



Public Comments

Attached are the public comments which were submitted via:

1. [LURB Regional Plan Database](#)
2. [CVRPC Comment Form](#)
3. [CVRPC Stakeholder Input Portal](#)
4. Email

LURB Regional Plan Database

Preapplication Review Comment Form

The purpose of the Land Use Review Board's preapplication review of a draft regional plan is to provide comments to the regional planning commission on whether draft regional plan conforms with 24 V.S.A. § 4302, 4348a, 5803, and 5804.

This comment form lays out the statutory requirements for a regional plan to receive an affirmative determination from the Board. This form does not need to be completed in its entirety, and a commentor can elect to complete only certain sections. If you have no comments under the given section, leave that section blank.

Commentor Information

1. Select the Regional Planning Commission you are providing comments for.

Central Vermont – RPC03

2. Name of commentor.

Thomas Weiss, P.E.

3. Commentor email address.

P. O. Box 512, Montpelier, Vermont

Comments without questions on the Form

Comment A. I acknowledge the CVRPC's intent to leave regional policy largely unchanged as stated in the "2026 Notable Updates Summary. I can understand the intent if the commission had actually updated its plan in 2024. However, the commission did not update its plan in 2024. The commission merely re-adopted its 2016 plan in 2024 and is now again postponing the work of bringing its plan up to date in all aspects. I disagree that the stated intent is valid.

Comment B. This plan exhibits one of the common lacks of plans. It lacks an evaluation of each of the goals, policies, and strategies; of the successes and failures of the previous plan. Were they successful? Did they fail? Should they be carried forward into the new plan? Should they be amended? This is compounded by the CVRPC's failure to amend its plan on schedule in 2024, instead readopting the 2016 plan. If this comment is not germane to the LURB review, then perhaps it could be considered in a revision to the application guidelines.

Comment C. Please do not use AI-generated responses. My previous experience with such responses is that they fail to address all comments and they fail to address specifics of comments. Rather they generalize the comments, causing AI generated responses to be inadequate.

4. Partner Agency (if representing a partner agency).

Not applicable

Section 2 – Part A – Consistency with State

Planning Goals (15 Goals)

Per 24 V.S.A. § 4348(h)(4), for the Land Use Review Board to issue a determination of plan compliance, it must find that the plan is consistent with the State planning goals as established in 24 V.S.A. § 4302. The application must describe plan compliance.

In this section, the RPC was required to provide detailed information about how the plan meets the general and specific goals out-lined in 24 V.S.A. §§ 4302(a), (b) and (c).

5. The draft plan must meet the general purpose of 24 V.S.A. § 4302(a), which states: "It is the intent and purpose of this chapter to encourage the appropriate development of all lands in this State by the action of its constituent municipalities and regions, with the aid and assistance of the State, in a manner which will promote the public health, safety against fire, floods, explosions, and other dangers; to promote prosperity, comfort, access to adequate light and air, convenience, efficiency, economy, and general welfare; to enable the mitigation of the burden of property taxes on agricultural, forest, and other open lands; to encourage appropriate architectural design; to encourage the development of renewable resources; to protect residential, agricultural, and other areas from undue concentrations of population and overcrowding of land and buildings, from traffic congestion, from inadequate parking and the invasion of through traffic, and from the loss of peace, quiet, and privacy; to facilitate the growth of villages, towns, and cities and of their communities and neighborhoods so as to create an optimum environment, with good civic design; to encourage development of a rich cultural environment and to foster the arts; and to provide means and methods for the municipalities and regions of this State to plan for the prevention, minimization, and future elimination of such land development problems as may presently exist or which may be foreseen and to implement those plans when and where appropriate. In implementing any regulatory power under this chapter, municipalities shall take care to protect the constitutional right of the people to acquire, possess, and protect property."

Not evaluated for these comments.

6. 4302(b) - GENERAL GOALS

- (1) To establish a coordinated, comprehensive planning process and policy framework to guide decisions by municipalities, regional planning commissions, and State agencies.
- (2) To encourage citizen participation at all levels of the planning process, and to assure that decisions shall be made at the most local level possible commensurate with their impact.
- (3) To consider the use of resources and the consequences of growth and development for the region and the State, as well as the community in which it takes place.
- (4) To encourage and assist municipalities to work creatively together to develop and implement plans.

Not evaluated for these comments.

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7. 4302(c) - SPECIFIC GOALS

Goal 1: To plan development so as to maintain the historic settlement pattern of compact village and urban centers separated by rural countryside. Are the proposed designated areas (downtown and village centers, planned growth areas, and village areas) adequate to accommodate the regional housing targets as required by 24 V.S.A. § 4302(c)(1)(A)?

(A) Intensive residential development should be encouraged primarily in downtown centers, village centers, planned growth areas, and village areas as described in section 4348a of this title, and strip development along highways should be avoided. These areas should be planned so as to accommodate a substantial majority of housing needed to reach the housing targets developed for each region pursuant to subdivision 4348a(a)(9) of this title.

(B) Economic growth should be encouraged in locally and regionally designated growth areas, employed to revitalize existing village and urban centers, or both.

(C) Public investments, including the construction or expansion of infrastructure, should reinforce the planned growth patterns of the area.

(D) Development should be undertaken in accordance with smart growth principles as defined in subdivision 2791(13) of this title.

Goal 1: B, C, and D are not evaluated for these comments.

8. Are the proposed designated areas (downtown and village centers, planned growth areas, and village areas) adequate to accommodate the regional housing targets as required by 24 V.S.A. § 4302(c)(1)(A)?

Comment 8.A. Regional planning commissions should be asked to answer this question. There is a mismatch between this preapplication review and comment form and the information requested of the CVRPC in the draft regional plan review checklist. The question "Are the proposed designated areas (downtown and village centers, planned growth areas, and village areas) adequate to accommodate the regional housing targets as required by 24 V.S.A. § 4302(c)(1)(A)?" is not in the checklist provided to regional planning commissions. This is a worthy and valid question whether in statute or not.

It is worthy for the RPC's to answer this question. It is inappropriate to ask this question only of the commenters. RPC's have the skills and resources to evaluate the question. Most commenters lack the skills and resources needed to answer the question. If more land is devoted to the designated areas than is needed to meet the regional targets, it is harder to further other specific goals (e.g., 4302(c)(5), (6), and (9)).

Comment 8.B. I find that the draft regional plan is not consistent with Goal 1 (A). The draft plan defines 60% of the regional growth as a substantial majority to be accommodated in the four land use categories for intensive development. It is not clear that 60% is a substantial majority. Anyway, the draft plan allocates the regional target as follows: 20% in downtown centers; 20% in planned growth centers, 10% in village centers, and 10% in village areas. The remaining 40% based on population, apparently meaning in the other land use categories. The plan should

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evaluate whether the regional targets can be achieved within the distribution.

Comment 8.C. On a regionwide basis, the 2030 target is 2540 housing units and the 2034 target (linearly interpolated) is 3641. The RPC's target is that by the year 2034 728 units will go into the five downtown centers. Questions that I think should be answered. What will it take to place those 728 units into the downtown centers? Is there sufficient unbuilt-upon land? Will existing buildings need to be demolished to make room for larger units? The same questions should be answered for the 728 units targeted for the planned growth areas in 7 municipalities; the 364 targeted for the village centers in 19 municipalities; and the 364 targeted for the village areas in 13 municipalities.

Comment 8.D. Comments related specifically to Montpelier are provided in response to no. 49.

9.Goal 2: To provide a strong and diverse economy that provides satisfying and rewarding job opportunities and that maintains high environmental standards,and to expand economic opportunities in areas with high unemployment or low per capita incomes. 24 V.S.A. § 4302(c)(2).

Not evaluated for these comments.

10. Goal 3: To broaden access to educational and vocational training opportunities sufficient to ensure the full realization of the abilities of all Vermonters. 24 V.S.A.§4302(c)(3).

Not evaluated for these comments.

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).

Not evaluated for these comments.

12. Goal 5: To identify, protect, and preserve important natural and historic features of the Vermont landscape, including:

(A) significant natural and fragile areas;

(B) outstanding water resources, including lakes, rivers, aquifers, shorelands, and wetlands;

(C) significant scenic roads, waterways, and views;

(D) important historic structures, sites, or districts, archaeological sites, and archaeologically sensitive areas. 24 V.S.A. § 4302(c)(5).

Not evaluated for these comments.

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13. Goal 6: To maintain and improve the quality of air, water, wildlife, forests, and other land resources.

(A) Vermont's air, water, wildlife, mineral, and land resources should be planned for use and development according to the principles set forth in 10 V.S.A. § 6086(a).

(B) Vermont's water quality should be maintained and improved according to the policies and actions developed in the basin plans established by the Secretary of Natural Resources under 10 V.S.A. § 1253.

(C) Vermont's forestlands should be managed so as to maintain and improve forest blocks and habitat connectors. 24 V.S.A. § 4302(c)(6).

Comment 13.A. I find that the draft regional plan is not consistent with goal 6(A). Goal 6(A) is to have all planning be in accordance with the principles of Act 250 at all times, not just when an Act 250 permit is required. Nor does the CVRPC's "Summary: Regional Plan Approval Criteria" show how the regional plan is consistent with this part of goal 6(A). The principle of criterion 1 is "Will not result in undue water or air pollution", for example. The draft plan does not mention how its planning supports the principles of the Act 250 criteria in all locations and all topics, whether or not an Act 250 permit is required.

Comment 13.B. The draft plan mentions Act 250 15 times. Every mention of Act 250 is about the CVRPC's participation in relation to permitting. And that CVRPC will participate in Act 250 when housing is involved. Yet Tier 1A areas are exempt from Act 250 permits and Tier 1B areas are exempt from most Act 250 permitting for housing and for mixed use developments (up to 60% of which may be non-residential).

14. Goal 7: To make efficient use of energy, provide for the development of renewable energy resources, and reduce emissions of greenhouse gases.

(A) General strategies for achieving these goals include increasing the energy efficiency of new and existing buildings; identifying areas suitable for renewable energy generation; encouraging the use and development of renewable or lower emission energy sources for electricity, heat, and transportation; and reducing transportation energy demand and single occupancy vehicle use.

(B) Specific strategies and recommendations for achieving these goals are identified in the State energy plans prepared under 30 V.S.A. §§ 202 and 202b. 24 V.S.A. § 4302(c)(7).

Comment 14.A. Page 85 of the draft plan states that Vermont's Weatherization Assistance Program has adopted a zero deferral program. Looking into the program in March 2026 showed that zero deferral for the presence of vermiculite applies only to units that are occupied by the owner. The 2020 Technical Policies & Procedures Manual, published by the Office of Economic Opportunity, requires deferral for vermiculite at properties that are rented by those who are eligible for weatherization assistance. That manual was still on that site as of March 2026 Appendix G states "The presence of vermiculite shall be treated as cause for automatic deferral of services in rental properties only. It is the responsibility of the owner of the rental to remediate vermiculite prior to the receipt of WAP services. The draft plan also quotes the annual "Performance Indicators for the Weatherization Assistance Program" Report to the Vermont Legislature

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Beginning next year, the report is required to provide information on deferrals and rental deferrals. The text should be corrected to note the limits of the zero deferral policy.

15. Goal 8: To maintain and enhance recreational opportunities for Vermont residents and visitors.
- (A) Growth should not significantly diminish the value and availability of outdoor recreational activities.
- (B) Public access to noncommercial outdoor recreational opportunities, such as lakes and hiking trails, should be identified, provided, and protected wherever appropriate. 24 V.S.A. § 4302(c)(8).

Comment 15.A. The Outdoor Recreation Goal (p. 223), policy 5, identifies access to lakes and streams as a need in the region. This policy is unchanged from 2016. Has this policy achieved anything in the last 10 years?

Comment 15.B. The policy does not indicate who will identify these access locations.

Comment 15.C. Two water based access and uses (Kingsbury Branch and Coburn Pond, both in East Montpelier) have not been added to the "Central Vermont Public Recreational Resources Map".

Comment 15.D Some symbols in the legend do not match the symbols on the map.

These all should be corrected.

16. Goal 9: To encourage and strengthen agricultural and forest industries.

- (A) Strategies to protect long-term viability of agricultural and forestlands should be encouraged and should include maintaining low overall density.
- (B) The manufacture and marketing of value-added agricultural and forest products should be encouraged.
- (C) The use of locally-grown food products should be encouraged.
- (D) Sound forest and agricultural management practices should be encouraged.
- (E) Public investment should be planned so as to minimize development pressure on agricultural and forest land. 24 V.S.A. § 4302(c)(9).

Not evaluated for these comments.

17. Goal 10: To provide for the wise and efficient use of Vermont's natural resources and to facilitate the appropriate extraction of earth resources and the proper restoration and preservation of the aesthetic qualities of the area. 24 V.S.A. § 4302(c)(10).

Comment 17.A. This is another example of a failure to update the plan. General Land Use Goal 2 is "To preserve the aesthetic quality of the Region. Policy 11 is that "CVRPC will track indicators that show impacts on aesthetic quality and natural beauty in Central Vermont." This policy is from 2016. The 2026 plan has no indication that the indicators have been tracked and what has been

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accomplished as a result of the regional plan's policy. This information should be added.

18. Goal 11: To ensure the availability of safe and affordable housing for all Vermonters.

(A) Housing should be encouraged to meet the needs of a diversity of social and income groups in each Vermont community, particularly for those citizens of low and moderate income, and consistent with housing targets provided for in subdivision 4348a(a)(9) of this title.

(B) New and rehabilitated housing should be safe, sanitary, located conveniently to employment and commercial centers, and coordinated with the provision of necessary public facilities and utilities.

