



# THE WATCH HILL CONSERVANCY

## WATCH HILL, RHODE ISLAND

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June 1, 2020

John A. Hall, IV, Esq.  
Chairman of the Planning Board  
Westerly Town Hall  
45 Broad Street  
Westerly, RI 02891

Dear Mr. Hall:

The Watch Hill Conservancy and our partners at the Watch Hill Fire District are delighted to share with you some comments on the Draft Comprehensive Plan for the Town. First, we want to say congratulations to you and the entire Planning Board, with your team including Lisa Pellegrini and Nancy Letendre, who have done a magnificent job pulling everything together.

Attached is a list of suggested changes to the May 18, 2020 Draft. Comments are organized by Plan Section and we provide page numbers to help you navigate. Some are minor points of grammar, punctuation, or pagination but others are related directly to the concept presented in the section.

Our review team had some "30,000 foot" big-picture comments we want to share with you as well. We hope you find these thought provoking.

- We are pleased to see climate change as a pervasive issue across most sections. There is no single driver of change more important than this for Westerly's future. We have the most vulnerable coast and river's edge landscape in Rhode Island. Climate change impacts will affect our coastal properties, water resources, stormwater management, transportation, economy, and public health and safety. **Please consider using the StormTools maps and StormTools as the data source of record for storm surge and climate change as it is the most comprehensive resource we have in the State of Rhode Island.** Storms are a big worry. We have 20-30 years to navigate the three-foot sea level rise that is expected. The 100-year storm, for which we are overdue, can come this season. More than ever, Amy Grybowski and her Emergency Management program will be extremely important to Westerly. Amy and her office might be given more prominence in the Plan.

***Yes, we have substituted the StormTools as a data source instead of the SLAMM.***

- The waters off Westerly's southern shore and all of Little Narragansett Bay are extremely important resources for the community. They are the setting for our commercial and recreational fishing industries and many forms of recreation (boating, sailing, paddle boarding, kayaking). The channel south of Napatree is one of the heaviest used travel lanes for maritime traffic in the state. More and more we are seeing applications for shellfish and kelp aquaculture in our near-shore waters and Salt Ponds. Our coastline is always breezy, but **do we want wind turbines on shore and near shore?**

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We would hope that you would use this Comprehensive Plan as an opportunity to initiate development of a marine spatial planning effort to determine what are, and are not, suitable uses of Little Narragansett Bay, the Salt Ponds, and our near-shore marine environments.

***Additional information on the concept of marine spatial planning has been submitted by the WHC. "Marine special planning" - a tool to improve decision-making for those maritime areas where competing human activities occur and to manage the effects on the marine environment. Staff recommends that the concept:***

- 1. be introduced under "Vision" Section 2.54 – Sustainable Development;***
  - 2. Be described in the Natural Resource Chapter; and***
  - 3. ACTION item NAT-1.2J be added; "With stakeholder engagement develop a marine spatial plan for Little Narragansett Bay, the Salt Ponds, and the Atlantic coastal waters, and ensure marine habitats and species are not impacted, that critical habitats such as submerged aquatic vegetation (eelgrass) and salt marsh are protected, and aesthetics and navigability are not compromised.***
- Economic development must be another pervasive issue throughout in the Comprehensive Plan. A vibrant, and diversified, economy is the fuel which supports our tax base, education programs, and housing costs. Westerly's rich natural (forests, shore, Pawcatuck River) and cultural (the Downtown) amenities are attractive magnets residents, visitors, and businesses. Our wonderful Ocean State Chamber of Commerce is the glue to tie it all together. **Incentives to promote strong economic development have to ripple through the plan. We would like to see more efforts in this critical arena.**

***In response, a new action items proposed:***

- 1. ECON-1.1.H Study and assess the links between coastal restoration and economic development, including an economic impact analysis, and identify how coastal restoration fits within the Town's larger economic development strategies.***
  - 2. RES1.2E Seek grant funding for an economic and spatial study of the vulnerability and adaptation to climate change of Westerly's coastal areas.***
- The Draft Comprehensive Plan suggests that special neighborhood plans be developed for different areas in town such as separate villages or Fire Districts, the Downtown, North End, Misquamicut, Weekapaug, Avondale, and Watch Hill. **This is an excellent idea.** The Watch Hill Conservancy is an eager partner to help develop a plan that identifies, respects, and protects the unique community character of Watch Hill Village, which is loved by many. Such a plan could call for a variety enhancement and smart planning tactics – better parking and traffic management, more comprehensive design control, drainage and harbor improvements, water quality improvements, resiliency initiatives, etc. all tailored to Watch Hill.

