

Tree Protection, Open Space, Landscaping, Storm Water Additional Elements Chatham Park Investors LLC’s Responses to Comments

Tree Protection

Additional Elements Committee Recommendations

- 1) **“The Committee recommends that the Town Commissioners have Chatham Park adopt the provisions in the draft UDO. Module 2, 4.2 rather than the methodology proposed in this additional element.”**

Response: Chatham Park’s comments regarding the problems that exist in the Town’s proposed Tree Protection ordinance have already been provided but we will follow much of the philosophy and methodology presented in The Town’s ordinance and revise it for consistency with our proposed enhancement of the methodology.

The revised Tree Protection Element will emphasize both tree canopy retention and tree canopy restoration, as shown in the attached Table, which describes Existing Tree Canopy Cover using the same percentage ranges as in the proposed UDO. These Existing Tree Canopy Cover percentages may be revised in the final draft of the Element.

Existing Tree Coverage Area ¹	Minimum Percentage of Tree Coverage Area			
	Residential		Non-Residential & Mixed-Use	
	Minimum Required ²	Minimum Preserved	Minimum Required ²	Minimum Preserved
0-6%	N/A	N/A	N/A	N/A
6-14%	43%	33%	20%	15%
14-22%	41%	31%	19%	14%
22-30%	39%	29%	18%	13%
30-38%	37%	27%	17%	12%
38-44%	35%	25%	16%	11%
44-52%	33%	23%	15%	10%
52-60%	31%	21%	14%	9%
60-68%	29%	19%	13%	8%
68-76%	27%	17%	12%	7%
76-84%	25%	15%	11%	6%
84-92%	23%	13%	10%	5%
92-100%	21%	11%	9%	4%

- 1) Existing Tree Coverage Area is the percentage of a development plan (excluding proposed street right-of-ways, existing utility easements, and natural water surface areas) that is covered by existing tree canopy before development or land disturbing activity.
- 2) Combination of Tree Preservation and Tree Restoration.

Incentive Tree Coverage Areas

A multiplier may be used for Tree Coverage Areas preserving Hardwoods and/or Pines greater than or equal to the following DBHs (Diameter at Breast Height):

DBH	Multiplier
12"	1.5
18"	2.0
24"	3.0
30"	4.0

Key Points

- *Both tree canopy retention and tree canopy restoration may be utilized, with tree canopy retention being required in all but one of the Existing Tree Coverage percentage areas in the Table.*
 - *Incentives toward meeting the minimum percentage of tree coverage area if larger trees are located and preserved.*
 - *A higher percentage of tree coverage area will be provided in Chatham Park than is required in the proposed UDO.*
- 2) **“The Committee recommends that the Town Commissioners have Chatham Park provide a definition of “Village” as used in the Additional Elements.”**

“Village” has been defined in the General Provisions section of the Additional Elements and will be further defined in applicable Small Area Plans.

Staff Comments

- 1) **“This element should complement the Town’s UDO draft. The UDO draft calls for preservation of trees based on a tree survey of the lot and the percentage of tree currently on the parcel to be developed.”**

See #1 Above

Tree Protection- Public Comments

- 1) *See #1 Above*

Open Space

Additional Elements Committee Recommendations

- 1) **“The Committee recommends that each Small Area Plan specify open space and include a running total of open space throughout Chatham Park to date in two categories: regulated open space and nonregulated open space.”**

Response: Each Small Area Plan will include descriptions and proposed locations for various types of open space. Specific locations and the types of all open space cannot be provided until final site designs and subdivision designs have taken place. As these development plans are submitted to the Town, running totals of open space will be provided.

- 2) **“Payment-in-lieu for open space must be approved by the Town of Pittsboro.”**

Response: Any payments in-lieu-of open space requirements will be made only with the approval of the Town Board or as allowed by Town ordinances.

Staff Comments

- 1) **“TCA or Tree Cover Areas that are part of setback and parking lot requirements should not be used as open space.”**

Response: Tree Cover Areas (TCA) typically will not be used to meet parking lot planting requirements and, typically, planting areas within parking lots will not be used to meet open space requirements. However, there may be situations where large areas of canopy trees are preserved within a very large parking area and those areas could get credit for both TCA and open space. As discussed in a previous Town Board meeting, there will also be building setback areas that could qualify as both TCA and open space. Also, streetscape buffers, and other buffers can be used to meet open space requirements if protections of those spaces are provided.

