

Comment and Response Document
for the
First Public Hearing
on the
Proposed Amendments to the 2008 Central Vermont Regional Plan

As part of CVRPC's current Regional Plan revision process, interim amendments are being proposed to improve specific sections of the Plan. The language being added to the 2008 Plan has been developed under the community input process that is also informing development of the complete Plan to be adopted in 2016. Sections of the 2008 Regional Plan currently undergoing amendment are:

- [Economic Element](#)
- [Utilities, Facilities and Services Element](#)
- [Land Use Element](#)
- NEW [Future Land Use Map](#)

The amendments to the 2008 Regional Plan also add a new Future Land Use Map, and policies for each mapped Land Use Planning Area.

This Comment and Response Document compiles comments received through the first public hearing held on May 12th, 2015. Proposed revisions addressing the comments are detailed in the "Response" to each comment. Proposed revisions will be incorporated into the plan following a second public hearing on June 9th, 2015, and upon approval of the Regional Commissioners.

Comments and Responses are organized by plan section. No comments were received on the Economic Element.

Commentators: The Commentator ID number is found in parenthesis following their comments.

1. Regional Commissioners at Hearing held May 12th, 2015
2. Avram Patt, State Representative, Lamoille-Washington District (Morristown, Elmore, Woodbury, Worcester)
3. Chris Violette, Planning & Zoning Administrator, Town of Barre
4. Laurie Emery, Office & Grants Manager, Central Vermont Regional Planning Commission

UTILITIES, FACILITIES & SERVICES ELEMENT

1. Comment:

Are tables/data sources being updated from the 2008 plan to reflect the most recent data, or can we pass over them?

- a. *A clear distinction should be made between the updated and non-updated tables to make things clear to the reader*
- b. *Table numbering needs to be changed based on Dan's finding (1)*

Response: The following will be included as a footnote at the beginning of the chapter and table numbers will be corrected:

"Because this text contains only selected amendments to the 2008 Central Vermont Regional Plan, a comprehensive data update has not been performed. Some statistics and figures (those labeled with "2008 Data") may not represent the most current data."

2. Comment: p. 5-10

On page 5-10, it states that Waterbury's phosphorous removal system is undergoing construction, but it is finished now

Response: Text will be revised as follows:

"The plant has been upgraded to improve its effectiveness at phosphorous removal."

3. Comment: p. 5-4 and p. 5-5, 2nd paragraph

Table 1 is seriously out of date and misrepresents the current power supply mix. For example, Vermont Yankee is closed and even before it closed, it had not been supplying any Vermont utilities for a few years. The table shows it supplying 38% of the state's load. Use the most recent information from the DPS.

Central Vermont Public Service Corp. no longer exists and should not be included as a utility serving part of the CVRPC area. It was acquired by GMP. (2)

Response: Table 1 will be removed as the data is out of date. Up to date information regarding sources of electrical generation for the region will be included in the new Energy Element to be developed for the 2016 Regional Plan.

Text referring to CVPS will be modified as follows:

"Central Vermont Public Service Corporation was acquired by Green Mountain Power in 2012. CVPS provided electric power to about 500 customers in Roxbury and

Northfield and served 123,048 residential customers and 17,851 commercial customers in total with output in 2005 of 2,300 million Kwh. ~~Its Former CVPS~~ facilities in Central Vermont now operated by GMP include distribution lines only.”

4. Comment: p. 5-15

Where did the # of private public water supplies come from on page 5-15? Is a fire district considered a PPWS? In addition, population served seems low. (3)

Response: The data was obtained from the Dept. of Environmental Conservation and Fire Districts are considered municipal systems, not private systems. They are therefore counted on the Municipal Water Systems Table on page 5-17.

5. Comment: p. 5-17

Barre Town’s water system on page 5-17 under Source name we’d like to have the order reversed to have it show East Barre Town well, Graniteville FD sources, and Dix Reservoir. (3)

Response: The order of sources for Barre Town in the Municipal Water Systems table will be revised as follows:

Barre Town/Barre Town Water System	East Barre Town Well	1,220	0.08	*	*
	Graniteville FD Sources				
	Dix Reservoir (Barre City)				

6. Comment: p. 5-17

Why is the source not listed for Websterville FD?(3)

Response: The source for the Websterville Fire District is Barclay Quarry and this data will be added to the Municipal Water Systems Table.

