*STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS*

Department of Administration

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July 15, 2019

Jennifer Siciliano Town Planner

181 Howard Hill Road Foster, RI 02825

Subject: Draft Comprehensive Plan Review

Dear Ms. Siciliano,

Our office greatly appreciates the opportunity to work with our municipal partners in the drafting of community comprehensive plans. Our office has completed its review of the draft *Foster Comprehensive Plan:* the following constitutes our evaluation of the draft material that you provided. This is a preliminary evaluation and does not constitute official findings.

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

The following pages detail a great deal of information for your consideration. Our staff would be happy to meet with you and/or your consultant team to answer any questions you may have, as well as to offer our technical assistance.

# STATE APPROVAL CONCERNS

The following approval concerns were identified during the review.

# Comments Relevant to Multiple Chapters

**Comment 1:** Comprehensive plans are required to use data that is sufficiently recent to be valid. Some of the data referenced in the draft Plan does not appear to meet this standard. For example, the draft cites American Community Survey (ACS) demographic data from 2014-15, economic

data (unemployment rate) from 2015, and housing stock information from the 2010 Census. Indeed, many statistics in the Housing chapter are dated. Additionally, the draft presents a traffic count from 2001 (Table 14: Local Traffic Volumes, page 103). While not an approvability issue, we also noticed that throughout the draft, references are made to events, actions, and planning work that occurred in the early 2000s and 1990s. These that do not seem relevant to the updated plan.

**Suggestion:** ACS data from 2017 is now available as well as 2018 economic data from the RI Department of Labor and Training. Traffic count data through at least 2017 is available. Housing-related data fact sheets are available on the Division of Statewide Planning' s website at [http://www.planning.ri.gov/pub lications/comprehensive-palnning-materials.php.](http://www.planning.ri.gov/publications/comprehensive-palnning-materials.php)

In addition to specific data citations, we recommend that that the Town thoroughly review the content of the plan to determine the relevance of events, actions, and planning work from prior decades. In order to lessen the chances for confusion and enhance the readability of the document, the Town should consider removing such references unless there is a clear connection to the updated Plan.

**Response:**

The 2021 Draft Plan has been updated as recommended to include the latest data available as of May, 2021, from the sources identified in the 2019 Draft Plan. These include updated information from the U.S. Census, ACS, HUD, RIDLT, RIDOT, RIHousing, HousingWorksRI, and the Town. Information from these sources updates tables and graphs in the Draft Plan through 2018-2019 in many cases. 2020 U.S. Census data are not currently available for Foster. Because the ACS data are estimates based on relatively small sample sizes for Foster, there is a greater margin of error associated with these data than the 2020 U.S. Census counts.

Outdated information with no current relevance has been eliminated from the 2021 Draft Plan as recommended. In some cases, historical data is included because it has relevance in understanding long-term trends. In some cases historical information is included to provide continuity with the prior approved Foster Comprehensive Plan.

**Comment 2:** The draft Plan contains many commendable Goals, Policies, Objectives, and Actions, but we do have several significant concerns. Some of our concerns relate to the organization and usability of the Goals, Policies, Objectives, and Actions; these concerns are listed under Comment A in section II of this letter. However, we also have concerns that present potential approvability issues. Comprehensive plans, in addition to local goals, must embody State goals and include policies and actions for achieving those goals. For some topics, the draft Plan appears to be deficient in one of two respects. First, for some topical areas, no goals are included in the draft Plan (or at least are not identified as a goal). Second, some policies/objectives are to develop polices/objectives at some point in the future instead of including them in the Comprehensive Plan. In one instance (Transportation Network), we have a concern over the specific wording of a goal. Our concerns include:

* + Under the Goal "Protect and preserve environmental resources of the town", there is an Objective to "Develop Conservation Policies... ", an Objective to "Develop Policies to promote responsible use of resources", and a Policy to "Develop policies for siting and delivery of energy sources... ";
  + The only actions to implement the goal of protecting and preserving environmental resources are to "Revise specific regulations... " (also see Comment P below) and to, "Form a committee or study group to develop policies for siting and delivery of energy sources";
  + Under the Historical and Cultural Resources goal, there is an Objective calling for "The establishment of a Historic District Commission" but the draft does not include an action, timeframe, or responsible parties for implementation;
  + The draft Plan does not include a goal for energy;
  + A Transportation Network goal is to "Retain the rural character of all paved and unpaved roads while ensuring that all roads are safe." While we generally agree with the intent, we are concerned that the current wording may be construed as not fully in alignment with State goals.

