



Partner Agency Comments

Attached are the comments received from the following partner agencies:

1. Vermont Emergency Management
2. Public Service Department
3. Agency of Transportation
4. Agency of Natural Resources

Vermont Emergency Management

Vermont Emergency Management

Goal 12: To plan for, finance, and provide an efficient system of public facilities and services to meet future needs.

(A) Public facilities and services should include fire and police protection, emergency medical services, schools, water supply, and sewage and solid waste disposal.

(B) The rate of growth should not exceed the ability of the community and the area to provide facilities and services.

Comments: The plan contains very robust and detailed descriptions related to educational facilities, water supply, sewage and solid waste infrastructure. It describes in great detail and in an easily digestible terms both the current status and the limitations/challenges related to these items. Additionally, the plan lays out detailed goals and policies relating to the growth and improvement of these public facilities to meet future needs. In contrast, however, the plan is limited in information related to public safety, particularly fire, emergency medical service and police coverage. For example, the plan provides only two paragraphs covering the fire service and law enforcement and one paragraph covering emergency medical services. Both the fire protection and ambulance/emergency medical services sections cite lack of staff/volunteers and financial constraints as issues yet there are no further analysis, goals or policies provided. Lack of well-staffed, trained and equipped public safety organizations will continue to impact growth unless accounted for. It is recommended these sections be reviewed in consultation with regional public safety leaders prior to plan publication. Lastly, a minor correction should be made on page 197, the regional VSP Barracks is no longer in Middlesex and is now in Berlin.

(5) A utility and facility element, consisting of a map and statement of present and prospective local and regional community facilities and public utilities, whether publicly or privately owned, showing existing and proposed educational, recreational and other public sites, buildings and facilities, including public schools, State office buildings, hospitals, libraries, power generating plants and transmission lines, wireless telecommunications facilities and ancillary improvements, water supply, sewage disposal, refuse disposal, storm drainage, and other similar facilities and activities,

and recommendations to meet future needs for those facilities, with indications of priority of need.

Comments: The plan is compliant with most requirements of this section; it contains of wealth of maps and tables related to the infrastructure listed above with the only exception being state office buildings. The plan also provides realistic goals and policies related to the growth of key infrastructure. Consider additional information documenting state offices.

Public Service Department

Public Service Department

Comments can address whether or not the plan meets the Act 174 standards as well as request clarifications/offer suggestions for revision before the EEP is finalized

General Comments/Questions

- Pg 74 notes “constitute Central Vermont’s Enhanced Energy Plan meeting the standards outlined in Act 174 and the 2022 Comprehensive Energy Plan (see Supplement Section: Standards) in addition to meeting the statutory requirements for the regional plan energy element (24 V.S.A. § 4348a(a)(3)).” – I would qualify this since the plan has not yet been granted an affirmative determination confirming it meets the standards – ex. “striving to meet the standard outlined in...”

Standard 4

- 4: Looks good
- 4a: Looks good
- 4b: Generally looks good - See targets for “use of renewable energy for heating” or “conversion to alternative heating fuels” in the Supplement – a sentence or two in the main energy chapter noting how meeting targets around Wx, CCHPs, HPWH, and AWH will increase use of renewable fuels in the thermal sector over the target years would be helpful to emphasize this transition
- 4c: Looks good, similar comment as in thermal sector about adding a sentence or two about transition to renewable fuels overall in the target years to main energy chapter
 - o Heading “Transportation & Land Use; Community Scale Decarbonization” on pg 92 seems unrelated to the text on Wx right blow it – is this out of place?
- 4d: Generally looks good – note standards checklist only includes references to EE targets, but see renewable gen targets on pg 114-115
 - o Note that thermal efficiency and electric efficiency are currently considered separately in the standards / state programs. Some of the text in the energy chapter and Appendix seem to conflate them. A discussion, even brief, of the role of electric efficiency separate from thermal and transportation would be warranted.

Standard 5 – Looks good

Standard 6 – Looks Good.

Note- Good discussion of waste heat recovery opportunities at the bottom of page 129. This section might be made even more informative if there is a discussion of Thermal energy networks (TENs). Moving (or duplicating) the TENs figure on page 93 down to page 129 could be a helpful visual.