***We are grateful to the Watch Hill Conservancy's endorsement and DDS looks forward to participating in the neighborhood planning process for the Watch Hill community.***

We hope you find our review helpful. Again, please accept our congratulations for developing a very solid Draft of the Westerly Comprehensive Plan. Should you wish further details on any of the points we raise, please do not hesitate to contact Jocelyn Lahey.

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Sincerely, and with encouragement,



Deborah Lamm  
President and Chair



Jocelyn Lahey  
Executive Director

## Comments on the May 18, 2020 DRAFT of the Town of Westerly 2020-2040 Comprehensive Community Plan

### How to use this document?

This document is intended to be used as a guide to the comments, corrections, and concerns that The Watch Hill Conservancy and its Comprehensive Plan Review Committee have for the Planning Board. The organization of this document mirrors the structure of the Draft plan.

Our comments will only be found in **RED** or **BLACK** text.

- ☐ **RED** text comments are CORRECTIONS.
- ☐ **BLACK** text comments are CONCERNS, QUESTIONS, SUGGESTIONS about proposed planning.

We hope that you find this document helpful in your editing process. If you have any questions about the notes we have submitted, please contact Jocelyn Lahey at [jocelyn@thewatchhillconservancy.org](mailto:jocelyn@thewatchhillconservancy.org) or at 401-315-5399.

Thank you for your consideration.

**June 21, 2020 A/O's Response**

**Change to be made by Town Planner prior to July 21.**  
**Items previously addressed or already incorporated.**

## Part I: Vision & Strategies

### Chapter 1: Introduction

#### Section 1.1 Preamble

#### Section 1.2 Introduction

- ☐ P.7. Paragraph 2. Consider mentioning climate change as a driver of future changes the Town has to be attentive to.

#### Section 1.3 Vision

- ☐ P.8. Bullet 4. Delete one of the commas after rivers.
- ☐ P.8. Bullet 4. Add scenic viewscapes.
- ☐ P.9. Consider adding a new bullet to acknowledge **the need to protect public health.**

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### Chapter 2: Overview

#### Section 2.1 Purpose and Intent

Subsection 2.1.1 Summary of the Plan

#### Section 2.2 Public Engagement and Plan Development

- *P.14. Paragraph 3. Line 3. Capitalize “Community”. Make “workshop” lowercase.*

#### Section 2.3 Using the Plan

Subsection 2.3.1 Consistency in Land Use Regulation

#### Section 2.4 Land Use and Zoning

Subsection 2.4.1 State Land Use Policy

Subsection 2.4.2 Existing Westerly Zoning

Subsection 2.4.3 Official Westerly Zoning

Map

- *P.16. Paragraph 1. “Until recently” is used twice.*

#### Section 2.5 Community Character

##### Subsection 2.5.1 Community Make-up and Concerns

*.19. West’lyans? Perhaps be more clear- “The citizens of Westerly...”*

- ☐ *P.19. Consider adding a paragraph acknowledging the need to protect public health and safety, and continuity of essential services; especially in these pandemic times.*
- ☐ *P.19. Paragraph 5. Line 1. We also find this to be an extremely important issue worthy of consideration.*

##### Subsection 2.5.2 MISSING

##### Subsection 2.5.3 Climate

- ☐ *P.20. Good statement of climate change.*

##### Subsection 2.5.4 Sustainable Development

##### Subsection 2.5.5 Sustainable Tourism

- ☐ *P.20. Sustainable Tourism is a good place to mention the importance of scenic qualities.*

##### Subsection 2.5.6 Westerly Neighborhoods

- *P.22. The Bermudian style house, “pink house”, has been torn down. The “carousel” is technically referred to as a Merry-go-Round.*

##### Subsection 2.5.7 Regional Considerations

- *P.25. Add to the end of the first paragraph that was continued from page 24; “Specific programs or committees should be created immediately in order to execute upon these goals.”*