LAND USE ELEMENT

- 1. Comments:** There were many comments regarding concentrating development in Regional and Town Centers, and Mixed Use Commercial Land Use Planning Areas. These comments refer to text on pages 2-23, and pages 2-26 through 28. Comments are listed, followed by staff's proposed revision to address the issues raised by the comments.

1a. I'm not sure we are comfortable having it stated in the plan that higher density residential, commercial, and industrial development occur in Regional or Town Centers (2-23). This is because of all the above points. I'm not sure we have a Town Center and if we did, we have so many other areas that are already either developed or is where we would expect our development to occur. (3)

1b. Really the same concern as 5 above for what is stated on page 2-27 where it is stated that municipalities should not pursue new roadside commercial designations because additional development in these types of areas would negatively impact the economic vitality of commercial areas in nearby Regional and Town Centers. Again, we have so many other villages and significant road frontage that to only say Regional or Town Centers does not really fit Barre Town real well. (3)

1c. I'm not sure the Town of Barre can support the language regarding "big box" store on page 2-28.. (3)

1d. The policy on Page 2-23 related to town centers should recognize that significant commercial and industrial growth takes place in areas that are not designated as town centers.

- The description of mixed-use commercial and industrial areas still does not fully encompass the situation of towns such as Berlin, because not all of Berlin's development in those areas are commercial services (e.g. medical offices)*
- It's not appropriate to single out the town of Berlin as an example of supposedly poor land use planning—it's an extremely negative tone*
- The discussion of mixed use commercial should be nameless*
- What is the reference on 2-27 to "roadside commercial"? it's not clear that that's defined anywhere*
 - Could just mean "strip development," in which case the term "roadside" should be scrapped and the plan should just discuss strip development*
 - Poorly planned commercial development anywhere can have negative traffic and safety effects, whether or not it is located along a roadside: the whole paragraph should be eliminated*
- It's backwards to say that development should be discouraged so that traffic doesn't tax infrastructure—infrastructure must be improved to accommodate the development that is already happening. Again, it should be worded in a positive way*

- *Policy 2 on page 2-26 remedies the situation somewhat, but still describes appropriate development as being “small-scale”*
- *There’s a conflict in language between the descriptions of town centers and mixed-use*
- *Staying true to the definition of “mixed-use development” allows all towns, including Berlin, to develop*
- *We need to come up with a new term to describe partial infill, partial strip development. Perhaps “existing commercial development along traffic corridors”?*
- *Alternately, we should just keep using the term “strip development” to stay in keeping with state statute and to make sure there is an existing definition to work with*
- *On 2-27 there is a conflict between the third and first paragraph, and the “no development” provision should be taken out (1)*

I.e. There is not specific definition of big-box stores on page 2-28. Those standards should apply to any new commercial development in a mixed-use commercial setting. Need to clarify that only the host municipality can request a study.

Response: Staff proposes revising the description and policies for the Mixed Use Commercial Land Use Planning Area on page 2-27 as follows. New language is underlined and language to be deleted is struck through.

“Mixed-Use Commercial includes areas of commercial, office and mixed-use development built in a spread out pattern and served by water and wastewater infrastructure. Typically dominated by commercial service industries, the intent of this land use category is to transform these areas into higher-density, mixed-use settlements through infill and redevelopment.

These areas in the region are concentrated along US 302, Fisher Rd, VT 12 and south of Route 2 in Berlin, and also includes South Barre in Barre Town. ~~The Central Vermont Medical Center associated offices and the Edward F. Knapp State Airport serve regional needs in the Berlin Corners area.~~

Planned commercial or mixed uses within existing roadside commercial zoning districts must be developed carefully to ensure efficient traffic flow, reduction of vehicle trips via transit and pedestrian connectivity, and a closely integrated layout of buildings. ~~avoid sprawl, traffic congestion, and safety hazards.~~

Redevelopment and infill in this land use planning area is strongly encouraged, along with the same in Regional and Town Centers, to support their economic vitality by maintaining concentrated commercial activity. The Town of Berlin envisions such advantages of compact development in its Town Plan as described in the box below.

