



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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

September 8, 2014

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

**Subject: Draft Comprehensive Plan Review – Community Services & Facilities and  
Open Space & Recreation Chapters**

Dear Mr. Hervey:

I am pleased to notify you that our office has completed its review of the above referenced chapters. As part of this review, we also solicited comments from other relevant State agencies. The following constitutes our evaluation of the draft material that you provided to our office. As with our previous reviews, this is a preliminary evaluation and does not constitute official findings.

As with previous chapters, these draft chapters are well-organized, clear, and attractively presented. However, the most important part of this review is to alert you to any aspect of the draft that could prevent its receiving State approval. This includes any potential conflicts with elements of the State Guide Plan or the goals and policies of State Agencies, any internal inconsistencies within the Plan, and any missing material that is required to be included in a comprehensive plan by the Comprehensive Planning and Land Use Regulation Act (the Act). Our understanding is that the Town intends for this plan to meet the requirements of the Act as amended in 2011 and thereby qualify for a ten-year State approval.

What follows is divided into four sections. Section I enumerates the standards for State approval of local comprehensive plans as outlined in the Act and supplemented by the Division of Planning. Sections II and III set forth concerns with the draft Plan that relate to approvability issues, and Section IV presents other suggestions that, although not directly related to the review requirements, could improve the Plan's overall accuracy, readability, and usability if addressed.

## **I. Standards for State Approval**

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

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

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

In addition to these general requirements, the Division of Planning is currently in the process of developing a Comprehensive Plan Guidance and Standards Manual that will offer both guidance on the development of comprehensive plans and set detailed standards relating to the above requirements for receiving State approval of comprehensive plans. However, until the Manual is adopted by the State Planning Council, which is anticipated for later this year, the review standards in force are the *interim* standards that were shared with all municipalities in 2013. Therefore, the comments included in this correspondence relating to State approval are divided into two categories, Section II presents comments relating to the current (interim) review standards and Section III presents comments relating to additional draft standards included in the Comprehensive Plan Guidance and Standards Manual. Please note that the draft standards used in this review are subject to change as the Manual is reviewed, finalized, and adopted by the State Planning Council.

Any municipally-adopted plan submitted before the adoption of the new Comprehensive Plan Guidance and Standards Manual by the State Planning Council, must satisfactorily address the comments found in Section II of this letter in order to receive State approval. Any municipally-adopted plan submitted after the adoption of the new Manual may also need to address the concerns identified in Section III.

## **II. State Approval Concerns based on the Interim Standards**

The draft Community Services & Facilities and Open Space & Recreation Chapters do not appear to contain any State Approval concerns for items 1), 3), 6), or 7). Our comments for item 2) appear below.

**The plan does not appear to be internally consistent and complete as required by § 45-22.2-6.**

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

### **Community Services and Facilities Chapter**

The draft Community Services and Facilities chapter, while very well done, does not appear to contain all the required content.

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

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

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

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

**Comment 3** – The final Plan will need to consider the topic of climate change, sea-level rise, and natural hazards. This may be accomplished in an individual chapter or it may be interwoven through several chapters. While the impact of a changing climate and sea-level rise on Barrington’s array of facilities and services is not required to be presented in the Facilities and Services chapter under the interim standard, the potential impacts must be assessed somewhere in the final document. However, with respect to infrastructure and facilities, the comprehensive plan must 1) identify what currently exists within areas exposed

to climate change, sea-level rise, and natural hazards; 2) identify any priority issues that the municipality would face in the event of a natural hazard occurrence; and 3) include goals, policies, and implementation actions for minimizing the risks posed to infrastructure by climate change, sea-level rise, and natural hazards.

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

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

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

### **III. State Approval Concerns based on the Draft Standards**

The draft Community Services & Facilities and Open Space & Recreation Chapters do not appear to contain any State Approval concerns for items 1), 3), 6), or 7). Our comments for item 2) appear below.

**The plan does not appear to be internally consistent and complete as required by § 45-22.2-6.**

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

#### **Community Services and Facilities Chapter**

The draft Community Services and Facilities chapter, while very well done, does not appear to contain all the content required by the draft *Comprehensive Plan Guidance and Standards Manual*.

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

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

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

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

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

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

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

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

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

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

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

## **Open Space & Recreation Chapter**

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

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

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

**Comment 8** – The proper categorization of Goals, Objectives, Policies, and Actions is important to the clarity of a comprehensive plan. The proper categorization of Actions is especially important under the new requirements of the Act, one of which is that communities must conduct an assessment of the plan’s implementation program within five years of its adoption. While the majority of these chapter’s statements are well-thought out, clear, and properly classified, a few may not be.

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

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

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

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

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

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

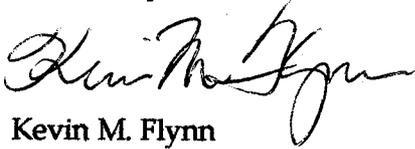
**Suggestion:** Revise as appropriate.

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

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

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

Yours truly,

A handwritten signature in black ink, appearing to read "Kevin M. Flynn". The signature is fluid and cursive, with the first name "Kevin" being the most prominent.

Kevin M. Flynn  
Associate Director

cc: Jared L. Rhodes II  
Kevin J. Nelson