



STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY
BUREAU OF RESOURCE INFORMATION & LAND USE PLANNING
93 STATE HOUSE STATION
AUGUSTA, MAINE 04333

JANET T. MILLS
GOVERNOR

AMANDA E. BEAL
COMMISSIONER

April 10, 2023

Mike Livingston, Town Engineer / Town Planner
Town of Wells
208 Sanford Road
Wells, ME 04090

Dear Mike,

The Department of Agriculture, Conservation & Forestry thanks the Town of Wells for submitting its Comprehensive Plan for review for consistency with the Growth Management Act in accordance with our Comprehensive Plan Review Criteria Rule (the Rule).

As soon as the town's plan was accepted for review, we invited other state agencies, neighboring municipalities, and your regional planning organization to review it and submit written comments. By the end of the comment period, we received written comments from three residents, the Beginning with Habitat program (Natural Areas Program & IFW), the Maine Department of Transportation, and the Maine Drinking Water Program. Those written comments are attached to this letter. The comments contain suggestions for improving and strengthening the plan. We urge the Comprehensive Planning Committee to consider how the plan might be revised to incorporate suggestions found in the comments.

With the close of the comment period, we began our review of the plan's "completeness". This is the point at which we determine whether the various elements of the plan, aside from the Future Land Use Plan, sufficiently address requirements of the Rule. **We identified missing elements that will need to be added or corrected before we can find the plan to be consistent with the Growth Management Act.** We can provide examples if the Committee has troubles with any of the following items. We have attached a simple example of Evaluation Measures that would simultaneously address #1 & #13 below. A common place to insert a simplified version of this example would be into Part 1 page 86 (directly above the implementation table). Also please let us know if you believe we missed any of the below items in the plan.

MUNICIPAL PLANNING ASSISTANCE PROGRAM
22 STATE HOUSE STATION
18 ELKINS LANE, HARLOW BUILDING
AUGUSTA, ME 04333



PHONE: (207) 287-3860
WWW.MAINE.GOV/DACF/MUNICIPALPLANNING

Missing items:

	Required Element
1	<p>Evaluation measures that describe how the community will periodically (at least every five years) evaluate the following:</p> <p>A. The degree to which future land use plan strategies have been implemented;</p> <p>B. Percent of municipal growth-related capital investments in growth areas;</p> <p>C. Location and amount of new development in relation to community’s designated growth areas, rural areas, and transition areas (if applicable)</p> <p>D. Amount of critical natural resource, critical rural, and critical waterfront areas protected through acquisition, easements, or other measures.</p>

	Water Resources
	Analyses
2	Are there point sources (direct discharges) of pollution in the community? If so, is the community taking steps to eliminate them?

	Agricultural and Forest Resources
	Policies
3	To safeguard lands identified as prime farmland or capable of supporting commercial forestry.

	Future Land Use Plan
	Analyses
4	How does the Future Land Use Plan relate to recent development trends?
5	Given current regulations, development trends, and population projections, estimate how many new residential units and how much commercial, institutional, and/or industrial development will likely occur in the planning period? Where is this development likely to go?
6	How can critical natural resources and important natural resources be effectively protected from future development impacts?
	Policies
7	To support the level of financial commitment necessary to provide needed infrastructure in growth areas.
8	To establish efficient permitting procedures, especially in growth areas.
	Strategies
9	Meet with neighboring communities to coordinate land use designations and regulatory and non-regulatory strategies.
10	Provide the code enforcement officer with the tools, training, and support necessary to enforce land use regulations, and ensure that the Code Enforcement Officer is certified in accordance with 30-A M.R.S.A. §4451.
11	Track new development in the community by type and location.
12	Direct a minimum of 75% of new municipal growth-related capital investments into designated growth areas identified in the Future Land Use Plan.
13	Periodically (at least every five years) evaluate implementation of the plan in accordance with Section 2.7.

Additional comments not required for consistency:

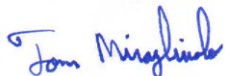
- Recommend numbering the pages in the Appendices as a single series (there are eleven pages 1’s)
- Part 2:
 - Page 20: significant wildlife habitat would be designated by MDIFW not MDEP.

- Page 20: unsure what “critical prime farmland” is. The Bureau of Agriculture uses “prime farmland” and “farmland of statewide importance”.
- Page 23: The State Planning Office was abolished in 2012.
- Page 59: Goal 4 related to mobile homes and mobile home parks should be turned into a strategy and inserted as a housing strategy (it is required as a strategy).
- Part 5:
 - Housing, Page 8: The State Planning Office was abolished in 2012. Population projections come from the Maine State Economist at the Department of Financial and Administrative Services.
 - Land Use, Page 28: This Chapter merges Existing Land Use and Future Land Use into one chapter. This often works perfectly well however this reviewer recommends reorganizing this section. We often find it easier to create two subsections with one for Existing Land Use (stressing the current conditions and land use restrictions) and another for Future Land Use. Kept in mind that Existing Land Use does not have policies and strategies while the FLUP does.

We trust the Committee will find this letter and agency comments to be helpful, and that it will be willing and able to submit plan revisions to us in relatively short order. That said, per the Rule, the town has 90 business days from the date of this letter in which to submit the revisions needed to complete the plan. That means we can accept your submission any time through **August 18, 2023**. Once we have received your revisions and confirmed the plan’s completeness, we will conclude our review for consistency within an additional 10 business days.

We congratulate the Comprehensive Plan Committee and the citizens of Wells for creating this valuable plan. We hope you’ll continue to work with us to bring it into greater alignment with the Act. As you move forward, we stand ready to answer any questions that may come up, and to assist you in whatever way we can. Please don't hesitate to contact me at (207) 287-3860 or tom.miragliuolo@maingov.gov.

Best wishes,



Tom Miragliuolo
Senior Planner
Municipal Planning Assistance Program

Attachments:

- Public comments
- Sample evaluation measures (addresses #1 & #13 above)

cc: Abbie Sherwin, SMPDC



STATE OF MAINE
DEPARTMENT OF TRANSPORTATION
16 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0016

Janet T. Mills
GOVERNOR

Bruce A. Van Note
COMMISSIONER

November 30, 2022
Tom Miragliuolo
Senior Planner, Municipal Planning Assistance Program
Department of Agriculture, Conservation and Forestry
22 State House Station
Augusta, ME 04333-0022

Dear Tom,

The attention devoted to transportation in the 2022 Wells Comprehensive Plan emphasizes both the importance and challenge of transportation issues in Wells. The Plan communicates more clearly than most comprehensive plans the unbreakable link between transportation and land use and the impacts that each activity has upon the other. MaineDOT finds the 2022 Wells Comprehensive Plan consistent with its mobility/transportation policies and goals.

