

From: [Lisa](#)
To: [Nelson, Kevin \(DOA\)](#)
Subject: [EXTERNAL] : Charlestown Comprehensive Plan Update
Date: Saturday, July 3, 2021 5:32:08 PM
Attachments: [Comp plan review follow up \(1\).docx](#)

Mr. Nelson,

I am writing to provide comment relative to the Charlestown Comprehensive Plan Update as submitted to RI Statewide Planning for review and approval. I write as not only the former Director of Parks & Recreation for the Town of Charlestown for over 22 years, but also as a former Charlestown Town Council member having been elected to serve 2 terms. My prior professional experience has provided me with a unique understanding and appreciation for the Town's Comp plan and is the reason I am writing to share my concerns and to respectfully request that the plan ***not*** be approved without revision. While I understand the importance of having an accepted plan to work from and can appreciate the desire to have the plan approved and finalized, I also know the importance of having a plan that is accurate, fact based, and one which properly addresses development going forward. This plan unfortunately is deficient in all 3 ways. It is for this reason that I respectfully provide the following for your consideration.

I spent over 8 hours reviewing the plan in its draft form and subsequently wrote a lengthy document providing my comments and outlining my concerns. I have attached a copy of this document for your review and will only address a few of the more substantive matters in this email. You will see by the attached document that I limited my review to those areas which I felt imminently qualified to comment on, with an emphasis on recreation. I provided the attached to both the Charlestown Town Council and the Charlestown Planning Commission for review. In addition, I participated in the public hearing for the plan (virtually) at which time I shared many of my concerns, The final Comp Plan document which has been submitted for approval incorporates only a few of the changes and corrections I suggested while many were not addressed. I provide the following for your review and consideration...

1. A major portion of the "recreation" element of the plan focuses on Ninigret Park, the towns' largest public property. I was very surprised to see that the original draft plan, as presented by the Town's Planning Commission, had misstated the total acreage of Ninigret Park, something so well documented and invariable. In addition to the overall acreage of the park being inaccurate, the acreage of the 2 identified parcels of land of which the park is comprised, were also inaccurate. Of even more concern were comments made relative to proposed uses, and more importantly, limits/prohibitions being proposed for these parcels. These issues not only caused me great concern but made me wonder about the degree of work which had gone into drafting of the plan, as well as the personal biases of some which seemed to played a significant part in the drafting of the document. This is the reason I chose to spend as much time as I did reviewing the "recreation" section of the plan. During the course of the public hearing, I shared comments relative to these concerns but unfortunately only a few minor changes were made. In addition, it was revealed that the National Park Service (NPS), the agency tasked with legal oversight of all development and operations of Ninigret Park, had ***not*** been contacted to seek input or provide comment. Upon learning that the Town was in the final days of amending the Comp plan, representatives of the NPS contacted Town Officials to request that the public hearing be delayed to allow their agency time to review the plan and provide input. This request was denied and the public hearing proceeded without review and comment by the NPS. This is ill advised not only because the NPS has the authority to take remedial action(s) if development is deemed to be inconsistent with deed restrictions, but also,

simply stated, it just doesn't make sense to not involve them as they have proprietary knowledge and information relative to Ninigret Park. I'm not certain as to why they were not contacted for input/review or why their request to have the public hearing delayed to allow them time to do so was denied, but I can't help but wonder if it was because some of the information they may have shared would not have comported with the desired outcome(s) of some involved with the drafting of the plan. Whatever the reason, it is very important that the regulatory body charged with oversight and development of Ninigret Park be permitted the time needed (and requested) to review the plan and provide comment.

2. Similar to the aforementioned, it makes absolutely **no** sense whatsoever that the Comp plan would be finalized and adopted without incorporating results of the upcoming town wide survey as it relates to development and use of public properties. If the Comp plan is meant to truly represent the needs and will of the people of Charlestown, it only makes sense that the results of this study would be factored in. It is my understanding the survey is set to go and the results should be available shortly after. The information gathered will be VERY IMPORTANT in terms of future development and should be incorporated into the Town's Comprehensive plan. The fact that several members of both the Town Council and Planning Commission acknowledged the importance of doing so and further agreed to support a memorandum of understanding agreeing to go back and "amend the comp plan after the results are available" speaks for itself. The Comp plan is now YEARS overdue so I don't understand the rationale of not waiting a few more weeks/months to get it right the first time.

3. The Comp plan was presented for review and adoption during the height of the worst pandemic on record, a time when many residents were focused (rightly so) on many other more important matters. While I appreciate the need to get a final plan to work with going forward, it does not seem appropriate (or make sense) to do so when participation, gathering of documents etc. was extremely difficult, if not impossible to do. .

If the Town Comp plan is to have any creditability at all, or is to be used in a way that best represents the needs and desires of a **MAJORITY** of town residents, I would respectfully suggest that the plan not be accepted at this time and be sent back to the Town to allow for a more thorough and accurate review and re-write. I thank you for the opportunity to share my thoughts and I hope the Department of Statewide Planning shares my concern in adopting a Comprehensive Plan that is not only accurate and complete but that is done in a manner that is sustainable and beyond reproach. It's just the right thing to do.

Sincerely,

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