#### Section 2.6 The Future

##### Subsection 2.6.1 Long-term Priorities

- *P.26. Change the sub header to “Protecting Open Space, Scenic Viewscapes, and Important Land Features”.*
- ☐ *P.27. Mentions neighborhood plans. Good idea. How will you be doing these plans? Will residents of each neighborhood be able to participate? Will the plan be specific to each neighborhood in terms of needs and future actions? When will they be completed?*
- ☐ *P.27. Last paragraph. Happy to see that the SC-WH is a valuable model.*
- ☐ *P.28. Paragraph 2. Mentions DPR needs to be revisited. We look forward to such a review.*
- ☐ *P.29. Paragraph 3. Mentions stormwater infrastructure as important to maintain (good for Bay Street area), which needs another upgrade in that the storm water controls to empty into the harbor are not working all that well.*

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## Part II: Land Use and Implementation

### Chapter 1: Land Use and Zoning

- Pg. 35. Paragraph 2. *“This Comprehensive Plan seeks to maintain the distinctions between urban and rural development patterns within the Town. To that end, growth is encouraged within the Town’s urban service area which includes neighborhoods such as Downtown and the North End as well as Potter Hill, **Watch Hill** and others along the Pawcatuck River and Route 1. The Urban Service Area, as shown on the Future Land Use Map (FLUM), is **characterized by having a full array of utilities, including public water and sanitary sewer systems. Higher density development is found within these areas.**”*

*We disagree that Watch Hill should be included in an urban service area. Watch Hill has no sewers and is not suited to handle significant growth. Increasing the density would significantly deteriorate the community’s unique character, enjoyed by residents and tourists alike, and would have a negative effect on property values.*

**Watch Hill shall be removed in the description. Replace with “Dunn’s Corners”**

#### Section 1.1 Existing Land Use

- Subsection 1.1.1 Agriculture
- Subsection 1.1.2 Commercial
- Subsection 1.1.3 Community Facilities
- Subsection 1.1.4 Conservation, Recreation & Open Space
- Subsection 1.1.5 Industrial
- Subsection 1.1.6 Residential
- Subsection 1.1.7 Vacant
- Subsection 1.1.8 Water

#### Section 1.2 State Land Use Policy

#### Section 1.3 Existing Zoning

Subsection 1.3.1 Residential Districts **Should be Subsection 1.3.1**

Subsection 1.3.2 Commercial Zoning Districts

- P.43. *“The district also provides for both direct and indirect access to the water by the general public.” Strike this sentence.*

Subsection 1.3.3 Industrial Districts

Subsection 1.3.4 Recreational Districts

Subsection 1.3.5 Other Districts

Subsection 1.3.6 Zoning Overlays

#### Section 1.4 Buildout Analysis

Subsection 1.4.1 Residential Buildout

Subsection 1.4.2 Commercial Buildout

Subsection 1.4.3 Industrial Buildout

#### Section 1.5 Upgrading Westerly’s Regulatory Climate **Section 1.5 header in wrong color. All of Section 1.5 is in a larger font.**

- P.50. Questions. Add- *“What steps could be taken to encourage businesses to invest in Westerly?”*

#### Section 1.6 Future Land Use

Subsection 1.6.1 The Future Land Use Map

#### Section 1.7 MISSING

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Subsection 1.7.1 **MISSING**

Subsection 1.7.2 Inconsistencies **Some bullets have empty areas.**

Subsection 1.7.3 Residential Density and Neighborhood Planning

Subsection 1.7.4 Affordable Housing

Subsection 1.7.5 Low- and Moderate-Income Housing Production Plan

Subsection 1.7.6 Commercial and Industrial Buildout

Subsection 1.7.7 Natural Resources Protection, Open Space and Outdoor Recreation

- **P.56. Last paragraph. Change first sentence to; "Maintaining a large percent of open space and recreation land preserves valuable scenic viewsapes and ensures that a portion of Westerly will remain..."**

Subsection 1.7.8 Agriculture

Subsection 1.7.9 Economic Development

- **P.57. Last paragraph. First sentence. After the word "ensuring", add the words "and enhancing".**

Subsection 1.7.10 Transportation, Infrastructure and Services

Subsection 1.7.11 Westerly Public Schools

## Chapter 2: Implementing the Plan

### Section 2.1 Goals, Policies & Actions

### Section 2.2 A Process for Implementation

#### Tables:

#### Natural Resources

- ❓ **P.63. Action NAT 1.1.A You mention only the Westerly Land Trust here- there are several land trusts in Westerly including the Westerly Municipal Land Trust, Weekapaug Foundation, and of course The Watch Hill Conservancy. Why not also support them?**
- ❓ **P.64. NAT 1.2.H Could this be expanded to include more of the shore community?**
- ❓ **P.64. Action NAT 1.2.I- Recreation Dept? Would the Conservation Commission be more appropriate?**

