

OBSERVATIONS AND COMMENTS
FLATHEAD COUNTY GROWTH POLICY

AUGUST 2006

COLLINS PLANNING

• A S S O C I A T E S •



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Performance Concepts in Planning

Planning • Zoning • Growth Management • Housing • Design

GENERAL OBSERVATIONS

It is hard to consider the Growth Policy as a policy plan to guide Flathead County's future. At best it reads more as a "scoping document" in that it identifies issues and provides a long list of good ideas that should be pursued; however, there is very little analysis or meaningful quantified information, no succinct policy questions raised by the issues, no alternatives identified and analyzed in response to the issues, no priorities among goals/policies, and no meaningful implementation strategy. Despite the claim to contain a vision within the Growth Policy, nowhere is there a clear vision or plan for the future of Flathead County. If asked to review a development proposal for conformance to the policy one could find goals/policy to support full approval or full denial by shopping around for suitable quotes.

In reading the chapters, it is not clear how or why the specific topics were identified for discussion and one questions whether the most critical topics are included in the discussions. Perhaps the seven parts of the vision in chapter 1 could outline more specific components that lead to the discussion points in the individual chapters. The narrative in the individual chapters could end with specific policy questions that create conclusions to the chapters and bridge the gap between the discussion and the goals/policies and implementation. The current draft does not contain a clear connection between the narrative/data and the goals and policies.

There are 43 goals and 219 policies with no ranking or priority established among them. This policy approach is fraught with problems. In our experience in Florida where policy plans have a similar number of goals and policies we observe that the document loses validity, because one can find both goals and policy to argue any position on a project. That type of situation does nothing to assist elected officials in making critical decisions, nor does it provide clear guidance to a developer as to what sort of proposal would comply with the plan. Among the many policies, 105 specify additional work to be accomplished but there is no priority among these items, nor are assignments of responsibilities or timelines for completion specified. Arguably, 50 of these policies should be wrapped into the analysis and work of the Growth Policy. Perhaps criteria could be developed that rank the policies and future work assignments.

The chapter on implementation appears to be an add-on and not discussed and decided upon throughout the public involvement process. This chapter mostly is an academic listing of methods and techniques. Preferably, a consensus is formed around certain implementation approaches concurrently with the discussions on issues and policy questions.

The Growth Policy and Appendix A are predominately and there is not really any analysis in the Appendix, but rather a listing of data. Much of the data in the Appendix and Growth Policy do not relate to the goals and policies and simply serves as a collection of data that frequently is not used.

There is a listing of land use categories but no related map. Likewise there is nothing that provides guidance as to the development requirements in any of these categories.

It appears that the debate between “regulating development versus everyone gets to do as he pleases” has not been settled. In all the discussions of strategies, the County has failed to seek a consensus on the types of strategies that would best respect the concerns of the competing views of the land as a public resource versus a private commodity.

The presentation of the data that is included in the Growth Policy and Appendix is weak on locational information. The maps are a very large scale, do not cover the entire County, and the discussion and presentation of data speak in County-wide terms rather than smaller cohesive areas of the County.

Planning should be viewed as an on-going program that evolves and matures over time. The Growth Policy represents a tentative first step in planning Flathead County’s future. While it represents significant efforts on the part of many people, failure to come to grips with the regulatory issues, or even starting to identify a group of strategies that should be used to implement any of the difficult goals, results in no clear direction for addressing Flathead County’s significant issues.

Upon the final revisions and edits of this document, the County should proceed to develop measurable criteria for ranking the many policies in importance. What needs to happen next is a serious discussion about implementation strategies and how some mix of these strategies can bridge the gap between the lofty goals and the perspective that calls for maximum preservation of property rights.

The plan proposes five years to the next step. Our initial assessment is that Flathead County is in serious trouble. In some areas like water quality the conditions are near extremis. Waiting five or ten years for implementation will create irretrievable conditions. If the County is serious about addressing the community’s issues, it needs to move immediately into a short intensive program.