(C) Sites for multi-family and manufactured housing should be readily available in locations similar to those generally used for single-family dwellings.

(D) Accessory dwelling units within or attached to single-family residences that provide affordable housing in close proximity to cost-effective care and supervision for relatives, elders, or persons who have a disability should be allowed. 24 V.S.A. § 4302(c)(11).

Comment 18.A The draft plan likely is not consistent with Goal 11 (B) with regard to co-ordinating new and rehabilitated housing with the provision of necessary public facilities and utilities. I found nothing in chapters 6 (housing), 8 (implementation plan), and 5 (utilities, facilities, and services) discussing such co-ordination.

19. 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. 24 V.S.A. § 4302(c)(12).

Comment 19.A The draft plan likely is not consistent with goal 12. I find nothing in the plan that discusses financing of water supply and sewerage or of any other public facilities and services.

20. Goal 13: To ensure the availability of safe and affordable childcare and to integrate childcare issues into the planning process, including childcare financing, infrastructure, business assistance for child care providers, and childcare work force development. 24 V.S.A. § 4302(c)(13).

Not evaluated for these comments.

21. Goal 14*: To encourage flood resilient communities.

(A) New development in identified flood hazard and river corridor protection areas should be avoided. If new development is to be built in such areas, it should not exacerbate flooding and fluvial erosion.

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(B) The protection and restoration of floodplains and upland forested areas that attenuate and moderate flooding and fluvial erosion should be encouraged.

(C) Flood emergency preparedness and response planning should be encouraged.

24 V.S.A. § 4302(c)(14).

*This goal is effective until 1/1/28, after which it is replaced with updated language accounting for the forthcoming statewide minimum flood hazard area standards established by rule by the Agency of Natural Resources

Comment 21.A. This no. 21 and no. 34 both cover the topic of flood resilience. The two responses by the CVRPC in the checklist have some identical items and many differences. I think that the two responses in the checklist should be better aligned.

22. Goal 15: With development of the regional plans, the regional planning commissions are required "[a]t the outset of the planning process and throughout the process, regional planning commissions shall solicit the participation of each of their member municipalities, local citizens, and organizations by holding informal working sessions that suit the needs of local people. The purpose of these working sessions is to allow for meaningful participation as defined in 3 V.S.A. § 6002, provide consistent information about new statutory requirements related to the regional plan, explain the reasons for new requirements, and gather information to be used in the development of the regional plan and future land use element." 24 V.S.A. 4348(a). Additionally, goal 15 requires the regional plan "[t]o equitably distribute environmental benefits and burdens as described in 3 V.S.A. chapter 72." The referenced chapter is titled: "Environmental Justice."

"Meaningful participation' means that all individuals have the opportunity to participate in energy, climate change, and environmental decision making. Examples include needs assessments, planning, implementation, permitting, compliance and enforcement, and evaluation. Meaningful participation also integrates diverse knowledge systems, histories, traditions, languages, and cultures of Indigenous communities in decision-making processes. It requires that communities are enabled and administratively assisted to participate fully through education and training. Meaningful participation requires the State to operate in a transparent manner with regard to opportunities for community input and also encourages the development of environmental, energy, and climate change stewardship." 3 V.S.A. § 6002(6). Please provide any comments you have as to whether the development of the draft regional plan meets these requirements.

Comment 22.A. The outreach to the public is limited and appears to be inconsistent with the goal of holding informal working sessions for participation by local citizens throughout the process.

The checklist provides page numbers in four locations. It also provides a table with outreach activities. That table (pages 4 and 5 of the checklist) has information essential to this comment that is not included in the draft plan (pages 25 and 26). The table includes the timing of the outreach activities. The outreach to local citizens is limited in time and scope. The activities occurred in April and May 2025 (ten library round table discussions); spring 2025 (a survey with limited public outreach); and April 2026 (tabling event at Waterbury LEAP, which is focused on energy efficiency and electric vehicles). So the draft plan and checklist describe very little public participation in the 12 months before the draft plan was submitted to the LURB. The scope of

local citizen events is limited to ten geographically distributed round table discussions, one tabling event, and one survey. That does not seem to be a robust outreach effort.

It appears that the solicitation used was limited. The draft plan has no indication on how effective the solicitation was. Questions to be answered. How many local citizens were reached at the library round table discussions? How many at the LEAP tabling? How many surveys were completed? How many "interested members of the public" are sent the "Weekly Roundup"? And how large is that mailing? 600 (as on p. 4 of the checklist) or 200 (as on p. 25, no. 7 of the draft plan)?

One can't go back on undone public participation. However, all the above questions can be answered. And the LURB can make sure that the CVRPC does robust solicitation of public participation at the remaining stages of the regional plan review and approval process.

Comment 22.B. Ten library round table discussions were held. Table 37 of the draft plan shows that there are 13 public libraries in the region. Which libraries did not have round table discussions. How does that relate to reaching target populations? For example, Roxbury has a public library.. Map X in appendix E shows that Roxbury has an environmental justice focus population based on more than 1% of households with limited English proficiency. That raises the question of whether a round table discussion was held in Roxbury. If there was a discussion there, that raises the question of how the outreach and the round table discussion were adjusted to account for the reduced English proficiency. The regional plan should discuss this issue as it applies throughout the region.

Section 3 – Part B – Consistency with the Purposes of a Regional Plan

Per 24 V.S.A. § 4348(h)(4), for the Land Use Review Board to issue a determination of plan compliance, it must find that the plan is consistent with the purposes of a regional plan as established in 24 V.S.A. § 4347. "Consistency" is defined in 24 V.S.A. § 4302(f)(1).

The application must provide detailed information describing how the plan is consistent with the purposes of a regional plan.

23. 24 V.S.A. § 4347 - Purposes of a Regional Plan: A regional plan shall be made with the general purpose of guiding and accomplishing a coordinated, efficient, equitable, and economic development of the region that will, in accordance with the present and future needs and resources, best promote the health, safety, order, convenience, prosperity, and welfare of current and future inhabitants as well as efficiency and economy in the process of development. This general purpose includes recommending a distribution of population and of the uses of the land for urbanization, trade, industry, habitation, recreation, agriculture, forestry, and other uses as will tend to:

- (1) create conditions favorable to transportation, health, safety, civic activities, and educational and cultural opportunities;
- (2) reduce the wastes of financial, energy, and human resources that result from either excessive

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congestion or excessive scattering of population;
(3) promote an efficient and economic utilization of drainage, energy, sanitary, and other facilities and resources;
(4) promote the conservation of the supply of food, water, energy, and minerals;
(5) **promote the production of food and fiber resources** and the reasonable use of mineral, water, and renewable energy resources;
(6) promote the development of housing suitable to the needs of the region and its communities; and
(7) help communities equitably build resilience to address the effects of climate change through mitigation and adaptation consistent with the Vermont Climate Action Plan adopted pursuant to 10 V.S.A. § 592 and 3 V.S.A. chapter 72.

Comment 23.A. The draft plan likely is not consistent with part of purpose 5. I find no goal, policy, or strategy that promotes the production of food And production of fiber is not mentioned in the draft plan at all.

The closest that I find are two policies from 2016 with no indication on whether the policies were implemented. And if they were implemented, was the result accomplished?

- Natural Resources and Working Lands Goal 2, policy 5 calls for considering methods to determine the amount of agricultural land required to meet the Region's long -term requirements under a "worst case scenario" regarding food importation This does not promote food or fiber.

- Economic Goal 5, policy 18 calls for fostering collaborative partnerships among regional food system stakeholders. This doesn't really promote production of food or fiber.

These policies were also in the 2016 plan. What has been done in the meantime?

Section 4 – Part C – Required Elements of a Regional Plan

The draft regional plan must include the following elements. 24 V.S.A. § 4348a(a).

24. A statement of basic policies of the region to guide the future growth and development of land and of public services and facilities, and to protect the environment. 24 V.S.A. § 4348a(a)(1).

Not evaluated for these comments.

25. A natural resources and working lands element, which shall **consist of a map or maps** and policies, based on ecosystem function, consistent with Vermont Conservation Design, support compact centers surrounded by rural and working lands, and that:

(A) Indicates those areas of significant natural resources, including existing and proposed for forests, wetlands, vernal pools, rare and irreplaceable natural areas, floodplains, river corridors, recreation, agriculture using the agricultural lands identification process established in 6 V.S.A. § 8, residence, commerce, industry, public, and semipublic uses, open spaces, areas reserved for flood plain, forest blocks, habitat connectors, recreation areas and recreational trails, and areas identified

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by the State, regional planning commissions, or municipalities that require special consideration for aquifer protection; for wetland protection; for the maintenance of forest blocks, wildlife habitat, and habitat connectors; or for other conservation purposes.

(B) Indicates those areas that have the potential to sustain agriculture and recommendations for maintaining them that may include transfer of development rights, acquisition of development rights, or farmer assistance programs.

(C) Indicates those areas that are important as forest blocks and habitat connectors and plans for land development in those areas to minimize forest fragmentation and promote the health, viability, and ecological function of forests. A plan may include specific policies to encourage the active management of those areas for wildlife habitat, water quality, timber production, recreation, or other values or functions identified by the regional planning commission.

(D) Encourages preservation of rare and irreplaceable natural areas, scenic and historic features and resources.

(E) Encourages protection and improvement of the quality of waters of the State to be used in the development and furtherance of the applicable basin plans established by the Secretary of Natural Resources under 10 V.S.A. § 1253.

24 V.S.A. § 4348a(a)(2).

It appears that the draft plan does not fully meet the requirements of the natural resources and working lands element.

Comment 25.A. (A) The maps in appendix A of the draft plan appear to be missing the following elements: , vernal pools, rare and irreplaceable natural areas, river corridors, agriculture using the agricultural lands identification process established in 6 V.S.A. § 8, open spaces, areas reserved for flood plain, aquifer protection; wetland protection;

Comment 25.B (D) The draft plan does not mention rare or irreplaceable natural areas.

Comment 25.C. The maps do not show earth resource operations. The draft plan states "that we must accommodate them even as we guard against their more harmful aspects." It is hard to guard against their more harmful aspects if we do not know where they are.

Comment 25.D. The policies, goals, and strategies are essentially the same as from 10 years ago, the 2016 plan. This is despite changes in conditions within the region and changes in laws. There is no indication of the means used to implement the strategies. Nor is there any indication of how successful the strategies were and why they were retained. I would hope that some of the goals, policies, and strategies had actually been achieved and could be eliminated from this draft plan. As examples:

The 2016 plan has a strategy to "develop a clearinghouse of resources that could be used by teachers and other groups working with youth to provide education on" "watershed functions, protection, and restoration." That strategy is still in the draft plan (p. 46). How has the clearinghouse been received by teachers and the other groups? Is this strategy still needed 10 years later? Should it be changed? Removed?

The 2016 plan has a strategy to perform audits of municipal websites and communications methods on request. The strategy is still in the draft plan (p. 46). How many audits were

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requested and what municipal actions were taken as a result? Is the strategy useful 10 years later? Should it be changed? Removed?

The 2016 plan has a strategy to coordinate region-wide trainings related to flood resilience with DEC. The strategy is still in the draft plan. How many trainings were offered and what actions were taken as a result of the training? Is it still useful after 10 years? Change it? Remove it?

26. An energy element, including an analysis of resources, needs, scarcities, costs, and problems within the region across all energy sectors, including electric, thermal, and transportation; a statement of policy on the conservation and efficient use of energy and the development and siting of renewable energy resources; a statement of policy on patterns and densities of land use likely to result in conservation of energy; and an identification of potential areas for the development and siting of renewable energy resources and areas that are unsuitable for siting those resources or particular categories or sizes of those resources. 24 V.S.A. § 4348a(a)(3).

Comment 26.A. The energy element of the draft plan states that "The supplement provides an extended table by town documenting local constraints, unsuitable locations, preferred sites, preferred project characteristics siting policies, and municipal generation projects cited in current town plans." I could not find this table which would contain important and relevant information.. Thus it appears that the supplement submitted as part of the pre-application is incomplete.

Comment 26.B. Goal 8 of the draft plan is partly about constraints to potential renewable energy location. The text of the energy element mentions the section 248 process for siting of renewable energy generation. There is no strategy to work with municipalities so that they can craft their town plans to be specific about sites where renewable resources are not allowed, in order to hold up during a section 248 proceeding. This could go into an expanded strategy e, along the lines of . "e) Work with municipalities, as requested, to evaluate and prioritize future renewable energy generation technologies and locations to best suit municipal needs and policies This includes how to write municipal plans to be strong enough to withstand the Act 248 process."

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. 24 V.S.A. § 4348a(a)(4).

It appears that the draft plan does not fully meet the requirements of the transportation element.

Comment 27.A. This transportation element (chapter 4) was rewritten in a major way. Yet none of the goals, policies, and strategies have changed. It seems that at least some of the changes in text would result in the need for changes to at least some of the goals, policies, and strategies. There is no explanation of why none of them changed.

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Comment 27.B. The section on highways in the draft plan omits the poor condition of many of our asphalt roads. These conditions are ruts that have worn through the top layer of asphalt; lengthwise cracks and settling along the outer edges of the driving lines because the old, narrower concrete was left in place when the wider asphalt was placed on top of the concrete; potholes; culverts and bridges too small for the increased intensity of storm runoff.

Comment 27.C. Transportation goal 2, policy 3 refers to levels of service C and D. The draft report should have a table describing the various levels of service.

Comment 27.D. The transportation element omits discussion of passenger rail. Amtrak makes two stops in the region: Montpelier Jct. and Waterbury. Passengers using those stations mostly to and from points south, New York City and Washington, D.C. Schedules do not allow same-day connections to other trains heading to Chicago (and points west), Florida, or New Orleans. Altering the schedules to allow those connections would allow transportation alternatives to motor vehicles and airplanes while saving energy. The plan also omits discussion of the effects and timing of the plans for extending the passenger service north of St. Albans to Montreal.