#### Recreation

#### Historic and Cultural Resources

- ❓ **P.67. Action HRC 1.1.A- Could cooperate with Conservancy in WH.**
- ❓ **P.67. Action HRC 1.1.B Housing tourism- what is this? Maybe best phrased architectural tourism?**
- ❓ **P.67. Action HRC 1.1.D- Could cooperate with Conservancy in WH.**
- ❓ **P.67. Action HRC 1.2.C- Could cooperate with Conservancy for Watch Hill Village.**
- ❓ **P.67. Action HRC 1.2.D - River Corridor Overlay District- Would it make sense to include historic values?**

#### Housing Opportunities

- **P.70. Action HSNG 1.2.F- We have concerns about "streamline permitting".**
- **P.70. Action HSNG 1.2.L- Change to; "Identify opportunities to provide living quarters for seasonal employees".**

#### Economic Vitality

- ❓ **P.73. Action ECON 1.1.A- Good.**
- ❓ **P.75. Action ECON 1.3.B We have concerns about broadening the uses in district SC-WH.**
- ❓ **P.76. Action ECON 3.3.A- Could cooperate with Conservancy in WH.**
- ❓ **P.76. Consider adding an action item acknowledging the significance of commercial fishing in Little Narragansett Bay and off the Westerly shore. Ensure that competing uses in these areas do not have a detrimental impact on fisheries.**

4. **Add ECON- 3.3.C "With stakeholder engagement develop a marine spatial plan for Little**

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*Narragansett Bay, the Salt Ponds, and the Atlantic coastal waters, an ensure competing uses in these areas do not have a detrimental impact on fisheries,."*

Services and Facilities

Infrastructure

Energy

Transportation Network

Natural Hazards and Resiliency

- ☐ P.90. Consider adding an action item that calls for planning uses of our coastal waters and Little Narragansett Bay so that marine habitats and species are not impacted, that critical habitats such as submerged aquatic vegetation (eelgrass) and salt marsh are protected, and the aesthetics and navigability are not compromised.

**Moved to NAT**

- ☐ P.90 Action RES 1.3.A. "Comprehensively study existing and future land uses in areas most vulnerable to coastal erosion and storm surge and evaluate alternatives to mitigate risk." We feel the community should have significant input in this process.
- P.90. RES 1.3.A & 1.3.B & 1.3.G- Excellent.

## Part III: Inventory and Analysis

The pagination for the start of Part III is off. It begins with Page 87 but is should be Page 91.

## Chapter 1: Sustainable Natural Resources

### Section 1.1 Watersheds

#### Section 1.2 Surface Water

- ☐ P.90. (in section III): Add a paragraph acknowledging that most of the town is included in the EPA sole source aquifer designation (established in 1988). This affords many special levels of aquifer protection that otherwise would not occur.

See <https://www.epa.gov/dwssa>

See map at

<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>

#### Section 1.3 Water Quality

- ☐ P.91. It is important to include information about water quality monitoring. Water quality monitoring occurs weekly from May through October. Save the Bay and The Watch Hill Conservancy do the Watershed Watch monitoring of Little Narragansett Bay and the Pawcatuck River.

Subsection 1.3.1 Domestic Wastewater

Stressors Subsection 1.3.2 Wellhead Protection

Subsection 1.3.3 Stormwater Management

Subsection 1.3.4 Flooding

- ☐ P.94. Acknowledge StormTools (and associated CERl and SDE mapping tools) as the data source of record on coastal flooding and storm vulnerability.

Subsection 1.3.5 Lakes, Freshwater Ponds, Rivers, and Streams

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### Subsection 1.3.6 Coastal Waters and Salt Ponds

- ❓ P.96. Acknowledge the monitoring of Little Narragansett Bay and the Pawcatuck River by The Watch Hill Conservancy and Save the Bay. These organizations cover the cost of data collection and contribute the samples to Watershed Watch at URI. Contact Grant Simmons (WHC) and Dave Prescott (STB) for details.
- ❓ P.96. Acknowledge the need to identify and protect upland habitats where salt marsh migration will occur.