LAND USE

Land use planning and analysis could be organized around an identified concept or paradigm such as:

1. developing within an accepted carrying capacity;
2. preserving community character;
3. where infrastructure is available promoting fiscal sustainability;
4. establishing compatibility among existing land uses; or
5. developing within certain environmental thresholds.

The introduction to this chapter does not clearly describe the organizing concept for land use planning, but does imply the desire to manage land uses changes to prevent

undesirable impacts. But the following text and data do not quantify land use changes, specify the negative impacts that are occurring, or define certain minimum thresholds to protect public health, safety, morals or other criteria. The data and narrative discussion provide educational information on a wide range of topics but lacks focus. The Growth Policy should serve an educational purpose and raise the public's awareness of the most critical land use issues, such as the consequences of the scattered location of development, but it is important to reach conclusions.

There is no existing land use map, no future land use plan or map to guide future decisions on zoning, infrastructure, various regulations, and other topics. There is no quantified information on the amount of development that is likely to occur in the future and whether this amount is good or bad. Information is lacking on how much growth the County can handle or desires in terms of infrastructure capacities, environmental thresholds like water quality, community character or any other paradigm.

Community character is mentioned without it being defined and without any methods for preserving it. Community character can be described in character types ranging from urban to suburban to rural types that are defined in quantified terms. These definitions can be based in the relationship between the bulk/mass of structures and the amount of land around the structures. A full community character paper was provided the County to serve as guidance in this area.

The rate of development is changing in Flathead County but there is no discussion of it. The past and projected rates of development would be helpful to know, and the much more rapid rate almost certainly creates issues for County services and infrastructure. There is not even an approximation of existing land use, an absolute essential starting point for planning.

Typical land use information found in community plans include items such as:
Existing Land use by category (residential, commercial, agricultural, fallow land, etc.);
Amount of development or changes occurring in land use;
Location of development (distance from services and infrastructure, proximity to natural resources, etc.);
Rate of growth;
Density of the new growth;
Quality of development (water, sewer, aesthetics, transportation, natural resources); and,
Land demands for projected population growth

Recommendation

While we have limited involvement in this planning process, we understand the critical issues facing the County to which a land use plan must react. Most of them were set forth in the vision: protect scenic and natural resources, create a quality living environment, protect agriculture, and be affordable to County government. These boil down to determining the location and intensity of development that responds to market pressures and the ability to provide services. In the next step, the County should develop a map of existing land uses and an analysis of growth so that projected development

needs can be quantified in acres. It is strongly recommended that a community character based land use system be used because it is the most flexible and can respond to environmental and growth related issues. It is recommended because it responds to the most basic of planning concerns, protecting the character of existing neighborhoods.

DEMOGRAPHICS AND HOUSING

More information on the in-migrants would be helpful, such as: socio-economic profile; reasons for moving to Flathead County; their service needs; housing needs; etc. Understanding the new population is an opportunity to generate data helpful to the school districts and other agencies. A survey or a series of focus group discussions may be necessary in between census counts.

Projecting the number of housing units, the amount of land needed to accommodate the future population and identifying the preferred locations for this housing is an important planning task. This projection should match the land use chapter.

This chapter contains a brief discussion on the “location of housing,” but it is too generic and general to be meaningful. Developing actual service costs per mile of road maintenance, school bus operation, emergency services and other central governmental services better informs the public and officials of the true fiscal consequences of land use decisions.

In addition to the very significant amount of in-migration, the rapid escalation in housing cost is the other major issue in this chapter. There are data on households by income classification but no comparison to the availability of housing that is affordable to these households. Other than the comparison of median incomes needed to afford the median house price and the actual median incomes, there is no data or discussion that tells the community if affordable housing is a problem. Due to the rapidly increasing prices over the past decade, housing affordability will become a major problem. With a large and growing number of service workers in the County, the experience of other western communities suggests that affordable housing issues will become more serious and will be a significant drawback to attracting industry. Facing this issue early is essential.