**Suggestion:** We recommend that the Town thoroughly review its entire set of Goals, Policies, Objectives, and Actions. With respect to the potential approvability issues identified above, we suggest:

* + - Policies are intended to guide decision-making in the pursuit of a goal. To the maximum extent possible, this Comprehensive Plan should present the policies that the Town will use in its decision-making for the protection and preservation of environmental resources. If it is not feasible to include sufficient policies in this Plan, the Town should include a narrative explaining why and, as with energy siting, include a specific action as to how and when such policies will be developed.
    - The Natural Resources, Conservation, and Recreation chapter contains some very good analyses of issues facing the town. We suggest you draw upon this content to add actions that will further the Town's efforts of protecting the environment. At a minimum, the Plan will need to clarify the regulatory revisions that the Town intents to implement.
* If the Town does truly wish to establish an Historic District Commission, an action will need to be added to this effect. Alternatively, the Town could withdraw the Objective calling for its establishment.
* Add a goal pertaining to energy. The wording found elsewhere in the draft Plan calling for "Sustainable and environmentally sound consumption and production of energy," would make an excellent goal statement.
* Reword the Transportation goal to read "Ensure all roads are safe while preserving the rural character of those roads to the greatest extent possible." Or something similar that reflects both state and local goals.

**Response:**

The Town’s goals, objectives, policies, and actions set out in the 2019 Draft Plan have been thoroughly reviewed, revised and reorganized in the 2021 Draft Plan. To address the concerns:

* Goals, objectives, policies and actions are grouped together at the end of each chapter, abandoning the table format, and assigning unique identifiers to each item. This improves clarity because a number of policies support more than one goal/objective, and some actions support more than one goal / objective / policy.
* The Implementation chapter has been revised to conform to the contents of the previous chapters, as revised. Many of the State comments relate to goals, objectives, policies and actions as presented in the Implementation chapter which did not exactly correspond to the items as presented in the previous chapters. The table format has also been abandoned. Unique identifiers for the actions also facilitates cross-referencing with goals, objectives, and policies.
* An appendix has been added which cross-references Foster’s goals, objectives and policies with the State of Rhode Island’s goals and policies as articulated in State Guide Plans and in State law. Applicable goals and policies articulated in each of the RI Comprehensive Planning Standards Guidance Handbook Series (Handbooks) were listed in a table and given a unique identifier, similar (but different) to the unique identifiers assigned to Foster’s goals, objectives, policies and actions. The new Appendix contains two tables: one lists Foster’s goals, objectives, and policies with reference to applicable/relevant State goals and policies. The other table lists the State’s goals and policies with reference to applicable/relevant goals, objectives, and policies in Foster’s Comprehensive Plan. This Appendix allows a means of ensuring the Comprehensive Plan meets the State Standard to “include goals that embody the State’s goals … and policies to support each goal”.
* Detailed comparison of the 2019 Draft Plan goals, objectives, policies, and actions with the State’s goals and policies led to revisions in the 2021 Draft Plan, including:
  + Elimination of items because they were no longer relevant or were redundant,
  + Rewording items to better demonstrate conformance to State goals and policies,
  + Reclassifying and rewording some objectives and actions as policies; reclassifying and rewording some objectives and policies as actions,
  + Adding new goals and policies to address gaps in the Town’s goals and policies with respect to the State’s goals and policies (e.g., new energy goal).

# Natural Resources, Conservation, and Recreation

**Comment 3:** The draft Natural Resources, Conservation, and Recreation chapter is missing some required maps; namely:

1. A natural resources map or maps displaying
   * Surface water, including ponds, rivers, and streams, and watersheds
   * Aquifers (if any)
   * Wetlands
   * Floodplains
   * Forested areas
   * Any existing large, intact, or connected blocks of habitat area
   * Any known critical, uncommon, or fragile wildlife habitat areas; and
2. Permanently protected conservation areas (both public and private). Please be sure to include the above maps in the final document.

**Response:**

Maps for all resources have been provided per Comment 3 (1. And 2.).