- 2) **“Payment in Lieu of Open Space should be an option only if the Town of Pittsboro agree to such an arrangement. Language should reflect that the Town has final determination of payment in lieu.”**

Response: As indicated above, any payments-in-lieu of open space will be made only with approval of the Town Board or as allowed by Town ordinances. Please note that payments-in-lieu could be used by the Town to preserve important open space areas located outside of Chatham Park.

- 3) **“I find that this element gives little detail as to how Open Space will be developed in Chatham Park, especially open space as part of a subdivision or development plan. As the reviewer of Future development plans and subdivision plans, I cannot turn to this document to see how a typical urban open space might look, or a plaza, or playground.”**

Response: Open Space in Chatham Park will fall into two categories: preserved spaces and those spaces provided as part of development plans.

In response to the public comments requesting open space in the first category- preserved and undisturbed, three additional core open space areas will be protected and their descriptions will be added to the Open Space Element. The first of the three will be described in more detail in the North Village Small Area Plan.

The open space detail referred to in the Staff comments fall in the second category of open space that is usually addressed in municipal ordinances, as well as in the Town’s proposed UDO, and such open space becomes part of the “urban fabric” woven through new development. Pursuant to Staff’s request, examples of such open space will be included in the revised Open Space Element, and may include the following:

- 1) *Playground (private)*
- 2) *Plaza*
- 3) *Close*
- 4) *Square*
- 5) *Parkway*
- 6) *Medians*
- 7) *Greenbelt*
- 8) *Mini-Parks (private)*
- 9) *Tot Lots (private)*
- 10) *Useable Open Space*

Public Comments

- 1) **Provide buffers along ephemeral streams. (Chiosso)**

Response: The provision of stream buffers was already addressed with the approval of the Chatham Park Master Plan. That document provided an additional 50 feet of buffer which, with the 50 feet along perennial streams required by applicable laws, resulting in a doubling of the required stream buffer open space along those streams. Chatham Park believes this requirement results in more stream protection than buffering ephemeral streams, which do not have buffer requirements under North Carolina law.

2) Provide buffers along wetland areas. (Chiosso)

Response: Almost all of Chatham park wetland areas are located within stream buffer areas and 100 year floodplains that are both already protected.

3) Significant Natural Heritage Area Commentary (Chiosso)

Response: In addition to previous responses to Open Space comments, Southwest Shore Assessment Recommendations are addressed in the North Village Small Area Plan and will be addressed in other applicable Small Area Plans.

4) Open Space Amenities (Cullington)

Response: Please refer to changes made to the Element based on staff comments.

5) Fee in Lieu of Open Space (Cullington)

Response: See previous responses to this matter.

Open Space (Wildlife Resources Commission)

1) “We recommend that the Open Space Element address how to protect and connect large natural areas throughout the development.”

Response: As mentioned in staff comments, three larger core conservation areas will now be defined in the Open Space Element, and more detail addressing the Southwest Shore Assessment recommendations is provided in the North Village Small Area Plan.

2) “Provide for a natural area buffer surrounding NCWRC Jordan Lake Game Lands in Sections 2.2, 2.3, 3.4, 3.5 and 3.7 of the development. Habitat management activities and hunting can persist on game lands, if they are buffered from development by at least 450 feet.”

Response: Buffers associated with Sections 2.2, 2.3, 3.4, 3.5 and 3.7 will be provided as part of the applicable Small Area Plan, but buffering Game Lands is more of a rural concept. Once development occurs in urbanizing areas, the use of the subject property will buffer and mitigate its own impacts. For the Wildlife Resources Commission to assume it can allow hunting up to an adjacent property without providing a buffer within its own property is not consistent with municipal buffer requirements. The request for a 450-foot barrier should be provided within the Commission Game Lands.

- 3) **“The NCWRC recommends that large natural areas be connected with a minimum of 150’ wide wildlife corridors.”**

Response: Numerous 200 foot-wide or greater stream buffers are provided in Chatham Park which will also serve as Wildlife Corridors.

- 4) **“It is the recommendation of the NC Wildlife Resources Commission that the Town of Pittsboro implement the proposed Natural Resources Conservation Ordinance and Overlay District and the proposed Open Space and Recreation Areas Ordinance to assist Chatham Park in meeting its stated Open Space objectives.”**

Response: Conservation subdivisions may be developed within Chatham Park in the future as single family residential plans are determined. However, the Master Plan and Additional Elements contain a sufficient number of provisions that will facilitate meeting the open space objectives described in the Master Plan.

