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"Designing with Nature for People"

General Memo

To: Signal Mountain Planning Commission

From: Randall Arendt

Date: April 3, 2007

Subject: General Comments on an Overall Approach to *Land Use and Transportation Plan* Language and Zoning and Subdivision Regulations to Conserve Land, Maintain the Town's Rural Character, and Protect a Greenspace Network

1. Introduction

I have been asked to review the Town's Zoning and Subdivision Regulations, and in this review I have also taken into account the various policies. goals, and objectives in its *Land Use and Transportation Plan,* with respect protecting the Town's significant natural and cultural resources, particularly as they relate to its rural character.

In this process, I have looked at the Town's existing code language through the eyes of a land-use planner who gives special emphasis to blending open space conservation with new development.

In providing this constructive critique, I have divided my observations into two parallel memoranda. In this "General Memo", observations are offered on a broader level, and indicate the overall approach to planning for conservation and development that I have illustrated and advocated in several books over the past fifteen years.

The program of work that I generally recommend communities take involves the following steps. They are listed in the sequence in which I feel it would be desirable to deal with them.

1) *Supplementing the Land Use and Transportation Plan to include a "Town-wide Map of Potential Conservation Lands".* This could consist of a composite of information appearing in natural and cultural resource maps that typically appear in such Plans -- such as soils, slopes, vegetation patterns, hydrology and wetlands, aquifers, historic and cultural resources, etc -- but which are surprisingly absent from yours. On a broader level, it would be helpful to consolidate all (or most of the more important) information from all these usual maps into a

grand composite, to show at a single glance the overall pattern of landscapes worth preserving -- or at least seriously considering -- in terms of both acquisition (by land trusts or public entities) and in terms of conservation subdivision design. This material would ideally be arranged and displayed in such a manner so as to be unified and clear with respect to a comprehensive strategy for protecting those resources in a co-ordinated way, so as to preserve an interconnected network of conservation lands.

Another potential data layer that would be extremely useful would be one showing unprotected, undeveloped, and unconstrained lands (i.e, those that are vacant, buildable, and without protection). This could be achieved by including a new *Map of Unprotected, Undeveloped, Unconstrained Lands* showing the location of unprotected woodlands, open fields, moderate slopes, and historic/cultural features so that the basic texture of these areas may be better understood. That map could then be overlain with another map showing the very severely constrained environmental lands (wet, floodprone, steep, etc.) which are presumably already protected from development through existing regulations, and also with a third one showing lands protected through easements, public ownership, etc. This third one might also show, in a related but different color, properties identified for potential acquisition by the Town or by a conservation organization. I believe that such a map would be a very useful tool to help the Town focus its attention on the most critical parcels that might be protected in any one of a number of different ways, including creative development design.

To simplify matters, I would suggest proceeding with a composite map rendered in essentially three shades of green. The darkest green would be reserved for public lands designated for conservation use, properties with conservation easements on them, and lands owned by conservation organizations such as land trusts. (Potential acquisitions could be shown in hatching of that shade of green.) The next deepest green would show the inherently unbuildable lands where development is prohibited under current law, a category I call "Primary Conservation Areas" (e.g., wet, floodprone, very steep, etc). This mapping unit should include land in the slope category beyond which the terrain is considered to be unsuitable for clearing, grading, and new construction (say, 25%).

The third and lightest green would include further resource lands such as woodlands and agricultural soils that are not otherwise wet, floodprone or steep, plus a number of other features of the natural and historic landscape that are noteworthy and desirable to protect, whenever feasible (a category I call "Secondary Conservation Areas"). This revised map could then be incorporated into the body of the *Land Use and Transportation Plan.* This point is elaborated on later in this memo, where I describe the *Town-wide Map of Potential Conservation Lands* in more detail. It would be beneficial if the *Land Use and Transportation Plan were* also updated in another way, with fuller descriptions of the specific kinds of revised language that would be needed in both the subdivision and zoning ordinances for implementation of the Town-wide open space network shown on the *Map of Potential Conservation Lands.* This is an important omission of the current *Plan*, which goes only a short way in this direction. Potential language for such an amendment can be found in one of the appendices to my fourth book, *Growing Greener: Putting Conservation into Local Plans and Ordinances* (Island Press, 1999). (I could easily transmit them to you electronically, if you would like.)