Standard 7 – Looks good

Standard 8 – Looks good

Standard 9

9B - please include explanation of how the rooftop solar potential in MW was derived, and please post or send to the Department the Generation Scenarios Planning Tool sheet used

9F – discussion in addition to that already under “Implications for Regional Siting Policy” – beyond general preferences and places to avoid – and inclusion of actions to foster generation interconnection on preferred sites would bring plan closer in line with standard

Standard 10 (Claire) – Looks good

- Note, some links to Federal Indices on pg 2 of Appendix B are broken, as is the link to the EJ Communities tool under state indices / tools
- 2019 Energy Burden data on pg 3-4 should really be updated to 2023 data, or at least reference a discussion of shifts between the results of the two reports, even if there was a shift in methodology
- Env. Benefits analysis begins on pg 300 (checklist says 310)

Standard 11

Maps appendix includes substations and hydro plants, but not other types of generation as map in body of plan; may be worth also including in map appendix (potentially with both higher resolution and level of detail)

Standard 12

As already noted by CVRPC comments in standards document, some maps still needed

Two references to 2021 VELCO Long-Range Transmission Plan should be updated to 2024 plan (and associated conclusions drawn should be reviewed)

Regional targets appear to be in line with transmission targets by order of magnitude, please provide municipal generation targets by technology type in MW that correspond with municipal generation targets in MWh (as likely already calculated in Generation Scenarios Planning Tool) and display their alignment against distribution system capacity limits

12E - More specificity needed on "specific areas or parcels" as in standard in addition to preferred types of location

Standard 13

As noted elsewhere in comments, additional specificity on the areas designated as unsuitable would be productive (or if already included in plan, consider adding reference to specific municipal restrictions in narrative or pictorial form)

Standard 14 - Looks good.

Standard 15 - Looks good. Proactive outreach to towns would be good once their maps are completed

Agency of Transportation

Agency of Transportation
219 N. Main Street, Barre, VT 05641
vtrans.vermont.gov

DATE: August 6, 2026
TO: Land Use Review Board
FROM: Vermont Agency of Transportation
RE: CVRPC Regional Plan and Future Land Use Maps

Section 2 – Part A – 11. Goal 4: To provide for safe, convenient, economic, and energy efficient transportation systems that respect the integrity of the natural environment, including public transit options and paths for pedestrians and bicyclers. (A) Highways, air, rail, and other means of transportation should be mutually supportive, balanced, and integrated. 24 V.S.A. § 4302(c)(4)

The Vermont Agency of Transportation (Agency) has reviewed the Central Vermont Regional Planning Commission Regional Plan and Future Land Use Map. The Transportation Element of the Regional Plan outlines a series of goals and policies that address the required elements of 24 V.S.A. § 4302(c)(4). These goals and policies call for maintaining the region’s transportation infrastructure, and to make improvements for safety and efficiency. The goals and policies highlight transportation demand management strategies to decrease the number of single-occupant vehicle trips including the promotion of public transit, ride sharing, and support for alternative modes of travel. The plan appropriately links the transportation network to regional economic development and quality of life.

Section 4 – Part C – 27. A transportation element consisting of a statement of present and prospective transportation and circulation facilities, and a map showing existing and proposed highways, including limited access highways, and streets by type and character of improvement, and where pertinent, anticipated points of congestion, parking facilities, transit routes, terminals, bicycle paths and trails, scenic roads, airports, railroads and port facilities, and other similar facilities or uses, and recommendations to meet future needs for such facilities, with indications of priorities of need, costs, and method of financing.

The Transportation Element of the Regional Plan includes general statements of present and prospective transportation and circulation facilities. The introduction identifies some



demographic trends impacting transportation use, such as how residents commute to work. Appendix 3 presents a map titled *Central Vermont Transportation* (Transportation Map) which shows the region's state-owned and private airports and its existing and future park and ride lots. Each of these elements is also described in the plan's narrative. The Agency understands the region does not have port facilities and the plan does not propose any new highways.