Open Space (Chatham County)

- 1) **“The County recommends that Chatham Park allow for flexibility in planning trails, with special regard for the connection of Chatham park trails to future county trails. The county strongly supports the concept that all trails will be open to the general public.”**

Response: Greenway trails should always allow for future connectivity and that twill be true in Chatham Park for every public trail. Any trail dedicated to the Town to meet recreation dedication requirements will be available for public use.

Open Space (Bynum)

- 1) **“Adopt the SW Shore Assessment Plan. Payment-in-lieu clauses throughout the elements including here are concerning and other options should be considered. Village one (hugging the river) should have its own (broader) open space percentage requirements due to its impact on the Haw River.”**

Response: Each comment has previously been addressed above.

Landscaping Element

Additional Elements Committee Recommendations

- 1) **“The Committee recommends that a sentence be added to this element that states that the NC Complete Streets Planning Design Guidelines be applied insofar as they apply to landscaping adjacent to streets and roadways.”**

Response: The NC Complete Streets Planning Design Guidelines were used in developing the details for planting requirements along roadways, including planting of street trees between the sidewalks and back of curbs along the street. A statement will be added to the Element stating this.

- 2) **“The Committee recommends that a resource section be added to this additional element and that this section include the following:**
 - **Pollinator Plants**
 - **Where to buy Native Plants**
 - **NC Wildflowers and Native Plants**
 - **Chatham Park Resource Additions**

“A statement should be added to this section that encourages consulting these resources when developing specific landscaping plans.”

Response: While the Additional Elements are intended to be the development ordinances for Chatham Park and are to be written in that style, a landscape resources section will be added to the Landscaping Element.

Staff Comments

- 1) **“Staff encourages the use of existing trees and landscaping to meet any requirement set forth in the Element. When existing tree coverage is to be preserved, that a detailed report of existing conditions and how existing trees/landscaping is meeting any provision of the element. Through review of current site plans, the use of existing trees has been difficult to understand.”**

Response: Noted. A tree inventory report is to be provided with applicable development plan submittals, and the use of any existing trees to meet landscape requirements should be made clearer within the plan set.

Landscaping Element- Wildlife Resources Commission Comments

- 1) **“The NC Wildlife Resources Commission commends Chatham Park for its stated intent to not plant any exotic invasive species in Chatham Park and to use native Piedmont species whenever possible. The use of native plant species supports the conservation of biodiversity.”**

Response: Thank you.

Landscaping Element- Cullington

Responses:

- 1) A majority of the land adjacent to Chatham Park consists of large tracts with a home or homes located on them (i.e., a residential use). The buffers are then determined by Table 2.1.
- 2) Perimeter Boundary Transitions are specified in this Element. We feel the Town's professional staff best understands plant material, topography, root zone needs, etc. - thus the wording of the provision.
- 3) Perimeter Buffer Standards- This is not saying planting doesn't need to occur for 5 years. This refers to allowing time for plants to grow after planting to meet the performance criteria established for Type A, B or C buffers.
- 4) Buffer averaging typically occurs in small isolated instances that would then require two times the area within the same buffer to compensate.

Landscaping Element- Bynum

- 1) **“Consult with Triangle Conservation Partnership to determine the best tree protection strategy. We would recommend a consultation/recommendation/adherence to consultation from extension agent. Write in requirements to maintain as much natural (existing) landscaping so as not to change ecosystem.**

Response: See responses above related to tree protection.

Stormwater

Additional Element Committee Recommendations

- 1) The Committee recommends that Chatham Park be asked to explain why they decided not to use the rational method.**

Response: Language will be added to the revised Element to emphasize this point. The rational method may be used for sizing of pipes, swales, and other conveyance systems; however it may not be used in the routing of ponds and other stormwater control measures. This is because the SCS method, in the opinion of Chatham Park's stormwater engineer, is less prone to under sizing of impoundments and is better suited to generate hydrographs representative of runoff patterns from urbanized development.

- 2) "Best management practices' in the Stormwater Element in the Master Plan is repeated in the stormwater additional element of page 40, except for item 5, "standards specified above are established as minimum standards". The Committee recommends that item 5 be included in the Additional Elements as well."**

Response: Item 5 will be included in the revised Element. It was not intended to be omitted.