See the SLAMM maps at CRMC- [http://www.crmc.ri.gov/maps/maps\\_slamm.html](http://www.crmc.ri.gov/maps/maps_slamm.html)

### Subsection 1.3.7 Groundwater

## Section 1.4 Water Resources Management and Protection

- ❓ P.97. Acknowledge the Sole Source Aquifer designation and its important in protecting drinking water quantity and quality in the region.

### Subsection 1.4.1 Management and Protection of Coastal Waters and Salt Ponds

- ❓ P.97. Acknowledge the presence and importance of USFWS CBRA sites in Westerly. <https://www.fws.gov/cbra/>
- ❓ P.97. Note that much of the Westerly shoreline is classified by NOAA as essential fish habitat. <https://www.fisheries.noaa.gov/national/habitat-conservation/essential-fish-habitat>
- P.97. The shore off Napatree is classified by CRMC as an “Area Designated for Preservation” because of its regional importance as winter sea duck habitat. This affords the area special protections. § 11.10.3.A.1, see Figure 8 in 11.10.2

### Subsection 1.4.2 Management and Protection of Non-Coastal Surface Waters

### Subsection 1.4.3 Management and Protection of Wellheads

## Section 1.5 Agriculture

### Subsection 1.5.1 Aquaculture

### Subsection 1.5.2 Farmland Soils

## Section 1.6 Natural Habitats and Vegetation

- ❓ P.103. Acknowledge the RI Wildlife Action Plan (see RIDEM) and acknowledge that the top ranking rare and vulnerable habitats in the state are abundant and healthy in Westerly, for example Maritime Herbaceous Dunes and Maritime Shrubland. The WAP database on habitat condition is the source of record for habitat vulnerability. (or perhaps P105, section 1.6.3) <http://www.dem.ri.gov/programs/fish-wildlife/wildlifehuntered/swap15.php>

### Subsection 1.6.1 Wetlands

### Subsection 1.6.2 Buffer Zones

### Subsection 1.6.3 Terrestrial Habitats

### Subsection 1.6.4 Barrier Beaches, Sandy Beaches, and Dunes

- P.105. Change “Westerly’s major beaches include” to “Major beaches in Westerly”. The names beaches are not owned by Westerly, as the heading implies.
- P.106. Last paragraph. There is no “Watch Hill Beach”. Dunes Park and Watch Hill beaches are not “public beaches”, they are instead beaches that are accessible to the public.

### Subsection 1.6.5 Bluffs and Rocky Shores

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### 1.6.6 Rare Species and Unique Habitats

- ❓ *P.106-107. Good place to mention Wildlife Action Plan and the occurrence of rare habitats in Westerly and particularly we noticed that Napatree Point is not mentioned (and abundant freshwater and saltwater wetlands and upland forest).*

### Subsection 1.6.7 Pawcatuck River

### Subsection 1.6.8 Aguntaug Swamp

### Subsection 1.6.9 Coastal Environment

- ❓ *P.107. Napatree (and other sites in Westerly) have been designated by the National Audubon Society as a globally important bird area because of their importance to migratory shorebirds. This is a big deal. Contact Janice Sassi at The Watch Hill Conservancy for details.*

See <https://www.audubon.org/important-bird-areas>

### Subsection 1.6.10 Habitat Protection

- ❓ *P.108. Consider adding a section specifically for Little Narragansett Bay. It is an incredibly unique resource for recreation, biodiversity, recreational and commercial fishing, etc. The Little Narragansett Bay complex – Barn Island refuge, Sandy Point, Napatree makes this a regionally significant estuary of distinction. Contact Peter August at The Watch Hill Conservancy for details.*