~~Municipalities should not pursue new roadside commercial designations because additional development in these types of areas would negatively impact the economic vitality of commercial areas in nearby Regional and Town centers.~~

Re-Energizing Commercial Areas

The Town of Berlin is planning for most of its future development in the northeast quadrant of town, much in these same areas designated as Regional Town Center, Industrial and Mixed Use Commercial Land Use Planning Areas. The following excerpts from the 2012 Berlin Town Plan describe the vision of the community:

"In order for the Town to make the best use of the potential of the Northeast quadrant, it is recommended that a comprehensive, integrated plan be developed...This plan could include such objectives as mixed commercial and residential uses to minimize vehicular travel between home and shopping or service facilities, a pedestrian network to facilitate walking between retail, office, service and residential establishments, and a unified, coherent vehicular circulation system." (p. 15-16)

Similar principles are called for along the U.S. Route 302 Corridor "to reenergize this important commercial area while minimizing the adverse impacts of traffic congestion and improving pedestrian safety and amenity." Recommendations for this corridor include:

- "Improve site design along the corridor by locating parking areas to the side and rear of buildings, where practical, and establish landscaping standards for front yards.
- Encourage better building design, including multi-story buildings, which are oriented to relate to the highway both functionally and visually.
- Establish a consistent streetscape by siting buildings close to the road
- Promote greater pedestrian access by requiring sidewalks along all road frontage, and ensuring that sidewalks are provided within a site to connect building accesses with parking areas and public sidewalks.
- Reduce the amount of land area devoted to parking by requiring shared parking in appropriate locations and reducing the amount of parking required for shared facilities serving multiple uses.
- Better manage highway access by requiring the consolidation and/or narrowing of curb cuts and, in appropriate locations, shared access between parcels and driveway connections to adjacent parcels in the rear of buildings." (p.16-17)

Policies

"1." Encourage the transformation of existing commercial areas into areas serving a mix of uses, including residential, and offering diversified transportation options, while also conforming to traditional historic development patterns.

Strategy 1a: Work with towns to incorporate standards such as placement of buildings near the road with parking areas to the side and rear, attractive

building design, application of access management principles and provision of pedestrian facilities within the center and facilities that connect to sidewalks and public transit.

"2." "Big box" retail ~~not incorporating these considerations should be permitted only if they~~ should include exemplary building and site design as described above, and should ~~are determined to~~ have a net beneficial impact, as based on an independent economic and community impact study that may be requested by the host municipality and/or CVRPC."

2. Comments: p. 2-33

Page 2-33: critical resource areas are taken from state maps and the validity of their boundaries needs to be checked

- *For example, someone needs to demonstrate that endangered animals still exist in the area before development is restricted*

Before any Act 250 or other development decisions can be made based on the future land use map, its accuracy should be independently verified

- *There is a callout box on page 2-21 that addresses this issue*

Response: In addition to the callout box on page 2-21 that addresses this comment, staff proposes the following revisions to the Resource Protection narrative on pages 2-6 and 2-7. New language is underlined and language to be deleted is struck through.

"RESOURCE PROTECTION

Within our Region's boundaries are many ecologically sensitive areas and resources that serve as symbols of our natural heritage and barometers of the Region's environmental health.

These environmentally sensitive lands are not mere amenities. They have great value for education and research and for the understanding and appreciation of natural systems and processes. They perform critical ecological functions, enhancing the stability and diversity of ecosystems. They also provide aesthetic relief and recreational opportunities, and hence, economic benefit.

The preservation of ecologically sensitive places is a goal of this Plan. Human use of such areas should be accomplished in a manner which protects their integrity and function.

Resource protection lands include: ~~natural and fragile areas,~~ protected lands, critical wildlife habitat, high elevation areas, steep slopes, critical resource areas, groundwater recharge areas, surface waters, wetlands, floodplains and scenic areas. (See maps: *Natural Resources 1* & *Natural Resources 2*)

Natural and Fragile Areas

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~~Natural and fragile areas are, according to Vermont Statute, "areas of land or water which have unusual or significant flora, fauna, geological or similar features of scientific, ecological or educational interest." For the purposes of this Plan such places include: sites listed on the Vermont Fragile Areas Registry, natural areas identified by the Vermont Natural Heritage Program, and elevations over 2,500 feet as shown on USGS topographic maps.~~²

Critical Wildlife Habitat

Our native wildlife species are valued by Central Vermont residents in a variety of ways for a variety of reasons. Some merely enjoy their presence as a reflection of nature's spirit. Some rely on wildlife for sport, food, or income (direct and indirect). Others have scientific or academic interests in wild creatures. For many of us, a combination of the above factors plays a role in our appreciation of wildlife.