Wells' transportation goals, policies, standards, and strategies are forward-thinking, specific and detailed—attributes that improve their prospect of remaining current and being implemented. MaineDOT acknowledges two transportation goals in particular: a Rt. 1 corridor study focused on access management and traffic calming—now underway in concert with MaineDOT and the promotion of “Main Street” or “Village” development areas along the Rt. 1 corridor and elsewhere. One or more of these identified growth areas may be appropriate candidates for MaineDOT's Village Partnership Initiative (VPI) grant program. The intention of the VPI is to calm traffic and make Maine downtowns and villages more conducive to non-vehicular uses and promote community development www.maine.gov/mdot/pga/cbi/village/index.shtml .

Thank you for the opportunity to review the 2022 Wells Comprehensive Plan.

Sincerely,

Stephen Cole
Regional Planner, Southern & Midcoast Maine, Regions 1 & 2

Date: December 1, 2022
To: Tom Miragliuolo
From: Ashley Hodge, Drinking Water Program
Re: Town of Wells Comprehensive Plan Review

On behalf of the Maine CDC, Drinking Water Program (MEDWP), I have reviewed the Town of Wells's 2022 Comprehensive Plan and have provided the following comments.

As you are aware, The Drinking Water Program works to ensure safe drinking water in Maine, to protect public health, by administering and enforcing drinking water and subsurface wastewater regulations, providing education and technical and financial assistance. The comments submitted below are based on the Maine State Planning Office's (SPO) instructions for agency commentors.

- (1) The MEDWP has contacted Kennebunk, Kennebunkport, & Wells Water District (KKW) regarding drinking water source protection and upcoming water infrastructure construction projects. The town should continue to work with KKW to support safe drinking water.

Please feel free to contact me should you have any questions regarding this information.



STATE OF MAINE
BEGINNING WITH HABITAT
DEPARTMENT OF INLAND FISHERIES & WILDLIFE
41 STATE HOUSE STATION
AUGUSTA ME 04333-0041



Date: November 15, 2022

To: Tom Miragliuolo, Municipal Planning Assistance

From: Lisa St. Hilaire, MNAP and Steve Walker, MDIFW

Re: Wells Comprehensive Plan Review

On behalf of Beginning with Habitat (BwH), the Maine Department of Inland Fisheries and Wildlife (MDIFW) and the Maine Natural Areas Program (MNAP) have reviewed the town of Wells Draft Comprehensive Plan (the Plan) and provide the following comments.

As you are aware, BwH is a habitat-based approach to conserving wildlife and plant habitat on a landscape scale. The goal of the BwH program is to maintain sufficient habitat to support all native plant and animal species currently breeding in Maine. BwH compiles habitat information from multiple sources, integrates it into one package, and makes it accessible to towns, land trusts, landowners, conservation organizations, and others to use proactively in conservation planning. The habitat information BwH provides is objective, comprehensive, and equips local decision-makers with the necessary tools to make informed and responsible land use decisions that mesh wildlife and habitat conservation with future growth needs. While BwH information is comprised of both regulated and non-regulated features, it should be used for planning purposes only. Other resources, such as MDIFW's Environmental Review Program (<https://www.maine.gov/ifw/programs-resources/environmental-review/index.htm>) and MNAP's Environmental Review Program (<https://www.maine.gov/dacf/mnap/assistance/review.htm>) should be contacted for assistance as projects get to the final design and permitting review phase.

BwH is housed at MDIFW but is comprised of more than ten public agency and conservation partners. Comments provided below represent two BwH public agency partners (MDIFW and MNAP) but are guided by the overall conservation principles of the BwH program. Feedback and recommendations included in this memo are based on the Maine Municipal Planning Assistance Program at the Department of Agriculture, Conservation, and Forestry (DACF) instructions for agency comments.

Appropriate Use of Data Provided by BwH, MDIFW, and MNAP

BwH provides natural resource data to all Maine municipalities on behalf of MNAP and MDIFW. Information regarding rare plants and natural communities is provided by MNAP within DACF. MDIFW data depict high value plant and wildlife habitats and critical natural resources. While the Wells plan addresses portions of the data provided by MDIFW and MNAP major resource topics such as freshwater fisheries, and rare and exemplary natural communities were overlooked. Additionally, while BwH attempts to provide resource information in a logical and easy-to-use format, the information was not presented very clearly in this plan. Below are suggestions for improving the



JUDITH CAMUSO
COMMISSIONER

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COMMISSIONER



town's discussion of natural resource topics. BwH data are regularly updated, and we encourage Wells to request information as plan implementation proceeds to ensure that land use decisions are based on the best available information at the time.

Resources identified on BwH maps are accurate at the time they are produced; however, it is important to note that the data contained on these maps are regularly updated. Much of this updated information is accessible to the public online through the BwH MapViewer:

<https://webapps2.cgis-solutions.com/beginningwithhabitat/mapviewer/>

Wells also may request updated paper and digital BwH maps as often as needed from MDIFW during plan completion and plan implementation:

<https://www.maine.gov/ifw/fish-wildlife/wildlife/beginning-with-habitat/maps/index.html>

Additional mapped information on stream habitats and barriers is available on the Maine Stream Connectivity Workgroup's Maine Stream Habitat Viewer:

<https://www.maine.gov/ifw/fish-wildlife/wildlife/beginning-with-habitat/maps/maine-stream-habitat-viewer.html>

Additional land use planning resources and tools intended for use at the municipal level are available through BwH: <https://www.maine.gov/ifw/fish-wildlife/wildlife/beginning-with-habitat/index.html>.

Relation of Plan's Policies and Implementation Strategies to BwH Principal Objectives and Directives

The policies and implementation strategies proposed by the town are consistent with BwH objectives and directives. While several sections pertaining to BwH objectives are meandering and not entirely accurate, the plan ultimately lays out strong strategies for the protection of most tidal, freshwater, and terrestrial habitat priorities. Additional information is included below that could help clarify information to readers and possibly improve the policies and strategies outlined within this Plan.

Consistency of Plan with BwH Programs and Policies

The proposed policies, strategies, and Future Land Use Plan are consistent with BwH programs and policies.

Specific Plan comments and recommendations below are provided by the following staff:

- *MDIFW: Steve Walker (Beginning with Habitat Program Coordinator – Augusta), Josh Matijas (Assistant Regional Wildlife Biologist – Region A, Gray), and Nicholas Kalejs (Assistant Regional Fisheries Biologist – Region A, Gray)*
- *MNAP: Kristen Puryear (Ecologist) and Lisa St. Hilaire (Information Manager)*

Several strategies in the plan reference working with state resource agencies for future implementation purposes. The BwH partnership stands ready to help should the town decide to move forward with actions as outlined.

Critical and Important Natural Resources

The availability of high-quality habitat for plants and animals is essential to maintaining abundant and diverse populations for ecological, economic, and recreational purposes. The town of Wells is one of

the most biologically diverse towns in the state. We feel that it is important to revise several narratives in the plan, and the consultant prepared inventory maps, to adequately convey the extent and importance of these natural features for greater public understanding.