Comment 27.E. The transportation element does not discuss the State-owned railroad between Montpelier Jct. (in Berlin) to Barre Town, via Montpelier, Berlin, and Barre City.

Comment 27.F. There appears to be no discussion on costs and methods of financing transportation needs. Nor is there discussion on priorities.

28. 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. 24 V.S.A. § 4348a(a)(5).

Comment 28.A. It seems that the utility and energy element in the draft regional plan is missing some items required by 24 V.S.A. § 4348a(a)(5).

The five relevant maps in appendix A are used to show some of the items required by statute, as provided above. Other items are not shown and need to be shown: Also, some items are incorrectly identified.

- Central Vermont Energy and Communication Map. The gas turbine plant in Berlin, the larger solar photovoltaic plants (perhaps those 500 kW or more), and the wind plants are not shown.
- Central Vermont Water Supply & Wastewater Systems
- Central Vermont Emergency Management. Health centers (e.g. Plainfield) and urgent care facilities probably should be shown in addition to hospitals..
- Central Vermont Educational Facilities. The map incorrectly identifies Roxbury's school district.

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It incorrectly identifies Northfield and Williamstown as belonging to different school districts. Goddard College no longer exists. It is not clear whether the property's present use still qualifies for it to be shown as a college / post secondary school.

- Central Vermont Public Recreational Resources. See comment 15.C.

State office buildings are not shown on any map. Neither are libraries.

Comment 28.B. The utility and facility element fails to identify future needs of any of the systems or facilities and fails to make recommendations. This lack is glaring because of the population growth expected from the housing targets.

Comment 28.C. Table 32: wastewater treatment facilities (p. 181) lost a lot with the removal of table 1 (page 5-6) of the readopted report. That table includes the additional columns of sludge treatment and sludge disposal location. The missing information is essential in order to provide a more complete description of the facilities.

Comment 28.D. The element has lost a lot with the removal of table 2 on larger subsurface disposal systems from the 2016 plan (page 5-10)

Comment 28.E. All goals, policies, and strategies of the utility and facility element are the same as in the 2016 edition of the plan. They should be updated.

29. A program for the implementation of the regional plan's objectives, including a recommended investment strategy for regional facilities and services based on a capacity study of the elements in this section. 24 V.S.A. § 4348a(a)(7).

Comment 29.A. The checklist states that this is covered in chapter 8, implementation plan (pages 286 through 289). It turns out that chapter 8 (except for the first two paragraphs and four of the Actions/Strategies) is the same as appendix A.6 of the 2016 plan. Appendix A.6 and chapter 8 list the same progress measures. I find no evaluation in the draft plan of the progress made since 2016. Thus it is not clear whether anything has been accomplished since the 2016 plan.

Comment 29.B. I find no capacity study and no investment strategy in either pages 286 through 289 or anywhere else in the draft plan.

Comment 29.C. The draft plan contains some 500 goals, policies, and strategies in chapters 1 through 7. The implementation plan (chapter 8) has only 14 items in its table of actions and strategies. The table does not show how its actions and strategies relate to the goals, policies, and strategies. So it is not clear which of the hundreds of goals, policies, and strategies will be implemented and which others will be left to languish.

Comment 29.D. It seems that the draft plan fails to conform with 24 V.S.A. § 4348a(a)(7).

30. A statement indicating how the regional plan relates to development trends, needs, and plans and regional plans for adjacent municipalities and regions. 24 V.S.A. § 4348a(a).

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Not evaluated for these comments.

31. 24 V.S.A. § 4302(f)(2) defines “compatibility” as follows:

(2) As used in this chapter, for one plan to be “compatible with” another, the plan in question, as implemented, will not significantly reduce the desired effect of the implementation of the other plan. If a plan, as implemented, will significantly reduce the desired effect of the other plan, the plan may be considered compatible if it includes the following:

(A) a statement that identifies the ways that it will significantly reduce the desired effect of the other plan;

(B) an explanation of why any incompatible portion of the plan in question is essential to the desired effect of the plan as a whole;

(C) an explanation of why, with respect to any incompatible portion of the plan in question, there is no reasonable alternative way to achieve the desired effect of the plan; and

(D) an explanation of how any incompatible portion of the plan in question has been structured to mitigate its detrimental effects on the implementation of the other plan.

Not evaluated for these comments.

32. A housing element that identifies the regional and community-level need for housing that will result in an adequate supply of building code and energy code compliant homes where most households spend not more than 30 percent of their income on housing and not more than 15 percent on transportation. To establish housing needs, the Department of Housing and Community Development shall publish statewide and regional housing targets or ranges as part of the Statewide Housing Needs Assessment. The regional planning commission shall consult the Statewide Housing Needs Assessment; current and expected demographic data; the current location, quality, types, and cost of housing; other local studies related to housing needs; and data gathered pursuant to subsection 4382(c) of this title. If no such data has been gathered, the regional planning commission shall gather it. The regional planning commission’s assessment shall estimate the total needed housing investments in terms of price, quality, unit size or type, and zoning district as applicable and shall disaggregate regional housing targets or ranges by municipality. The housing element shall include a set of recommended actions to satisfy the established needs. 24 V.S.A. § 4348a(a)(9).

Comment 32.A. Figure 19 of the draft report shows the distribution of housing units by municipality. Adding a table showing the number of each type of unit in each municipality will be useful.

Comment 32.B Where is the breakout on the needed supply? The draft plan appears to provide only some of the information to estimate the total needed housing investments in terms of price, quality, unit size or type, and zoning district. It appears that the draft plan does not fully comply

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with the housing element.

Comment 32.C. The draft plan shows a total housing target for 2030 of 2540 new units and a target of 8045 new units by 2050. Linearly interpolating between 2030 and 2050 means 275 new units per year or 1101 units between 2030 and 2034. That means 3641 new units during the validity of the regional plan, the eight years 2026 through 2034. It seems that the plan should be built around achieving that target.

Comment 32.D. The draft report fails to provide statistics on existing housing stock and existing demographics (household sizes, incomes). Without this information, one cannot determine the validity of the charts on pages 259 through 261.

Comment 32.E. The draft plan then fails to take the required next step of going from the charts to an estimate of the total needed housing investments in terms of price, quality, unit size or type, and zoning district as applicable and shall disaggregate regional housing targets or ranges by municipality. The investment estimate should be complete, including everything needed to go from current conditions on the parcels to having the new units available and move-in ready with all utilities available, whether on the parcel or off the parcel.

Comment 32.F. The 2016 plan's equivalent to table 38 appears to have only the three towns in Orange County. Including only the three towns in Table 38 (p. 237) seems more appropriate than proportioning based on the entire county. Orange, Williamstown, and Washington are demographically quite different from Orange County as a whole.

Comment 32.G. What is a householder? (p. 237 and following) At first reading, I think a householder is a resident. On looking more closely at the numbers, it appears that the term "householder" means what other jargon calls "heads of households". This should be clarified in the draft.

Comment 32.H. Why does table 40, the Projected Number of Vermont Households by Age of Householder not extend to 2034, the end of the planning period?

Comment 32.I. Why does table 48 put 100% of the 2030 housing target into the four high-density future land use categories, which are listed as having only 60% of the target? Conversely, where does a housing target of 4233 ($2540 / 0.6$) come from?

33. An economic development element that describes present economic conditions and the location, type, and scale of desired economic development, and identifies policies, projects, and programs necessary to foster economic growth. 24 V.S.A. § 4348a(a)(10).

Comment 33.A. Page 270. (Education). It seems that the closure of the New England Culinary Institute and Goddard College should be addressed.

Comment 33.B. Page 270. (Education) And the conversion of the Vermont College of Fine Arts to the Greenway Institute should be addressed.

Comment 33.C. Page 273. (Challenges) Omitting the July 2024 flood is a slap in the face to Plainfield and to the other communities flooded then.

34. A flood resilience element that:

- identifies flood hazard and fluvial erosion hazard areas, based on river corridor maps provided by the Secretary of Natural Resources pursuant to 10 V.S.A. § 1428(a) or maps recommended by the Secretary, and designates those areas to be protected, including floodplains, river corridors, land adjacent to streams, wetlands, and upland forests, to reduce the risk of flood damage to infrastructure and improved property; and
- recommends policies and strategies to protect the areas identified and designated under this subdivision (A) and to mitigate risks to public safety, critical infrastructure, historic structures, and public investments.

A flood resilience element may reference an existing regional hazard mitigation plan approved under 44 C.F.R. § 201.6. See 24 V.S.A. § 4348a(a)(11).

Comment 34.A. It appears that the draft plan is not consistent with 24 V.S.A. § 4348a(a)(11). I do not find a specific flood resilience element. Rather, the narrative in the checklist (p. 28) lists four locations in the draft plan that relate to flood resilience. That list is not complete. Flood resilience is so scattered within the draft plan, that it is hard to determine whether the plan has a comprehensive flood resilience element or not. There is some discussion on pages not in the checklist that relate reducing the risk of flood damage. The flood resilience element needs to be more cohesive, more complete, and easier to find and comprehend as a whole.

Comment 34.B. The draft plan identifies the flood hazard areas and fluvial erosion areas on Natural Resources Maps 2 and 3. The draft plan does not appear to designate which of those areas are to be protected.

Section 5 – Future Land Use Element

The draft regional plan must include a future land use element. 24 V.S.A. § 4348a(a)(12). As the Board reviews the future land use map and land use categories, the Board will be relying on the land use categories listed in 24 V.S.A. § 4348a(a)(12) and on the Mapping Process and Standards v 3.0, which summarizes the methodology and planning considerations followed by the RPCs in developing the future land use map.

35. A future land use element, based upon the elements in this section, that sets forth the present and prospective location, amount, intensity, and character of such land uses in relation to the provision of necessary community facilities and services and that consists of a map delineating future land use area boundaries for the land uses in subdivisions (A)–(J) of this subdivision (12) as appropriate and any other special land use category the regional planning commission deems necessary; descriptions of intended future land uses; and policies intended to support the implementation of the future land use element using the land use categories as defined by 24

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V.S.A. § 4348a(a)(12).

Not evaluated for these comments.

36. Downtown Center - The traditional and historic central business and civic centers within planned growth areas, village areas, or may stand alone. 24 V.S.A § 4348a(12)(A).

Share any comments you have on proposed downtown centers.

Not evaluated for these comments.

37. Village Center - The traditional and historic central business and civic centers within planned growth areas, village areas, or may stand alone. Village centers are not required to have public water, wastewater, zoning or subdivision bylaws. 24 V.S.A § 4348a(12)(A).

Share any comments you have on proposed village centers.

Not evaluated for these comments.

38. Planned Growth Area - These areas include the high-density existing settlement and future growth areas with high concentrations of population, housing, and employment in each region and town, as appropriate. They include a mix of historic and nonhistoric commercial, residential, and civic or cultural sites with active streetscapes, supported by land development regulations; public water or wastewater, or both; and multimodal transportation systems. 24 V.S.A § 4348a(12)(B).

Share any comments you have on proposed planned growth areas.

The response to this question is based on Montpelier's proposed planned growth area and is contained in no. 49. Comments made in no. 49 might also apply to other planned growth areas.

39. Village Area - These areas include the traditional settlement area or a proposed new settlement area, typically composed of a cohesive mix of residential, civic, religious, commercial, and mixed-use buildings, arranged along a main street and intersecting streets that are within walking distance for residents who live within and surrounding the core. These areas include existing village center designations and similar areas statewide, but this area is larger than the village center designation. 24 V.S.A § 4348a(12)(C).

Share any comments you have on proposed village areas.

Not evaluated for these comments.

40. Transition or infill Area - These areas include areas of existing or planned commercial, office, mixed-use development, or residential uses either adjacent to a planned growth or village area or a

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new stand-alone transition or infill area and served by, or planned for, public water or wastewater, or both. The intent of this land use category is to transform these areas into higher-density, mixed-use settlements, or residential neighborhoods through infill and redevelopment or new development. New commercial linear strip development is not allowed as to prevent it negatively impacting the economic vitality of commercial areas in the adjacent or nearby planned growth or village area. This area could also include adjacent greenfields safer from flooding and planned for future growth. 24 V.S.A § 4348a(12)(D).

Share any comments you have on proposed transition or infill areas.

The response to this question is based on converting part of Montpelier's proposed planned growth area into transition or infill. The response is contained in no. 49. Comments made in no. 49 might also apply to altering parts of other planned growth areas into transition or infill areas.

41. Resource-based Recreation Area - These areas include large-scale resource-based recreational facilities, often concentrated around ski resorts, lakeshores, or concentrated trail networks, that may provide infrastructure, jobs, or housing to support recreational activities. 24 V.S.A § 4348a(12)(E).

Share any comments you have on proposed resource-based recreation areas.

Not evaluated for these comments.

42. Enterprise Area - These areas include locations of high economic activity and employment that are not adjacent to planned growth areas. These include industrial parks, areas of natural resource extraction, or other commercial uses that involve larger land areas. Enterprise areas typically have ready access to water supply, sewage disposal, electricity, and freight transportation networks. 24 V.S.A § 4348a(12)(F).

Share any comments you have on proposed enterprise areas.

Not evaluated for these comments.

43. Hamlets - Small historic clusters of homes and may include a school, place of worship, store, or other public buildings not planned for significant growth; no public water supply or wastewater systems; and mostly focused along one or two roads. These may be depicted as points on the future land use map. 24 V.S.A. § 4348a(12)(G).

Share any comments you have on proposed hamlets.

