above. The Town may even want to consider removing Action #1 and replacing it with Action #2 in the chapter, as they seem to both be related to the Town’s consideration of balancing natural resource protection while still provided for housing growth via strategies such as conservation subdivisions and rural compound zoning.

Comment E: Within the draft chapter for Open Space and Outdoor Recreation, on Page 21, the text and pie chart are confusing and seem to conflict (and be out of proportion visually). If the gray pie is forty percent, as the beginning of the paragraph suggests, this brings the chart over one hundred percent, yet the categories seem mutually exclusive (and a pie chart isn't ideal if they are not). Additionally, the end of this paragraph cites thirty-eight percent for seemingly the same number. With the pie chart math, it would be twenty-four percent.

Suggestion – We suggest reviewing this information and accompanying pie charts to ensure that the data being provided is accurate and consistent throughout the draft chapter.

Comment F: The overall formatting of the draft Plan could be improved by the addition of a Table of Contents (TOC) for a more efficient review of such a large amount of material. Also, we encourage the use of more photos from Exeter showing various resources, land use, housing and other features. Compared to other recent community submissions, this one is rather text heavy. A picture is worth a thousand words.

Suggestion – We understand this is an early draft of the community Comprehensive Plan but adding a TOC and additional photos throughout the document will aid in the Division of Statewide Planning’s review process and provide additional context for staff to help move along the process for the Plan.

Comment G: The Economic Development chapter alone has over forty action items, but what can realistically be accomplished in the next ten years by a part-time planner and volunteer committees, along with the action items from the plan’s other sections? Although there is the temptation to create an exhaustive list of action items, the number of action items should be streamlined to reflect what can be accomplished in the ten years, given the Town’s limited resources.

Suggestion- Pare down the number of action items to what can realistically be accomplished by the Town within the next ten years.

As previously mentioned, this is a preliminary review. We have attempted to identify any approvability issues regarding the material provided but there are some items, such as requirements related to the Plan's internal consistency and completeness, that cannot be fully evaluated until a full draft is submitted. At the appropriate time, we encourage the Town to provide us with additional draft chapters for comment and review. Please feel free to contact Roberta Groch, Assistant Chief, with any questions, concerns, or requests that you may have at 401/222-4720 or at Roberta.Groch@doa.ri.gov. Yours

truly,



Meredith E. Brady
Associate Director

cc: Roberta Groch, AICP- Assistant Chief Joshua
O'Neill, AICP- Supervising Planner Benny
Bergantino- Principal Planner



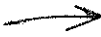
Town of Exeter, RI

Town of Exeter- 675 Ten Rod Road - Exeter, RI 02822

To: Lynn M. Hawkins, Town Clerk

From: William J DePasquale Jr., AICP Town Planner *WJdjr*

Date: March 13, 2024



RE: Planning Board Amendments – (4)
 Made at the MONDAY, MARCH 11, 2024, 7:00 P.M. JOINT MEETING OF THE TOWN COUNCIL AND PLANNING BOARD: PUBLIC HEARING: PLANNING BOARD RECOMMENDATION AND TOWN COUNCIL ADOPTION OF TOWN OF EXETER COMPREHENSIVE PLAN: NEW PLAN: "EXETER 2044 - ONE COMMUNITY MOVING FORWARD TOGETHER"

Please find attached the approved amendments that were discussed during the Joint Meeting of the Town Council and Planning Board on March 11, 2024. This meeting included a public hearing on the adoption of the Town of Exeter Comprehensive Plan titled "Exeter 2044 - One Community Moving Forward Together."

Amendment		Vote
1	Amend the plan to address: Letter Dated March 7, 2024 Letter from Department of Administration Division of Statewide Planning 235 Promenade Street Suite 230 Providence RI 02908 I. State approval concerns 1-10	Approved 5-0
2	Amend the plan to address: Letter Dated March 7, 2024 Letter from Department of Administration Division of Statewide Planning 235 Promenade Street Suite 230 Providence RI 02908 II. Comments and suggestions to enhance accuracy readability and usability sections A-F	Approved 5-0
3	Delete Economic Development Goal 8-3 strategy B (ii) "allow multifamily and mixed use development in the route 2 and route 3 corridors "byright" where supporting infrastructure is available" page – 8-37 economic development.	Approved 5-0
4	Section 10 Public Facilities, Services and Infrastructure —ADD language as the cost of the proposed improvements and evaluate the Town's ability to fund the infrastructure and obtain a bond rating.	Approved 5-0



Town of Exeter, RI

Town of Exeter- 675 Ten Rod Road - Exeter, RI 02822

AGENDA

EXETER TOWN COUNCIL SPECIAL MEETING

MEETING DATE

MONDAY, MARCH 11, 2024, 7:00 P.M.