General Comments

Page 16 (Natural Resources Policies and Strategies #1) We recommend revising Implementation Strategy 1 to: “Through local land use ordinances, require applicants for subdivision and non-residential developments to utilize Beginning with Habitat maps when planning their projects to identify natural resources on or near the project site, and to consult the Maine Department of Inland Fisheries and Wildlife and the Maine Department of Agriculture, Conservation and Forestry Maine Natural Areas Program for guidance to avoid and minimize impacts to resources prior to seeking any permits for development activity.”

Page 17 (Natural Resources Policies and Strategies #6). The plan calls for the creation of a long-range climate action plan. BwH would be happy to assist in the development of this plan especially as it relates to conservation of unfragmented habitat blocks and connecting corridors, aquatic habitat connectivity, and facilitation of marsh migration.

Page 17 (Natural Resources Policies and Strategies #7) The intent of this strategy is unclear. While some climate impacts may be obvious from “investigations”, many are likely to be less obvious at first. Perhaps a better approach would be to start with ‘no regrets’ approaches of expanded riparian setbacks and discouraging development in future floodplains. MNAP offers guidance through: https://www.maine.gov/dacf/mnap/assistance/coastal_resiliency.html and the BwH partnership has completed a robust vulnerability analysis of priority habitats and species that may also be helpful to local efforts.

Page 19 (Surface Waters Policies and Strategies #10) While Stream Smart is referenced later in the plan, we recommend revising this strategy to “culvert replacement utilizing Stream Smart techniques”. While one objective of Stream Smart is to promote fish and other aquatic organism passage, the program also benefits water quality and climate readiness objectives.

Page 19 (Wetland Strategies) Should this strategy be implemented, we encourage the town to consider a local wetlands protection program that piggybacks on the existing Natural Resources Protection Act by locally regulating wetland impacts that currently fall below state regulatory thresholds, and that encourage avoidance by assessing and impact fee similar to Maine’s in lieu fee for wetland impact mitigation. BwH would be happy to provide additional information regarding this approach and where it has been successfully implemented at the local level.

Page 20 (Wildlife and Fisheries Strategies #2) MDIFW recommends that a minimum 100-foot “no-cut” buffer be designated along all streams.

Page 20 (Wildlife and Fisheries Strategies #3) BwH has successfully worked with other communities to help establish and overlay district that incorporates priority blocks and connecting corridors. The overlay district includes performance standards that incentivize open space subdivisions and requires habitat “mitigation” if development impacts exceed a certain threshold. We would be happy to assist the town if this approach would be of interest.

Page 20 (Wildlife and Fisheries Strategies #4) We recommend revising this strategy to: “Require all applications for subdivision and site plan review to consult the Maine Department of Inland Fisheries and Wildlife (ifwenvironmentalreview@maine.gov) and the Maine Department of Agriculture, Conservation and Forestry Maine Natural Areas Program (maine.nap@maine.gov) for a letter that may include guidance on minimizing impacts to these natural resource features prior to seeking any permits for development activity. Examples of these natural resource features include significant wildlife habitat such as Significant Vernal Pools and state Endangered, Threatened, and Special Concern species such as Blanding’s turtle and northern blazing star. Timber harvests inquiries should go through Beginning with Habitat, which will review properties for foresters against a variety of natural resource features and provide management guidance for any natural resource features on or near the property. Requests for forestry reviews should be sent to (fmp.ifw@maine.gov).”

Page 20 (Wildlife and Fisheries Strategies #5) We recommend revising this strategy to: “Work Cooperatively with the Maine Department of Inland Fisheries and Wildlife, Maine Natural Areas Program, Natural Resource Conservation Service, and Wells National Estuarine Research Reserve to manage and protect high value habitat and areas for Significant Wildlife Habitat, Rare and Exemplary Natural Communities, and habitat for Endangered, Threatened, and Special Concern species.”

Page 67 (Open Space Strategy #1) BwH would be happy to assist the town with the development of an open space plan. We also provide example plans and guidance for plan development on our web-site.

Page 88 (Open Space/Land Acquisition and Protection Implementation Program #10) We recommend revising this strategy to: “Use Beginning with Habitat maps, state agency consultation, and open space priorities as identified by the Wells Conservation Commission when evaluating subdivision applications. In the event the proposed subdivision is in an area where natural resources exist, the Planning Board should consider avoidance and minimization measures suggested by the state agencies and recommendations from the Conservation Commission regarding building and open space locations.”

Page 90 (Regional/Intergovernmental Cooperation Implementation Program #4) We recommend specifically adding the Maine Natural Areas Program to this list of potential cooperators.

Page 140 (Critical Natural Resources Inventory page 6) The discussion of Wetlands of Special Significance does not include critically imperiled and imperiled wetland natural communities (S1 and S2) as being drivers of this designation. This criteria should be added.

Page 142 (Critical Natural Resources Inventory) While Section C is titled “Significant Wildlife and Fisheries Habitat”, the important freshwater fisheries in Wells are not noted anywhere in the plan. This is a significant deficiency as riverine habitats such as Branch Brook rise the the level of state significant wild brook trout fisheries.

Page 143 (Critical Natural Resources Inventory page 9) The plan’s discussion of Significant Wildlife Habitats includes “shellfish areas” as a type of Significant Wildlife Habitat. This is incorrect and should be removed. Additionally, while habitat for state and federally listed endangered or threatened species is listed by MDEP as a Significant Wildlife Habitat category, this never went through the state’s rule making process and thus is not technically regulated under NRPA. We recommend removing the reference to bald eagles in this section as they are not longer considered threatened or endangered in the state of Maine.

Page 145 (Rare Plants and Exemplary Natural Communities) Please change “Maine Department of Conservation” to Maine Department of Agriculture, Conservation, and Forestry. Overall, we recommend listing the actual rare plant, animal, and natural community occurrences in Wells. See list below. Incorporating some species, but not all, and mixing various categories in narrative paragraphs is confusing and does not leave the reader with a true ‘inventory’ of Wells’ rich biodiversity.