The Growth Policy could discuss and decide more directly local government’s role in addressing housing affordability. The existing local housing agencies should be integral in this process and their capacities, programs and goals should be integrated with the Growth Policy. The Growth Policy should contain goals, policies and implementation strategies that are compatible and integrated with these agencies. This is a good opportunity for coordination.

The occupancy rate for owner occupied homes of 1.7% is extremely low and should be included as a discussion point and addressed in the goals and policies.

There is a reported capacity of the homeless shelters but no mention how this capacity compares to the need.

The demographic statistics in the Appendix do not relate to any of the discussion or goals/policies in the Growth Policy.

It is rare for a County the size of Flathead to not issue building permits. This topic should be discussed, analyzed, and perhaps lead to a goal or policy.

Recommendations

Project land and housing demands to accommodate the projected population and develop a map that depicts the preferred locations for this housing. Develop strategies for trying to steer the housing to these locations.

Generate additional data and analysis to determine the magnitude of the affordable housing problem and determine the County's role in addressing the issue.

PARKS & RECREATION

The only indirect mention of the lack of money to maintain existing parks is the policy statement calling for the development of funding strategies. Since maintenance of existing facilities is such a large financial problem, the Growth Policy should address it directly and the goals and policies should realistically reflect the financial capacity and priorities of the County.

The growing population is changing the composition of the community and these demographic changes should be considered in determining the park and recreation goals. For example, total County population is growing five times faster than school age population. The total population grew 36% between 1990 and 2005 while the total student population (public, private and home schooling) grew 7% between 1992 and 2005. How does this change the County's focus for parks and recreation? Much of the text of this chapter discusses programs and facilities for the youth of the community.

Establishing a level of service to project future need should be more thoughtful than simply taking the current ratio of park acres to population. There is no discussion or data to determine if the 7.2 acres per 1,000 people is an adequate or inadequate level service despite this ratio being the sole basis for projecting future acreage needs.

Further, when determining the appropriate level of service, the recent population growth should be considered. For example, the population has been growing very rapidly during recent years and the ratio of park acres per 1,000 people would have been much higher five and ten years ago. Has there been a measurable over use of the parks and has the quality of parks and programs declined under an increased demand? How does the ratio of 7.2/1,000 compare to industry standards, statewide averages and the goals of the Park

Board and Parks & Recreation Department? How does this ratio compare to the level of service in the cities?

The goals and policies do not directly relate to the basic conclusion of the chapter that 143 additional acres of parks will be needed by 2025.

The Appendix is completely redundant with the Growth Policy.

Recommendations

The level of service discussion should be revised through a more comprehensive thought process and research. The goals and policies should then reflect the revised projected need in facilities and park acres, and a strategic plan should be developed that evaluates alternatives for achieving the goals.

In addition to revising the level of service, this chapter should discuss and analyze the changing demographic composition of the community in terms of park and recreation, and the goals, policies and implementation strategies should reflect this analysis.

The County's fiscal reality should be reflected in this chapter and its goals and policies.

ECONOMY

The discussion does not come to any clear conclusion in terms of issues and policy questions. For example, while included in the data and description, the Growth Policy does not clearly address the fact that job growth is robust while relative wages and incomes are declining. While there are sufficient employment opportunities, the cost of living is outpacing wages and incomes. While the economy is growing, it is expanding in the low paying and non-basic sectors of retail and services.

These conclusions are not clearly stated and substantiated, and do not carry over to the goals and policies. These conclusions also should be integrated with the housing analysis.

Similar to the comments on future housing needs to accommodate the projected population, the land area needed to accommodate the future economic growth should be quantified as well, and a map should be prepared to depict the preferred locations for this non-residential growth.