Not evaluated for these comments.

44. Rural; General - These areas include areas that promote the preservation of Vermont's

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traditional working landscape and natural area features. They allow for low-density residential and some limited commercial development that is compatible with productive lands and natural areas. This may also include an area that a municipality is planning to make more rural than it is currently. 24 V.S.A § 4348a(12)(H).

Share any comments you have on proposed rural - general elements.

Not evaluated for these comments.

45. Rural; Agriculture and Forestry - These areas include blocks of forest or farmland that sustain resource industries, provide critical wildlife habitat and movement, outdoor recreation, flood storage, aquifer recharge, and scenic beauty, and contribute to economic well-being and quality of life. Development in these areas should be carefully managed to promote the working landscape and rural economy, and address regional goals, while protecting the agricultural and forest resource value. 24 V.S.A § 4348a(12)(I).

Share any comments you have on proposed rural - agriculture and forestry elements.

Not evaluated for these comments.

46. Rural; Conservation - These are areas of significant natural resources, identified by regional planning commissions or municipalities based upon existing Agency of Natural Resources mapping that require special consideration for aquifer protection; for wetland protection; for the maintenance of forest blocks, wildlife habitat, and habitat connectors; or for other conservation purposes. The mapping of these areas and accompanying policies are intended to help meet requirements of 10 V.S.A. chapter 89. Any portion of this area that is approved by the LURB as having Tier 3 area status shall be identified on the future land use map as an overlay upon approval. 24 V.S.A § 4348a(12)(J).

Share any comments you have on proposed rural - conservation elements.

Not evaluated for these comments.

47. Do the Rural Conservation areas identified on the plan's FLU map help meet the requirements of the Community Resilience and Biodiversity Act (10 V.S.A. Chapter 89) (see 24 V.S.A. 4348a(12)(J))?

Comment 47.A. The draft plan lacks sufficient information to evaluate how the identified areas help to meet the requirements of 10 V.S.A. chapter 89. It would help greatly for the regional plan to have a table providing the total land areas and the areas of each future land use category. The table would provide regional totals and amounts for each municipality in the region. One could then use that information to determine whether the region might be close to providing a

reasonable share to the 30x30 goal and the 50x50 goal. One could also use the information to see whether the environmental justice focus populations might be disproportionately affected with environmental burdens or benefits.

Comment 47.B. The table of land areas in Appendix D does not match the areas obtained by clicking on parcels on the future land use map.

Section 6 – Part E – New Tier 1B Status Requests

With Tier 1B Status Requests, the Board's review has two subparts: first, whether each municipality with proposed Tier 1B status areas meets the requirements of 10 V.S.A. § 6033(c)(1)-(6); and, second, whether the underlying proposed Tier 1B area/s as designated in the Future Land Use Map meets the requirements for a "downtown or village centers", "planned growth areas", and "village areas" as described in 24 V.S.A. § 4348a(12)(A)-(C).

48. Subpart 1 - Requirements of 10 V.S.A 6033(c)

Instructions: to the extent that you have comments on whether the municipality/ies with proposed Tier 1B status areas meet the requirements of 10 V.S.A. § 6033(c), list the municipality, and if it does not meet the requirements of 10 V.S.A. 6033(c), any additional comments.

The subsections of 10 V.S.A. § 6033(c) are as follows:

- (1) The municipality has requested to have the area mapped for Tier 1B.
- (2) The municipality has a duly adopted and approved plan and a planning process that is confirmed in accordance with 24 V.S.A. § 4350.
- (3) The municipality has adopted permanent zoning and subdivision bylaws in accordance with 24 V.S.A. §§ 4414, 4418, and 4442.
- (4) The area excludes identified flood hazard and fluvial erosion areas, except those areas containing preexisting development in areas suitable for infill development as defined in Section 29-201 of the Vermont Flood Hazard Area and River Corridor Rule unless the municipality has adopted flood hazard and river corridor bylaws applicable to the entire municipality that are consistent with

the standards established pursuant to subsection 755(b) of this title (flood hazard) and subsection 1428(b) of this title (river corridor).

(5) The municipality has water supply, wastewater infrastructure, or soils that can accommodate a community system for compact housing development in the area proposed for Tier 1B.

(6) The municipality has municipal staff, municipal officials, or contracted capacity adequate to support development review and zoning administration in the Tier 1B area.

Comment 48.A. (1) This comment is specifically for Montpelier, although it does apply to all municipalities. Has the municipality requested to have the area mapped for tier 1B? The CVRPC is not providing copies of the actual requests from municipalities for tier 1B status. Instead, the

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CVRPC is providing a sheet for each municipality. The sheet covering Montpelier checks the box that a municipal resolution requesting tier 1B status for downtown center and planned growth area is "anticipated for final" Thus, it appears that no municipality has yet requested to apply for tier 1B status.

Comment 48.B. (4) are flood hazard areas excluded? This comment is specifically for Montpelier, although it does apply to all municipalities. It relates to the box for "Excludes identified flood hazard and fluvial erosion areas, except those areas containing preexisting development in areas suitable for infill development." It seems inappropriate to lump the exclusion and exception together. It would be more accurate to split this row into two: "Excludes identified flood hazard and fluvial erosion areas" and "Contains identified flood hazard and fluvial erosion areas containing preexisting development in areas suitable for infill development". This would be accompanied by maps showing where the exclusions are.

Comment 48.C. This comment applies specifically to Montpelier, although it can apply to the other municipalities. (5) does Montpelier have water, sewer, or soils in all of the tier 1B area? The box for "Yes has been checked with notes "Water Supply: Montpelier Wastewater System"; Wastewater Infrastructure: Montpelier Wastewater System"; and "Soils Class I, II, and/or III on-site septic soils generally available in the areas identified as tier 1 eligible that are not served by municipal water or wastewater infrastructure." Soils are irrelevant except in village centers and village areas. Downtown centers are required to have both public water and public wastewater, because village centers (in the same subdivision of statute) are not required to have both. The description for planned growth areas does not allow for reliance on on-site systems. So the note on soils should be removed.

49. Subpart 2 - Underlying Future Land Use Map Designations

To the extent that you have comments on whether any FLU area as proposed on the Future Land Use Map and underlying a proposed Tier 1B area does not meet the requirements for a downtown or village center, planned growth area, or village area as described in 24 V.S.A. § 4348a(12)(A)-(C), list the municipality, description of the Tier 1B area, any underlying FLU map areas, and if it does not meet the requirements, any additional comments.

Comment 49.A. This comment refers to Montpelier's planned growth area shown on the draft FLU map. Portions of the planned growth area shown on the FLU map appear to be incorrectly included. They might be more appropriately shown as transition or infill.

Montpelier's planned growth area was created for its 2025 Plan. That was before Act 152 (2026) simplified and shortened the process to amend future land use maps and to make Tier 1B status requests. Thus, the areas of overreach on the region's future land use map should be removed now. The areas can be amended in later through the simplified process when they actually meet the criteria" a definite plan for public water and wastewater and the appropriate documents to be a planned Complete Streets area.

A planned growth area includes "the high-density existing settlement and future growth areas" and

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is required to be "served by public water or wastewater infrastructure". (24 V.S.A. §4348a(12)(B)(ii))

A transition or infill area is required to be "served by, or planned for, public water or wastewater, or both". (24 V.S.A. §4348a(12)(D))

The areas that appear to be improperly included in the planned growth area lack both public water and public wastewater, so they cannot be said to be "served by public water or wastewater infrastructure". Rather they might meet the condition for designation as a transition or infill area of "planned for public water and wastewater". The VAPDA mapping conditions for what it means to be "planned for" are specific, so it is not clear if the areas in question even meet the definition of "planned for".

VAPDA's mapping process for a planned growth area has four steps.

Step 1 Let's assume that Montpelier meets the requirements of Step 1 (administrative requirements relating to the City plan and zoning and subdivision).

Step 2 of the VAPDA mapping process for a planned growth area is to include all existing downtown development districts and growth centers.

Step 3 is to add the 1/2 mile interim Act 250 exemption.

Step 4 is to review whether the areas mapped in steps 2 and 3 should be expanded or reduced using six criteria (lettered a through f). The proposed planned growth area contains all the legacy growth center (1054 acres) plus additional land (totaling 1995 acres).

Criterion a. Is the area planned for higher density residential and mixed-use development? The municipal future land use map shows the area in question to be designated as planned growth area. The term "higher density" is never defined: not in chapters 151, 117, 76A or 139. The closest is that an existing settlement "has significantly higher densities than densities that occur outside the center" (10 V.S.A. §6001(16)(A)(ii)). Chapter 117 has a similar statement for downtown and growth center zoning districts (24 V.S.A. §4414(1)(A)(i)). Chapters 76A and 139 have nothing relevant. The expansions are shown on Montpelier's Future Land Use map as planned growth area.

Portions of the planned growth area are presently zoned as rural, meaning they are not planned for higher density.

Criterion b. Is the area served by public water or wastewater systems? Portions of the proposed planned growth area are served by neither public water nor public wastewater. Act 181 (2024) made all areas served by public water and wastewater into higher density areas. Thus they can be added to the planned growth areas. Areas not served by public water and wastewater should not have been added to the planned growth area. These should be removed from the proposed planned growth area. Please note that legacy growth centers are also subject to reduction,

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because of their initial inclusion in Step 2.

Criterion c. Is the area served by existing or planned Complete Streets Infrastructure? The VAPDA mapping process states "To be considered planned, it must be included in a capital budget, or other municipally adopted infrastructure plan that includes information on financing the planned infrastructure, such as an official map, annual municipal budget, or capital improvement program." I have not found any of the required supporting documents for planned Complete Streets infrastructure.

Criterion d. Snap the boundary of the planned growth area to parcel lines where reasonable.

Criterion e. Exclude flood hazard and corridor areas. The areas suggested for removal in this comment are not within or near either flood hazard areas or river corridors. So this will not affect the areas to be removed.

Criterion f. Verify the area is large enough to provide for a substantial portion of new housing. This can be done generally be a visual comparison of parcel boundaries and sizes in the remaining portions of the planned growth area to existing parcel boundaries and sizes in the legacy growth center. Montpelier's 2030 low housing target is 529 units. Montpelier's 2050 low housing target is 1676 housing units. The high housing targets were based on an unsustainable, short term surge during the early COVID years. That surge crested and is ebbing, so the low range targets are appropriate. The year 2030 will be the middle of the planning period of this regional plan. The regional plan will expire 4 years into the 2030 to 2050 period, or 1/5 of the 20 years. The incremental 2030 to 2050 target is $1676 - 529 = 1147$. One fifth of that increment is 229 units. So the target when the plan expires is $529 + 229 = 758$ units. The regional plan calls for 40% to be built outside the downtown center and planned growth area. Then 60% of the 2034 target would be built inside the downtown center and the planned growth area. That means that the target of units to be built in those two land use categories is $0.6 \times 758 = 455$ units. A visual inspection makes it appear that there is ample area in the remaining planned growth area to provide the 2034 target.

It is likely that the areas removed from the planned growth area would be designated as transition or infill. The areas to be removed lack both public water and wastewater. Transition or infill areas are not required to have either public water or wastewater.

Figure 1 shows the legacy growth area, the planned growth area, water lines, the sewer service area, and parcels. Parcels that do not appear to be eligible are bordered in blue and labelled A through E. The text on the figure explains each of the criteria that the parcel has not met.

Submit this form by email to the Land Use Review Board at act250.Board@vermont.gov.

All these parcels likely are eligible for transition or infill status.

From: [Alan Goldman](#)
To: [Michael Miller](#); [Alyssa Schuren](#); [BL-Heney Realtors](#); [Sandra Vitzthum](#); [Joslyn Wilschek](#); [Christian Meyer](#); [voight@cvregion.com](#); [Act250 - Board](#)
Cc: [Marc Gwinn](#); [Jim Sheridan](#); [Ben Doyle](#); [Alan Goldman](#); [salfano@montpelier-vt.org](#); [Pelin Kohn](#)
Subject: Re: FLU map comments to LURB From Alan Goldman
Date: Friday, August 7, 2026 4:19:39 PM
Attachments: [PC recommendations_080526 a.pdf](#)
[Montpelier FLU map comments final a.pdf](#)

You don't often get email from goldiefun@msn.com. [Learn why this is important](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Janet, Christian and Brian,

I hope this email finds you well.

I am reaching out before today's deadline to respectfully highlight an issue with the FLU map submitted by the City of Montpelier concerning my parcel, known as Crestview or 1014 Terrace Street. Upon reviewing Mike's submission, you'll notice that item number 9 does not accurately reflect the narrative for my property—this appears to be an oversight and should be corrected as indicated above. These are the maps we used for our JO and come from the City's GIS program. My email below to the group provides further context regarding this mistake/matter.

Thank you for your attention to resolving this error.

Kind regards,
Alan Goldman

Dear Mike,

Thank you for taking the time to review this, especially on your day off. I've attached the maps that Joslyn and I used for our JO, which clearly illustrate the corrections that should have been made regarding the "boney pasture and all my buildings." These maps include my residence, the 10,000-square-foot barn, carriage house and all infrastructure—sewer and water—already available on site. However, the map you shared does not accurately represent these features. Specifically, it omits the boney pasture, which is essential for both connecting to Terrace Street and supporting future growth, my home, my carriage house, and my antique reverse truss 10,000 sf barn that I have restored accurately for years. All of these buildings have sewer and water and can be redivided back into multifamily buildings that we so badly need. I have spoken of them many times on record, and with Ben about my excitement of re-using the magnificent barn.