(INSERT PAGE NUMBERS)

**Comment 4:** With regard to recreation, the Comprehensive Planning Act (the "Act") requires comprehensive plans to include an analysis of existing and future recreational needs. The draft Natural Resources, Conservation, and Recreation chapter contains a thorough inventory of recreational assets, but does not include an analysis of how well those assets meet existing and future recreational needs. The Action to "Determine the future recreational needs of the community - taking into consideration all residents of the community" does not fulfill this requirement.

**Suggestion:** The draft chapter includes a well-done section titled, "Natural Resource Assessment". We recommend that you add a similar section for recreation. Such an assessment may consider:

* + whether there are any neighborhoods that do not have enough recreational resources in general, or enough of a specific type of recreational resource;
  + whether the existing recreational options suit the needs of current and anticipated future residents; and
  + whether any of the existing recreational areas, including conservation areas intended for recreation use, need improved public access.

The Act also requires an identification of areas for the potential expansion of recreational facilities.

In addition, while technically not required, the chapter does not include a map of existing recreational areas and sites. We strongly recommend that such a map be included.

**Response:**

A section titled RECREATION in the Natural Resources chapter has been provided pursuant to the state’s Comment #4 detailing the present and future needs of all recreation resources. Including an inventory of all recreational resources, and an assessment of the needs that are provided for and needed. (INSERT PAGE NUMBER)

# Historical and Cultural Resources

**Comment 5:** While the draft chapter includes an Historic Resources map, the map does not provide clear identification of the name of each mapped resource area and/or site.

**Suggestion:** The resources/sites on the map need to be identified. One simple way of accomplishing this would be to label each site with a number and provide a separate corresponding list with the site names.

**Response**:

A Historic Resource map has been provided per Comment 5.

(INSERT PAGE NUMBER)

# Community Services and Facilities

**Comment 6:** There appears to be some confusion and possibly an internal inconsistency pertaining to the NIKE site. The draft Plan mentions that the NIKE site contains contamination, but the Goals, Objectives, Policies, and Actions section of this chapter appears to connect it with public recreation (pages 79-80).

**Suggestion:** The body of the draft Plan does not include a section dedicated to a discussion of the NIKE site; it is merely mentioned in passing. Given the apparent significance of the site, it would be helpful to include a description of the site, the issues involved, and the Town's intent for the future. At a minimum, the Objectives, Policies, and Actions on pages 79-80 should be scrutinized and clarified. Additionally, it is not clear why recreation would be presented in this chapter's Goals, Objectives, Policies, and Actions as opposed to the Natural Resources, Conservation, and Recreation chapter.

**Response:** A detailed description of the site has been added to this section as requested, detailing the history and the challenges of the site. As well as a description of town action to date and the intentions of the town with the site going forward. Pages 83-84.

# Natural Hazards

**Comment 7:** The draft Plan contains a policy that we believe will result in an internal inconsistency once the Future Land Use Map is completed. Specifically, a policy on page 94 is, ''Not to allow development within the National Flood Plain Zones (as shown on the NFIP Maps issued March 2009)". Unless the Town intends to designate such areas as Open Space, Conservation, or similar, and institute corresponding zoning that would prohibit development, an inconsistency between this policy and future land use/zoning will occur.

**Suggestion:** If the Town wishes to maintain this policy, it will need to be reflected on the Future Land Use Map, and the Implementation Program will need to identify zoning changes that will be needed to prohibit development in these areas. Alternatively, the Town may revise the policy (for example, "Minimize development. ..") or it may delete the policy entirely.

Response: This policy has been revised to state “Ensure development complies with requirements of National Flood Insurance Program per state and local law”

**Comment 8:** The draft Plan appears to be missing a map to illustrate the areas of the town that would be flooded in the event of a 1% and 0.2% storm, as appears on the most recent Federal Emergency Management Agency Flood Insurance Rate Maps (FIRMs).

Please be sure to include the above information on a map in the final document.

Response: A Flood map has been added {INSERT PAGES}

# Housing Opportunity

**Comment 9:** Comprehensive plans are required to include implementation actions within the Implementation Program that address the "development of housing units in adequate numbers to

meet future population needs, including the development of a minimum of 10% of the year­ round housing within the community as low- and moderate-income housing."

The draft Plan recognizes that the Town's supply of LMI housing units has slightly *decreased* since the Town's Affordable Housing Plan was adopted in 2004; however, the same LMI Production Plan that was presented in the 2004 Plan is retained virtually word for word.