There is no information on the needs of local businesses and employers, such as job training, employees, telecommunication and other infrastructure, land, energy, financing and working capital, etc. A description of these types of needs can lead the Growth Policy to goals and policies that are meaningful to the local businesses and employers.

The economic development organizations in the community should be identified and their capacities and goals integrated. The Growth Policy need not reinvent the wheel or

duplicate efforts of others, but integrate with the efforts of these potential partners. As with housing, this is a great opportunity for coordination.

Realism is important. The vision suggests growth in good paying jobs but every community wants this. How does Flathead County relate to the needs of different business sectors regarding work force and transportation? How does Montana relate to these same factors? What does Flathead offer a prospective new business? How does the County's desire for good paying jobs relate to the declining industrial sector of the nation and the local transportation challenges? What attracts the growth sectors and what can be done to make Flathead more attractive to these sectors are critical.

Recommendations

Project land area needs for various categories of non-residential land uses and prepare a map depicting the preferred locations for the commercial growth. Develop a strategic plan that evaluates alternative methods for steering the commercial growth to these locations and develop implementation strategies to accomplish the preferred method.

If not already completed by economic development agencies, survey major local employers for their needs in terms of labor force, land area, telecommunications and other infrastructure, facilities and other key categories. Develop a strategic plan that coordinates with the economic development agencies, establishes a goal, and evaluates alternative methods and implementation strategies to achieve the goal.

TRANSPORTATION

Except for some very general statements mentioning the relationship between transportation and land use, there is limited coordination between traffic demands and the land use goals and policies. Is it the goal to steer development to certain traffic sheds or road corridors where capacity either exists or is planned to exist? Or, is it the goal to simply extend the road network to where development occurs? Can the County afford either approach or do fiscal circumstances steer the goals and policies to one or the other?

Except in the most simple of ways, the transportation goals and activities do not relate to the land use goals. The County's road and bridge department annually constructs three miles of new road, overlays 30 – 40 miles of paved road and chip seals about 35 to 50 miles. Furthermore, the County constructs two miles of pathway annually. These activities should be coordinated with land use planning. The maps of preferred locations for residential and commercial development, discussed above, could be coordinated with new road and pathway construction and maintenance work of the County's road department. The County's road and pathway work could occur in the areas designated for development.

One of the transportation goals calls for managing land use and transportation to ensure one does not outpace the other. Perhaps the criteria for subdivision approval could incorporate a concurrency requirement that leads to approvals only in areas where the

road network meets certain standards. The concept of scattered and premature development could be incorporated into subdivision reviews and provide a basis for preventing development in locations not sufficiently served by services and infrastructure.

While this chapter contains much discussion about the strong growth in vehicle trips, there is no discussion about Transportation Demand Management (TDM). Is it the policy of the County to view traffic growth as something that is beyond the influence of governmental policies and programs? Or, does the County believe that policies and programs can slow traffic growth? Can the County afford to expand the road system to accommodate project growth in vehicle trips or do financial circumstances require alternative approaches to traffic?

One goal promotes multi-modal transportation but there are no discussion, data, analysis or implementation techniques that relate to the goal. If traffic growth is a major issue, as suggested by the text of this chapter, the County should consider approaches to TDM to slow this growth. The transit system provides a starting point. Despite the transit system mostly serving social service needs, its expansion could be a part of a long term plan to slow traffic growth. Park and ride lots, van service, managing work times of major employers, and other programs could be analyzed for their applicability in Flathead County. A Growth Policy should be asking the question, what happens when gas goes to \$4 a gallon or higher? Transit and other modes of transportation become more important as does the average trip length.

Recommendation

Relate the County's road construction program to the map of preferred locations for residential and commercial development.

Consider TDM approaches for their applicability to Flathead County.

