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Ravi Venkataraman, Town Planner and Acting Zoning Administrator
(via email only)

February 7, 2021

Sketch Plan application SUB21-02, 2427 Hillview Road

Dear Mr. Venkataraman,

Please provide this letter to the members of the Development Review Board as our written comments concerning this Sketch Plan application which is scheduled for discussion on February 10, 2021. We have resided at 21 Bates Farm Rd. for thirty-three years. Our residence abuts the southern end of Hillview Rd. We intend to participate as full parties in any proceeding related to this application.

We understand the limited purpose of Sketch Plan review—the opportunity for an informal discussion. Even within this flexible construct, however, the Board should table this proposal until the applicant provides a submission that addresses development plans for the entire parcel. Without those plans, even an informal discussion is premature and unwarranted because the Board and the public will not have the requisite information for a meaningful conversation.

Richmond's subdivision ordinance requires applicants to submit a comprehensive plan as part of an application:

For any portion of the parcel or LOT not proposed for LAND DEVELOPMENT in the SUBDIVISION as of the application date, a master development plan is required. The master development plan shall conceptually show future roads, future stormwater infrastructure, future building areas, future open areas, and future uses on such remaining land, including those that the SUBDIVIDER expects to offer to the Town of Richmond.

Town of Richmond Subdivision Regulations, Section 610.1.

Despite this clear requirement, the applicant's submission depicts eight lots—with substantial detail on proposed development—and no information concerning a ninth lot with 61.35 acres. There is a right-of-way that terminates at the border of the 61.35-acre parcel that appears to be designed to serve development on this parcel. In addition, it appears that a substantial parcel

of land across Hillview Rd (described on the applicant's plan as "Other Lands of Robert & Tammy Avonda") is in ownership that is affiliated with the applicant.

While the applicant may wish to avoid Act 250 review at this time by remaining silent on the full reach of its plans—which is in itself a questionable proposition under State law—Richmond's ordinance does not offer that option.

Richmond's ordinance requires that a developer provide a full, detailed description of the entire development plan. Our ordinance is intended to prevent developers from obtaining piecemeal review that hides the true impact of their proposals. Full disclosure is critical at every phase of Board and public review. Without full disclosure, even an informal conversation will at best be incomplete and a waste of both the Board's and the public's time. At worst, it will be misleading.

We request that the Board table this Sketch Plan review until the applicant provides a plan that complies with section 610.1. We would then look forward to a meaningful conversation in a Sketch Plan review on the actual implications of the applicant's full proposal.

Very truly yours,

/s/ Michael Marks and Sally McCay

Michael Marks and Sally McCay