Furthermore, the proposed implementation actions are seriously deficient to improve the production of LMI housing.

**Suggestion:** The draft Housing Opportunity chapter identifies housing needs but does not adequately address the actions that the Town will undertake to ensure housing needs are met. We recommend that Town reach out to Rhode Island Housing for technical assistance and that the Town revise the draft Plan to include additional policies, strategies, and, in particular, actions that that Town will commit to in order to reach its housing goals. The Town may also wish to review our *Guidance Handbook #5: Planning for Housing* available on our website at [http://www.planning.ri.gov/documents/comp handbook/5 Housing.pdf](http://www.planning.ri.gov/documents/comphandbook/5Housing.pdf)

While not an approvability issue, we note that several items listed under the Goals, Objectives, Policies, and Actions section pertain to revising the LMI Housing Act, especially with respect to broadening the definition of what is counted as LMI housing. While the Town is free to pursue this objective, we must point out that it will not result in the production of additional housing units.

# Land Use

**Comment 10:** The draft Land Use chapter is missing required content. Specifically, the final Plan will need to include:

* + - A Future Land Use Map meeting the standards set forth in the *Rhode Island Comprehensive Planning Standards Manual;*
    - Descriptions of each of the future land uses;
    - An Existing Zoning Map;
    - Identification of any areas of the municipality in which inconsistencies exist between the existing zoning districts and the desired future land uses illustrated on the Future Land Use Map; and
    - If any inconsistencies are identified, the Plan must propose resolutions to them.

**Suggestion:** We strongly urge the Town to consult our *Guidance Handbook #13: Planning for Land Use* available on our website at

<http://www.planning.ri.gov/documents/comp> handbook/13 LandUse.pdf and our *Rhode Island Comprehensive Planning Standards Manual* for additional details and information on completing the Land Use chapter.

# Implementation Program

**Comment 11:** Not all the Actions in the Implementation Program have been assigned a timeframe for implementation. Additionally, some Actions have been assigned timeframes that may not be what the Town truly intends, e.g. assigned both a short-term and a long-term implementation.

**Suggestion:** Review the Implementation Program for completeness and accuracy.

**Response:**

The implementation program has ben revised to conform to the revised format and content of the previous chapter’s presentation of goals, objectives, policies and actions, including providing unique identifiers (codes) to facilitate cross-referencing and tracking progress over time. Implementation actions have been updated to reflect current conditions / needs. Actions have been made more specific and realistic in response to State comments.

# COMMENTS AND SUGGESTIONS TO ENHANCE ACCURACY, READABILITY, AND USABILITY

**Comment A:** As previously noted, the draft Plan contains many commendable Goals, Policies, Objectives, and Actions but the current structure is difficult to use. The assignment of statements as being a goal, policy, objective, or action appears, at times, to be arbitrary and inconsistent. One option the Town may wish to consider is simplifying the structure by eliminating the category "Objectives" and recategorizing its content as either goals or policies, as appropriate. The following set of comments all pertain to the draft Plan's Goals, Policies, Objectives, and Actions:

Al. - The Plan should be consistent in how it categorizes goals, policies, objectives, and actions. Pages 15 - 20 of *Guidance Handbook# 1: The Comprehensive Plan* IO1, offers detailed guidance for proper categorization. It is available on our website at: <http://www.planning.ri.gov/documents/comp> handbook/I **CompPlanlOl .pdf.**

**Response:**

The 2021 Draft Plan goals, objectives, policies and actions has been reorganized and a number of these items recategorized to better conform to the State’s guidance. The category “Objectives” has been retained. While some of the objectives in the 2019 Draft Plan have been recategorized as policies, the objectives retained in the 2021 Draft Plan can be considered as intermediate goals or sub-goals, generally supportive of one or more goals articulated in the Plan.

A2. - We strongly recommend that each goal, policy, objective, and action be assigned a unique identifier for ease of reference. Most municipalities choose an alpha-numeric system that uses the initial(s) of the topical chapter and sequential number. For example, the first goal in the Natural Resources chapter would be Goal NR-1. There are many other approaches for assigning an identifier, but it would greatly improve the usability of the Plan if one is incorporated.

**Response:**

The 2021 Draft Plan includes these unique identifiers as recommended.