PUBLIC FACILITIES AND SERVICES

Solid Waste

The discussion on solid waste mentions a 19% increase in volume of solid waste between 2004 and 2005. No explanation is available for this high percentage nor is there any discussion on whether it was an aberration. Heightening the concern is the 29 year remaining life of the landfill is based on an annual increase of 8%. If the 19% increase is representative of current trends, the landfill has a 10 or 12 year life and land use policies and goals should address ways to reduce the rate of growth or begin reviewing alternatives for when the landfill is full.

Education

The total population grew 36% between 1990 and 2005 while the total student population (public, private and home schooling) grew 7% between 1992 and 2005. Population is growing five times greater than the student population. This brings into question the

accuracy of the student population projections in the Education chapter. These projections simply apply the current ratio of student to total population to project the number of students. However, this ratio is changing and a trend analysis is needed to project the future student population.

Emergency Services

The discussion on fire and ambulance services and law enforcement are cursory and offer very little guidance. The discussions are too general to relate the provision of these services to the County's growth and do not identify issues and problems needing attention. The law enforcement section contains projected demand for service but the fire and ambulance sections do not. No information is included that describes how the County's growth is changing or increasing the levels of service demand for these functions. There are no descriptions of the types of incidents that regularly occur and the capacities of the agencies to respond. For example, the number, condition and age of fire apparatus and the types of apparatus needed for projected service demand are not included. The types and levels of training of personnel in comparison to the demand for services are not described. The ability to communicate across the emergency functions and with federal and state counterparts could be assessed. The status of any fire prevention and code enforcement program, school training programs and other techniques to reduce demand are not described. There is no analysis of the number and distribution of fire stations that could be accomplished with ISO guidelines and simple models developed by the Rand Corporation.

The provision of fire, ambulance and law enforcement services are the community services most directly related to the health, safety and welfare of the public. The impact of growth on these services in a County as large as Flathead, particularly one with volunteer fire departments and severe budgetary constraints, is critical. Much more description and analysis is needed to make these sections of the Growth Policy useful and to understand the affects of growth in these crucial functions.

Recommendations

Elaborate on the projected demand for landfill area.

Revise the projected student population.

Provide much more information on emergency services and add meaningful analyses on the issues and challenges caused by dispersed growth.

NATURAL RESOURCES

The discussions on the various resources are mostly academic descriptions and a resource by resource commentary. These sections would be improved by drawing more conclusions and specific policy questions. Natural resources should be rephrased as the environment. It is critical that the environment be thought of as a system. The water cycle encompasses all the aspects of water quality, flooding, and drought, for example.

The carbon and oxygen cycles address air quality. There are a host of other nutrient cycles that need to be understood as well.

The critical issue is how development and human interactions with these natural systems throws them out of balance. Some environmental issues are caused by poor locational decision-making. Flooding is a part of natural cycles that occur to a greater or lesser extent yearly in response to general weather patterns, despite the west being hard hit in recent years by drought. Flooding is going to occur; building in a flood area will cause damage to property and on occasion life. Development increases the amount of storm water and ultimately increases the level of a flood for all flood events: 5 year, 100 year, and 500 year. The simple answer to flood damage is not to build in flood areas. Why should government let a person build in the floodplain and then have all the tax payers pay for emergency assistance, extra police and emergency service costs? Staying out of high hazard areas is a priority to all environmentally sensitive areas where health and safety problems are related to the locational decision.

One of the County's most important features is its lakes. A detailing of the impact of different land uses lakes, forest, prairie, farmland, pasture, and other resources needs to be discussed.

The second aspect of the environment particularly with respect to water quality and flooding is that each land use can be ranked from the most beneficial to the worst with respect to increased storm-water, reduced ground water recharge, and pollutants generated. This must be understood not only on a per acre basis, but on a per dwelling unit or per person basis. They are not the same, pollutant loading rates increase with density on a per acre basis, but low density development may be bad in many cases because the pollutant loading rate for 1,000 people or 1,000 dwelling units declines with density. Patterns of development can reduce pollutant loading rates considerably and this relates to the rate of growth and the ultimate impact on lakes and streams. Slopes and soil conditions also interact with development.