Town Staff Comments:

- 1. All stormwater practices by Chatham Park, within the PDD and as per the approved master plan, will be adhered to at a minimum**

Response: At a minimum, all development within Chatham Park will comply with the 4 performance criteria outlined in the "Best Management Practices" section of the Stormwater Management Plan in the approved Chatham Park PDD Master Plan. The fifth statement in this section of the Master Plan was omitted from the Stormwater Element because it was thought that it did not need to be restated. However, it will be included in the revised Element.

- 2. All provisions and guidelines contained within the Town's effective (latest version) Stormwater management Ordinance will be adhered to by Chatham Park.**

Response: The stormwater performance criteria within Chatham Park are governed by the approved Master Plan and Stormwater Element. For this reason, we are not able to include a statement that the current applicable version of the Town's ordinance will always be adhered to, because some parts of future requirements may be inconsistent with those documents. The Master Plan provides for development in Chatham Park, including stormwater control measures ("SCM", which, together with stormwater systems and stormwater treatment practices are referred to in the Master Plan as "Best Management Practices" or "BMPs") to be governed by the standards in the Master Plan, Additional Elements, and Development Agreement. To the extent that development standards are not addressed in the foregoing, applicable Town ordinances will be followed. Watershed protection techniques and stormwater controls used in Chatham Park will comply with applicable government approved design criteria. Where permit

requirements allow, innovative SCM may be employed. A draft version of the Chatham Park Stormwater Design Manual (“manual”) will be included in a revised Stormwater Element. The Manual can be revised from time to time to incorporate new SCM and designs.

In working with Town staff, Chatham Park is developing a watershed scoring system which will quantify the cumulative benefits of conservation strategies, non-structural SCMs, and structural SCMs, as well as the net benefit of other design elements which are directly beneficial to watershed health. The intent is to develop a scalable metric which can be applied at the watershed level rather than the project/site level. We feel that the watershed scale is more applicable because the benefit of natural systems, such as conservation areas, is difficult to quantify at the site level. As part of the ongoing commitment to exceptional design and planning, the proposed watershed scoring system will be designed to assess, evaluate, and recognize excellence in watershed management throughout Chatham Park. The scoring system will use a weighted point system to assess project elements with direct ties to protecting, preserving, and restoring watersheds within Chatham Park. The scoring system is rooted in the premise that exceptional development plans use a variety of strategies to protect the overall health of the watershed.

To assess the variety of potential impacts and mitigation strategies, the scoring system is divided into 6 categories: Natural Resource Protection, Tree Protection, Construction Site Management, Landscaping, Stormwater Infrastructure, and Innovation.

Natural Resource Protection sub-categories will focus on a development’s impact to the critical hydrologic components within a watershed. Those components include streams, wetlands, floodplains, stream buffers, and steep slopes. Watersheds where impacts are avoided score higher than those with impacts.

The Tree Protection section will use quantitative assessments of tree canopy, existing pastures and farm lands, and Chatham Park’s tree protection standards to reward watersheds where existing canopy is preserved and protected.

Moving into the built environment, the remaining categories focus on efforts that can be implemented during site work and construction to protect the watershed or offset impacts to natural resources. The Construction Site Controls category rewards development projects which exceed minimum standards for erosion control during construction. The Landscaping category offers Chatham Park the option of accumulating points when the landscaping plan is used to reduce runoff volumes and protect water quality. As a final layer of watershed protection, stormwater management systems offer an opportunity for points associated with the built environment. Points are gained by using other stormwater controls and green infrastructure to reduce runoff volume, lower nutrient loads, and exceed flood control requirements.

The final scoring system will be incorporated into a revised Stormwater Element.

Comments From Liz Cullington (note – for brevity some comments have been summarized or paraphrased. If we have misrepresented the comment we apologize and ask for the opportunity to discuss the comment in more detail to gain a better understanding so that we can respond accordingly).

1. The Chatham Park Master Plan and Element are the Town’s regulations for Chatham Park.

Response: That is correct.

2. Runoff needs to be controlled during clearing and construction

Response: Chatham Park is subject to Town and State requirements for construction site stormwater controls (Erosion & Sedimentation Control Plans). The requirement applies to any land disturbing activity that increases built upon area or decreases the infiltration of precipitation into the soil.