A3. -The draft Plan's Goals, Policies, Objectives, and Actions do not always appear under the chapter where a reader might expect to find them, nor are cross-references provided. For example, there are no goals, policies, or actions for recreation in the Natural Resources, Conservation, and Recreation chapter; rather, they are located in the Community Services and Facilities chapter. Additionally, there are closely related Goals, Policies, Objectives, and Actions that appear in more than one chapter but are not cross-referenced for the reader. In these instances, adding an "also see... " would not only be helpful, it would strengthen the Plan.

**Response:**

The 2021 Draft Plan’s goals, objectives, policies and actions have been reorganized and revised to improve clarity. The Implementation chapter has been revised to include consolidated actions cross-referenced to relevant goals. An appendix has been added which cross-references Town goals, objectives, and policies with those of the State.

A4. - The four-column format used at the end of each chapter needs to be carefully reviewed. Specifically, when read horizontally, some Goals, Policies, Objectives, and Actions don't line up

with each other. A couple of examples: On page 139, a stated Policy is "Improve access to housing for younger residents," while the following Action is listed as "Evaluate the option of a second senior housing location." Similarly, on page 153, an Objective reads, "Siting and delivery of energy sources should be consistent with the health and safety of Foster residents" but the adjacent Action is, "Promote continuing education of landowners regarding local, state and federal tax mechanism that helps owners retain agricultural and forest land".

**Response:**

The 2021 Draft Plan has abandoned the four-column table format used in the 2019 Draft Plan and uses a simplified listing of goals, objectives, policies and actions by chapter. As noted, policies and actions may support more than one goal, and while some objectives, policies and actions are clearly supportive of certain goals and not others, the previous format was confusing.

A5. - While some Actions are admirably specific (e.g., "Evaluate and plan for relocation of administrative offices to more suitable and up-to-date facility by 2022"), others are so general that it is impossible to tell what needs to be done to implement them. For example, what are the *specifics* associated with the Action to "Ensure availability to town officials, information, and services"? Will the Town enhance its website, increase its office hours, or something else?

**Response:**

The 2021 Draft Plan has recategorized some of the general actions as policies, and revised actions to make them specific and realistic.

**Comment B:** The draft Plan references a community survey from 2012 as a source of public input. It is questionable as to whether its results reflect current views of Town residents. It is important that the Town solicit up-to-date input from its residents in the completion of this comprehensive plan; consider deleting references to the 2012 survey.

**Comment C:** On page 28, the section "Federal and State Regulations and Programs" contains an erroneous statement, namely: "FEMA regulates development in floodplains." The primary regulation of development in floodplains is through local zoning. FEMA's role is limited to federally-funded projects and participation in the National Flood Insurance Program.

**Comment D:** There is a bulleted list appearing on page 75 under the heading "Assessment of Community Services and Facilities;" however, what follows is not an assessment, but a bulleted list of what appears to be policies and actions. We recommend that the list be removed and that the specific bulleted items be integrated into the Goals, Objectives, Policies, and Actions matrix as appropriate. The draft chapter does contain various assessments of services and facilities within its narrative which could either be summarized here or, alternately, the heading could be deleted.

**Response:**

The 2021 Draft Plan has integrated the bulleted items into the goals, objectives, policies and actions, and removed the heading and bulleted list as recommended.

**Comment E:** The *Energy* section of the draft Community Services and Facilities chapter (page

75) makes a couple of claims that should be reconsidered. One is that "Burning wood for home heating reduces demand for petrochemicals and reduces carbon emissions." While it does reduce demand for petrochemicals, it *does not* reduce carbon emissions. Fuel oil emits 77.4 kilograms of CO2 per gigajoule of energy, whereas wood emits 109.6 kilograms of CO2 per gigajoule.

A second statement that is misleading is "Wood is a carbon neutral fuel." While this is not entirely incorrect, it is conditional on other factors, such as the planting of replacement trees. *Scientific American* notes that:

"Burning [wood] for energy releases large amounts of carbon into the atmosphere all at once. But depending on the type of tree, forests may take decades or even a century to draw the same amount of carbon back out of the air. Even for the process to be considered carbon neutral on long time scales, forest managers would have to be certain that replacement trees were given enough time to store the same amount of carbon that their predecessors contained when they were harvested."

We urge the Town to correct, clarify, or delete the above-mentioned statements.