Common Name	State Status	State Rank	Global Rank
Natural Communities			
Salt-hay Saltmarsh	-	S3	G5
Dune Grassland	-	S2	G4?
Dwarf Shrub Bog	-	S5	G5
Red Maple Swamp	-	S5	G3G5
Sandplain Grassland	-	S1	GNR
Coastal Dune-marsh Ecosystem	-	S3	GNR
Raised Level Bog Ecosystem	-	S4	GNR
Endangered, Threatened, Special Concern Animals			
Arrowhead Spiketail	Special Concern	S1	G4
Citrine Forktail	Special Concern	S1S2	G5
Cobweb Skipper	Special Concern	S2	G4
Dusted Skipper	Special Concern	S1S2	G4G5
Eastern Ribbon Snake	Special Concern	S3	G5
Grasshopper Sparrow	Endangered	S1B	G5
Great Blue Heron	Special Concern	S4B	G5
Harlequin Duck	Threatened	S2S3N	G4
Least Tern	Endangered	S1B	G4
New England Cottontail	Endangered	S2	G3
Northern Black Racer	Endangered	S2	G5T5
Piping Plover	Endangered	S2B	G3
Salt Marsh Tiger Beetle	Special Concern	SNR	G5
Saltmarsh Sparrow	Special Concern	S3B	G2
Spicebush Swallowtail	Special Concern	S2	G5
Spotted Turtle	Threatened	S3	G5
Upland Sandpiper	Threatened	S3B	G5
Wood Turtle	Special Concern	S4	G3
Endangered, Threatened, Special Concern Plants			
Beach Plum	Endangered	S1	G4
Beach Wormwood	Special Concern	S1S2	G5T5
Blunt-lobed Grapefern	Threatened	SU	G4
Dwarf Glasswort	Threatened	S1	G5
Georgia bulrush	Special Concern	SU	G5
Hairy Boneset	Endangered	S1	G5T5
Hollow Joe-pye Weed	Special Concern	S2	G5?
Indian Grass	Endangered	S1	G5
Mountain-laurel	Special Concern	S2	G5
Northern Blazing Star	Threatened	S1	G5?T3
Pale Green Orchis	Special Concern	S2	G4?T4Q
Saltmarsh False-foxglove	Special Concern	S3	G5
Sassafras	Special Concern	S2	G5
Slender Blue Flag	Threatened	S2	G4G5
Small Reed Grass	Special Concern	S3	G5
Smooth Winterberry Holly	Special Concern	S3	G5
Spicebush	Special Concern	S3	G5
Sweet Pepper-bush	Special Concern	S2	G5
Upright Bindweed	Threatened	S2	G4G5
White-topped Aster	Endangered	S1	G5
Wild Coffee	Endangered	S1	G5

Page 146 (Focus Areas of Statewide Ecological Significance p 12) We recommend simply appending already prepared focus area descriptions as an alternative to the scant paragraphs currently included with the plan. These descriptions can be found at:

<https://www.maine.gov/dacf/mnap/focusarea/index.htm>

Pages 151 & 152 (Data Sources and References) Web links provided for many of these resources are out of date.

Page 283 (Natural Areas and Wildlife Habitats Map 3) This map appears to be based on BwH data, but it has not been translated correctly. Depictions of Significant Wildlife Habitat are incomplete, none of the BwH mapped natural communities or ecosystems are included, no fisheries information is included and there is no way to determine if mapped occurrences of rare species are plants or animals. The maps symbology and cartography is also confusing. We strongly recommend simply appending updated BwH maps.

Fisheries and Public Access to Waters

I. Protection and Enhancement of Fisheries and Fisheries Habitat

The plan addresses some fishery habitat protection issues and states that protecting natural resources is a priority and guiding principle of future town land use. However, more detail is needed in some areas. Wild brook trout habitat constitutes a significant resource but is absent on resource maps (ex: Map 3); the plan also lacks any inventory of key fisheries habitat. Most streams in Wells have been inventoried by MDIFW with many flowing waters supporting wild brook trout; a list of these waters has been attached at the end of these comments and should be part of a complete inventory of important natural resources. Wells has an abundance of wild brook trout streams, which is a unique distinction in southern Maine. These important resources should be highlighted in the plan but are currently absent, despite some discussion of surface waters. For example, Branch Brook is highlighted for its excellent water quality and significant contributions from aquifers, but no mention of its abundant wild brook trout population is made. Beyond wild trout resources, some rivers and streams are also stocked with brook trout and/or brown trout, representing a significant investment of state resources (see attached list of stocked water bodies in Wells). Additional protection should be considered to protect these waters and other important natural resources when reviewing proposed development projects. Brook trout habitat is particularly vulnerable to a host of land-based activities, which often lead to a concurrent loss of riparian habitat. We typically request 100-foot undisturbed buffers along both sides of any stream, including stream-associated wetlands. Buffers should be measured from the upland wetland edge of stream-associated wetlands; if the natural vegetation has been previously altered then restoration may be warranted¹. Protection of riparian areas diminishes erosion/sedimentation problems, reduces thermal impacts, maintains water quality, and supplies leaf litter/woody debris (energy and habitat) for the system. Protection of these important riparian functions ensures that the overall health of the stream habitat is maintained. In addition, smaller headwater and lower order streams are often affected the greatest by development and these systems benefit the most from adequately sized, vegetated buffers.

Based on MDIFW surveys around the region, many road maintenance and construction projects also often inadvertently impede passage at stream crossings. The Town should consistently adopt stream-crossing practices (i.e., culvert installation/maintenance) which do not impede fish passage as required by the Natural Resources Protection Act². Refer to guidelines attached to this document. In addition, the Army Corps of Engineers has adopted regulations regarding stream crossings that potentially affect municipal road maintenance programs. Maine Audubon, along with many local and federal partners, has also developed a “Stream Smart” design methodology for road crossings built according to high standards of aquatic organism passage. Such a methodology may be of use to the Town in future development projects. Finally, the Town should include responsible stream crossing practices as part of its stated polices for achieving natural resources goals (Part 2, Chapter 3 of the plan).

II. Public Access

There is a public need to provide safe angler access to all Town waters that support recreational and commercial fisheries, as well as other recreational uses. The Town plan should adopt language that reflects State and MDIFW goals^{3,4,5} and access development needs to be consistent with those goals. For example, public access to public waters must never be limited to Town residents only, as such action would jeopardize existing MDIFW stocking and management programs⁶ and is inconsistent with MDIFW and State public access goals.

Based on this review, no formal boat access sites to inland waters exist within the Town. Creating a public boat launch is cited by some Town residents as a way to improve aquatic recreation; the Town should ensure that consideration of this strategy includes inland waters as well as marine.

The plan identifies some public access locations to marine waters located within the Town of Wells; however, more information could similarly be provided on freshwater access, where present. The town plan should identify and describe the status of public access to all freshwater within the Town’s boundaries, including more detailed descriptions of shoreline access, parking capacity, facilities, and type of boat launch present, if applicable. A map similar that that provided for marine resources in Map 5 should be included and would help describe access points to inland waters. Wells encompasses or borders only one Great Pond at least ten acres in size (Ell Pond; Hobbs Pond is an impoundment less than thirty acres in size and therefore not a Great Pond in statute) but public access is from the Town of Sanford. However, some discussion of Ell Pond is warranted from a fisheries perspective, as it produces quality rainbow trout and may be of interest to local anglers. Additionally, Wells contains miles of flowing waters. Access to flowing waters is generally informal, but waters such as Branch Brook, the Merriland River, Blacksmith Brook, Depot Brook, the Webhannet River, Green Brook, Stevens Brook, and the Ogunquit River may be of special interest to anglers. Recreational access to most of these waters is not discussed and should be more detailed in terms of any existing facilities and locations, if applicable. The Town could also explicitly outline strategies to maintain or expand public access to additional water bodies, including in the form of future development goals. These strategies should help prioritize public access needs based on a variety of factors including existing access, fisheries present, water size, proximity to population centers, land availability and cost, existing waterfront development, and other related factors. Lastly, the Town should consider MDIFW and

MDOC as a potential partner in future public access projects. By working together Town and State agencies are more likely to be successful in achieving our common goal of improving public access.