2) *The second recommended work-step is to update the Subdivision Regulations* to include several critical elements for all new residential developments, such as an expanded *Location Map* (renamed *"Context Map"),* a new *Sketch Plan* section providing standards for an "overlay sheet" based on the *Existing Resource/Site Analysis Map* (and very strongly encouraged through the ordinance itself), an *On-site Visit* by staff and local officials (wherever possible), and a *four-step design process* that would establish an orderly and logical procedure for analyzing each property in terms of its potential for conservation and development in light of the *Town-wide Map of Potential Conservation Lands* (the four steps: identifying conservation areas, positioning house sites, locating streets and trails, and drawing in the lot lines). An additional component would be some requirement that concept plans be prepared by a landscape architect or physical planner having demonstrated experience with such designs.

3) *The third work step involves selectively amending the Zoning Ordinance* to include a variety of mechanisms, as described in my *Growing Greener* book, and in these two memos.

The above sequence of actions or amendments is generally recommended because I feel it is very important, at the outset, that all parties should have a shared sense of the direction in which the revised ordinances should be taking the Town before beginning the process of revision. However, because your current *Subdivision Regulations* need considerable improvement, I think my first two priorities would be to update that code first.

2. Evaluating the Town's Context -- A Critical Element of Planning: It is often helpful to step back and look at the Town's situation from at least a short distance. In this case, I see a substantially-developed, suburbanizing community with some very significant remaining open space, located in an area of the County experiencing increasing development pressures, and situated relatively close to places offering a variety of attractive employment opportunities.

Although some large and small parcels have been permanently protected from future development through public ownership or private easements, much of the remaining undeveloped land that is not actually wet/, floodprone, or steep is currently zoned for conventional developments in which all of the land may be cleared, graded, and converted into suburban houselots. The flexible design options in your ordinance, which could protect substantial open space within new residential developments, are essentially inoperative until such time as public sewer is extended.

3. Overview and General Strategy

The typical first step in the conservation planning process, as I perceive it, involves the preparation of a *Town-wide Map of Potential Conservation Lands* (as described in Chapter 3 of *Growing Greener,* and as prepared and adopted by Orange County, NC), which would reflect stakeholder consensus and identify a shared goal that the Town's land-use ordinances should be carefully crafted to implement.

The second step should typically focus on the specific procedures for analyzing each proposed subdivision site, and the methodology of preparing a conservation-based development plan wherein the conservation areas will be related to the *Town-wide Map of Potential Conservation Lands* (in order that an interconnected network of open space will ultimately be preserved).

After securing agreement on the overall goal and on the principal methodology involved in achieving that goal, I feel that the Town would be better equipped to deal with the more detailed work involved in the accompanying zoning revisions which are typically needed. Apart from the logic that this progression seems to offer, another possible advantage is that the dimensional details of the zoning will be seen in a broader perspective, as the fairly minor items that they actually are. When viewed in the context of a community-wide open space network of conservation lands, the relative insignificance of these details will hopefully become apparent. It is my experience that when local officials deal with zoning provisions in the abstract, they tend to place more emphasis on such details than is warranted, and often spend extended periods debating the merits of this number or of that dimension.

By working from the "big picture" of *Potential Conservation Lands*, to the intermediate level of the methodology involved in analyzing and laying out subdivision development proposals, before getting into the minutiae of the zoning standards, I have found that local officials and residents are often more productive and better satisfied with the ultimate results.

4. Supplementing the *Land Use and Transportation Plan*

As indicated above, the key to conserving an interconnected network of open space is to prepare a *Town-wide Map of Potential Conservation Lands* which would outline areas that are recommended to be developed and areas recommended to be conserved on each parcel of land. Some of the background data needed for preparing the *Town-wide Map of Potential Conservation Lands* is already contained in your existing *Land Use and Transportation Plan.*

Ideally, nine kinds of special features should be shown on a base map of existing roads and parcel ownership lines. They are: wetlands and their buffers; floodways and floodplains; moderate and steep slopes; groundwater resources and their recharge areas; woodlands; productive farmland; significant wildlife habitat; historic, archaeological and cultural features; and scenic viewsheds from public roads (possibly in that order of importance).

This draft map would render a variety of resource lands in various shades of green. Possible categories might include:

•Primary Conservation Areas: floodprone, steep, wet, or otherwise unbuildable under existing law
•Secondary Conservation Areas: stream corridors, moderately steep slopes, woodlands and hedgerows, fields, meadows and pastures with soils rated prime or of statewide importance, fields, meadows and pastures in the public viewshed as seen from existing roads, historic structures and archaeological sites (including ruins and cellarholes), stone walls, military earthworks, noteworthy rock formations, established trails, etc.), and

• Existing Protected Areas: eased land, public parks, conservancy properties, etc., but not land registered under any "current use" tax-reduction programs, unless they are also protected through a permanent easement. Proposed future acquisitions can/should be rendered in a hatching of the same color.