The Transportation Map, together with Figure 5 in the plan and other maps in Appendix 3, shows the region's roadways by type and character of improvement (i.e., road classification, AADT). Limited access highways are included as state and U.S. highways on several maps, but they are not labeled specifically as limited access. The Agency recommends that the Transportation Map be amended to label limited access highways to facilitate precise location of these facilities. The Agency notes that it maintains a data layer of limited access highways¹ on its website.

The Transportation Element includes a discussion of current congestion levels in the region. Figure 6, a map of the average percent of free flow speed by segment for average weekday road travel, depicts current levels of congestion by showing where travelers are typically not moving at free flow speeds. To connect this information to planned growth in the region, and to show where anticipated points of congestion may be in the future, CVRPC could include further reflections on roadway and intersection safety issues, particularly with respect to future growth areas (e.g., seasonal congestion, high crash locations, truck turning constraints, multimodal concerns). The Agency appreciates the transportation element's nuanced discussion of roadway congestion as both a result of successful, dense community development and as a potential hazard, depending on location and context.

The plan's transit and transportation demand management (TDM) sections include a discussion of existing public transit services. The Transportation Map shows general bus service areas and helpfully includes seasonal bus service areas. The Agency notes an opportunity for CVRPC to include additional detail in both the mapping and discussion of public transit, including more detailed maps of transit routes (e.g., local public transit circulation routes; link routes to and from the region; regular private bus service out of state) and a more detailed discussion of regional public transit issues and ridership patterns. This would bolster several of the plan's goals and policies related to promoting public transit and transportation demand management.

¹ <https://geodata.vermont.gov/datasets/VTrans::vt-limited-access-highways/explore?location=43.723687%2C-72.855787%2C8>



The bicycle and pedestrian section of plan narrative connects biking and walking to the community development and public health goals of the plan, and helpfully outlines some of the known issues related to bicycle and pedestrian transportation infrastructure in the region. The plan is missing a map of bike and pedestrian facilities. The Agency recommends CVRPC use data collected via the Agency's Bicycle and Pedestrian Planning Integration Program and annual bike and pedestrian counts to develop a detailed map of current and planned infrastructure. Additionally, we recommend adding a brief description of notable bike and pedestrian transportation facilities already existing and planned in the region, including the Cross Vermont Trail and Mad River Path.

The Agency recommends amending the Transportation Map (or including a standalone map) to depict designated scenic roads. The narrative portion of the plan on Scenic Byways (p. 158) could also connect to the earlier discussion about points of congestion and safety by including a discussion of the transportation challenges posed by heavy seasonal traffic on some of the region's scenic byways.

Regarding the region's railroads, the Transportation Element includes acknowledgement of both regional passenger (Amtrak) and freight movement by rail. The Transportation Map includes the Amtrak rail line and stations, but the freight rail line between Montpelier and Barre is missing from the map. The Agency recommends this line be added and noted as a freight-specific line.

Finally, some general recommendations to meet future transportation infrastructure needs are identified in the Transportation Element and in the implementation section of the Regional Plan, but specific projects, project locations, and anticipated costs are not identified. The transportation element includes *Table 25: Transportation Funding Programs*, which outlines funding available for bridges, culverts, and other transportation projects. This is a helpful resource for municipalities as it also includes municipal cost share information. If CVRPC develops a list of more specific, prioritized transportation project needs, Table 25 could be cross-referenced to help municipalities connect their project needs with appropriate funding opportunities. Additionally, the Agency recommends that any cost estimates in such a list indicate the relative *high, medium, or low* cost to implement, if dollar figures are unknown.

Future Land Use Map Comments:

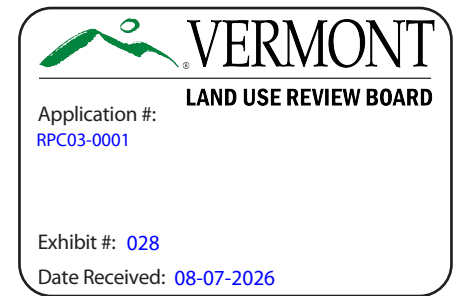
The Agency agrees with the classification of the Edward F. Knapp State Airport and the Sugarbush Airport as part of the enterprise land use category. We notice a few



inconsistencies in the Future Land Use map regarding categorization of state highways and Interstate 89. Some of I-89 and state highways are categorized as special use, while other roads and trails have no categorization or are categorized to match the adjacent land use category. The Agency recommends a consistent approach across the region. Finally, the Agency recommends that railyards and rail sidings in the region be included in the enterprise land use category. Rail sidings, even if not currently used, can in the future be developed into rail-related enterprise land use functions.