In adopting measures to address land use and development issues, it is imperative that language and measures not be adopted which could preclude efforts by the Town, MDIFW, or other State agencies from developing public access to public waters of the State, which would be inconsistent with State and MDIFW goals^{3,4,5}. Also, land use zoning ordinances and practices designed to protect water quality should not be so strict as to impede the development of public access opportunities. These measures could severely limit or eliminate good access prospects on heavily developed waterfront areas. An “exemption” for public access projects should be adopted for projects which are consistent with Town, State, and MDIFW public access goals. This measure will ensure consistency while foregoing the need to undertake a very detailed and comprehensive review of all plan provisions, including their implications.

Open space is being used more and more by Towns to provide recreational opportunities and access. This is a good idea, particularly when public resources (i.e. lakes, rivers, and streams) are located within or adjacent to the designated open space areas. Additionally, the open space that public water resources provide can greatly expand the total amount of recreational space for town residents and visitors. However, the Town should be sure that such areas are open to and can accommodate use by all Maine citizens and not just Town residents.

III. Significant Habitats and Fisheries

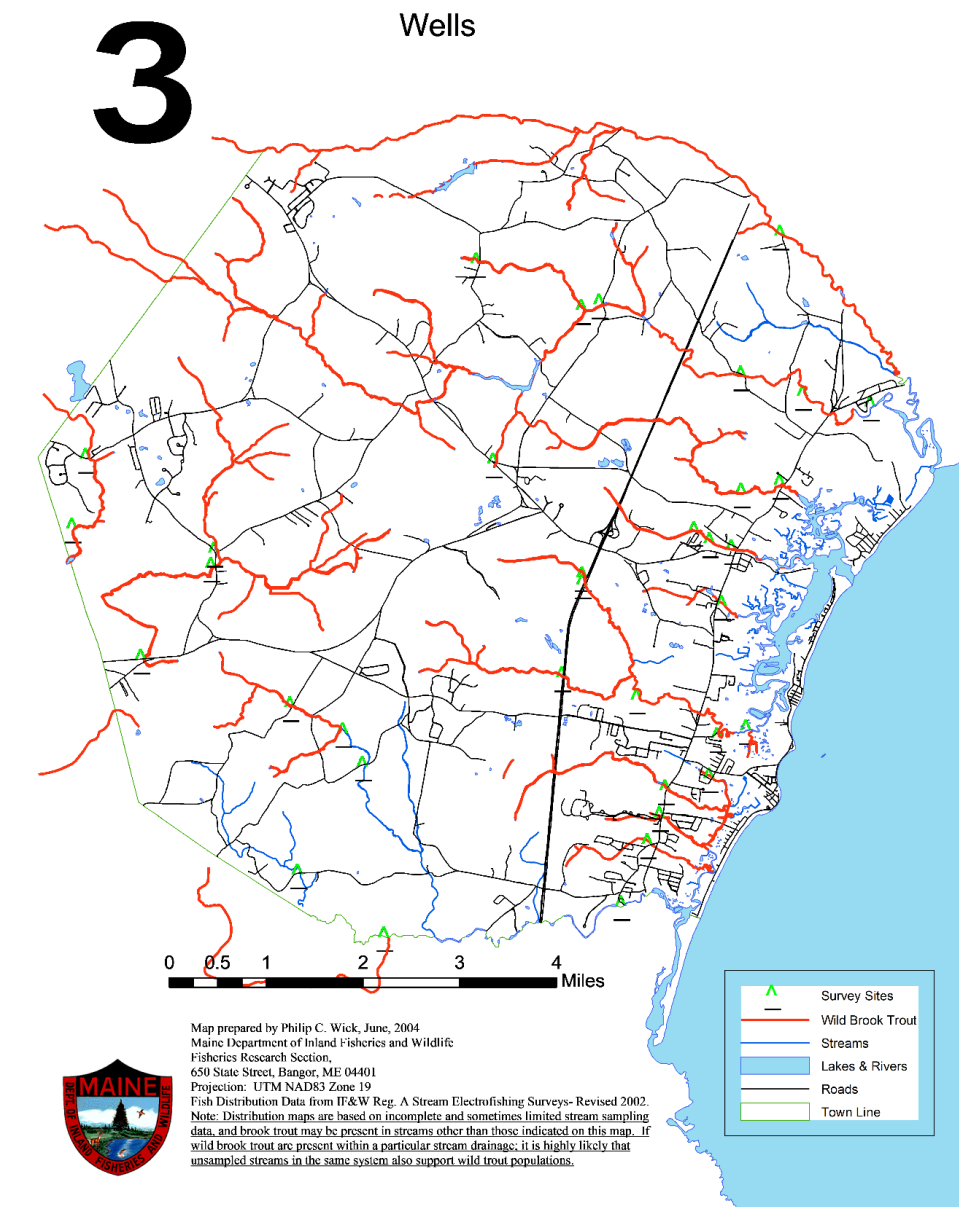
The plan discusses some significant habitats and values for wildlife but does a poor job of including the same detail for inland rivers and streams within the Town of Wells. Notably, Part 5, Section 3, Subsection C devotes an entire subheading to significant wildlife habitat, but no such section exists for fisheries. While fisheries in Ell Pond and other inland waters should be represented, more attention should be particularly paid to wild brook trout fisheries. Wild brook trout streams represent a unique resource, and their importance should be emphasized. Presenting trout habitat as an essential part of local environmental systems reinforces the Town’s commitment to conservation of important fisheries resources. Brook trout are of special conservation importance to the State of Maine, and habitats necessary to sustain wild populations merit additional protections. As there are numerous wild brook trout streams in Wells, this knowledge may be useful for prioritizing public access needs/improvements, identifying significant fisheries habitats for protection, securing additional partnerships with conservation organizations, and addressing other Town planning needs.

For further fisheries information, see the attached inventory of water bodies stocked with trout within Town boundaries. Along with the list of wild brook trout waters (also attached), the plan should include this information in the description of any inland waters. Finally, attached is an example map of wild brook trout habitat developed by MDIFW staff in 2004. While not up to date on more recent sampling sites and some sections of flowing waters (e.g., all of the Ogunquit River should be highlighted), the Town may find it useful in the development of a mapped wild brook trout inventory for the plan.

IV. Miscellaneous Items/Errors

(1) On page 14 of the plan (bullet point #7), the Town lists a variety of “natural resource-dependent recreation opportunities” that are worthy of promotion and protection but does not include traditional forms of outdoor recreation such as hunting and fishing. These activities are important components of a holistic policy of natural resources recreation and should be represented here.