The purpose of dividing these resources into three broad categories is to acknowledge major differences between them. The first category, Primary Conservation Areas, are deemed to be inherently unsuitable due to extremely severe environmental constraints. The second broad category, Secondary Conservation Areas, contains resources that are either significant at some level or are at least notable and worthy of consideration for conservation wherever possible. This map should definitely be drawn on (or overlain by) another map showing tax parcel boundaries, to ensure that not more than half of the buildable area in any single ownership is shown as potential conservation land. The third category, Existing Protected Lands, forms the core areas around which the Town's future network would grow.

It should be emphasized early on that there is an absolute commitment under the *Growing Greener* approach to allow all landowners to develop their properties to whatever legal density is permitted under the zoning ordinance which is ultimately adopted, and that none of the conservation areas would necessarily become either public or publicly accessible, so this approach avoids the so-called "takings" issue.

In fact, this approach has sometimes been described as "the ultimate in private property rights" because it allows landowners to realize the full economic value of their potential density, while still retaining ownership of the majority of their land for future resource use after development.

Although your *Land Use and Transportation Plan* includes several maps with many of the needed inventory items, that document should ideally be supplemented with a few additional resource layers, which would then be super-imposed to create the *Town-wide Map of Potential Conservation Lands*. Simply stated, the principal purpose of this map is to establish an overall structure for the open space network, and to show everyone how the open space in any particular, individual subdivision would fit into this broader framework. This kind of map (which is best prepared using "GIS") would be supplemented by several pages of text describing its function and significance. Also, several additional pages should be added to augment the existing text, providing further observations and recommendations about certain zoning and Subdivision Regulations changes needed to make the "conservation subdivision design" process operational. Such wording would create the legal foundation for the specific kinds of zoning and Subdivision ordinances modifications recommended later in this memo and in the parallel memo. (Staff are referred to the eight pages of model language for Land Use and Transportation Plans, contained in the *Growing Greener* appendix, as mentioned above.)

To sum up this section, the importance of this kind of map is that it would form the framework around which new development is either encouraged or required to be designed. Such an approach would almost certainly ensure that the conservation network which will evolve in The Town will be interconnected, and that it will encompass a substantial amount of land that would otherwise be subdivided, cleared, graded, and developed. As such, it could be the unifying

concept map that defines your future pattern of conservation and development, in a rational and orderly manner.

5. General Analysis of the Subdivision Regulations and Zoning Ordinances

The Subdivision Regulations, originally adopted in 1991, are quite outdated, containing some very inadequate submission requirements, incomplete procedures, and poor review standards. This situation is fairly common, in ordinances old and new alike and, on the positive side, essentially represents a real opportunity to correct existing deficiencies so that the ordinance becomes a truly effective tool for implementing key policies regarding land conservation that should be a cornerstone of a newly updated *Land Use and Transportation Plan.*

Fortunately, this shortcoming is quite easily overcome by updating the Town's Subdivision Regulations with strategic revisions to reflect the conservation design approach with fuller procedures for evaluating resources, prioritizing them for conservation, and laying out developments around the central organizing principle of conserving open space networks, blocks of productive farmland, and less-fragmented woodland habitats. In addition, and equally as important, this approach (when incorporated into zoning regulations) establishes standards such that future developers of the remaining unprotected land would be obliged to conserve a significantly larger part of the unconstrained ("buildable") resource land as a precondition for approval.

The extensive critique in the next section details the ordinance's shortcomings, suggesting for each a specific, positive solution.

In my judgment, the Subdivision Regulations should contain, at minimum, the following elements, for both conventional and for conservation subdivisions. This is not only because the below process is an excellent and very logical one, but also because the Town should avoid unintentionally creating a disincentive for conservation subdivisions by increasing the number of steps and informational requirements needed for that superior alternative.

All these steps and informational requirements are equally applicable to conventional subdivisions, which would themselves be likely to be much better-designed with such improvements to the basic process. In fact, when I began my career in York County, Maine 30 years ago, long before I had developed the concept of "conservation subdivisions", many of these refinements were already standard operating procedures in ordinances applying to conventional layouts.

- Procedures that require an extensive dialogue between the applicant and the Town before detailed plans are engineered.
- A requirement for a *Context Map*, showing all natural and manmade features surrounding the site.
- A requirement for a detailed site inventory of existing features upon which to base informed decisions regarding the development.
- A required site visit by staff and Planning Commission members accompanied by the developer, with the site inventory in hand.