Aquifers are also important. The plan shows depth to water tables, but not flow directions or rates. While ground and surface water area are plentiful, development reduces recharge, can pollute ground waters and surface waters, and climate change may radically alter the picture over the next 20 to 50 years. These are real problems whose impacts can be seen in historical photos of glaciers in the park. The long term impacts of these changes should be evaluated and planning done to insure the community will have adequate resources.

The sustainability of resource based industries needs to be carefully considered. Those industries provide jobs. How do those jobs stack up in terms of salary to the County averages? Sustainability of a job base by continuing the industry is important. However, it is known from other parts of the nation that as land values climb, the incentive to abandon the industry and sell out for development will occur. The costs and benefits of this to the County should to be evaluated. Given the size of the County, development patterns can be important in this area as well.

Recommendations

The documentation of the impacts of various land uses on pollution and flooding is an essential first step. A sensitivity map that indicates the sensitivity of land due to slope and soil conditions is another critical tool to understanding the environment. There are two basic approaches to environmental protection, avoid damage or mitigate the damage after it has been done. Intermediate between these extremes is minimization. Mitigation is costly and not always viable. In theory, floodwalls allow development in the floodplain, but, they will always fail in a storm larger than they were designed for, they deteriorate, and they push the flooding to other locations. Thus, for new development avoidance is feasible and inexpensive.

Clustering is one of the most important implementation strategies for resource protection because it addresses property rights concerns as well as being environmentally sound. This must be documented for all the various resources.

IMPLEMENTATION

The chapter on Implementation is a simple inventory of techniques that fails to provide a complete range of techniques available. With the clear conflict between goals that protect resources and the property rights goal, this is a huge disservice. Also, there are no clear statements of commitment to implement the goals, assign responsibilities or establish a time table for completion.

A plan is only as good as its implementation. This plan falls far short of most plans. It is not unusual for a plan to call for a series of actions. A classic recommendation and one we frequently use is to call for specific changes to the regulatory structure to achieve very specific objectives not currently being met by the regulatory structure. An example would be to have specific standards for a district, a regulation, or fiscal actions that need to be done.

Development Predictability Map

The basing of implementation on the creation of a development predictability map is curious. A zoning map creates predictability. It is unclear what is meant by the development predictability map or how it would be used. There is no draft map included in the Growth Policy or any criteria to guide its creation. How does it relate to a zoning map or subdivision approval? What is its statutory authority? Since no one knows what this is, it can be discussed as a solution without any real opposition. Zoning maps rigidly establish predictability. For example, the property next door can be used for a house with a minimum lot size. That is a very rigid form of predictability. Performance standards suggest that any housing type or lot size is permitted provided overall density and open space standards are met. What is to be predictable is avoided in the discussion. There is a long list of potential elements that might be predictable. Land use, density, lot size, and landscaping are enforced by zoning ordinances across the nation. Other predictable

elements could be maximum congestion, maximum pollution, minimum habitat protection, minimum fire protection, the amount of park land available, and many others. This discussion on the map is too unclear to provide either an understanding of what the map would do or how landowners would be impacted. Nor can anybody compare it against other strategies.

Official Map

There is no indication of what the Official Map really achieves. At best these are wish lists for road widening and new roads. While identifying proposed locations, this needs to be supplemented with a whole series of other actions that are not discussed. For example, how are corridors to be identified, and based on what development pattern and densities? What principles are to guide the corridor planning; grid and redundancy among transportation system? Nodes of development? Avoidance of critical natural resources? None of these serious issues have been addressed.

Transferable Development Rights (TDR)

This discussion indicates that transferable development rights (TDR) could be important. TDR, as we indicated in material we submitted to the County, has proven to be very difficult to use. As a means of achieving any significant protection of resources, farmland, or scenic views, TDR is largely a failure. The land area involved in Flathead County is too large for a TDR system as normally conceived to have a chance of success. Some improvement could be achieved if the system included participation by the cities. There are other variations of TDR that could be considered that might have limited applicability. The discussion is not very realistic and may offer false hope.