MEETING LOCATION

Wawaloam Elementary School Cafeteria
100 Victory Highway (Rte. 102)
Exeter, Rhode Island

*All Agenda Items are subject to review, consideration,
discussion, and/or possible action by the Town Council*

Per the Town Council's By-laws, Section 119 (Decorum), order must be preserved during Town Council Meetings. No person shall by statement, action, conversation, or otherwise, interrupt a Council Member or delay the proceedings of the Town Council Meeting.

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Suggestion- Explain how the plan will advance the State’s interim comprehensive economic development strategy (CEDS), *Ocean State Accelerates*.

Comment 9: Planning Standard 6.2 (b) requires that a municipality “Discuss any issues that may exist related to the services and infrastructure provided for local businesses” and Planning Standard 6.2 (c) requires that a municipality “Discuss any local economic or regulatory issues affecting the business and industry sectors within the municipality.” The draft chapter provides very little description of the availability of infrastructure (including broadband) for businesses and, while there is good analysis of potential zoning changes for Route 2 and Route 3 corridors, there is no description of the current strengths or weaknesses of the existing zoning regime for businesses or local economic development programs to assist businesses.

Suggestion – In order to fulfill the requirements of Planning Standard 6.2 parts (a) – (d) the Plan must provide more information and discussions of the current regulations for commercial and industrial businesses in Town, as well the availability of infrastructure and any economic development programs or incentives offered by the Town to support businesses.

Transportation

Comment 10: Planning Standard 8.3 requires that a municipality, “Include goals that embody the state’s goals for transportation and policies to support each goal.” Based on the way the goals and policies are currently structured in the Transportation and Circulation chapter, there does not appear to be a commitment behind the language in achieving consistency with the goals of *Moving Forward Rhode Island 2040: The State Long Range Transportation Plan*. For instance, the provided Goals 2 and Goal 5 do not actually read like goal statements but rather as subjective statements of condition or facts regarding occasional review of infrastructure.

Exeter Goal 2 - “Speeding is not a significant problem on Exeter roads.”
Exeter Goal 5 - “The Town reviews transportation needs every five years.”

These are not goal statements: a goal statement is a desired outcome. Goals should be simple, broad, high reaching, yet specific enough to be meaningful for guiding policy. The Town should review the Rhode Island Division of Statewide Planning’s *Comprehensive Planning Guidance Handbook: Revised and Abridged* for further guidance on how to draft appropriate and specific goals, policies, and actions.

The Town has not provided any goals that embody Goal 1 of the State Long Range Transportation Plan (LRTP) to “Support Economic Growth through transportation connectivity and choices to attract employers and employees.”

Suggestion – In order to fulfill the requirements of Planning Standard 8.3, the town must provide new goals that fully embody the goals of *Moving Forward Rhode Island 2040: The State Long Range Transportation Plan* and are written in a clear and concise manner to guide policy and future actions relating to transportation needs within the Town of Exeter.

II. COMMENTS AND SUGGESTIONS TO ENHANCE ACCURACY, READABILITY, AND USABILITY

Comments and suggestions common to multiple elements are presented first, followed by an element-by-element assessment.

General Comments:

Comment A: Within the Housing draft chapter, the tables included in the Plan do not have table number references. The chapter should include table numbers in ascending order for the data tables provided for easy reference when reading the Plan.

Suggestion – Please include table numbers for the data tables provided in the Plan for reference.

Comment B: One of the recommended Planning Standards for Housing (Standard 5.3) recommends that municipalities include data points relating to housing affordability as provided by the Department of Housing and Urban Development’s (HUD) Comprehensive Housing Affordability Strategy (CHAS) datasets, which are readily available online. Exeter has included some of this data within the chapter for Housing relating to cost burden for households within the community but has not included all the data that is usually provided via the CHAS database. Most communities include a table derived from the latest CHAS datasets, which currently are the 2016 – 2020 ACS 5-year estimates.