- A requirement for a "Sketch Plan Overlay Sheet" showing the location of proposed conservation areas, house sites, and the circulation pattern,
- A Four-Step Design process in which the conservation areas are determined first, before houses, streets, and lot lines are established.
- Standards for the configuration and location of the conservation lands so that the open space is designed to link up with potential conservation areas on adjoining properties to ultimately preserve a Town-wide network of protected open space.

Regarding the zoning, the most critical deficiencies in my view are that it does not appear to allow flexible lot sizes (essentially precluding conservation design) as a by-right Permitted Use, and that submission standards and review criteria for Planned Unit Developments (PUDs) are woefully inadequate in terms of data requirements and design standards for open space.

This deficiency is related to a continuing reliance on conventional platting techniques that are actually inconsistent and at odds with the kinds of policies, goals, and objectives for open space and natural resources protection that are the foundation of Comprehensive Plans in most other communities.

6. Subdivision Regulation Suggestions

The following paragraphs within this section (and some within the companion document, the *Specific Memo*) describe a number of procedural refinements that I would suggest for the Town's consideration, to ensure that future developments will be as well-designed as they can possibly be from a resource conservation and rural character perspective.

After completing the "greener visions" map (of potential conservation lands) in an updated *Land Use and Transportation Plan*, the most appropriate next step, in my view, would be to draft possible revisions to the Subdivision Regulations, under which most of the critical layout decisions are taken by developers and their site designers. The highlights of this approach would include the following elements:

a. *Existing Resources/Site Analysis Map*: Your Ordinance currently does not require this kind of detailed map for conventional subdivisions. However, in my professional judgment, it should; otherwise, all parties will continue to proceed in a poorly-informed manner, with insufficient information to prepare good layouts or to review them intelligently.

The *Existing Resources / Site Analysis Map* which I recommend would provide a greater amount of essential information than is currently required for either conventional or conservation subdivisions in your ordinance, and would reflect a much more thorough approach to documenting the location of a large variety of site features, ranging from those deemed to be critical to those considered to be noteworthy. It would typically be prepared by a landscape architect for the developer, and would sometimes be based on recommendations from historic preservation specialists and/or conservation biologists. (In South Kingstown, RI, developers' application fees have been increased to hire a landscape architect or physical planner of the Town's choosing, to work with the developer to conduct a Site Walk, prepare an

Existing Features/ Site Analysis Map, and to create the *Sketch Plan* layout. If the current review fees in the Town were increased, for example, that could enable such an approach to be funded. Considering the very high and rapidly rising value of land, together with the sales figures for approved houselots in the Town, such an upward adjustment would not be onerous in the least.)

The *Existing Features/Site Analysis Map* would tell reviewers virtually everything they need to know about the property in terms of its noteworthy natural and cultural features. Drawn to a scale of one inch equals 100 or 200 feet, it would reflect a thorough understanding of the site by those who have walked it extensively, so that even the location of noteworthy trees or tree groups, unusual geological formations, vernal pools, or the depth of the public viewshed, could be identified. Regarding tree locations, the use of GPS technology makes their documentation relatively easy and inexpensive.

This information enables the site designer, the developer, and the Town officials to render much better-informed decisions. An increasing number of developers are beginning to understand that preserving trees -- whether they be notable individual specimens, hedgerows, or woodlands -- enhances the value of their projects, because buyers appreciate such amenities. (Money really does grow on trees.) With respect to the diameter at which a tree becomes noteworthy, I recommend girths related to specific species, such as 4 inches for an Eastern redbud or flowering dogwood, 6 inches for a sassafras or water beech, 8 inches for a holly, 10 inches for a wild cherry, 12 inches for a white oak, 14 inches for a green or white ash or for a red oak, 16 inches for a tulip poplar, larch, or sweet gum, 18 inches for a sycamore, 20 inches for white pines, etc. Trees in unbuildable wetlands or floodplains would not need to be documented, as no development would occur there.

I feel that this is the most important document in the subdivision design process, as it provides the factual foundation upon which all design decisions are based.

b. Site Visit: With the detailed *Existing Resources/Site Analysis Map* in hand, staff and officials would ideally walk the property (proposed for either conventional or conservation subdivisions) with a view toward offering suggestions about the recommended location of features to be designed around and preserved (in conservation subdivisions, those known as Primary and Secondary Conservation Areas). I might have missed them, but I did not see any provisions requiring Planning Commission members to conduct site visits. I believe this procedure should be followed religiously, to help all voting members fully understand existing site conditions, and to help them determine which site features are most worthy of "designing around".