3. The funding requirements for performance bonds and long term operation and maintenance has changed from the master Plan and is different from Town ordinances.

Response: The funding requirements for perpetual escrow accounts for BMPs in Chatham Park were not changed by the Additional Elements. The Master Plan sets out the funding requirements for these escrow accounts.

4. No qualifications are stated for the Stormwater Administrator, the Town Engineer does not get to see inspection reports, and funding for the stormwater administrator role is not specified

Response: The Stormwater Element requires that the party responsible for maintaining a BMP shall provide an annual inspection report to the stormwater administrator. The report shall be completed by a professional who is certified for BMP inspections by the State of North Carolina or other equivalent certification acceptable to the Town. As the annual report is required to be provided by a certified professional, it is not necessary that the stormwater administrator also be a certified professional. The Element also requires the stormwater administrator to prepare an annual report of inspections and maintenance activities that have occurred during the immediately preceding calendar year. The Element will be revised to provide that the POA is responsible for employing the stormwater administrator and that the annual reports submitted by the stormwater administrator to the Town will include copies of the inspection reports done by the certified professionals.

5. The master Stormwater Manual is missing

Response: A Chatham Park Stormwater Manual was included as Appendix B to the Additional Elements. A revised draft will be included with the revised Element.

- 6. Nothing in the Element holds Chatham Park to a higher standard, and it's not clear that innovative ideas implemented and planned would meet a higher standard or be adequate to replace retention ponds**

Response: See the response to the Town's comments, specifically the additional narrative describing the watershed scoring system.

- 7. Developments within Chatham Park can opt to use NCDEQ minimum design criteria**

Response: Correct, that is one set of design standards however Town approved designs may be implemented as well on a case by case basis.

- 8. Chatham Park has not defined "watershed", Chatham Park should not be allowed to exceed 70% impervious just because other parts of Town are lower than 70% impervious, development in Chatham Park should not restrict development in other parts of Town, and the northern part of Chatham Park contains residential areas with few to no "open space amenities" in some areas.**

Response: This is a multi-part comment and the response is broken into each section below.

The revised Element will include a commitment to provide and maintain a watershed map to be kept on file with the Town Engineer. The map will outline the watershed boundaries used as the basis for analysis and documenting compliance with peak flow requirements, nutrient loading, and watershed scoring.

Chatham Park is limited to 70% overall built upon area per the Master Plan and applicable State watershed regulations. Development in Chatham Park does not limit the maximum allowable impervious area for other projects outside of Chatham Park. Chatham Park received no additional allowable built upon area due to existing development levels in other parts of the Town.

Open Space Amenities are delineated in some areas of the Master Plan and Additional Elements, but more specifically are incorporated into individual development plans during the detailed development plan review process. Chatham Park will meet its commitment to Open Space described in the Master Plan.

- 9. The section calls for review by competent and appropriate experts, and comparison to the Master Plan and current ordinances (and draft UDO?) as well as state law regarding the "high density option" in this WS-IV watershed, which review should include both water quality and legal aspects.**

Response: Noted, Chatham Park anticipates a thorough review, and has had multiple meetings with Town staff while editing the Stormwater Element. All Development in Chatham Park is subject to Town approval and approval by other applicable government entities, including Chatham County, North Carolina Division of Water Resources, and US Army Corps of Engineers.

Powerpoint and additional comments from Pittsboro Matters & Haw River Assembly (Elaine Chiosso) These comments were not numbered, so I've tried to copy items from the email and address them in order.

- 1. The design manual seems incomplete and only includes maintenance information, use the LID guidebook as a reference.**

Response: See responses above. The design manual will be expanded and submitted with the revised Element

- 2. What is the rationale for excluding the rational method?**

Response: See previous response regarding the rational method.

- 3. Point #5 from the master plan was omitted**

Response: Item 5 will be included in the revised Element. It was not intended to be omitted.

- 4. The use of the Pittsboro buffer ordinance instead of Chatham County's will result in more clearing and the need for more BMPs. Chatham Park may result in more flooding and stormwater pollution.**

Response: Chatham Park's buffer widths exceed the minimum standards of the Jordan Lake Riparian Buffer standards as well as those of the Town of Pittsboro. Unlike Chatham County, Chatham Park will include areas of concentrated urban development, and stormwater from those areas will be controlled by appropriate SCM. These protections, in addition to related open space requirements, exceed local regulations.