Our most critical wildlife species are generally thought of as those which yield significant economic return, provide for sport and subsistence hunting, are symbolic of wilderness values, or face the threat of extirpation or extinction. We know that viable habitat is the single most important survival need for most of these species; yet for many, habitat loss and fragmentation is a real and present threat. As defined by the Vermont Department of Environmental Conservation, ~~critical~~ significant habitats are: white-tailed deer wintering areas, black bear reproduction zones, and any areas necessary to support the food, shelter or breeding needs of rare, threatened, or endangered species.

High Elevation Areas and Steep Slopes

Areas of high elevation and steep slopes garner multiple considerations for resource protection. Slopes between 15-25% grade are typically considered "steep" in Vermont and elevations about 2,500 feet are regulated at the State level, with some communities regulating at lower elevations. Soils in these areas are often more sensitive to erosion, as at high elevation they can be shallow to bedrock, and on steep slopes are being willed by gravity to move. Where soils are more erodible, disturbance of them is more likely to lead to effects on water quality, as soils and their nutrients are washed into surface waters. Additional sediment in rivers can lead to bank destabilization and streambank erosion. High elevation areas also have an important role in the watershed overall, as the starting point for much precipitation that will eventually run over the land to valley water bodies.

Special scenic and wildlife habitat values are connected to high elevation areas as well. At some elevations, climatic conditions are just right for supporting certain species that are rare at lower elevations. Vermont has long identified with the scenery of its mountains, and ridgeline vistas are inherently formed by lands at highest elevation. In Central Vermont the Camel's Hump State Park is established as an ecological area, to protect scarce and rare plants and preserve natural habitat and wilderness aspect.

Future Land Use Map Resource Data and Sources

Data is only as accurate as the original sources and are for planning purposes only. Data should be verified during permitting processes per the provisions of the regulatory authority.

- Protected lands: This data consists of both private and public protected lands. These include VT State Forests, Parks, Wildlife Management Areas, Town Forests, and Land Trust Easements.
Source: Vermont Conserved Lands Database, VT Land Trust, and Towns
- Elevations above 2,500 ft (elevations above 1,700 ft in Waitsfield, as regulated): This data consists of all areas about the elevation of 2500 ft and in Waitsfield VT above 1,700 ft.
Source: USGS contours over 2500 ft and Town of Waitsfield Land Use Regulations
- Slopes of 25% or more: This data includes all areas with slopes of 25% or more.
Source: CVRPC slope analysis using 10 meter Digital Elevation Model.
- Rare, threatened or endangered species and significant natural communities: This data consists of all mapped rare, threatened or endangered species and significant natural communities as identified by the Vermont Fish and Wildlife Department, Natural Heritage Inventory.
Source: Vermont Fish and Wildlife Vermont Natural Heritage Inventory
<http://www.vtfishandwildlife.com/common/pages/DisplayFile.aspx?itemId=229831>
- Wetlands: This data consists of all mapped class 2 wetlands as identified in the Vermont Significant Wetlands Inventory.
Source: Vermont Department of Environmental Conservation Water Quality Division Wetlands Section
- Special flood hazard areas: This data consists of FEMA mapped Special flood hazard areas Zone A and AE.
Source: FEMA Digital Flood Insurance Rate Map data
- Shoreline protection areas: This data consists of all lakes and ponds greater than 10 acres plus a buffer of 250 feet (Lake Shore Protection areas in Calais, as regulated) .
Source: CVRPC selected Vermont Hydrologic Dataset lakes and ponds greater than 10 acres and then buffered those by 250 ft and the Town of Calais Land Use Regulations

Critical Resource Areas

For the purposes of this Plan critical resource areas include:

- National Natural Landmarks: a designation that encourages and supports the voluntary conservation of sites that illustrate the nation's geological and

biological history, and to strengthen the public's appreciation of America's natural heritage;

- State-designated Natural Areas (more info >>): limited areas of land which have retained their wilderness character, although not necessarily completely natural and undisturbed, or have rare or vanishing species of plant or animal life or similar features of interest which are worthy of preservation for the use of present and future residents of the State and may include unique ecological, geological, scenic, and contemplative recreational areas on State lands;
- Sites listed on the Vermont Rare, Threatened and Endangered Species, and Significant Natural Communities as designated by the Vermont Natural Heritage Inventory; and
- Elevations over 2,500 feet as shown on USGS topographic maps.