Without the benefit of experiencing the property in a three-dimensional manner (as opposed to viewing a two-dimensional abstraction in a meeting room) at a very early stage in the process -- even before a *Sketch Plan* is submitted -- it is extremely difficult to offer informed suggestions as to the preferred locations of conservation areas and development areas as well as to evaluate the proposed layouts. Your current regulations could be significantly improved by requiring the applicant to provide copies of the *Existing Resources/Site Analysis Map* for staff and officials to use as they walk the property with the applicant and his/her engineer or site

designer (who should be required to attend to point out the location of the various features shown on the site analysis map). In my view, this site walk should definitely become standard operating procedure and part of the job description for all Board members (except those with physical disabilities). It should ideally occur right at the beginning of the process, so that the Town may provide critical input to the applicant before he/she prepares the *Sketch Plan*.

One way of looking at the Site Visit requirement is to liken it to a job interview. What employer would ever, ever consider hiring someone for a full-time permanent position on the basis of reviewing a resume only? That is essentially what happens when a Planning Commission approves a permanent subdivision on the basis of a two-dimensional document consisting of black lines on white paper.

c. *Sketch Plan Overlay Sheet*: Apart from the *Existing Resources/Site Analysis Map,* the *Sketch Plan* is perhaps the second most important document in the entire subdivision process, for both conventional and conservation subdivisions. The lack of one in your current regulations is truly an omission of huge proportions. This is the step where the overall concept is outlined, showing areas of proposed development and areas of proposed conservation. I recommend that the *Sketch Plan* be required to be prepared by a landscape architect or physical planner working with a civil engineer. (Your current Sketch Plan requirements consist of one single sentence in Section 404, simply instructing applicants "to submit a sketch plat showing the proposed development layout of the subdivision.") Clearly a new section is needed to deal with this critically important submission requirement, which is arguably the most significant stage of the entire process, as it is where the "bones" of the development are laid out, forevermore.

The kind of Sketch *Plan* that I recommend should be drawn to scale on white tracing paper as an <u>overlay sheet</u> to be lain on top of the *Existing Resources/Site Analysis Map* so that everyone can clearly see how well (or how poorly) the proposed layout avoids conservation lands with resources that have been ranked highly on the priority list contained in the Subdivision ordinances. Ideally the proposed development "footprint" on the *Sketch Plan* should dovetail and not intrude upon with the resources documented on the *Existing Resources/Site Analysis Map*. This section of the ordinance should also provide more criteria for staff to follow, so that everyone knows the parameters for evaluating the *Sketch Plan*. The review process for *Sketch Plans* should identify and document their shortcomings, which should then be communicated to the applicant, so that these deficiencies can be corrected prior to submitting the *Preliminary Plan*. (I truly believe that three plans are needed to ensure a proper review. In some states, such as RI, three plans are clearly required by state law. In other states, such as PA, state law limits the review steps to *Preliminary* and *Final*, with 120 days for each. In that instance, progressive municipalities are dividing the first stage into two plans, a <u>*Conceptual*</u> *Preliminary Plan* -- really a *Sketch Plan* -- and a <u>*Detailed*</u> *Preliminary Plan*. Another alternative is to delay the details until the *Final Plan* stage.)

It is absolutely essential that a conceptual step occur before the applicant spends large sums on preparing any substantially-engineered drawing. Once a certain layout has been heavily engineered, at very considerable cost, applicants are understandably reluctant to modify their drawings in any substantial way. After agreement is reached at the conceptual stage, the

applicant moves to the more detailed *Preliminary Plan*, with the full benefit of the site analysis, site visit, and concept review to prepare him for the next stage where serious engineering money is spent.

d. Four-Step Design Approach: I believe that the most effective methodology for producing subdivision layouts which are centered around the principle of land conservation is one that begins with the determination of open space as the first step. If this is done, and if the ordinance requires that a significant proportion of the unconstrained land be designated as open space, it is nearly impossible to produce a truly inferior or simply conventional plan. In fact, to the extent that the property contains elements of the community-wide network of conservation lands, the plan is likely to be at least fairly good. The logical second step, after locating the open space areas, is to select house locations, with homes positioned to take maximum advantage of the open space in neighborhood squares, commons, greens, playing fields, greenways, farmland, or forest preserves.