- 5. The water quality storm and peak flow standards are less than the Chatham County Standard**

Response: Chatham County is a low density and mainly rural county. Chatham Park will contain areas of concentrated urban development and the performance requirements in the Master Plan, including buffers and stormwater performance standards, exceed the minimum standard set by the Town and State for such development.

- 6. The stormwater element does not exceed the Town's requirements for peak flow or the Town's stormwater design standards, use the County standards.**

Response: The Chatham Park standards meet or exceed Town stormwater control requirements

- 7. The information provided does not meet the exceptional design commitment.**

Response: The Manual will include the details of the proposed stormwater scoring system, which will show that each designated portion of the watershed in which Chatham Park is located will have exceptional watershed protection.

Comments from Bynum

1) Adopt the 24 year plan for stormwater management

Response: The standards included in the Master Plan and the Element exceed Town standards for high density development.

2) How will Chatham Park protect natural hydrology?

Response: Chatham Park's stormwater performance standards are aimed at mimicking natural hydrology in developed areas. There are compliance points at each point where stormwater crosses a riparian buffer boundary as well as watershed level controls for nutrient management and peak flow control. These standards will be met using a variety of controls as described in the Master Plan, Stormwater Element, and Manual. See the response below for more information and LID controls

3) The low impact controls in the master plan are minimal and need not be any less

Response: The stormwater scoring system will prioritize the use of non-structural, natural and lid controls.

Definitions & General Provisions

Town Staff Comments

Response: See the previous responses from Chatham Park to these comments made by the Town Staff prior to the public hearing on the Definitions & General Provisions. Also see response below to Additional Committee Recommendation #1 to Additional Elements.

Additional Elements Committee Recommendations

1) "We recommend language in the General Provisions that would not allow a developer to use a buffer on an adjacent property."

Response: A Chatham Park buffer requirement cannot be met on adjacent property unless the owner of the adjacent property allows this to happen through a written agreement that is recorded in the office of the Register of Deeds for Chatham County, North Carolina. This response supersedes the previous response to the same comment from the Committee and a comment from the Town Staff on the same subject made prior to the public hearing on the Definitions & General Provisions.

2) "We recommend that the Town do a careful analysis between elements and the drafted UDO to determine any significant differences that should be resolved prior to approving the Additional Elements. It is understood that future changes to UDO may result in exemptions for Chatham Park, but nonconformities should be minimized to the extent possible between

Chatham Park Master Plan/ Additional Elements and the Town's new UDO, provided that it does not cause undue delay in the approval of Additional Elements or the UDO."

Response: See the previous response from Chatham Park to this comment made by the Committee prior to the public hearing on the Definitions & General Provisions. Also, please note that adoption of the Additional Elements as more detailed development regulations for Chatham Park was the method approved in the Master Plan. As has been noted in previous correspondence, there are many errors and problems with the proposed UDO in its present form and Chatham Park cannot agree to follow the requirements of this draft document. At the same time, portions of the proposed UDO are being used as a guide for some of the revisions to the Elements as has been requested by the Committee and Town Staff.

- 3) "Subsequently adopted ordinances of the Town or changes to the UDO which may be novel to the aforementioned Master Plan and the standards contained in the Additional Elements require review and discussion between Town officials and representatives of Chatham Park to explore amending an Element."**

Response. See the previous response from Chatham Park to this comment made by the Committee prior to the public hearing on the Definitions & General Provisions.

Public Hearing Comments

- 1) "The relationship between the Chatham Park Master Plan and Additional Elements and the Towns UDO"**

Response: As provided in the Master Plan, except for matters addressed in the Master Plan, Additional Elements approved by the Town, and the Development Agreement for Chatham Park approved by the Town, development in Chatham Park will be subject to any UDO or other land use ordinance of the Town that is applicable throughout the planning jurisdiction of the Town.

- 2) "Does the Town ever get full development control over the Chatham Park PDD?"**

Response: The Town has had this control from the beginning and will always have this control. Each Additional Element must be approved by the Town, the Development Agreement must be approved by the Town and every development plan must be approved by the Town.

- 3) Administrative Alternative**

Response: Most municipalities that consider development plans on a regular basis have Administrative Alternative provisions. You have hired a professional staff more capable of dealing with these smaller, more technical issues than anyone else in Town. Larger decisions would still go before the various Town Boards.