**Comment F:** The Action on page 94, "To identify the types of natural hazards which have and can occur in the Foster community including but not limited to hurricanes, fires and winter storms etc.," has been admirably completed in this draft Plan and need not be listed.

**Response:**

The 2021 Draft Plan has revised this action in recognition that new, unforeseen, hazards may occur in the future and the Plan should be prepared to consider them. Note also the 2021 Draft Plan has been revised to include reference to “droughts” in conformance with the State goals and policies.

**Comment G:** Another Action on page 94 is "To continue to update and revise the Foster Storm Water (Wastewater) Plan in accordance with state regulations". What is the connection of this Action to the chapter's topic of Natural Hazards? If there is a connection, it should be explained in the narrative.

**Comment H:** Consider relocating the section "Storm Water Management" from the Transportation chapter (page 102) to the rest of the discussion regarding storm water in the Community Services and Facilities chapter on page 69.

**Comment** I: We found the bulleted list on pages 105-106 to be confusing. The introductory sentence states, "The following are specific polices for action:" but the list itself contains only three items specified as a "Policy" and contains items that would more appropriately be listed as implementation actions. Compounding the confusion is the Goals, Objectives, Policies, and Actions matrix (pages 107-110) which contains some, but not all, of these bulleted items. We recommend that the list be removed and that the specific bulleted items be integrated into the matrix as appropriate.

**Response:**

The 2021 Draft Plan has removed the bulleted list and integrated the items as appropriate in the consolidated listing of goals, objectives, policies and actions, as recommended.

**Comment J:** On page 118, under the section "Planned Redevelopment," the draft plan states "As of summer, 2016, Foster is also awaiting news of the purchase of one of its primary designated sites for affordable housing... ". Please update as to what has happened in the interim.

**Comment K:** On page 119, under the section "Weaknesses," the draft Plans references the *Scituate Reservoir Watershed Management Plan, State Guide Plan Element 125;* please be advised that this Plan was repealed in 2012.

**Comment L:** On page 144, under the heading "Single-Family Residential (less than 9.2 acres)", the draft plan states: "While almost half(% percent) [sic] of the properties recorded by the Tax

Assessor are used for single-family residences, this represents only 14.5 percent of the total actual land use." We are not clear as to how this was calculated. Similar statements regarding percentages ofland use are also found in other sections. We recommend the Town include a table, similar to "Table 19: Total Acreages by Zoning District," that displays the actual current land use acreage.

**Comment M:** With an array of twenty-seven land uses/land covers, we found the Current Land Use Map (page 149) to be difficult to use. It could be simplified. For example, certain categories, such as the various agricultural uses and various forest covers, could be combined into single "agricultural" and "forest" categories. In addition, certain categories may have been coded in RIGIS in error: the Town's local knowledge should be used to correct them. For example, does Foster actually contain urban open transitional areas? Also, some of the shading is very similar between categories and is difficult to distinguish.

**Comment N:** We are confused as to the status of "HC" zoning in the town. It is not listed on the zoning table but on page 151, the Zoning section begins "In the past decade, the HC zoning district... ". Later in the section, the draft mentions that "HC zoning in selected areas" was replaced by GBM zoning. Please clarify.

**Comment 0:** On page 152, the paragraph beginning, "The NC zoning district... " contains an unfinished sentence. The second sentence from the end reads, "Given the similarities to the former HC zoning district, the town should". Similarly, the last sentence on page 152 reads, "The town... "

**Comment P:** On page 155, there is an Action to "Revise specific regulations for Conservation Zoning". Since it does not appear that the Town currently has conservation zoning, please clarify whether the intent of this Action to *adopt* Conservation Zoning or to revise conservation­ related *subdivision* regulations.

**Comment Q:** On page 158, there is an Action to work with the Blackstone River Valley National Heritage Corridor Commission; this Commission no longer exists. The successor organization is Blackstone Heritage Corridor, Inc.

**Response:**

The 2021 Draft Plan includes the correct name.

**Comment R:** On page 172, there is an Action to "Review and update Foster's zoning ordinance to create a set of design standards for commercial developments;" however, design standards are not covered in zoning ordinances. Please correct.

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, which cannot be fully

evaluated until a full draft is furnished. 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: 222-2093 or [kevin.nelson@doa.ri.gov.](mailto:kevin.nelson@doa.ri.gov)

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