(2) In Part 5, Section 3, page 7, the plan discusses wetland areas that co-occur with significant wildlife habitats. Wild brook trout habitat is often associated with wetland influence and should be included here and on any maps displaying the co-occurrence of wetlands and significant habitat areas.



From: [William Piombino](#)
To: [Miragliuolo, Tom](#)
Subject: Comments on Wells Comprehensive Plan
Date: Monday, November 7, 2022 5:31:56 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The plan accurately reflects the rampant and unbridled growth in Wells, But does little to address it. The action of " Establish a standing Growth Management Committee to review the tools available for managing growth in the Town of Wells on an ongoing basis and make recommendations to the Selectmen." Is nothing more than kicking the can down the road. It presents the positive fiscal impact of this growth but does little to address the impact on services and quality of life. In addition, the Wells Board of Selectmen are notorious for populating volunteer committees with people inclined to get the answer/result they predetermine. The Comprehensive Plan Committee is a fine example, where there were a preponderance of builders, developers and real estate persons on the committee. I and other like minded citizens volunteered and were rejected.

Some of the data is cherry picked, for example building permits.

"From 1995 to 1999, the Town issued an average of 74 permits per year. From 2000 to 2003, though, the average jumped to 106. In the years following the 2008 recession, the average fell to 56.5. It has since increased to 149.25 permits per year between 2016 and 2019."

What about 2020, 2021, and 2022? It is SIGNIFICANTLY higher than that!

Re water quality in Wells Harbor. There is no mention of multiple sewer line breaks in the sewer line that runs under Wells Harbor. Due to lack of maintenance and avoiding a known issue for years. Same can be said for roads and bridges, where we are suddenly funding massive work that is due to years of neglect and mismanagement

An example of lack of managing growth. Right after last years town meeting and approval of the budget, the Fire Dept requested an additional firefighter due to growth. Literally days later. That should have and could have been foreseen with an active and robust comprehensive plan. Instead it was funded through a slush fund that the Selectmen control

There are a lot more examples of the towns services and infrastructure suffering due to unbridled and unplanned growth. Unfortunately, the Town leadership is intent on paying Comprehensive Planning lip service to meet a State need and check a box, not steward the citizens best interest.

William E. Piombino
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Wells, ME 04090
207.641.2277

Edmond B. Paré, PhD, MST
184 Loop Rd
Wells, Maine 04090
December 01, 2022

Tom Miragliuolo, Senior Planner
Municipal Planning Assistance Program
Department of Agriculture, Conservation & Forestry
22 State House Station/Harlow Building
Augusta, Maine 04333-0022

RE: Wells, Maine, Comprehensive Plan Review, Public Comment Submission

Dear Mr. Miragliuolo:

My comments, regarding the Wells 2022 Comprehensive Plan which was submitted for your review, are as follows:

1. Map 2, Existing Zoning, on page 282 is not an Official Zone Map of the Town of Wells. The attached file titled, **Zone Map Nov 2012 Signed.pdf**, to my knowledge, is the most recent Official Zone Map of the Town. **I respectfully suggest that this official signed zone map should be included in the Maps section of the Plan.**
2. The attached file titled, **MGS-WellsSignificantSandGravelAquifers-20171212.pdf** displays the Significant Sand and Gravel Aquifers located in Wells, as deemed so by the Maine Geological Survey (hereafter MGS). This PDF is a low-resolution composite of the Alfred, Kennebunk, North Berwick and Wells Quadrangle maps, which I purchased from MGS; outlined the Town of Wells boundaries; and annotated, indicating the four (4) significant sand and gravel aquifers wholly or partially located within the Town. **These significant aquifers contain fresh, potable groundwater and should be included as freshwater resources on the page 284, Map 4, Freshwater Resources map.**

Additionally, the Wells Comprehensive Plan should explain, in detail, how these aquifers are going to be protected from the industries and residences which are located on top of them and from such future growth. This is particularly relevant with regard to the Route 9 aquifer which runs under Route 9 from Route 109 to Bragdon Road and is rapidly being impacted by industrial development. Currently, there are no restrictions as to the chemicals which can be spread along this road, which will undoubtedly end up in the aquifer. One landowner along that route told me

the aquifer is less than ten feet below the surface of his property. Likewise, the Bragdon Road aquifer should be re-evaluated, as the MGS maps indicate there are septage disposal areas atop that aquifer, as well as a fairly recently constructed fire pond.

- 3. My purpose of this final comment is to strongly recommend that the Wells Comprehensive Plan submission be found to not be consistent with Maine's Growth Management Act, because it will not achieve the primary State goal of §4312.3A. *To encourage orderly growth and development in appropriate areas of each community and region while protecting the State's rural character, making efficient use of public services and preventing development sprawl; [PL 2001, c. 578, §9 (AMD)]. My reasoning is as follows:***

I was a member of the [2016 Comprehensive Plan Re-Write](#) Committee. This Plan was approved by the State, but never made it to Town Meeting, because three of us on the Committee were unhappy with the growth management aspects of the plan and petitioned the townspeople for a new [Chapter 12 Comprehensive Plan Updates](#) ordinance which was adopted at the 11-5-2019 Special Town Meeting by more than 75% of the voters. This ordinance required a newly formed Comprehensive Plan Updates Committee to do a strict update of the Town's 2005 Comprehensive Plan, maintaining the 2005 Plan's structure. The **Statement of purpose** of this ordinance is as follows:

A. Statement of purpose. This chapter is enacted as a result of public dissatisfaction with irregularities and lack of transparency in the preparation of the 2016 Comprehensive Plan Update, as well as the process employed in such preparation. This chapter is intended to ensure the maximum public participation in future updates; and, to ensure public awareness of proposed departures from the previous Comprehensive Plan (at this time the "2005 Comprehensive Plan"), through consistent document content structure with the prior Comprehensive Plan, and requiring that changes to the prior Plan be highlighted or otherwise made conspicuous in the updated plan, to enhance public comprehension with respect to changes.

From 3-7-1986 through 6-30-2008¹, the Town of Wells had a Residential Growth Management ordinance which effectively controlled growth. However, although Chapter 2 of the 2005 Plan continued the Residential Growth Management ordinance, a new addendum to its Chapter 6 Land Use Policies and Strategies, titled, RECOMMENDATIONS FOR MANAGING GROWTH, pp 34-37, called for the Residential Growth Management Ordinance to be discontinued after no more than three years and replaced by an alternative system, which was to be determined by a new Growth Management Committee appointed by the selectmen. Once the 2005 Plan was adopted, the Board of Selectmen decided not to appoint a Growth

¹ See the notes at <https://ecode360.com/7613448> and <https://ecode360.com/7613487>

Management Committee, but chose to pay the Town's attorney to construct a Chapter 174 Impact Fees ordinance shell, which was adopted 4-27-2007. The Chapter 175 Residential Growth Management ordinance was expired on 6-30-2008.