## Chapter 2: Open Space and Recreation

### Section 2.1 Existing Open Space for Conservation

#### Subsection 2.1.1 Open Space Acquisition

### Section 2.2 Regional Conservation Plans and Strategies

#### Subsection 2.2.1 South County Greenspace Protection Strategy

### Section 2.3 Conservation Tools

### Section 2.4 Recreation

#### Subsection 2.4.1 Municipal Facilities

#### Subsection 2.4.2 School District Facilities

#### Subsection 2.4.3 Quasi- Public Facilities

#### Subsection 2.4.4 Private Facilities

#### Subsection 2.4.5 Regional Facilities

#### Subsection 2.4.6 Water-Based Facilities

- *Pg. 117. Table 2-8 The title for this table “Public Water-Based Recreation Facilities” is incorrect. Not all of these facilities are “public” though they are publicly accessible. We suggest that this Table is titled “Water-Based Recreation Facilities in Westerly”.*
  - *East Beach- Not Public*
  - *Maschaug Beach- Not Public*
  - *Napatree Point - Not Public*
  - *“Watch Hill Beach”? Not familiar with this name- Not Public*
  - *Watch Hill Yacht Club- Not Public*
- *Why does the table say “Napatree Point and Napatree Point”?*

### Section 2.5 Water Access

### Section 2.6 Recreation Programming Providers

## Chapter 3: Historic and Cultural Resources

### Section 3.1 Historic Places

#### Subsection 3.1.1 Historic Cemeteries

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### Section 3.2 Regulatory Protection

❓ P.123. What are the requirements of NFIP if they maintain their historic designation?

### Section 3.3 Funding Assistance

### Section 3.4 Community Accomplishments and Opportunities

Subsection 3.4.1 Recognitions

### Section 3.5 Community Institutions and Events

## Chapter 4: Housing Opportunities

Throughout the Draft you have wonderfully explained goals and objectives of the Plan. This chapter feels entirely disconnected from the rest of the Draft. Through reading this chapter we understand the demand and necessity for increased LMI housing opportunities in Westerly, including those for seasonal workers. However, the approach to improving these numbers appears to us as muddled by an abundance of obstructive information and detail. Given that this is a Census year, we also hope that this chapter will be revisited when the new data is available.

**All points well understood, we are in agreement.**

This chapter is dense with data and legal jargon making it confusing to follow. Given the importance of housing to our community, we suggest this chapter be reexamined in its entirety.

**It has been reexamined. We did our best to improve it.**

### Section 4.1 Demographics

Subsection 4.1.1 Population Size and Age

Characteristics Subsection 4.1.2 Income Characteristics

### Section 4.2 Housing Availability

Subsection 4.2.1 Year-round Occupied Housing

- P.130. Subsection Paragraph 2. There is an extra space between “as” and “weekends”.
- ❓ P.130. The description of seasonal housing units for non full-time residents is confusing and needs reconsideration.

Subsection 4.2.2 Housing Types

### Section 4.3 Rental Housing

### Section 4.4 Housing

#### Conditions

- P.133. “recent economic recession”- Be more specific. The recession has been labeled a number of ways throughout the document. Use a year, or a name, but stay consistent.

Subsection 4.4.1 Age of Housing

Subsection 4.5.2 Quality of Housing **Should be Subsection 4.4.2**

Subsection 4.5.3 Property Maintenance Code Enforcement **Should be Subsection**

#### 4.4.3 Section 4.5 MISSING

### Section 4.6 Housing Affordability

- P.135. “Elevated housing prices and rental rates reflect the desirability of Westerly as an attractive community for both year-round and seasonal residents...” But, you also report a population decline?

Subsection 4.6.1 Housing

Costs Subsection 4.6.2 Home

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### Values

Subsection 4.6.3 Cost Burden and Unmet Affordability

Needs Subsection 4.6.4 Residents with Disabilities

Subsection 4.6.5 Residents Experiencing Homelessness

### Section 4.7 Affordable Low- and Moderate-Income Housing

Subsection 4.7.1 LMI Unit Approvals

- P.144. *“Increased housing density in established neighborhoods that are built out is impractical and may adversely affect neighborhood character as well as environmental integrity.” Good.*

Subsection 4.7.2 Meeting Local Housing Needs

Subsection 4.7.3 Projected Affordable Housing

Production

Subsection 4.7.4 Housing Opportunities through Affordable Rental Units

- P.152. *Strategy 2. Paragraph 2. Line 1. “Westerly works with this non-profit...” What non-profit? There is nothing noted in the surrounding text.*
- ❓ P.153. *Strategy 4. Line 1. Awkward intro.*
- ❓ P.156. *Is table 4-18 complete?*
- P.157. *“However, a robust allowance of accessory apartments in residential zones is recommended as part of this...” Which residential zones? Not appropriate in all zones.*

Subsection 4.7.4 Strategic Production Plan for LMI Qualified Units **Should be Subsection 4.7.5**