Agency of Natural Resources



Preapplication Review Comments

Regional Planning Commission: Central Vermont - RPC03

Name of Commentor: Jennifer Mojo

Commentor Email Address: jennifer.mojo@vermont.gov

Partner Agency: Agency of Natural Resources

Natural Resources Goal and Element

The Natural Resources chapter includes a thorough discussion of various natural resources in the region and their benefits, as well as strategies and policies to minimize impacts and maintain/improve functions.

The Plan notes the importance of riparian vegetation along shorelines of rivers and lakes. These riparian buffers support multiple beneficial functions including flood resilience, habitat and habitat connectivity, and water quality.

The Plan also highlights the Region's reliance on forest resources to support the forestry, agriculture, and recreation economies, and provide flood resilience. Overall, the Region experienced a loss in forest cover due to parcelization and conversion. The regulatory and non-regulatory strategies and policies outlined at the end of the chapter aim improve forest conditions and connectivity within the Region.

Drinking Water: The Region may want to consider changing the term Wellhead Protection Area to Source Protection Area, especially when referring to public drinking water sources, to reflect terminology used in the Groundwater Protection Rule and Strategy.

RINAs: Rare and irreplaceable natural areas (RINAs) are not mentioned in the plan but may overlap resources identified as fragile areas. Many RINAs are mapped as significant natural communities on the ANR atlas and could be considered for inclusion in one of the natural resources maps and/or referenced in the text of the plan. Also consider adding a new map (or on an existing map) ANR atlas layers that identify river corridors, vernal pools, and rare, threatened, and endangered species.

Wetlands: As noted for other regional plans, the Wetlands Program is updating the National Wetlands Inventory maps. This process is ongoing, and the region's draft maps were finalized. A draft of the map is viewable

here: <https://experience.arcgis.com/experience/c76d18185ede4acb8068fa352ea73c1e>. More information about the Wetland Program's map update process is available

here: <https://dec.vermont.gov/watershed/wetlands/wetland-maps>. The Region may want to consult the draft maps prior to adjusting FLUAs to better understand the current extent of mapped wetlands and development potential.

Stormwater: On page 71/72, there is a policy recommending implementation of the ANR's AMPs for forestry, agriculture, and earth extraction activities for stormwater control. Consider adding reference to AAFM's Required Agricultural Practices (RAPs) for agricultural operations. Stormwater

from earth extraction (and other industrial) operations is generally regulated under ANR's Stormwater Multi- Sector General Permit (MSGP) Program.

Appendix A: Maps – Many of the maps appear to have been created in 2007. The Region may want to check the layer sources to ensure the maps reflect the most up to date information. Many ANR layers are updated on a regular basis (especially DWA, wetlands, FEMA layers, BioFinder – Highest Priority Interior & Connectivity Blocks, and Bear habitat which is likely discontinued).

Flood Resilience Goal and Element

The Plan highlights the two main causes of flooding and the importance of undertaking comprehensive river corridor planning processes to improve the resilience of the Region. The mention of the Region's Bridge and Culvert inventory is an important planning tool that can help municipalities prioritize culvert and bridge replacements.

As a note, FEMA is in the process of updating Vermont's Flood Insurance Rate Maps. These updates are the first for many communities since the 1970s and 1980s. The Region's District Floodplain Managers can provide the most up-to-date information regarding the update process and schedule. Overviews of the initial schedules and process may be found on the Vermont Flood Ready webpage (<https://floodready.vermont.gov/>) under the "New Flood Map Updates" section.

The Region may want to consider adding the river corridor layer on one of the Plan's maps, as well as ensure the FEMA layer reflects the most recent flood insurance rate maps.