

STATE OF VERMONT

SUPERIOR COURT

ENVIRONMENTAL DIVISION
Docket No.: 12-1-13 Vtec

Howard Center Renovation Permit

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STATEMENT OF QUESTIONS

NOW COMES the SOUTH BURLINGTON SCHOOL DISTRICT ("District"), by and through its attorneys, Lynn, Lynn & Blackman, P.C., and pursuant to Rule 5(f) of the Vermont Rules for Environmental Court Proceedings, hereby submits the following Statement of Questions:

1. Whether the location of the proposed HowardCenter methadone clinic at 364 Dorset Street is located in the Traffic Overlay District under the Land Development Regulations for the City of South Burlington ("LDR") § 10.02, requiring an analysis of traffic impacts before a permit can be issued, LDR § 17.02.

2. Whether the proposed HowardCenter methadone clinic at 364 Dorset Street is a change of use, requiring conditional use review, LDR § 14.10; Table C-1, before a permit can be issued, LDR § 17.02.

3. Whether the proposed HowardCenter methadone clinic at 364 Dorset Street is a change or expansion of use, requiring site plan review, LDR § 14.03-14.05, before a permit can be issued LDR § 17.02.

4. Whether as a result of the change in use, the proposed HowardCenter methadone clinic at 364 Dorset Street is permitted under the terms of the August 1, 2000 Planned Unit

Development ("PUD") without approval from the South Burlington Development Review Board, and whether such approval is required before a permit can be issued LDR § 17.02.

5. Whether safety concerns relative to traffic, impaired driving, and crime relative to the location of the proposed HowardCenter methadone clinic at 364 Dorset Street are permissible considerations under the LDR and whether such issues must be reviewed and considered before a permit can be issued LDR § 17.02.

DATED in Burlington, Vermont this 15th day of February, 2013.

SOUTH BURLINGTON SCHOOL DISTRICT

BY: _____


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