## Chapter 5: Economic Vitality

- P.160. *Paragraph 2. Line 2. There is an extra space between “of” and “the”.*
- P.160. *Paragraph 3. “In addition to health care, hospitality, retail, manufacturing, banking, finance service industry, the arts and the schools, other sectors of significance to Westerly’s economy include textiles, printing, and construction.” This could be simplified.*  
*Perhaps- - Sectors of significance in Westerly’s economy include health care, hospitality, retail, manufacturing, banking, finance, service industry, the arts, the schools, textiles printing and construction.*

### Section 5.1 Regional Economic Overviews

- P.160. *Paragraph 3. “A tourism satellite account prepared by the IHS...” This sentence is in a different font or a different font size.*

### Section 5.2 Local Economic Overview

- P.162. *Paragraph 1. Line 2. Change to “projects that included” instead of “projects including”.*

Subsection 5.2.1 Health Care

- ❓ P.162. *Consider acknowledging medical staffing as preparedness for pandemic events.*

Subsection 5.2.2 Finance

Subsection 5.2.3 Westerly State Airport and the Airport Industrial Park

- P.163. *“Expanding the airport has never been proposed and is not desired.” Not desired by who if it has never been proposed?*

Subsection 5.2.4 Manufacturing

- ❓ P.164. *Paragraph 1 and 2 are formatted incorrectly.*
- P.164. *Paragraph 1. “grand list”??*

Subsection 5.2.5 Consumables

Subsection 5.2.6 Local Government

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### Subsection 5.2.7 Tourism

- *P.165. Paragraph 3. “preserving the community’s natural and cultural resources for the benefit of all” Balancing these interests is vitally important.*

### Subsection 5.2.8 Accommodations

### Subsection 5.2.9 Seasonal Residents

### Subsection 5.2.10 Agriculture

- ② *P.176. Consider adding a section focused on fishing and aquaculture as significant parts of the local economy. Westerly has a number of commercial fishermen and a huge number of recreational fishers who spend large amounts of money on docking, fuel, fishing gear, etc.*

***This was in the plan and removed early on-. Shall we bring it back.***

### Subsection 5.2.11 Employment and Industries

### Subsection 5.2.12 Private and Public Establishments

## Section 5.3 Income

## Section 5.4 Economic Development Initiatives and Organizations

### Subsection 5.4.1 Neighborhood Revitalization

### Subsection 5.4.2 Westerly-Pawcatuck Downtown Business Association

### Subsection 5.4.3 Westerly Land Trust

### Subsection 5.4.4 Ocean Community Chamber of Commerce

### Subsection 5.4.4 Arts & Entertainment District **Should be Subsection 5.4.5**

### Subsection 5.4.5 Real Jobs RI **Should be Subsection 5.4.6**

### Subsection 5.4.6 Other State-wide Business Incentives **Should be Subsection 5.4.7**

## Section 5.5 Economic Resilience

- ② *P.176. Consider adding a statement that cybersecurity is an important issue for the Town to be cognizant of. This includes Town IT systems but the community writ large, especially sectors like banking, health care, and public safety.*

## Chapter 6: Services and Facilities

### Section 6.1 Westerly Police Department

### Section 6.2 Fire Protection Services

### Section 6.3 Ambulance Services

### Section 6.4 Medical Facilities and Services

#### Subsection 6.4.1 Westerly Hospital

#### Subsection 6.4.2 South County Health

#### Subsection 6.4.3 Wood River Health Services

#### Subsection 6.4.4 Nursing Homes, Retirement Homes, and Assisted Living Facilities

### Section 6.5 Education

#### Subsection 6.5.1 Enrollment

#### Subsection 6.5.2 Demographics and Special Services

#### Subsection 6.5.3 School Facilities

#### Subsection 6.5.4 Academic Performance

#### Subsection 6.5.5 Other Educational Resources

### Section 6.6 Solid Waste Disposal

- *P.185. Paragraph 2. “If residents use a private hauler, they are not required to use orange bags.” Watch Hill Fire District pays for private hauler and has to use orange bags.*

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*Orange bags are required by the Westerly Transfer Station.*