Neighborhood Plans

How is the statement “some communities may feel that each landowner has the right to do whatever they see fit ...” reconciled with the Development Predictability Map? None of the serious problems faced by the County can be addressed in a situation where large areas of the County are simply left to the land owner to decide on the desired use. If the County has an industrial park and a neighboring landowner has junked cars, old farm machinery and other assorted junk visible from the road, that will adversely affect the marketability of the industrial park. There needs to be an overall plan and a means of implementing it.

Special Consideration Areas

These are things the County needs to address. They are not implementation and they do not even address the need. Land around the Glacier International Airport needs to have height regulations and residential development should be prohibited in the high noise zone. The description of what was likely to be needed at each special area should have been outlined. Every one of these needs a special ordinance, a zoning district, or subdivision regulation to implement.

Zoning

Zoning is almost not discussed. More importantly, without a land use or community character plan or map, how could zoning be applied? The chapter on zoning sounds like its only purpose is to eliminate incompatibilities with adverse impacts. In fact all of special consideration areas are in fact often addressed by zoning. The two major tools for protecting agriculture, scenic views, or natural resources are zoning and acquisition. Neither is given any significant discussion, leaving unanswered the question of how the stated vision is to be implemented.

Subdivision Regulations

The subdivision discussion creates a system of total unpredictability. The thresholds are not standards and the developer may challenge them. The conditional approval is a familiar process in many communities around the nation. Conditional approvals are uncertain and unpredictable and thus totally at odds with the predictability the plan seeks. The process oriented approach is the most expensive way to regulate the land. It has major costs for developers, the County, and citizens. It fosters negotiation which aside from easily becoming political, insures that the best plan is never submitted. The first rule of negotiation is to take a position from which one can retreat to an alternate acceptable position. The fact that the Growth Policy does not define the thresholds and criteria makes this another unpredictable idea.

CIP

This is another powerful planning tool, in the right circumstances. In Flathead County, the over riding issue is whether a CIP can be funded? The second question is whether there are operational funds to support the capital facilities, police and parks that currently are inadequately staffed. What is to be done? What principles will guide the development of the community and set priorities among various projects? The County needs to have at least two levels of service areas, urban and rural. The decision to live in rural areas carries with it either much lower levels of service for such things as police, fire protection, and road maintenance. In rural areas, the response time needed to get to a fire can mean the property is a loss and the spread of the fire must be contained. There is no way such increased services levels can be afforded. There are many other services that are more costly in rural areas such as snow plowing where the feet of road per house is much larger. It is very important that the different levels of service and their related costs be spelled out.

Recommendations

Implementation is what planning is about. The Growth Policy fails to meet the needs for getting the community on the way to a real plan. What is needed is a listing of the major planning goals and under each a complete analysis of the implementation strategies to address the goal. There are dozens of techniques that are not mentioned in the implementation chapter. Some techniques are very specific to one goal; others may serve many goals. Vision and goals can be implemented only if the community is willing to pay the price of implementation. But there also is a cost for not acting.

The goals should be considered to be hypotheses about the future. Take scenic views for example. First, they need to be mapped so people know whether their land will be

impacted. Second, all the alternatives need to be discussed and understood for its effectiveness in achieving the desired result. Some are more effective than others.

This discussion of implementation techniques must be contrasted with the view of maximizing the preservation of property rights. A decision then needs to be made on the strategy or combination of strategies that will be applied. If no effective implementation strategy is acceptable, then the goal must be eliminated or altered to make it consistent with the community's conclusion. Until this type of effort is undertaken, the planning effort will continue to be an exercise with no meaningful prospect of having an effect. This means real detailed data and it also means tough decision making.