3. Comment: p. 2-36

Policy 5 needs to recognize that there is already significant investment in flood plain areas, and new development in those areas should be built to minimize flood risk and minimize public safety concerns, not prohibited

Response: Staff proposes the following revision to Policy 5.

"Policy 5. ~~Avoid or limit~~ Development and investment in identified flood hazard areas should adhere to strong standards for limiting losses due to flood damage, ~~where feasible~~.

4. Comment: Future Land Use Map

East Barre is shown to be a Town Center.

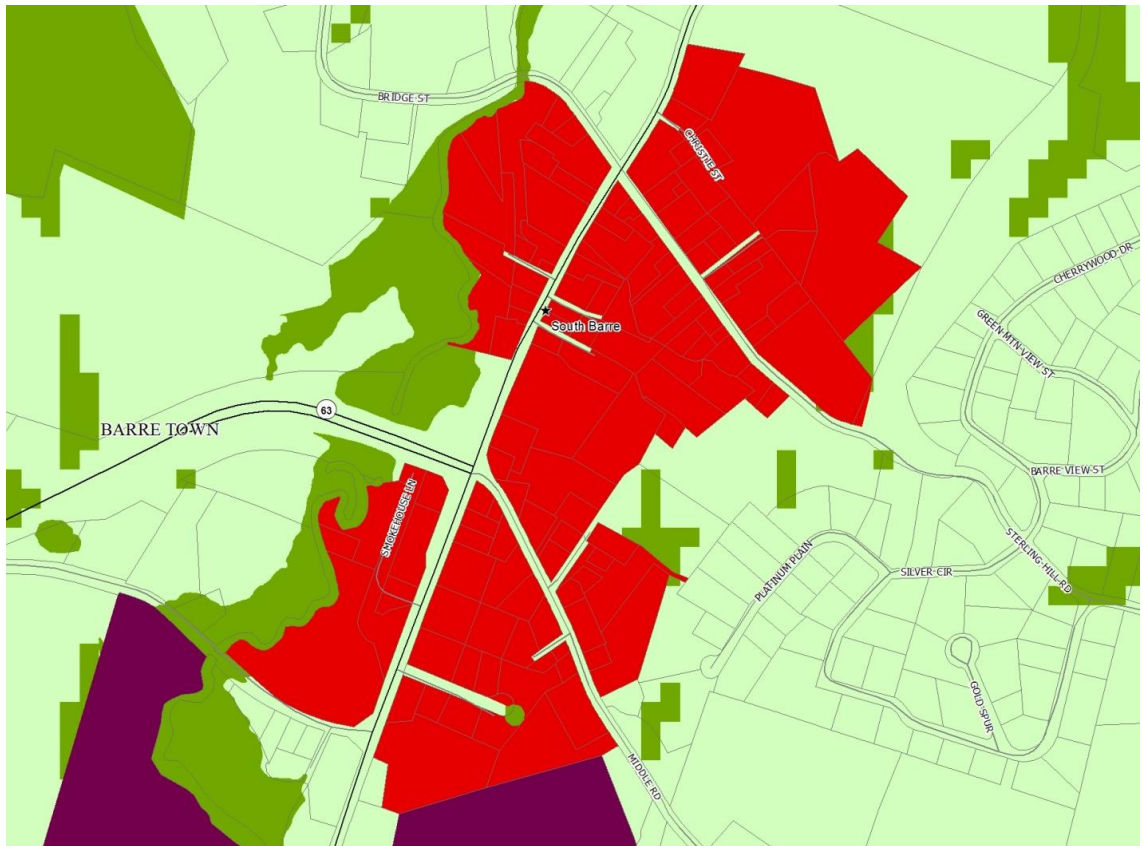
- a) How did East Barre achieve that status? According to the description of a Town Center it says that it is State designated.*
- b) Is it the appropriate designation considering Barre Town doesn't truly have a Town Center?*
- c) As much as East Barre may seem like a good Town Center, what about all of our other villages that may be as much Town Centers as Hamlets or vice versa?*
- d) Should all our Villages just be Hamlets?(3)*

Response: The Town Center area of East Barre has no State designation. We included it as a town center area because it met the other criteria of the Town Center area including: "local road network and availability of public utility infrastructure, relatively dense development and smaller lot sizes (1 unit per acre or higher), a mix of land uses, and a distinct separation from surrounding rural areas"

5. Comment: Future Land Use Map

South Barre isn't mentioned in the plan at all that I saw. South Barre is as much of a Center as East Barre would be if not more. Can we have two Town Centers designations. (3)

Response: South Barre could be added to the future land use map as a Mixed Use Commercial area. We will also add a Village star with label for South Barre. See map below for change.