I want to emphasize that I have not made any changes to our original submissions. **I have never ever said or agreed to leave out the improvements on my parcel.** That would be silly with 4000 sf residential space blessed with five points of entry, ready to be subdivided back into mutli family units and to not use a historically correctly restored 10,000 sf barn for adaptive use. It appears the housing committee, acting as a three-person team, privately reviewed the city and my parcel and presented a plan that colored large parcels with a wash from Gallison Hiil to Town Hill and my land on Terrace street. Their idea was to encourage as much growth in the city as reasonably possible, which I agree with but have no say.

You may recall you believing that the line on Crestview marked the lot boundary; however, I have repeatedly clarified that it actually delineates the limit of our previous Act 250-approved disturbance area near the wetland—not the lot line.

The boney pasture with all my buildings, as discussed, remains a critical element that needs to be properly reflected on the map. I hope we can address these omissions in number 9 and ensure the map aligns with the agreed boundaries and the narrative sent to the CVRPC. Please look at the maps we created from the City's GIS that accurately shows what the PC and the Housing Committee agreed to and what Attorney Wilschek sent to Susan Baird.

Thank you again for your attention to this matter.

Kind regards,
Alan Goldman

From: Michael Miller <MMiller@montpelier-vt.org>

Sent: Friday, August 7, 2026 11:20 AM

To: Alan Goldman <GoldieFun@msn.com>; Alyssa Schuren <alyssaschuren@gmail.com>; BL-Heney Realtors <tim@heneyrealtors.com>; Sandra Vitzthum <svitzthum@proton.me>; Joslyn Wilschek <joslyn@ilovt.net>

Cc: Marc Gwinn <marcgwinn05602@gmail.com>; Jim Sheridan <jsheridan@montpelier-vt.org>

Subject: Re: FLU map comments to LURB

Hi Alan, What we are currently debating with the LURB is the preliminary map. There will be continued opportunities to amend this map over the next few months. There is no urgency to meet before Monday. Please let me know when you would like to meet (preferably Tuesday). We can come to a common understanding of what you want in the planned growth area. Then we can work with various folks to work that into the next map.

The span issue is not a thing. The assessor may "merge for tax purposes" but that does not merge your parcels. Unless you have filed deeds to merge them, you retain separate parcels which is better for you from an Act 250 purposes. If you go online to the assessor page you can see the tax maps or we can show them to you when we meet.

I really want to emphasis this. I am not working today. I am trying to be on vacation today. I will talk to you next week.

Mike

Mike Miller, AICP CFM
Planning Director
City of Montpelier
(802) 262-6269

From: Alan Goldman <GoldieFun@msn.com>
Sent: Friday, August 7, 2026 11:09 AM
To: Michael Miller <MMiller@montpelier-vt.org>; Alyssa Schuren <alyssaschuren@gmail.com>; BL-Heney Realtors <tim@heneyrealtors.com>; Sandra Vitzthum <svitzthum@proton.me>; Alan Goldman <goldiefun@msn.com>; Joslyn Wilschek <joslyn@ilovt.net>
Cc: Marc Gwinn <marcgwinn05602@gmail.com>; Jim Sheridan <jsheridan@montpelier-vt.org>
Subject: Re: FLU map comments to LURB

Hi Mike,

Thank you for your prompt response. I wanted to clarify that the boney pasture is missing from the map, which makes it inaccurate. While the span number issue is significant, the omission of the boney pasture is a pressing concern, as we had previously agreed it should be included. I have reached out to CVRPC several times but have not received any response. I believed we had resolved the issue regarding my home and barns, especially since my home is only three feet from Terrace Street and is the closest residence to it. Despite this, my property is still not shown in the growth center map as currently presented. As Sandy suggested, it is important that this correction be made by Monday.

I would greatly appreciate your immediate assistance with this matter.

Kind regards,
Alan

From: Michael Miller <MMiller@montpelier-vt.org>
Sent: Friday, August 7, 2026 10:00 AM
To: Alan Goldman <GoldieFun@msn.com>; Alyssa Schuren <alyssaschuren@gmail.com>; BL-Heney

Realtors <tim@heneyrealtors.com>; Sandra Vitzthum <svitzthum@proton.me>

Cc: Marc Gwinn <marcgwinn05602@gmail.com>; Jim Sheridan <jsheridan@montpelier-vt.org>

Subject: Re: FLU map comments to LURB

Hi Alan,

We submitted our letter already but we will have other opportunities to request amendments when we get the document back. Did you get to sit down with CVRPC? I know they were trying to schedule a time with you. If you gave a description to them they may be working on adding it from their end.

The boney pasture of #9 is based on the description of the area that was included in the City Plan. You had wanted that area amended into the city plan's future land use map and you and I (and Nick) sat down to draw an outline of what (at the time) you described as the boney pasture. You agreed to that boundary at the time. You may be considering a larger area today, which is perfectly fine, but I chose this area because this was what was agreed to in the city plan map. We did not include the barn and house because that was not specifically requested (just the boney pasture was requested).

We still will have additional opportunities to make changes before the CVRPC adopts their plan this fall. If you want to sit down next week to look at an arial photo with Nick and me we can get a new boundary to consider adding once the preliminary maps are returned to CVRPC for final inclusion in the plan. I'm trying not to work on Fridays right now (including today) but let me know what might work for you next week. Tuesday and Thursday are best for me.

Thank you for you input and I hope we can get on the same page to make sure we can properly support your projects.

Mike

Mike Miller, AICP CFM
Planning Director
City of Montpelier
(802) 262-6269

From: Alan Goldman <GoldieFun@msn.com>

Sent: Thursday, August 6, 2026 9:19 PM

To: Michael Miller <mmiller@montpelier-vt.org>; Alyssa Schuren <alyssaschuren@gmail.com>; BL-Heney Realtors <tim@heneyrealtors.com>; Sandra Vitzthum <svitzthum@proton.me>

Cc: Alan Goldman <goldiefun@msn.com>; Marc Gwinn <marcgwinn05602@gmail.com>; Jim Sheridan <jsheridan@montpelier-vt.org>

Subject: Fw: FLU map comments to LURB

Hello everyone,

I noticed that on the map, Number 9 does not include my home, the barns, carriage house, or the 18 boney acres, which already have access to sewer and water. Could we please discuss how to update the map to accurately reflect what the PC agreed to, and what Mike's letter describes?

Thank you for your attention to this matter.

Wishing you all a wonderful summer ahead!
Alan

From: Alan Goldman <GoldieFun@msn.com>
Sent: Thursday, August 6, 2026 9:00 PM
To: Michael Miller <mmiller@montpelier-vt.org>
Cc: Alan Goldman <GoldieFun@msn.com>; Douglas Zorzi <doug.zorzi@gmail.com>
Subject: Fw: FLU map comments to LURB

Hi Mike,

Thank you for all your efforts and continued support. I wanted to bring to your attention that the map for Crestview/Joslyn Farm currently omits the boney pasture, which the Planning Commission agreed to include during the recent meeting. It's important that this section be added promptly to ensure the map accurately reflects the commission's decisions. Could you please share your thoughts on how best to address this amendment?

Wishing you a wonderful summer ahead!
Alan

From: Michael Miller <MMiller@montpelier-vt.org>
Sent: Thursday, August 6, 2026 3:52 PM
To: Alan Goldman <goldiefun@msn.com>; Doug Zorzi <doug.zorzi@gmail.com>
Subject: FLU map comments to LURB

Hi Alan and Doug, Apologies I have not been able to connect on your zoning map questions. I hope some of them were answered at the planning commission meeting last week.

I'm sending you a copy of our memo that was just sent to the LURB because the suggested changes directly impact properties you own. Please find the memo and associated map to see what the planning commission ultimately decided to submit. I'm hoping these are generally what you would hope for. We will have other opportunities to amend them in the future as they move from preliminary to final maps to be submitted this fall.

Congratulations on your JO. We received a copy as a statutory party. I think this would be a good result for you. We look forward to seeing the various projects advance.

Have a great rest of your summer.

Mike

Mike Miller, AICP CFM
Planning Director
City of Montpelier
(802) 262-6269

Gott, Catherine

From: Sandra Vitzthum <svitzthum@proton.me>
Sent: Tuesday, July 28, 2026 1:00 PM
To: Act250 - Board
Subject: flood hazard areas in Tier 1 mapping
Attachments: floodplain houses.docx

Categories: Catherine

You don't often get email from svitzthum@proton.me. [Learn why this is important](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Chair Hurley,

I am a longtime architect who also does urban planning based in Montpelier. I have been following the evolution of CVRPC's map and am in touch with other regional planning commissions.

I am truly concerned about both the mapping of flood hazards and the methodology for classifying development in those hazard areas. While the VAPDA methodology is open to interpretation about "infill" in growth areas (between designated downtowns and rural), it seems the RPC consensus is to exclude those parcels from exemption. I was glad that Christian Meyer proposed an intermediate zone, "Resilience zone," but I fear that does not go far enough.

Before I explain why I feel that way, I want to ask about procedure. I have checked with ACCD, and it seems they have no voice in this. It sounds like LURB has exclusive jurisdiction, and the only way I as a citizen can register concerns is through the input process? I am deeply concerned that as the mapping continues, your public process will be too late to make a high-level comment that will be useful.

So is there a way that, as a single person, I can reach you and your board earlier?

Here is my concern: As you know, something like 3% of Vermont is settled area with infrastructure that is located in wet areas with flood hazard. Yet this land is key for redevelopment and even new development: it has ready access to sewer, and it's pedestrian friendly. There are areas in Montpelier, Barre, Plainfield, Randolph, Waterbury... pretty much every town and village I can think of. These areas can be exempt if they are in designated downtowns, but they are likely to be excluded immediately outside that boundary.

Beyond that, exclusion seems to be extending out well beyond actual floodways or corridors (Zone AE for FEMA) into flood plains. In many areas of the United States, floodplain construction is permitted, even encouraged, as long as it complies with FEMA standards (see the attached sheet).

This compares the Housing Exemptions Map of ACCD's VT Planning Atlas with FEMA maps at Hudson Ave in Plainfield. The difference affects many parcels.



I would like to suggest this approach for municipalities with flood hazard regulations and/or projects getting an ANR permit:

- 1) **Designated downtowns/villages:** Within the FEMA AE zone, focus on redevelopment of existing buildings. New construction should have detailed review if it's permitted at all.
- 2) **Tier 1 exemption areas, meaning existing or eminent sewer service and pedestrian access:** Within the FEMA AE zone, snap to property lines in favor of exemption. During project review, new development can be prohibited in the FEMA AE zone itself by local or state regulation. (No need to trigger Act 250.)
- 3) **½ mile buffers:** Within the FEMA AE zone, same as #2.
- 4) Tier 1 development should be allowed anywhere outside the AE zone, including the 100-year flood plain (aqua color code on the FEMA map), as long as it follows FEMA standards.

I understand that the overall Tier 1 process is supposed to be local up, but in practice I have seen the State and LURB restrict towns as they try to get designations like Neighborhood Development Areas. It seems critical to get everyone on the same page early.

Thank you!
Sandra

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land (802) 223-1806
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Closing Comment and Consolidated Synthesis

Stephen Whitaker

Preapplication RPC03-0001 — Central Vermont Regional Planning Commission (CVRPC)

Draft Regional Plan and Regional Future Land Use Map

To: Vermont Land Use Review Board — Act250.Board@vermont.gov

From: Stephen Whitaker, Montpelier, Vermont

Date: August 7, 2026

Preapplication deemed complete: July 8, 2026 · Comment period closes: today, August 7, 2026

This closes my written comments under this docket — eight filings since July 24, running to forty-two numbered points. I don't want to send the Board a forty-third point, or a table of contents. What follows is the idea that was underneath all of them, said plainly, without asking anyone to go back and match it to a part number or a section citation.

The idea underneath all of it

Everything in this record traces back to one dependency chain, and the chain only runs in one direction.

Start at the ground. A site's contamination has to actually be delineated — mapped, sampled, understood — before a municipal plan can responsibly describe what happens there. A plan compliant with Chapter 117 is supposed to say where development goes and at what density; it can't say that honestly for ground whose contamination footprint isn't yet known. That's not a formality. It's the difference between a plan describing a place and a plan describing a hope about a place.

Once that's settled, the plan has to actually lay out — even conceptually — where roads, water, and sewer would go before anyone can build a real infrastructure plan around it. You can't cost, finance, and schedule a pipe whose route hasn't been decided. A concept-level roads-and-utilities picture is an input a capital budget needs; it isn't something a capital budget can substitute for or invent on its own.

A town's capital budget is usually thought of as a bookkeeping document — a schedule of what gets paid for and when. It's actually something more useful than that. When a road, a sewer main, or a water line shows up on a six-year capital program with a cost and a priority attached, that's the town saying, in a form anyone can check: this is real, this is funded, this is coming. When something doesn't show up, that's just as informative — it tells you the town hasn't gotten there yet, whatever the plan's narrative language might say. That visibility is what makes a capital program a public-participation tool, not just a finance document. A resident doesn't need to master planning law to look at a capital schedule and see whether their street's deferred maintenance is funded in year two or isn't funded at all. That's a much fairer way to find out what a town actually intends than parsing a growth-area map or a plan's aspirational language for the same answer.

There's a second layer to this, and it's easy to miss. A capital schedule isn't a one-time snapshot — projects slip, financing falls through, priorities shift, almost as a matter of course. That's usually treated as a bureaucratic inconvenience. It's actually a second, ongoing participation opportunity, distinct from the first. When a scheduled project stalls, a town has a real choice: let that year's allocated money sit idle, or move a different, ready project up to use it. A visible schedule — the town's top handful of projects, what's funded, what's stalled, and why — turns that choice into something the public can see and weigh in on, rather than something that happens quietly inside a public works department. It functions less like a ledger than a dashboard: what's moving, what's stuck, and what a stall opens up for everything behind it in line.