Suggestion – We recommend that the Town of Exeter include the full CHAS data on the number of households within the community that are housing cost-burdened, as well as LMI households that are cost burdened.

The data is readily available at: <https://www.huduser.gov/portal/datasets/cp.html>

Comment C: Exeter has noted within the Housing chapter that the Town has met the state goal for affordable housing units as of 2023, now that 184 group home beds for persons with special needs can be counted as part of a municipalities affordable housing inventory. In Exeter, sixty-nine percent of the affordable housing units are group home beds (Pages 10 -11 of the draft chapter), resulting in only one-third of the affordable housing units in the community that are available for year-round housing in single family or multi-family dwelling units. With that being the case, the Town should be cautious with some of the language included in the chapter relating to future affordable housing strategies that indicate pulling back or eliminating affordable housing strategies such as inclusionary zoning or accessory dwelling units (due to changes in the state laws in 2023 related to these strategies). The percentage of “available” year-round affordable housing units in Exeter is quite small when the group home beds that only serve special needs individuals are deducted from the total. The Plan should suggest clear new strategies for developing affordable housing units in Exeter.

Suggestion – We suggest that the Town promote a new inclusionary zoning ordinance (not the prospective elimination of inclusionary zoning) as well as strategies for the promotion of new affordable housing units such as the pursuit of available affordable housing development and

affordable housing rehabilitation grants and loans provided through the RI Department of Housing as well as RI Housing.

Comment D: The first action included in the Housing chapter begins with a statement, “This is a big job and not realistic...”. This text should be removed and placed within the text that precedes the actions within the documentation that explains the statement. Explanatory wording is neither necessary nor appropriate for actions.

Suggestion – Please remove the language described above. The Town may even want to consider removing Action #1 and replacing it with Action #2 in the chapter, as they seem to both be related to the Town’s consideration of balancing natural resource protection while still provided for housing growth via strategies such as conservation subdivisions and rural compound zoning.

Comment E: Within the draft chapter for Open Space and Outdoor Recreation, on Page 21, the text and pie chart are confusing and seem to conflict (and be out of proportion visually). If the gray pie is forty percent, as the beginning of the paragraph suggests, this brings the chart over one hundred percent, yet the categories seem mutually exclusive (and a pie chart isn't ideal if they are not). Additionally, the end of this paragraph cites thirty-eight percent for seemingly the same number. With the pie chart math, it would be twenty-four percent.

Suggestion – We suggest reviewing this information and accompanying pie charts to ensure that the data being provided is accurate and consistent throughout the draft chapter.

Comment F: The overall formatting of the draft Plan could be improved by the addition of a Table of Contents (TOC) for a more efficient review of such a large amount of material. Also, we encourage the use of more photos from Exeter showing various resources, land use, housing and other features. Compared to other recent community submissions, this one is rather text heavy. A picture is worth a thousand words.

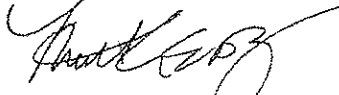
Suggestion – We understand this is an early draft of the community Comprehensive Plan but adding a TOC and additional photos throughout the document will aid in the Division of Statewide Planning’s review process and provide additional context for staff to help move along the process for the Plan.

Comment G: The Economic Development chapter alone has over forty action items, but what can realistically be accomplished in the next ten years by a part-time planner and volunteer committees, along with the action items from the plan’s other sections? Although there is the temptation to create an exhaustive list of action items, the number of action items should be streamlined to reflect what can be accomplished in the ten years, given the Town’s limited resources.

Suggestion- Pare down the number of action items to what can realistically be accomplished by the Town within the next ten years.

As previously mentioned, this is a preliminary review. We have attempted to identify any approvability issues regarding the material provided but there are some items, such as requirements related to the Plan's internal consistency and completeness, that cannot be fully evaluated until a full draft is submitted. At the appropriate time, we encourage the Town to provide us with additional draft chapters for comment and review. Please feel free to contact Roberta Groch, Assistant Chief, with any questions, concerns, or requests that you may have at 401/222-4720 or at Roberta.Groch@doa.ri.gov.

Yours truly,



Meredith E. Brady
Associate Director

cc: Roberta Groch, AICP- Assistant Chief
Joshua O'Neill, AICP- Supervising Planner
Benny Bergantino- Principal Planner