***We should delete this sentence.***

## Section 6.7 Westerly Library & Wilcox Park

## Section 6.8 Social Service Agencies and Programs

## Section 6.9 Energy Usage and Conservation

Subsection 6.9.1 Evaluation of Energy Conservation Measures

Subsection 6.9.2 Anticipated Energy Savings

Subsection 6.9.3 Recommended Energy Conservation Measures

Subsection 6.9.4 Carbon Emissions Reduction

## Chapter 7: Infrastructure and Energy

### Section 7.1 Potable Water System

Subsection 7.1.1 Potable Water Source

Subsection 7.1.2 Potable Water Supply

Subsection 7.1.3 Drought Management

Subsection 7.1.4 Distribution

### Section 7.2 Wastewater Systems

- *P.200. Failure of OWTS's in a coastal setting will increase with rising sea levels. It would be good to specifically state this as a planning challenge.*

Subsection 7.2.1 Existing Sewer System Capacity

Subsection 7.2.2 On-site Wastewater Treatment Systems

### Section 7.3 Stormwater System

7.3.1 Stormwater Pollution Prevention

### Section 7.4 Electricity and Natural Gas

### Section 7.5 Solar, Wind and other Alternative Energy

Subsection 7.5.1 Net Metering

Subsection 7.5.2 Future Alternative Energy

### Section 7.6 Communications

### Section 7.7 Electric Vehicles and Electric Charging Stations

- *P.203. "Bay Street and other roadways with on-street parking, such as those in Downtown, may also be ideal locations for installing electric charging stations..." Given the seasonal nature of Bay Street this doesn't seem like an ideal location. Retaining parking spots in support of local business might be a higher priority.*
- *P. 203. Paragraph 5. Line 6. "Westerly, a place for visitors and residents Bay Street and other roadways with on-street parking, such as those in Downtown, may also be ideal locations for..." The beginning of this sentence doesn't make sense?*

## Chapter 8: Transportation Network

### Section 8.1 Roadways and Motor Vehicles

Subsection 8.1.1 Functional Classification of Roadways

Subsection 8.1.2 Traffic Volumes and Safety

Subsection 8.1.3 Motor Vehicle Parking

- *P.208. Last sentence of paragraph 2 is unnecessary. Already addressed parking.*

### Section 8.2 Public Transit Service

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### Section 8.3 Rail Services **Section Header in Wrong Text Color**

### Section 8.4 Pedestrians and Walkability

- P.212. Paragraph 3. *There is no mention of The Watch Hill Conservancy's involvement and contribution to the Bay Street Project. Below is a suggested narrative of our shared work.*

*"The Watch Hill Conservancy, using donor dollars and matching funds provided by the A.M. Roberts Charitable Foundation, put into action burying the utilities along Bay Street in resilient underground conduit when the Town revamped the street's stormwater drainage systems in 2012. The completion of this project, the Conservancy's largest to date, was realized in 2019 in partnership with the Town of Westerly and the State of Rhode Island utilizing Federal Transportation Improvement Program funds, with the construction of new sidewalks including restored granite curbing, fresh paving, and historically appropriate street lamp fixtures outfitted with energy efficient lighting."*

***This will be added into the document.***

### Section 8.5 Cyclists and Bikability

### Section 8.6 Transportation Improvements

### Section 8.7 Water and Waterfront Access

### Section 8.8 Air Service

## Chapter 9: Natural Hazards and Resiliency

### Section 9.1 Overview of Natural Hazards

Subsection 9.1.1 Storm Surge and Wind

Subsection 9.1.2 Tropical Cyclones

Subsection 9.1.3 Tornadoes

Subsection 9.1.4 Thunderstorms

Subsection 9.1.5 Winter-related Hazards

Subsection 9.1.6 Flood-related Hazards

Subsection 9.1.7 Coastal Erosion

- P.222. Paragraph 2. *Suggest you acknowledge CRMC's StormTools as the dataset of record for assessing risk and vulnerability to sea level rise and storm flooding. The HAZ-M2 map is a poor representation of 1', 3', and 5' SLR scenarios. It misses large areas that will be flooded. SLAMM is not a sea level rise tool, it is used to map marsh migration.*

Subsection 9.1.8 Dam Breaches

Subsection 9.1.9 Wildfires

Subsection 9.1.10 Drought and Extreme Heat

Subsection 9.1.11 Geological-related Hazards

Subsection 9.1.12 Climate-related Hazards

### Section 9.2 Resiliency

Subsection 9.2.1 Local Hazard Mitigation Plan

Subsection 9.2.2 Community Resilience Building