That's four links — delineation, plan, infrastructure layout, capital budget — and every one has to hold before the next one means anything. A designation that skips ahead of that chain isn't a shortcut. It's a designation resting on a step that hasn't happened yet.

For anyone who wants the citation trail rather than the plain version: this is criterion (ii)'s "served" question, criterion (v)'s adopted-plan requirement, and criterion (vii)'s capital-program requirement, read together rather than as three separate boxes to check.

None of that chain does anyone any good if it isn't visible parcel by parcel. The map itself needs to show, for each parcel, which of these links actually hold — not just a final classification, but why: this parcel has a delineated site, a plan

reference, a costed infrastructure line, and that one doesn't. Two parcels a few hundred feet apart can look identical on today's map even though one has completed every step above and the other hasn't started. Without that detail, a neighbor can't tell why their parcel was left out while the one next door made the cut, and nobody outside CVRPC can check the chain at all — they can only take the classification on faith. CVRPC already does this kind of layered, per-parcel attribute display elsewhere in its own mapping work, so showing the criteria basis parcel by parcel is a scope decision, not a technical limitation.

The last link is what makes this urgent rather than academic. A Planned Growth Area designation is, in practice, close to permanent — the regional plan isn't appealable, and PGA status opens the door to a Tier 1A process that removes Act 250 review, the one forum built to catch what a designation misses.

Undesignating a parcel later, after the fact, is far harder than designating it now was. Declining to designate now costs almost nothing by comparison — a parcel that isn't ready can be added next cycle once the chain above actually holds, and actually shows. That asymmetry is the whole argument in one sentence: when a decision is nearly impossible to undo, the burden belongs on showing readiness now, visibly, not on explaining later why it should have waited.

Why it matters beyond this parcel and this plan cycle

This same logic is what should govern how the region prioritizes the harder work still ahead — traffic and transportation mitigation, flood and disaster resilience, and hardening the region's emergency communications, including backup power for dispatch and closing the dead zones in cellular coverage. None of that gets prioritized well without the same capital-budget specificity behind it: knowing what's funded, what isn't, and in what order. I don't expect the telecommunications and dispatch-hardening piece to be resolved in this plan cycle — that's next year's work — but it belongs on the same track, for the same reason.

CVRPC isn't the only regional commission working through this framework, and this isn't the last plan that will come before the Board under it. Whatever standard of documentation gets expected here — that infrastructure has to be actually budgeted, not just intended, before it can justify where growth goes — is likely to be the standard other regions build toward as their own plans come up. That's worth getting right the first time it's tested.

On public participation, going forward

The written comment period closes today, but the record doesn't close with it — CVRPC's adoption process and the Board's later consistency review both remain open. I'd encourage the Board to treat the participation gaps in my earlier filings as something to keep working on through those next stages, not something this deadline closes out. And I'd encourage anyone who hasn't weighed in yet to do so before decisions get harder to revisit. A designation is easy to grant and hard to undo; a comment is the reverse.

Requested actions

- Require, region-wide, that the dependency chain actually hold before a Planned Growth Area designation is credited: site contamination delineated, a Chapter 117-compliant municipal plan resting on that delineation, a concept-level roads/water/sewer layout in that plan, and a capital budget costing and scheduling that layout.
- Require that the map display, per parcel, which links in that chain are satisfied and which aren't — not just a final classification — so residents can see why one parcel qualified and a neighboring one didn't, using the same layered attribute display CVRPC already uses elsewhere in its own mapping work.
- Treat capital-budget specificity — an actual line item, year, and cost, not a statement of intent — as the standard for crediting "planned" infrastructure toward a growth designation.
- Weigh the asymmetry directly: because a designation is functionally permanent and non-designation is easily cured next cycle, the burden belongs on demonstrating the chain is complete now, not on justifying a delay.
- Carry the participation-process concerns raised earlier in this docket forward into CVRPC's adoption process, rather than treating them as resolved by this cycle's comment period.
- Preserve this record for the Board's later consistency review, since the same documentation questions will still be live at adoption regardless of how CVRPC's own process unfolds between now and then.

Respectfully submitted,
Stephen Whitaker

Montpelier, Vermont

August 7th

CVRPC Comment Form

Comment 1: How do I go about modifying land use boundaries? I believe a portion of my land should be in the Village Area instead of the Rural Conservation Area.

Comment 2: The housing targets in this plan are ludicrous. The statistical method of dispersing the artificial target set by the state is completely unrealistic and will be proven unworkable in the future. The state should not be dictating housing needs for towns and cities, that should be up to local government. I don't know how you could squeeze 245 more homes into Barre Town. The state and the RPCs need to wake up to reality.

Comment 3:

Pg 255 Housing Units By Future Land Use Areas: "And replace homes in Hamlets and Working Lands". Sounds like you want to remove or discourage people from living on their land in rural areas. Sort of like the Federal Government want to buy up Northeast Kingdom Land and move the residents to villages (1930?). The plan should support people who live on their farms and work the land- not have them commute to work from villages or hamlets. That is the impression I get.

Pg 285 Strategies: #2 Oppose c) Policies that increase financial or regulatory barriers for small business.

In my opinion, this is exactly what the regional plan does. It allows the foundation for towns and state government to add additional costs and regulation all along the way including additional fees, permits or applications. There is nothing in the plan that addresses Act 250 reform that will help small and large businesses. Act 181 went so far as to require Act 250 review for structures around existing dwellings on Tier 3 properties. In Cabot, would have required an Act 250 permit to build a 100 sqft woodshed.

The word "Support" is used throughout the document. I feel it needs to go further and explain in specifics, what "Support" means. Lastly, Please provide the land percentage for each of the 11 categories on the town of Cabot Map. It would appear that about 10% of the land is Village or Rural General. Also please provide the percentage of Flood Areas for the town. It appears that the Village areas overlap with the flood areas reducing the amount of land available for housing.

CVRPC Stakeholder Input Portal

Comment	x	y
Parcel "Molly brook" is in land trust and current use	-72.2464	44.3817
Parcel lindstrom is in current use	-72.2363	44.38993
Parcel Craig and Barbara cook is in current use	-72.2448	44.39004
There are sections of Montpelier Rural General that appear to have sewer and water service. All of the parcels that are serviced by sewer and water should be within the Planned Growth Area.	-72.5924	44.27481
There are sections of Montpelier Rural General that appear to have sewer and water service. All of the parcels that are serviced by sewer and water should be within the Planned Growth Area.	-72.5719	44.27318
Transition Infill areas that have municipal water and sewer in the city of Montpelier should be Tier 1a status.	-72.5821	44.2489
Transition Infill areas that have municipal water and sewer in the city of Montpelier should be Tier 1a status.	-72.5599	44.24324
Some Rural Agriculture - Forestry properties appear to be majority cleared land with homes or farm buildings. These should likely be Rural General IF they don't have sewer and water access. If they do, they should be in the Planned Growth Area.	-72.5469	44.25758
These four parcels in the Western Gateway are not classified in this future land use map. They have sewer and water access and should be classified as Planned Growth Area.	-72.5907	44.25818
This large parcel should be designated as transition infill to align with the city's future land use areas map.	-72.5884	44.25222
This parcel is not classified in this map. It is very large, private, and connected to sewer and water, and could be added to the Planned Growth Area	-72.5952	44.27429
VLT conserved land	-72.2449	44.38911

VLT conserved land	-72.2396	44.38536
Should be rural general as it is a residence	-72.4066	44.21533
I am concerned that portions of the Future Land Use Map are being designated as Rural Conservation based primarily on modeled wildlife corridors rather than verified on-the-ground conditions. Before restricting future land-use options, CVRPC should clearly explain the data, assumptions, and methodology behind these designations and ensure they accurately reflect current conditions. Conservation decisions should be based on facts and field verification, not simply map outputs.	-72.3517	44.14092
I believe 57 Prechtl Road should be designated Rural Agricultural rather than Rural General. The property is actively used for agricultural purposes and contributes to Orange's working landscape. The Future Land Use Map should recognize and support existing agricultural uses by placing productive farmland in the Rural Agricultural category whenever appropriate.	-72.3899	44.14356
I request that CVRPC review the designation of 264 George Street. Based on the property's forest and working-landscape characteristics, Rural Agriculture & Forestry appears to be a more appropriate classification than Rural Conservation. The Rural Agriculture & Forestry category is intended for farmland and forestland that support resource industries while still providing wildlife habitat and other environmental benefits. Not every forested parcel should automatically be placed in Rural Conserva	-72.4087	44.16428
Rumney School and town highway garage should not be in rural-conservation	-72.6034	44.35012
Center Road continues through here - there is no break.	-72.5178	44.29454
Should be rural general, it is a residence	-72.477	44.22625
Not seeing a discription of the different catagories 137 Prechtl Road should be classified as Rural General.	-72.3863	44.13945

Please review the Stanley-Wasson portion of this larger parcel separately. The mapped parcel appears to include both Rural Conservation/open land and Downtown Center areas, but the Stanley-Wasson site is flood-prone land next to existing homes already at risk. Please clarify whether floodplain function, stormwater/inundation patterns, emergency access, and neighborhood impacts were considered before assigning this area to Downtown Center.	-72.7533	44.33227
Reject flood hazard reclassification. Area has not flooded ever. Even in 1927. Negative impact on property value	-72.6799	44.292
This parcel is part of the largest housing development in Barre City in 35 years. It has been in the planning stages for the last 3+ years and should be included in the Planned Growth Area.	-72.5134	44.19309
This is part of the Wilson Industrial Park and should be classified under the same category "Enterprise" as the other separate parcels in the Park.	-72.4784	44.17365
This is part of the Wilson Industrial Park and should be classified under the same category "Enterprise" as the other separate parcels in the Park.	-72.4757	44.1749
This whole neighborhood is filled with single-family and townhomes which reflect more of a planned growth area instead of rural general. Not sure the reason for dissecting this neighborhood as two different land use zones.	-72.5167	44.19206
This parcel seems more appropriately classified as planned growth area as there is neighborhood development around almost the entire parcel.	-72.4937	44.20362
	-72.399	44.43587
Designating this 2700+ acre forest a "Conservation" area would be better aligned with the goals described in the plan, and would be a better strategy for keeping contiguous forest and wildlife habitat/corridor. Breaking up this block, and the smaller one southeast of it, creates a break between contiguous blocks and access of wildlife to the main north Fayston waterway	-72.8812	44.25635

(Sheperd Brook) and introduces a great deal of risk to well documented sensitive areas, by allowing large scale resource e.		
This parcel was recently acquired by the Town of Fayston through the FEMA buyback program. Should be Rural-Conservation.	-72.8186	44.23781
Rural Forestry is a good designation. I walk this block of Rural ag/Forestry parcels almost daily. It supports bear, deer, fisher, bobcat, red and gray fox, coyote, racoons, beavers, a variety of birds; and multiple wetlands. It has a lot of ledge, many steep areas and a variety of natural communities. I believe that Rural Conservation could also be an appropriate designation.	-72.5458	44.23207
The boundaries of the FLU are roughed in by parcel boundaries and in the Centers do not indicate SFHA, River Corridors or Open Water.	-72.5792	44.25952
The roughing in of DC designation here is in conflict with River Edge Planning for flood resilience.	-72.5825	44.26112
parcel 5006 in Washington VT has an upland wet area in it. Owner wanted to log / drain ditch it across 5006 making 5005 unusable. 5005 driveway did not wash out when 5006 did in 2019.	-72.4194	44.12741
Very hard to figure out website can't see the maps the rules should be sent to every landowner and how it affects them bunch of bull shit if this happened it would definitely go away	-72.4236	44.09991
Landesboro should be designated as a hamlet. This small cluster of historic homes was a separate stop on the Montpelier & Wells River Railroad to serve a sawmill	-72.3113	44.30731
If the Randall Street area is noted as rural conservation because it is in SFHA, then this area should be rural conservation as well, given it is in a SFHA as well.	-72.7541	44.33392
Lot 7 is 75.79 +/- acres and is conserved in Perpetuity. Please change to 'Rural Conservation' this entire parcel.	-72.8322	44.2085

Lots 2, 4, 5 & 7 have a conservation easement on border with SPAN 222-072-10174. See slide 349B in Town of Fayston Land Records map approved 5/20/08. Please show as Rural Conservation the conserved land of Lot 2 that varies 642.71' to 817.13' from border; Lot 4, 557.79' to 642.71' from border; lot 5 574.33' to 557.79' to border, and Lot 7 on Range 8 519.27' to 574.33' from border as 'Rural Conservation'.	-72.828	44.20818
Please show as 'Rural Conservation' the conservation easement with border of SPAN 222-072-10174 that varies from 574.33' to 557.79' deepPeep. Please see slide 349B in Town of Fayston Land Records.	-72.8264	44.20794
Lot 4 has a conservation easement recorded on slide 349B of Town of Fayston Land Use Records	-72.8244	44.20729
There should be a Land Use Data classification of 'Rural Conservation' of 642.71' x 661.76' x 817.13' x 722.36'. See of this parcel that borders SPAN 222-072-10174	-72.8224	44.20668

Email

Central Vermont Regional Planning Commission
29 Main Street, Suite 4
Montpelier, VT 05602
(802) 229-0389

From: Nicholas Laskovski <n.laskovski@gmail.com>
Sent: Monday, August 24, 2026 9:46 AM
To: CVRPC <cvrpc@cvregion.com>
Cc: Kristen Getler <kristen.getler@gmail.com>
Subject: Re: Central Vermont Regional Plan

You don't often get email from n.laskovski@gmail.com. [Learn why this is important](#)

Hello,

I sent the email below to Jerry D'Amico of Roxbury via FPF but I have not received confirmation of receipt. I would like for my letter to be submitted for comment on the CVRPC 2026 Regional Plan.