6. Comment: Future Land Use Map

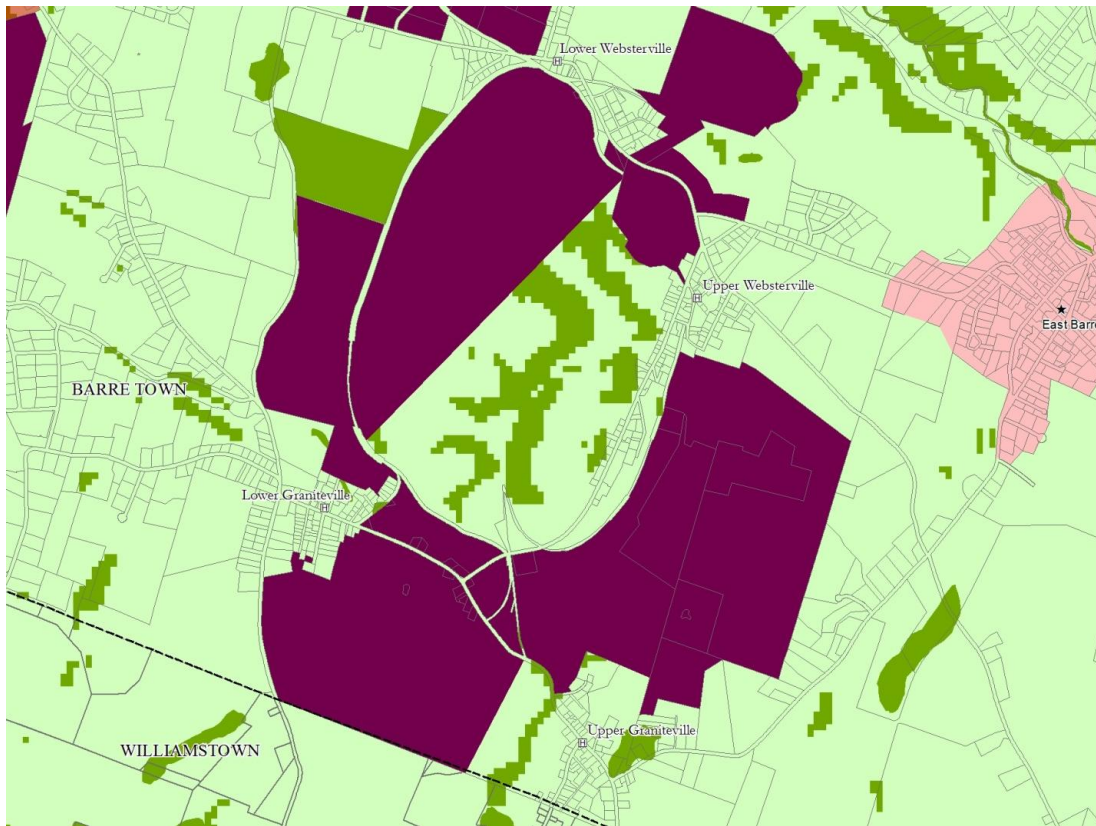
Cogswell is mentioned as a Hamlet, I spoke to Laurie about this and we don't have a village called Cogswell but we do have a Cogswell Street in Upper Graniteville. (3)

Response: Cogswell is a hamlet in Williamstown and it is talked about in their Town Plan.

7. Comment: Future Land Use Map

Graniteville and Websterville are shown to be Hamlets. These two villages are really recognized in our Town Plan as four; Websterville and Upper Websterville, Graniteville and Upper Graniteville. Now sure if all four should be mentioned or not but they are very distinct villages. (3)

Response: These four village areas could be added as hamlets to the map with labels. See map below for change.



8. Comment: Future Land Use Map

The area near Route 62 and Coos Trail is most appropriate for Mixed Use Commercial Land Use Planning Area

Response: This area will be added to the Mixed Use Commercial area. See map below.