[The Chapter 174 Impact Fees ordinance](#) shell appears to have been a ruse, however, because a review of the Wells Board of Selectmen's Agendas and Meeting Minutes indicates there has been absolutely no discussion of imposing impact fees since then, even though such fees could have easily been imposed on several capital improvements. One example is the approximately \$14.5 million spent to build new fire and public safety facilities, which were marketed to townspeople as satisfying the Town's needs for the next 50+ years (beyond 2015 – See [WellsPD-FDInfoFlyer-03-15-16](#)). Instead, the portion of that \$14.5 million, necessitated by projected new growth in the Town, is being assessed to existing property owners, thus raising all of our property taxes by \$54.86 per \$100,000 assessed property value, while **the cost of new housing is being kept artificially low, enabling developers to make more of a profit on each build. In other words, Town property owners are being forced to subsidize new construction via increased property taxes; whereas, a portion of this property tax increase should be assessed to developers, in the form of impact fees. As a result, since their profit margin is far better here than elsewhere, Wells has become a Mecca for out-of-town and out-of-state developers, who further drive Wells' rate of growth and capital costs upward.**

The result of Wells having no residential growth management ordinance for the past fifteen years is shown on page 6 of the attached Wells Code Enforcement Office document titled, **CopyOfCodeOfficeInfo-PagesNumbered.pdf** , where the number of new single family dwellings in Wells outpaced the next highest municipality, Scarborough, by 45% and 21% in 2013 and 2014, respectively. As shown in the Wells 2022 Comp Plan submission, Inventory and Analysis, Economics and Demographics, A. Population, page 1, this rapid growth has resulted in a 23.58% increase in the year-round population of Wells between 2010 and 2020; whereas, the increase between 2000 and 2010, when Wells had a Residential Growth Management ordinance, was only 2.01%. This 23.58% increase between 2010 and 2020 is more than double that of the next highest Southern Maine municipality, Kennebunk.

The 2022 Comprehensive Plan now appears to be employing the same ruse to get State reviewers and Wells townspeople to believe that the Wells Board of Selectmen is serious about controlling growth. On page 11 of Chapter 2 – Population Policies and Strategies, the Plan again suggests establishing “a standing Growth Management Committee to review tools available for managing growth...” This strategy accomplishes nothing specific.

Again, the same ploy is used in Chapter 6 – Land Use Policies and Strategies, Policies, 4, where “...This includes studying alternative methods of managing growth and financing public improvements required by new growth, such as: a differential growth cap, Transfer of Development Rights (TDR), Purchase of Development Rights (PDR), Impact Fees and other innovative planning tools such as Tax Increment Financing.”

Thus, it’s clear that the 2022 Comp Plan is not directing that anything specific be implemented to slow growth in the Town. We continually saw the same ploy during meetings on the 2016 Plan, where our desire for specific directions to the Implementation Committee were watered down by the town manager and staff to “suggest”, which meant that the item could be ignored and never implemented. Our belief was that the members of the Comp Plan Committee should be specifying what is to be done; and, the Implementation Committee should be implementing those directives. The Implementation Committee should not be specifying the directives.

I fully agree with the Wells Comprehensive Plan Update Committee of 1990, who stated in that Plan, with regard to Growth Control:

The overall growth of the Town should be limited to a level which can be assimilated without damaging the essential fabric of the community or exceeding the capability of public services or facilities. The Town should regulate its growth by:

- 1) limiting the amount of new residential development;*
- 2) restricting the construction of condo hotels and other transient housing such as motels, campgrounds and trailer parks and controlling the density of these uses;*
- 3) requiring that developers demonstrate that new development will not adversely affect public services and facilities; and*
- 4) requiring that developers pay their "fair share" of the improvements to the Town's physical plant which are necessary to service the proposed use.*

I contend that the Wells 2022 Comprehensive Plan Update should re-establish a rate-of-growth management ordinance to limit the rate of growth of property development, and use that ordinance and the Town's Chapter 174 Impact Fees ordinance to satisfy the State's mandatory Growth Management Program's primary goal of [§4312.3A](#). **To encourage orderly growth and development in appropriate areas of each community and region while protecting the State's rural character, making efficient use of public services and preventing development sprawl; [PL 2001, c. 578, §9 (AMD).]**

Sincerely,

Ed Paré

Edmond B. Paré, PhD, MST

Attachments:

Zone Map Nov 2012 Signed.pdf

MGS-WellsSignificantSandGravelAquifers-20171212.pdf

CopyOfCodeOfficeInfo-PagesNumbered.pdf

James N. Smith, CPA (Retired)
1596 Littlefield Road
Wells, Maine 04090

December 01, 2022

Tom Miragliuolo, Senior Planner
Municipal Planning Assistance Program
Department of Agriculture, Conservation & Forestry
22 State House Station/Harlow Building
Augusta, Maine 04333-0022

RE: Wells, Maine, Comprehensive Plan Review, Public Comment Submission

Dear Mr. Miragliuolo:

I make the following comments as a member of the Comprehensive Plan Update Committee of the Town of Wells.

It should be noted that the last Comprehensive Plan for the Town of Wells that was accepted by the voters in Wells is the 2005 Comprehensive Plan. There was a revision attempt in 2016 which was submitted to the State for review but this plan was never presented to the voters for approval as it had significant opposition from townspeople and was not approved to be put on the ballot.

On November 5, 2019 based on a citizen initiated petition the town adopted **Chapter 12 Comprehensive Plan Updates** (copy attached) which outlines the statement of purpose, method and procedure by which future Comprehensive Plan updates would be completed. Based on this procedure the Select Board formed a Comprehensive Plan Update Committee (the Committee) of 11 town residents. The majority of members on the initial committee (3 construction contractors, 3 real estate agents, and one key principal and registered agent of a lumber yard) as well as the current committee members (3 construction contractors, 2 real estate agents, and one key principal and registered agent of a lumber yard) have now or had occupations in construction and real estate. One can judge for themselves how that may affect the positions those members took on matters presented to the Committee.

The Committee, in two Community Forums, one Survey Monkey survey, and three or four anonymous focus groups, sought input from citizens of Wells. This input as well as comment from other citizens and Town Boards, Commissions, and Committees was presented to the Committee for consideration. The Town employed consultants Resilience Planning & Design, LLC who took all this input as well as demographic, environmental, traffic, housing, mapping and numerous other relevant data sources and presented to the Committee for review and approval drafts of all chapters and elements of the five parts of the 2022 Wells Comprehensive Plan_6_10_2022_ Complete Draft.

In the Committee's rush to try and get a plan on the November ballot it rushed through the plan in the end and never allowed time for the Committee to go through the completed document before submission to the State. I believe that this led to errors and some draft items were eliminated in the final draft. In fact, my review of Committee meeting minutes found items that were supposed to be removed from the Plan left in, and others supposed to be added left out.

When reading the Plan all appears to be in order, and one would think that the recommendations presented to the Committee by the community would be followed. This is not what happened. What did happen was that Committee members who heavily represented construction and real estate interests seemed to systematically eliminate or significantly water down the wants and desires of the citizens of the Town of Wells.