Thanks,

Nicholas Laskovski
802.595.0522

On Aug 18, 2026, at 10:47, Nicholas Laskovski <n.laskovski@gmail.com> wrote:

Hi Jerry,

I've been spending some time reviewing the draft Regional Plan, particularly the renewable-energy siting sections and the new Future Land Use mapping, and wanted to share a few thoughts and get your perspective as Roxbury's representative to CVRPC.

Overall, I like the direction of the energy-siting framework. The draft recognizes that meeting Vermont's energy goals requires substantially more renewable generation while also acknowledging that where projects are located matters. The use of known and possible constraints, preferred sites, existing roads and electrical infrastructure, forest fragmentation, and municipal siting policies seems like a sensible way to approach that balance.

One question I keep coming back to, though, is how Roxbury's existing Town Plan should inform the Regional Plan and CVRPC's review of future projects.

Roxbury has already made some fairly specific land-use statements in its Town Plan, including identifying land above 1,800 feet as Forest Reserve and discouraging residential development there. The plan also recognizes the importance of large forest blocks, ridgelines, steep slopes and wildlife habitat.

At the same time, Roxbury doesn't have conventional town-wide zoning or subdivision regulations implementing many of those policies.

For ordinary development, I understand that limits the regulatory effect of the Town Plan. But energy projects reviewed under Section 248 are different, since municipal plans and regional plans can play a direct role in the state siting process.

That raises an important question for me: **Given that Roxbury does not have conventional zoning, how much weight do the policies in our duly adopted Town Plan actually receive when CVRPC develops the Regional Plan and participates in Section 248 proceedings?**

And related to that, if Roxbury wants its Forest Reserve and other locally identified resources to receive meaningful consideration in future energy-siting decisions, is our existing Town Plan language specific enough, or should Roxbury strengthen those policies in its next Town Plan update?

I support wind energy and think it should remain part of Vermont's renewable-energy mix. Wind has characteristics that are particularly valuable to a renewable grid, including its ability to produce during winter and nighttime periods when solar generation is zero. The draft itself recognizes this complementary value and assigns a portion of the region's future renewable generation to wind.

At the same time, the draft maintains the existing policy that industrial-scale wind—defined as turbines with hub heights greater than 125 feet—is incompatible with the future land-use patterns of Central Vermont.

I have trouble reconciling those two positions.

It also seems inconsistent with the otherwise site-specific approach the plan takes toward renewable-energy siting. For solar and other generation, the plan asks whether a particular location is appropriate based on environmental impacts, existing infrastructure, land use and community considerations. For

modern wind, the 125-foot threshold largely makes that determination based on the technology before those site-specific considerations are evaluated.

I'd rather see CVRPC apply the same basic siting philosophy to wind that it applies to other renewable generation: leave open the possibility of modern wind where a project can demonstrate that the site is appropriate, while establishing strong protections for locations where the impacts would be unacceptable.

For me, the Northfield Ridge is a good example of the latter.

I support wind energy generally, but I would have serious concerns about utility-scale wind development along the Northfield Ridge. It is a largely intact high-elevation forest landscape extending across multiple communities, including an important part of Roxbury's Forest Reserve. Development there could require substantial new roads, clearing, transmission infrastructure and fragmentation of an otherwise continuous mountain landscape.

That isn't an argument against wind technology. It's an argument that some locations simply aren't appropriate for industrial-scale energy development.

I think the same principle should apply across technologies. A large solar project requiring extensive clearing and fragmentation of an intact forest shouldn't automatically be considered more appropriate than a wind project simply because one uses panels and the other uses turbines.

It seems to me that Roxbury's Town Plan could potentially provide the basis for a more site-specific and technology-neutral approach. Rather than simply prohibiting or supporting particular forms of renewable generation, the Town could identify the landscapes and resources it considers particularly important and establish clear policies regarding utility-scale energy development within them.

If Roxbury were to strengthen its Town Plan in that way—for example, by specifically addressing utility-scale energy development within the Forest Reserve or along the Northfield Ridge—how much weight would CVRPC give those policies in its own Section 248 review? And would CVRPC recommend that Roxbury take that approach if we want our local land-use priorities to have meaningful influence without adopting conventional zoning?

I think there's an opportunity here for the Regional Plan to accomplish both goals: support the additional renewable generation Vermont is going to need while giving meaningful weight to municipal planning and protecting particularly sensitive landscapes.

I'd be interested in your thoughts, particularly on how Roxbury's Town Plan has been considered in developing this draft, how CVRPC views the role of municipal plans in towns without zoning, and whether the 125-foot wind provision has been discussed during the current Regional Plan process.

Thanks,

Nick

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From	Chapter/ Element	Category	Comment	Staff Recommendation/Comment	Resolution
Alice Peal	Overall	Narrative style	I feel that this narrative is not well focused. Many of the paragraphs/sentences combine issues that should be stated separately. Things seem to meander around without clear explanation and lack of solutions.	This has been part of the challenge of advancing the 2026 Interim Plan with as few changes as possible to facilitate board adoption, while importing text from the Rewrite Plan that the Regional Plan Committee had seen in their recent work. The goal was to only add new text as needed to meet Act 181 statutory requirements.	No action necessary.
Alice Peal	Overall	Process	Alex told me send the LURB what you have. Send this as a draft...	Submission to the LURB requires the completion of the pre-application checklist. This work is in progress and will be done once all Commissioner feedback has been received.	No action necessary.
Alice Peal	Overall	Narrative style	I hate the run on sentences.	The "voice" of the 2026 Interim Plan has been a carryover from the 2024 plan. The forthcoming Rewrite Plan to follow will resolve issues like this.	No action necessary.
Doug Greason	Overall	Amount of Changes	1. This draft interim regional plan is being created as an amended regional plan based on the amended regional plan adopted in 2024. I am concerned that the extent of changes in this draft interim plan is much greater than I had anticipated, and that the draft interim plan may exceed the limit of what can constitute an amended plan.	This 2026 Interim Plan will be a "new" Regional Plan for the purposes of restarting the 8-year clock per Act 181. The recycling of text from the 2024 plan was to facilitate a speedier adoption process by the Board of a familiar document, as outlined above.	No action necessary.
Doug Greason	Overall	Amount of Changes	2. When CVRPC created an amended regional plan in 2024, there was pushback arguing that the extent of changes being made required that the plan be reviewed as a new plan, with a longer and more detailed public review process. The extent of changes being made in the draft amended interim plan we are reviewing now is much greater than the extent of changes made in 2024.	The public review process laid out by Christian in the Regional Plan Committee and CVRPC Board meetings, follows the Act 181 timeline. The process for adopting this 2026 Interim Plan is the same for any amount of revisions.	No action necessary.
Doug Greason	Overall	Amount of Changes	3. I think we can anticipate that there will be claims advanced that the amended plan we are creating is indeed a new plan with the longer review process that would require. If there is a formal objection raised to this draft interim plan as an amended plan, I am concerned that our draft amended plan may be found to actually be a new plan. Accordingly, it would have to go through the full review process. If that is the case, we lose the scheduling advantage of this interim plan.	Because this is a "new" Plan per Act 181, the timeline won't be extended because of the amount of changes from the 2024 Plan.	No action necessary.
Doug Greason	Overall	Process	4. If we are committed to developing this interim plan rather than pushing for revised deadlines for a final plan, I would like to understand how CVRPC can ensure that our amended interim plan will indeed be acceptable as an amended rather than new plan.	Once the preliminary draft has been approved by the CVPRC board, that version will go to the LURB for review. The LURB will give both suggested and required changes. While the LURB is reviewing the pre-application draft, public comment will continue. The intention is to focus on the LURB-required changes and those needed in response to public comment in editing the final version submitted to the LURB.	No action necessary.
Alice Peal	Overall	Amount of Changes	I agree with Doug here. (1-4 above)	See responses to comments 4-7.	No action necessary.
Doug Greason	Overall	Structure of Document	There are eight required elements in a regional plan. Why wouldn't we make it easier for the LURB to approve this draft plan by giving them eight chapters that correspond directly to these elements? Our plan needs to meet the requirements of the LURB – it seems shortsighted not to accept their terms for these specific requirements.	The LURB uses a pre-application checklist for the RPC to identify where the Plan addresses each element, goal and other statutory requirements. Staff have communicated with the LURB about how to best complete this document for their review. There is an expectation that elements and goals will be addressed in multiple places throughout the document.	Resolved: Natural Resources and Working Lands and Future Land Use content were separated.

Alice Peal	Overall	Content: missing	Also this is not the Natural Resources Chapter the committee first reviewed.	This is the 2024 version of the Natural Resource chapter. The version the RPC reviewed was the draft language for the forthcoming Rewrite Plan. Continuing the work on that Rewrite Plan will be the focus of the RPC work immediately after this 2026 Interim Plan has been adopted and approved.	No action necessary.
Doug Greason	Overall	Narrative style	Review new text for vague language (“encourage, support” etc.) that can be made mandatory.	Newly added goals/policies/strategies have been reviewed, and no changes have been made to the draft released on 4/21/2026. If edits are desired to create mandatory language, changes should be flagged for the CVRPC Board to review their agreement with.	Reviewed and resolved. No action taken.
Alice Peal	Overall	Language: policies	And we have had the discussion about should and shall. The should need to go.	See response to comment 11.	Reviewed and resolved. No action taken.
Doug Greason	Overall	Language: policies	Clarify that policies are indeed policies – the plan does not “propose” policies, it “states/establishes/creates” policies. See Land Use Policy Statement p45.	The Land Use Policy Statement has been revised to use direct voice.	Resolved: Text revised.
Doug Greason	Overall	Language: policies	Review all uses of “CVRPC” as the subject of a sentence. See Land Use Policy Statement p45. The Regional Plan is created by the CVRPC, do actions/policies within the plan need to be identified as the actions/policies of the CVRPC?	This structure "CVRPC will <u>verb</u> " is the primary structure to convey actions that CVRPC as an organization will undertake or strategies it supports, "CVRPC supports <u>idea or concept</u> ." This language is consistent through strategies/policies in Land Use, Energy, Utilities/Facilities/Services, Housing, and the Implementation Plan chapters. The Full Rewrite Plan Aspiration/Goals/Strategies/Policies are directive policy language, i.e. "Goal 1: Evolve... Goal 1: Identify... Strategy 1: Support..."	Reviewed and resolved. No action necessary.
Jerry D'Amico	Overall	Narrative style	Referred to by Alice: too many adverbs (?)	The "voice" of the interim plan has been mainly a carryover from the 2024 plan. The Full Rewrite Plan will resolve issues like this.	No action necessary.
Alice Peal	Overall	Content: missing	I don’t think this document represents the work that has been done by the committee over the past year.	This has been part of the challenge of advancing the interim plan with as few changes as possible to facilitate board adoption, while importing text from the Full Rewrite text that the Regional Plan Committee had previously seen. The goal in adding the new text was solely to meet statutory requirements.	No action necessary.
Alice Peal	Land Use	Content: edit	There is references to Tier 3 and the Road Rule in this document. This should be removed citing the repeal. Alex Weinhagan has said that Tier 3 work has ceased.	These appear in the VAPDA methodology and Future Land Use Area definitions, and are not referred to in the body of the text	Reviewed and resolved. No action necessary.
Alice Peal	Land Use	Content: edit	I think the Natural Resources and Land Use Chapter should be separate chapters. Also this is not the Natural Resources Chapter the committee first reviewed.	The Natural Resources and Land Use Chapter has now been broken out into the Natural Resources and Working Lands Element and the Future Land Use Element.	Resolved: Natural Resources and Working Lands and Future Land Use content were separated.
Doug Greason	Land Use	Content: edit	6. Small point – in Rural Conservation, non-profits acquire development rights by donation as well as by purchase. Maybe this needs to be described as “acquire” rather than “purchase”	Text has been edited.	Resolved: Text edited.
Doug Greason	Energy	Narrative style	Each chapter needs to be organized in a way that creates a logical whole. Some of the chapters, particularly Energy, seems like more of a list of topics.	The Rewrite Plan will be organized in a more cohesive way. The goal in adding the new text was solely to meet statutory requirements, while retaining as much of the 2024 as possible. The Energy Chapter has been edited down to meet statutory requirements, and the Energy Plan is supplemental.	Reviewed and resolved. No action necessary.