The third step involves "connecting the dots" by aligning the streets and trails to serve the new homes. Drawing in the lot lines, Step Four, is the least significant part of the process. One of the greatest weaknesses of most Subdivision ordinances is that the open space is not defined in this manner, and therefore tends to become a collection of whatever bits and pieces of land that have proven difficult or challenging to develop. The other common failing of such provisions is that they often require deep perimeter buffers around the proposed development (as if it were a gravel pit or junkyard). This practice inadvertently leads to very poor layouts in which a substantial percentage of the total open space is consumed by excessive separation (particularly needless when new single-family developments are being "buffered" from existing single-family developments).

The above approaches are fully described in Chapter 5 of *Growing Greener*.

7. Zoning Language Suggestions

In addition to providing more detailed subdivision submission requirements pertaining to site analysis as well as more effective standards for open space conservation in new residential developments -- incorporating a mechanism to ensure that that conservation design becomes the option most often selected by applicants, I recommend three conservation planning concepts for inclusion in zoning ordinances. The first two are described in this memo, while the third is discussed in the companion memo ("Detailed Memo"), as they are a bit more involved.

••Requiring management plans for conservation lands

••Offering small density incentives to encourage developers to grant public access to certain non-agricultural parts of subdivision conservation areas, and/or to encourage the endowment of maintenance funds for land trusts to whom such lands would be donated

••Adopting a refined method for determining density in new conservation subdivisions, consisting of a "Yield Plan" showing a conventional layout designed in a realistic manner.

a. Management Plans for Conservation Lands: The land in conservation subdivisions which is not divided into houselots should be managed comprehensively (usually by a homeowners' association) to maintain or enhance the ecological health of the habitat. The land trust in Pennsylvania for which I still work part-time (Natural Lands Trust) has prepared a set of model land management guidelines for subdivision open space. It should be understood that for commonly owned land, homeowner associations have the responsibility for maintenance, taxes, and liability. They generally discharge those responsibilities reasonably well when three rules are followed: (1) HOA membership must be automatic upon purchase of a lot or house, (2) the HOA bylaws must give the HOA legal authority to place a lien on the property of any member who does not pay his or her dues, and (3) the facilities should generally be kept simple, if dues are to be low, in the range of $100 to $350 yearly. This model is available directly from the Trust for a very nominal charge.

b. Limited Density Incentives: To encourage certain desirable results where the legislative authority to require them is absent or subject to debate, the Town should consider adding provisions offering density incentives. Examples of what such incentives could be used for are the creation of endowment funds to finance perpetual maintenance of conservation lands within a new subdivision that are donated to a land trust, and public access to trail corridors within new subdivisions where staff and officials would at least like to reserve the right to include this segment in a longer community-wide trail network.

c. Landowner Stewardship

No discussion of a municipal conservation planning strategy would be complete without mentioning the role of landowner stewardship. Such an effort is best carried out by nongovernmental groups, such as land trusts and watershed associations. To be most successful, such efforts should be low-key and ongoing, so that last-minute rescue operations do not become the norm. People who have worked in this field for a long time know that a certain percentage of landowners are willing to accept a lower-than-maximum return in order to conserve the character of their properties, whether that involves bargain sales, limited developments, or other similar techniques.

8. Roadside Commercial Design

Your codes do not address issues relating to how best to design infill, expansion areas, or the inevitable, eventual redevelopment of existing roadside commercial areas in town. I have studied traditional villages and small towns for several decades and have compiled my observations, thoughts, and recommendations in both *Rural by Design: Maintaining Small Town Character* and in a more recent volume entitled *Crossroads, Hamlet, Village, Town: Designing Traditional Neighborhoods, Old and New.* It is likely that a copy of these two books are located in your planning department library, as they have both been available through the American Planning Association for many years.

Many of the key concepts in these books can be downloaded on-line from a 48-page booklet accessible through my website (www.greenerprospects.com). It is entitled *Smart Development*

for Quality Communities: A Design Guidebook for Towns and Villages. And it can be found under "Products", following descriptions of my various books, videos, and CD-ROMs.

Roadside commercial development design is not a topic covered in your regulations. As it is a specialty subject, it is beyond the scope of these two memos (which are already probably too long anyway). However, if this is something you would like to discuss further, do let me know. The "short review" comment here is that your codes fail to deal with this aspect of planning (which is relevant in terms of developing land adjacent to existing towns and villages). By reading the captions and studying the illustrations in this small book, officials will know much much more about how to design and regulate infill and extension proposals in these kinds of neighborhoods.