Below are examples:

The #1 concern from citizen feedback is the desire to regulate and control growth. This is true in both the public forums and the survey. The Committee resisted all suggestions throughout its deliberations to implement any growth control in the resulting goals, policies or implementation strategies.

The following is a Note by the Consultants regarding growth on a 2/7/22 draft of Chapter 6:

Note: The most pressing Land Use Goal identified by citizens during the public outreach was that development has been uncontrolled and Wells has lost its rural character, and as a result, the town has seen increased threats to natural resources, excessive use of recreational resources, traffic congestion, etc. This should be addressed in goals, policies, and strategies in the future land use plan.

In Chapter 6 Wells Goals instead of regulating growth the ending result is:

3. Allow growth that is respectful of the Town's village, rural and beach/waterfront areas.

In Chapter 6 the Energy Committee suggested wording of "Growth management strategies should be employed to ensure growth is compatible with meeting the Town's goals to achieve 80% net zero carbon emissions by 2035."

In Chapter 6 Wells Goals the final result is:

4. Growth management strategies should be employed to ensure growth is compatible with meeting a goal to reduce carbon emissions.

Another priority generated from the forums and survey and suggested by the Consultant was the following:

16. Prioritize establishing and increasing pedestrian and bike infrastructure in the town to provide alternative, healthy means for residents as transportation costs increase. Specifically, plan for bike paths and sidewalks/walkways along the western side of the town within the route one corridor to provide means for residents in western Wells to

shop and work, and parallel to the Route 1 corridor to allow coastal residents to walk and bike as an alternative to facing Route 1 traffic.

This was removed and the following is the replacement:

16. Recognizing that the Eastern Trail should be completed during the life of this Plan, encourage the connection of the Eastern Trail to Route 1.

Suggested policies for the Committee to consider were removed as follows:

A change making future development less restrictive was the change in Land Use Standards in Transitional Area 1 – Moody as follows:

From: Require road and pedestrian connections among new and existing residential developments.

To: Encourage pedestrian connections among new and existing residential developments.

This is a small change but it makes growth easier and less constrained.

The Consultant recommended the following to be added to Implementation Strategies in Chapter 6 Land Use:

Note: The following policies were identified in the Comp Plan Review Criteria Rule (Chapter 208) and we recommend considering them.

8. Assign responsibility for implementing the Future Land Use Plan to the appropriate committee, board, or municipal official.

9. Using the descriptions provided in the Future Land Use Plan narrative, maintain, enact or amend local ordinances as appropriate to:

- a. Clearly define the desired scale, intensity, and location of future development;
- b. Establish or maintain fair and efficient permitting procedures, and explore streamlining permitting procedures in growth areas; and
- c. Clearly define protective measures for critical natural resources and, where applicable, important natural resources.
- d. Clearly define protective measures for any proposed critical rural areas and/or critical waterfront areas, if proposed.

10. Periodically (at least every five years) evaluate the implementation of the plan in accordance with Section 2.7 (bullet #9 directly above).

11. Include in the Capital Investment Plan anticipated municipal capital investments needed to support proposed land uses.

12. Meet with neighboring communities to coordinate land use designation and regulator and non-regulatory strategies.

13. Provide the code enforcement office with the tools, training, and support necessary to enforce land use regulations, and ensure that the Code Enforcement Officer is certified in accordance with 30-A M.R.S.A. §4451.

14. Track new development in the community by type and location.

The Committee removed this proposed inclusion, proposed by the town's Consultant, from being part of the Comprehensive Plan.

In the Implementation section of Chapter 6 the Consultant suggested the following:

7. Establish a standing Growth Management Committee to review the tools available for managing growth in the Town of Wells on an ongoing basis and make recommendations to the Selectmen. The previous Growth Management Committee was sunsetted in 2008 and if re-established should monitor regional growth trends, research and provide examples of ordinances and other growth management techniques from surrounding communities, and consider the long-term capacity of Wells' municipal facilities and services.

This item was removed.

I could fill pages with additional examples, however the above makes the point.

Suffice it to say the Committee with its make-up had no intention of including many of the major recommendations from the public, the town's Energy Advisory Committee or the town's Conservation Commission. As a result, it is my belief that the plan lacks the vision that would produce respect for land use, public safety, environmental concerns, and an enhanced quality of life for the citizens of and visitors to Wells.

My experience with promoting the passage of the Chapter 12 Ordinance mentioned in the second paragraph of this feedback tells me that the Comprehensive Plan presented to you will not be approved when presented to the community for a vote. I for one will expend the time, energy and resources available to me to see that this plan, as now written, will fail.

Sincerely,

James N. Smith, CPA (retired)

Attachment:

Chapter_12_ordinance_Comprehensive_Plan_Updates



Implementation and Evaluation

There are many strategies in The Thomaston Plan, ranging from the broad and ongoing to the specific and finite. A matrix listing each strategy, an estimated timeframe for implementation, and the group or person who is primarily responsible appears at the back of this Plan. The Implementation Matrix also prioritizes the strategies (with necessary caveats) and suggests how each one relates to the Town's eight major aspirations.

This Plan is intended to serve as a guide for the Selectboard and Town Manager as they develop annual work plans, for other Town departments as they plan and prioritize their respective work, and for the Planning Board as it considers land use and development requests. Ultimately, the success of The Thomaston Plan will be measured by its use during everyday decision-making. Monitoring the Plan's implementation should be an open and ongoing process. At the least, the Selectboard will conduct an annual review of progress toward meeting the goals of The Plan, identify strategies that have been implemented according to the time-line in the Implementation Matrix, and establish a work plan that identifies implementation priorities for the coming year.

As The Plan is implemented, the Comprehensive Plan Committee's role will evolve into one of monitoring progress and identifying areas in need of further clarification or modification. Additionally, the Committee will assist the Code Enforcement Officer in drafting amendments to the Town's Land Use and Development Ordinance to assure its compatibility with the Plan. (A joint committee of Planning Board members and Comprehensive Plan Committee members is recommended for this purpose.) The Committee should also review all future recommended Ordinance changes for compatibility with the Comprehensive Plan.

As required by the goals and guidelines of the Growth Management Act, progress on the Plan will be evaluated at least every five years to determine the following:

- 1** The degree to which the Future Land Use Plan strategies have been implemented;
- 2** Percent of municipal growth-related capital investments that have been directed to growth areas;

- 3 The location and amount of new development in relation to designated growth areas, rural areas, and transition areas;
- 4 The amount of critical natural resource, critical rural, and critical waterfront areas protected through acquisition, easements, or other measures.

Note: *This concludes the **Planning Guide** section of the Thomaston Comprehensive Plan. For more on how these recommendations were derived, see the **Background, Conditions, and Analyses** section of the Plan, which can be found in the following pages, on the Town website, or at the Town Office.*