Alice Peal	Energy	Narrative style	I agree with Doug about the Energy Chapter.	The Energy Chapter has been edited down to meet statutory requirements, and the Energy Plan is supplemental. This is the work that John Brabant did with Sam.	No action necessary.
Doug Greason	Housing	Content: edit	7. Review housing chapter for consistent use of State Designation Program categories and the new LURB categories. For example, does the “New Town” designation survive the latest changes?	State designations in the Housing Chapter were reviewed, and all references to "New Town Centers" throughout the document were revised to clarify reference to legacy designation titles and new FLUA categories/designations.	Resolved. Text edited.
Doug Greason	Overall	Structure of Document	Our draft interim amended plan already has five chapters whose titles identify them as elements – Energy Element, Transportation Element, Utilities Facilities and Service Element, Housing Element, and Economic Element. It would be straightforward to provide the other required elements as dedicated chapters. The chapter “Natural Resources and Land Use” could be changed to “Natural Resources and Future Land Use Element”. “Economic Element” could become “Economic Development Element”. “Flood Mitigation Element” could added as a new chapter Yes with relevant references in other chapters as is done with other broad topics. We have already added a chapter for “Implementation” to this draft, and there is no reason we couldn’t add this new chapter.	This has been done, with the exception of flood resilience, as noted in response to comment 25.	Reviewed and resolved. See comments #9/25
Alice Peal	Resilience	Structure of Document	Flooding, mitigation, disaster recovery is a separate chapter.	In this Interim Plan, flood resilience is threaded throughout many chapters, as are mitigation and disaster recovery. In the Full Rewrite Plan they will be collected in a cohesive way in a new Chapter based on Act 181 Element 10.	Reviewed and resolved. No action taken.
Alice Peal	Natural Systems/Land Use	Content: missing	There is no discussion of River Corridor, Flood Plain, Wetlands (small blurb somewhere) nothing of substance.	These topics are covered in maps, which meets statutory requirements, but not narratively.	Reviewed and resolved. No action taken.
John Brabant	Energy	Content: missing	beginning at p. 13 (bottom) Siting section for energy and highlighted language beginning on p. 16 (top) -p. 18 (bottom) that should be added back into the 2026 draft to be submitted to the LURB.	Staff met with John to review. Language from the 2016 plan siting section has been integrated into 2026 Plan siting section. If further edits are desired, those should be flagged for the CVRPC Board to review their agreement with.	Resolved. Text edited.
John Brabant	Energy	Content: missing	There also needs to be clarifying language added to state that projects or project sites (any projects be they housing, energy, industrial development, etc.) proposed for development in a municipality MUST have the support of the municipality wherein they are proposed to be in compliance and compatible with the CVRPC regional plan, regardless of regional significance or impact. Where projects not supported by, or otherwise in alignment with the municipal plan and zoning and are thus disallowed under the regional plan, the CVRPC will not endeavor to otherwise support or advocate for such projects in any proceeding, including, but not limited to Act 250 and Public Utility Commission hearings.	Language revised in the Compatibility Statement has been revised to reference the precedence of municipal plans in Act 250 and Section 248/248a applications, except as to the aspects for a project that create substantial regional impact, with the definition proposed by the Regional Plan Committee and ratified by the Board of Commissioners. The full definition of SRI is included in that section as a footnote and has been added as an appendix.	Resolved. Text edited.
Doug Greason	Housing	Content: missing	5. Affordable Housing section seems quite weak. This is an important topic, how about more discussion of the current state of play and likely directions for progress.	“Affordable Housing” referred to state and federally subsidized housing, the statutory language. Revisions were made to headings and order of content to facilitate easier navigation of the current situation, i.e. population trends, housing expense, housing availability, and future housing targets.	Resolved. Headings revised and order adjusted to make more clear/accessible.

Gerry D'Amico	Transportation	Content: missing	I'm recommending that [CVRPC] include a description of the imaginary surfaces around the airport and to include statements about the need to protect them from development. I suggest that we add a paragraph informing the reader of the plan that any construction within 5 nautical miles of the airport should file a notification of construction within the FAA. (To determine if such construction will affect navigable airspace.)	Text added to Air Transportation that development near Knapp and Sugarbush airports will need to follow State and Federal standards around flight path and approach clearances.	Resolved. Text edited.
Paula Emery	Overview	Content: edit	NECI is gone.	Text has been removed.	Resolved. Text edited.
Paula Emery	Introduction	Content: missing	Scenery? This is new to me – is it time to introduce wildlife corridors/intact forests?	Wildlife corridors and forest blocks are included further in the Plan, but reorganization of that content can be considered in the Full Rewrite Plan. The goal in adding the new text was limited to that needed to meet statutory requirements, while retaining as much of the 2024 as possible. (See response to comment 1.)	Reviewed and resolved. No action taken.
Paula Emery	Implementation	Content: idea	A venn diagram illustrating the relationship between state and region would be cool.	This idea will be included in notes for the Full Rewrite Plan.	Reviewed and resolved. No action taken.
Paula Emery	Introduction	Content: missing	Refers to chapter 117 but not of what – what document?	Text has been edited.	Resolved. Text edited.
Paula Emery	Compatibility Statement	Content: idea	Since substantial regional impact is a recurring and important matter, could there be a pull-out box for definition?	SRI has been added to Appendix H, and the idea for a text box will be included in notes for the Full Rewrite Plan.	Resolved. Text edited.
Paula Emery	Policies to Guide Future Growth	Content: idea	I think this paragraph can be used more than once, particularly on page 13, because restatement adds emphasis (and clarity for the reader)	This idea will be included in notes for the Full Rewrite Plan.	Reviewed and resolved. No action taken.
Paula Emery	Policies to Guide Future Growth	Content: idea	This [the bulleted list of broad policies goals/objectives aim to implement] is very good and hopefully can be set off in the text by a box or something. It is a good reference point for anyone reading the document.	This idea will be included in notes for the Full Rewrite Plan.	Reviewed and resolved. No action taken.
Paula Emery	Compatibility Statement	Content: idea	Consider adding a link to the map referenced [as resources consulted for identifying vulnerable communities for Environmental Justice analysis]	References to the websites (not the maps) are included in the footnotes. The map will be included in Appendix E once it is completed.	Reviewed and resolved. No action taken.
Paula Emery	Equitable Planning: Frontline/Vulnerable Communities	Structure of Document	Really glad these are here. THANKS [Footnotes with links to websites/resources that are referenced in EJ analysis]	We're glad that readers are interested in learning more.	No action necessary.
Paula Emery	Communications: Newspaper	Content: idea	Please use the Times Argus as the newspaper of record. While it still exists it should be the paper of record.	This idea will be included in notes for the Full Rewrite Plan.	No action necessary.
Paula Emery	Throughout	Structure of Document	Can there be a box noting other places in the doc where people can find flood information since it is new and occurs elsewhere	In the Full Rewrite Plan Flood Resilience will addressed in a more cohesive way. For this Interim Plan, the LURB checklist identifies all the places where it appears. Some RPCs have included the checklist as part of their document. CVRPC will consider including this as part of our 2026 Interim Plan submission to the LURB.	Reviewed and resolved. No action taken.

Paula Emery	2. Natural Resources and Working Lands: Introductory paragraph	Content: missing	With this exposure came new people, new development..., [add: and new demands on existing systems.]”	Text has been edited.	Resolved. Text edited.
Paula Emery	2. Natural Resources and Working Lands - Discussion: Trends	Content: idea	Where does this [bulleted list of expected changes over time in use of lands]come from ? Should it be footnoted/referenced?	This text is a carryover from the 2024 plan. Citations were not included in the original. Staff will review citations policy for Full Rewrite Plan.	Reviewed and resolved. No action taken.
Paula Emery	P. 27	Comment	Notable that this is happening [need for regional self-sufficiency in food production due to various factors]	No change necessary.	No action necessary.
Paula Emery	Resource protection	Content: missing	Note that this priority is not listed in the beginning of the document in Policies to Guide Future Growth	The Policies to Guide Future Growth were carried over from the 2024 plan. More specific language around resource protection can be considered in the future rewrite of the plan.	Reviewed and resolved. No action taken.
Paula Emery	Wildlife habitat	Narrative style	Is there another way to say “nature’s spirit” that doesn’t sound so... spiritual? This is a slippery slope.	The goal in adding the new text was limited to that needed to meet statutory requirements, while retaining as much of the 2024 Plan as possible. (See response to comment 1.)	Reviewed and resolved. No action taken.
Paula Emery	Pg. 34	Content: edit	In only mentioning Camels Hump it diminishes all of the other areas of significance --	The goal in adding the new text was limited to that needed to meet statutory requirements, while retaining as much of the 2024 Plan as possible. (See response to comment 1.)	Reviewed and resolved. No action taken.
Paula Emery	Critical resource areas	Content: idea	Links and reference would be good here – a map	Will be a part of the mapping appendix	Staff will edit and add the correct figure and map reference numbers in the pre-application draft of the plan.
Paula Emery	Impermeable surfaces	Structure of Document	In aquifer recharge areas – can this be map referenced? I’m guessing that some are still being built while others are defunct but still paved, like the old Ames plaza on the BM road that is now mostly vacant due to flooding.	The Water Supply and Wastewater Systems Map is included in the Map Appendix.	Reviewed and resolved. No action taken.
Paula Emery	Pg. 39	Content: edit	The new red text is HUGE and has a lot of important information but is garbled in places and has run-on sentences. Can it be broken into shorter paragraphs or bullet points for clarity?	Text has been edited.	Resolved. Text edited.
Paula Emery	Natural Systems and Land Use - Discussion Trends: Watersheds	Content: missing	Provide a link to the referenced documents [Tactical Basement Plan].	A link to the Winooski River Tactical basement Plan is included as a footnote when in the Critical Resource Areas section.	Reviewed and resolved. No action taken.

Paula Emery	Land Development Issues: Stormwater Management	Content: missing	Is this the only mention of worsening the hazard downstream? Because that’s becoming a very big deal.	The goal in the new text was limited to adding only that needed to meet statutory requirements, while retaining as much of the 2024 plan as possible. (See response to comment 1.) Flood resilience will be covered in significantly more depth in the Full Rewrite Plan.	Reviewed and resolved. No action taken.
Paula Emery	Centers Policies	Language: policies	I found this very confusing. Are we encouraging shopping centers? What is a shopping center? It is the very same sprawl development condemned later in this document. I feel like this section was written for Williston and the BM Road.	Language has been clarified to explain when text refers to Downtown/Village Centers and when it refers to shopping centers. The shopping centers definition text box was moved closer to the specific policy that it pertains to.	Resolved. Text edited.
Paula Emery	Centers Policies	Content: missing	This whole section doesn’t mention downtowns – just shopping centers. If this is an omission I think it is a very dangerous omission and I would like to discuss it with the Commissioners.	Language has been clarified to explain when text refers to Downtown/Village Centers and when it refers to shopping centers. The shopping centers definition text box was moved closer to the specific policy that it pertains to.	Resolved. Text edited.
Paula Emery	Future Land Use Areas: Transition or Infill	Content: missing	Greenfields is mentioned here but is not defined and isn’t mentioned prior to this (I think). It should be defined.	A footnote has been added with a definition.	Resolved. Text edited.
Paula Emery	Pg. 59	Content: missing	It says that host municipalities and CVRPC can request a community impact study, but can neighboring communities request one? Is this an omission?	As the 2024 Plan was revised for the Interim Plan, some anecdotal content was carried forward in this version. Staff will review to what extent this is preproperate in the Full Rewrite Plan.	
Paula Emery	Future Land Use Area Definitions	Comment	Rural areas... are generally rural in character. ;)	No change necessary.	No action necessary.
Paula Emery	Future Land Use Area Definitions	Comment	Yup.	No change necessary.	No action necessary.
Paula Emery	Public Water Systems	Content: missing	Plainfield isn’t on this list [Municipally-owned Community Water Systems]	The table has been expanded to include all municipally-owned water systems. The latest data available from the state through DEC is 2023. A footnote has been added that permitted ability to expand and having the capacity to expand may not be congruent.	Resolved. Text edited.
Paula Emery	Solid Waste: Re-use	Content: missing	Mention drop n swap	Salvation Army call out removed in text. This information has been noted for the Full Rewrite Plan.	Resolved. Text edited.
Paula Emery	Solid Waste: Re-use	Content: missing	ReSource has used clothing now	Text has been edited.	Resolved. Text edited.
Paula Emery	Solid Waste: Re-use	Content: missing	Salvation Army was flooded out. new one is rarely open	Salvation Army call out removed in text.	Resolved. Text edited.
Paula Emery	Voice communication	Content: edit	FairPoint has been gone for a LONG time. Consolidated Communications has been purchased by Fidium – there’s a transition happening now.	Text has been edited.	Resolved. Text edited.
Paula Emery	Voice communication	Content: edit	Judging by the disappearance of the telephone book, I think the third paragraph’s opening is no longer true.	Text has been edited from modifier most to many. In the Full Rewrite Plan, comments like this will be verified or omitted.	Resolved. Text edited.

Paula Emery	Infrastructure: Solid Waste Policy 6A	Content: edit	6A – The ARCC [additional Recyclables Collection Center]is up on Granger Road now – is that permanent?	This is referenced online as a year-round facility. Text has been edited accordingly.	Resolved. Text edited.
Paula Emery	Economic Goal 2, Policy 2C	Content: missing	Greenway Inst. is doing this.	This idea has been noted for the Full Rewrite Plan.	Reviewed and resolved. No action taken.
Paula Emery	Economic Goal 2, Policy 2B	Content: edit	Again, reference the newspaper of record.	This idea has been noted for the Full Rewrite Plan.	Reviewed and resolved. No action taken.
Paula Emery	Economic Goal 5, Policy 17	Content: missing	I’m surprised that the Cross Vermont Trail isn’t mentioned here. It could become a great economic driver – in an eco tourist kind of way. Think Camino Santiago on a bike: inns, parks, resting places along rivers, people buying food and beverage all along the way.	This idea has been noted for the Full Rewrite Plan.	Reviewed and resolved. No action taken.
Jerry D'Amico	Chapter 2	Content: edit	Chapter 2 is that after citing Act 181 on page 47 [ignore that Act 181 has been redacted by the legislature] the plan discusses FLUAs which are organized into the following groups [see page 47]: then the plan is not consistent in keeping the following groups in order .. there are name changes and the descriptions are out of order, e.g. Hamlets [page 62] follows Rural Areas [page 60]; while on page 47 under Act 181citation, Hamlets is item 5 and Rural Areas are item 6.	Text has been edited.	Resolved. Text edited.
Jerry D'Amico	Throughout	Narrative style	I found the plan cumbersome to read... it is too wordy. It should be concise and readable.	The "voice" of the 2026 Interim Plan has been a carryover from the 2024 plan and the insertions to meet statute. The forthcoming Rewrite Plan to follow will have a much more cohesive and consistent voice.	No action taken.